



The city is conducting this public meeting using a hybrid model. The public is welcome to attend tonight's meeting in-person at City Hall (Council Chambers), or virtually by using the meeting access link below.

<https://sumnerwa-gov.zoom.us/j/86825227093>

Or One tap mobile +12532158782,,86825227093# +12532050468,,86825227093# US

Or Telephone: +1 253 215 8782 +1 253 205 0468 US

Webinar ID: 868 2522 7093

CALL TO ORDER

Pledge of Allegiance

Invocation

Roll Call: Bitetto, Bowman, Clerget, Cole, Elfers, Kenna and Reinke

The following items are distributed to Councilmembers in advance for study and review, and the recommended actions will be accepted in a single motion. Any item may be removed for further discussion if requested by a Councilmember.

CONSENT AGENDA

1. Approval of the minutes from the December 9, 2024, special council meeting and study session.
2. Approval of the checks and electronic payments in the amount of [\\$2,183,920.75](#).

PUBLIC HEARING

REGULAR BUSINESS

1. **Unfinished Business**
 - a. Ordinance No. 2906 - 2024 Comprehensive Plan Volume I, Draft Environmental Impact Statement Volume II, Transportation Plan, and Capital Facilities Plan
 - b. Ordinance No. 2907 - Zoning Code Text Amendments on Housing and Land Use Regulations
 - c. Ordinance No. 2908 -Zoning Code Text Amendments on Historic & Cultural Preservation Regulations
 - d. Ordinance No. 2909 - Critical Areas Regulations Amendments
 - e. Ordinance No. 2915 - Sumner Library Development Agreement
2. **Public Comment (Limit 3 minutes)**

Members of the community who wish to give public comment are strongly encouraged to join the meeting via the ZOOM link or by telephone. If you are unable to join the meeting, please submit your public comment in writing via email to the City Clerk at Michelllec@sumnerwa.gov no later than 4:00pm on the day of the meeting. Any written comments received will be provided to the City Council and attached to the meeting minutes. Please contact the City Clerk at 253-299-5590 with any questions.
3. **New Business**
 - a. Election of Deputy Mayor
4. **Reports**

- a. Council
- b. City Administrator
- c. Mayor

5. Executive Session

6. Adjournment

This meeting is accessible to persons with disabilities. For individuals who may require special accommodations, please contact the City Clerk at (253) 299-5590, 24 hours in advance.

SUBJECT: Approval of the minutes from the December 9, 2024, special council meeting and study session.

CATEGORY: Consent

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Minutes - Special Council Meeting
2. Minutes - Study Session

STAFF CONTACT: Michelle Converse, City Clerk

SUMMARY BACKGROUND:

Approve minutes from the previous council meeting.

COUNCIL COMMITTEE/STUDY SESSION:

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION:

STAFF RECOMMENDATIONS/MOTION:

Approve as presented.



Staff present: Wilson, Marquez, Moericke, Steffens, Palmer, Raymond, Beagle, O'Haver-Ayala, and Converse

CALL TO ORDER

Deputy Mayor Cole called the meeting to order at 6pm.

Pledge of Allegiance

Roll Call: Bitetto, Bowman, Clerget, Cole, Elfers, Kenna and Reinke

Mayor Hayden was absent.

CONSENT AGENDA

MOVED BY BITETTO, SECONDED BY KENNA TO APPROVE THE CONSENT AGENDA CONSISTING OF:

1. 2024 Sidewalk Repair Program - Change Order
2. Resolution No. 1707 - Transportation Improvement Board Complete Streets Grant Acceptance
3. Biosolids Dryer Procurement Thermal Fluid Heater Modification - Change Order #1
4. Steffens Employment Agreement Amendment
5. Water Rights Pilot Project - Consultant Services Contract Amendment
6. South Tank Retrofit - Design Consultant Contract Amendment
7. White River Restoration Project - Plant Procurement
8. Resolution No. 1706 - Amending the Interlocal Agreement (ILA) with East Pierce County Interlocal Coalition (EPIC) for Emergency Management
9. City Hall Access Control and Intrusion - Goods and Services Contract
10. Approval of the Council meeting minutes from November 18, 2024 regular meeting, special study session and the December 2, 2024 regular council meeting.

PASSED BY VOICE VOTE.

PUBLIC HEARING

1. Ordinance No. 2915 – Sumner Library Development Agreement

DEPUTY MAYOR COLE OPENED THE PUBLIC HEARING AT 6:03pm.

City Attorney Andrea Marquez addressed the Council.

Comments were made by the following:

Nick Biermann, 5802 Parker Road East, Sumner

Gretchen Caserotti, Pierce County Library Executive Director

WITH NO ADDITIONAL COMMENTS FROM THE PUBLIC, DEPUTY MAYOR COLE CLOSED THE HEARING AT 6:08PM.

REGULAR BUSINESS

1. Unfinished Business

a. Ordinance No. 2905 – 2025/2026 Biennial Budget

MOVED BY BOWMAN, SECONDED BY CLERGET TO APPROVE ORDINANCE No. 2905 – 2025/2026 BIENNIAL BUDGET.

Chief Financial Officer Kassandra Raymond addressed the topic.

Council comments were made.

Since this item had a Public Hearing on December 2, there was no comments from the public.

PASSED BY ROLL CALL VOTE.

b. Ordinance No. 2910 – 2023/2024 Final Budget Amendment

MOVED BY REINKE, SECONDED BY ELFERS TO APPROVE ORDINANCE No. 2910 – 2023/2024 FINAL BUDGET AMENDMENT

Chief Financial Officer Kassandra Raymond addressed the topic.

Since this item had a Public Hearing on December 2, 2024, there was no comments from the public.

PASSED BY ROLL CALL VOTE

2. Public Comment

Randall Adams, 15013 63rd Street Ct E, Sumner

3. New Business

a. Operations Facility Phase 3 – Construction Contract

MOVED BY CLERGET TO APPROVE THE CONSTRUCTION CONTRACT FOR THE PUBLIC WORKS OPERATIONS FACILITY PHASE 3. SECONDED BY ELFERS.

Deputy Public Works Director Alisa O’Haver-Ayala presented the item.

Discussion ensued.

PASSED BY ROLL CALL VOTE.

4. Reports

a. Council

Councilmember Reinke participated in the Santa Parade, there was a great turn out followed by a big football win. He ended his comments by wishing everyone happy holidays.

Councilmember Kenna congratulated the Spartans on the state win.

Councilmember Elfers reminded the public that the consent agenda consists of items which were preciously brought before various council committees. It’s during this time council asks questions and

examines the item thoroughly. We wished everyone happy holidays.

Councilmember Clerget wished everyone happy holidays and congratulations to the Spartans.

Councilmember Bowman also wished everyone Merry Christmas and Happy New Year. She has had a few questions about a parade for the football team, and as soon as the School District files their parade permit, the City is ready to process it.

Councilmember Bitetto congratulated the Spartans and is very excited to see the development agreement with the library.

b. City Administrator

Upcoming Policy Issues:

- No Meetings until January 6th
- January 6, 2025 – Regular Council Meeting
 - 2024 Periodic Comprehensive Plan Adoption, including associated zoning code amendments.
 - Library Development Agreement
 - Deputy Mayor Selection

Mr. Wilson ended his comments by wishing all happy holidays.

c. Mayor

Deputy Mayor Cole hopes that everyone enjoys the holiday season and stays safe!

5. Executive Session

There was no Executive Session tonight.

Adjournment

With no additional business before the Council, Deputy Mayor Cole adjourned the regular meeting at 6:38pm. Councilmembers concurred.

ATTEST:

Deputy Mayor Pat Cole

Michelle Converse, CMC City Clerk

DRAFT



Staff present: Wilson, Marquez, Windish, Kosa, Beagle, Moericke, Steffens and Raymond

Councilmembers present: Bitetto, Bowman, Clerget, Cole, Elfers, Kenna and Reinke

Mayor Hayden was absent from the meeting. Deputy Mayor Cole presided over the meeting.

THE MEETING WAS CALLED TO ORDER AT 6:42PM BY DEPUTY MAYOR COLE.

SPECIAL STUDY SESSION BUSINESS

1. 2024 Comprehensive Plan Periodic Update – Public Hearing Follow-up.

Discussion was led by Economic and Community Development Director Ryan Windish.

ADJOURNMENT

With no additional items for discussion, Deputy Mayor Cole adjourned the meeting at 6:58pm.

Attest:

Pat Cole, Deputy Mayor

Michelle Converse, City Clerk

SUBJECT: Approval of the checks and electronic payments in the amount of
[\\$2,183,920.75.](#)

CATEGORY: Consent

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Approvals

STAFF CONTACT: Jeff Steffens, Administrative Services Director

SUMMARY BACKGROUND:

Checks and electronic payments since the last council meeting.

COUNCIL COMMITTEE/STUDY SESSION:
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MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION:

STAFF RECOMMENDATIONS/MOTION:

Approve as presented.



CITY OF
SUMNER
WASHINGTON

CLAIMS VOUCHER APPROVAL

City of Sumner
Finance Department

The following check/electronic payments are approved for payment:

Accounts Payable Check #:	From: 35151	To: 35237	\$605,011.83
Use Tax (paid to WA State Department of Revenue)	11/19/2024	To: 11/26/2024	\$17.74
Voided Check(s)	22272, 25801, 26119, 26437, 26590, 27632	And: 27925, 30092, 30112, 30115, 30129, 30130	\$(3,403.29)
Voided EFT(s)	860	To: 860	\$(254,546.85)
Voided Wire(s)	-	-	-
AP Electronic (EFTs) Payments:	From: 864	To: 869	\$414,369.40
AP Wire(s):	From: 15399	To: 15403 **	\$542,437.78
Payroll & Benefits Electronic Payments	From: 11/15/2024	To: 11/28/2024	\$879,124.14
Payroll & Benefits Checks	From: 10052	To: 10052	910.00
		TOTAL	\$2,183,920.75

I, the undersigned, do hereby certify under penalty of perjury that the materials have been furnished, the service rendered, or the labor performed as described herein, and that the claim is a just, due, and unpaid obligation against the City of Sumner and I am authorized to authenticate and certify to said claim.

DocuSigned by:

Kassandra Raymond
Chief Financial Officer

12/13/2024 | 3:32 PM PST

Date

We, the undersigned Finance and Personnel Committee of the City of Sumner City Council, do hereby certify that the check numbers and electronic payments listed above are approved for payment in the amount of:

\$2,183,920.75

Signed by:

Patricia Cole

1B39614FF4684BF...

Signed by:

Barbara Bitetto

74E2EC62EDD845C
Committee Member

Signed by:

Carla Bowman

Committee Member

12/13/2024 | 4:03 PM PST

Date

12/13/2024 | 8:05 PM PST

Date

12/17/2024 | 6:07 PM PST

Date

** Wire #15400 was used in the prior check run, and Wire #15401 will be used in the next check run.

SUBJECT: Ordinance No. 2906 - 2024 Comprehensive Plan Volume I, Draft Environmental Impact Statement Volume II, Transportation Plan, and Capital Facilities Plan

CATEGORY: Ordinance

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Ordinance 2906 - 2024 Comprehensive Plan, Environmental Impact Statement, Transportation Plan, Capital Facilities Plan
2. Exhibit A - 2024 Comprehensive Plan
3. Exhibit B1 - Final Environmental Impact Statement
4. Exhibit B2 - Draft Environmental Impact Statement
5. Exhibit C - Transportation Plan
6. Exhibit D - Capital Facilities Plan
7. Staff Report

STAFF CONTACT: Ryan Windish, Community & Economic Development Director

SUMMARY BACKGROUND: The Council held a public hearing on the 2024 Comprehensive Plan Periodic Update on December 2, 2024 and discussed comments on December 9, 2024. The items that are being presented for City Council action are four separate ordinances to adopt the 2024 Comprehensive Plan; miscellaneous Comprehensive Plan text and policy updates; and to adopt the Environmental Impact Statement. Finally, these ordinances will adopt updated housing, historic & cultural regulations and Critical Areas regulations. The final adoption will meet the City's requirements per the state Growth Management Act.

- Ordinance No. 2906 - Adopts the 2024 Comprehensive Plan Volume I, Draft/Final Environmental Impact Statement Volume II, Transportation Plan, and Capital Facilities Plan.
- Ordinance No. 2907 -2024 Comp Plan Amendments on Housing Regulations
- Ordinance No. 2908 -2024 Comp Plan Amendments on Historic & Cultural Preservation Regulations
- Ordinance No. 2909 -2024 Comp Plan Amendments on Critical Areas Regulations

COUNCIL COMMITTEE/STUDY SESSION: Study session reviews occurred on October 16, 2024, October 28, 2024, November 12, 2024, and December 9, 2024

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION:

STAFF RECOMMENDATIONS/MOTION:

Move to adopt Ordinance No. 2906 approving the 2024 Comprehensive Plan Volume I, Draft/Final Environmental Impact Statement Volume II, Transportation Plan, and Capital Facilities Plan.

ORDINANCE NO. 2906
CITY OF SUMNER, WASHINGTON

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, ADOPTING THE SUMNER 2024 COMPREHENSIVE PLAN, TRANSPORTATION MANAGEMENT PLAN, CAPITAL FACILITIES PLAN AND THE 2024 COMPREHENSIVE PLAN ENVIRONMENTAL IMPACT STATEMENT.

WHEREAS, the City of Sumner's Comprehensive Plan was originally adopted by Ordinance No. 1625 on April 4, 1994 to comply with the Growth Management Act, addressing land use, community character, transportation, regional planning, the environment, open-space and parks, capital facilities and utilities; and

WHEREAS, the Washington State Growth Management Act, per RCW 36.70A.130 requires periodic updates of the Comprehensive Plan, development regulations, critical areas regulations and other supporting plans and documents; and

WHEREAS, the City's 2024 Comprehensive Plan periodic update contains multiple amendments and revisions to different sections of the Municipal Code and development standards. This ordinance relates solely to the adoption of the Comprehensive Plan and Comprehensive Plan Environmental Impact Statement, the Transportation Management Plan and the Capital Facilities Plan. Separate ordinances will adopt amendments to the Zoning Code Title 18 and other provisions in the Sumner Municipal Code, Critical Areas Ordinance in Environment Title 16, and Multifamily Tax Exemption in SMC 3.52; and

WHEREAS, the City conducted a public outreach process following a Public Participation Plan that was approved by the Planning Commission on March 2, 2023 and included public open houses and other community meetings, website postings, public meetings with the Planning Commission and City Council, and public hearings and public notices; and

WHEREAS, in compliance with the State Environmental Policy Act (SEPA) the City issued a Determination of Significance on this proposal on May 18, 2023 and scoping was conducted and the 21-day comment period was open until June 8, 2023; and the City issued a Draft Environmental Impact Statement (DEIS) on this proposal on March 1, 2024 for a 60-day comment period ending April 30, 2024 and a Final Supplemental Environmental Impact Statement (FEIS) was issued on January 6, 2025; and

WHEREAS, on February 29, 2024 this proposal was forwarded to the Washington State Department of Commerce for the mandatory 60-day state review per the Growth Management Act; and

WHEREAS, on April 4, 2024, the Planning Commission held a duly-advertised public hearing on the proposed amendments, after multiple study sessions during 2023, with additional study sessions on June 6, 2024 and September 5, 2024; and on September 19, 2024 voted unanimously to recommend that the City Council adopt the proposed 2024 Comprehensive Plan dated September 2024, including the Draft Transportation Management Plan and Draft Capital Facilities Plan; and that the DEIS dated March 1, 2024, be updated via the FEIS based on responses to comments; and that the FEIS reflect the Preferred Alternative selected out of the Alternatives described in the DEIS; and

WHEREAS, on December 2, 2024, the City Council held a duly advertised public hearing. Prior to the public hearing the City Council discussed the Planning Commission recommendations in study sessions on October 16 & 28, 2024 and November 12, 2024 where the City Council deliberated, discussed and public comments; and discussed public comments on December 9, 2024 at a Study

Session; and

WHEREAS, the basis for the proposed amendments has been set forth in the staff reports for the amendments, including an analysis of the amendments' consistency with the City's adopted policies and regulations; and

WHEREAS, the City Council finds the proposed amendments to be consistent with the Sumner Municipal Code criteria for Comprehensive Plan and Zoning Code amendments, Growth Management Act, VISION 2050 Multi-county planning policies, and Pierce County Countywide Planning Policies.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON DO ORDAIN AS FOLLOWS:

Section 1. That the "Sumner 2020 Comprehensive Plan with 2022 Amendments" is hereby repealed and replaced with the Sumner "2024 Comprehensive Plan" dated January 6, 2025, as shown in **Exhibit A**.

Section 2. That the following environmental documents are incorporated herein by reference and hereby adopted: The 2024 Comprehensive Plan Final Environmental Impact Statement January 6, 2025 (FEIS), including by incorporation the associated 2024 Draft Environmental Impact Statement March 1, 2024 (DEIS) as shown in **Exhibits B1 and B2**, respectively.

Section 3. That the "2015 Sumner Transportation Plan – June 2015" is hereby repealed and replaced with the "2024 Transportation Management Plan January 6, 2025" as shown in **Exhibit C** and incorporated herein by reference.

Section 4. That the "2015-2021 Sumner Capital Facilities Plan" is hereby repealed and replaced with the "2024 Sumner Capital Facilities Plan" dated January 6, 2025 as shown in **Exhibit D** and incorporated herein by reference.

Section 5. That the amendments and associated exhibits contained herein shall constitute the 2024 Sumner Comprehensive Plan Update, and are hereby adopted.

Section 6. Severability. Should any section, paragraph, sentence, clause or phrase of this Ordinance, or its application to any person or circumstance, be declared unconstitutional or invalid for any reason, or should any portion of this Ordinance be preempted by state or federal law or regulation, such decision or preemption shall not affect the validity of the remaining portions of this Ordinance or its application to other persons or circumstances.

Section 7. Corrections by City Clerk or Code Reviser. Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Section 8. Effective Date. This ordinance This ordinance shall take effect five (5) days from the date of publication in the City's official newspaper.

Section 9. Corrections by City Clerk or Code Reviser. Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the

correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Passed by the City Council and approved by the Mayor of the City of Sumner, Washington, at a regular meeting thereof this _____ day of 2025

Mayor Kathy Hayden

ATTEST:

APPROVED AS TO FORM:

City Clerk Michelle Converse, CMC

Andrea Marquez, City Attorney

First Reading:

Date Adopted:

Date of Publication:

Effective Date:

EXHIBIT A - Sumner 2024 Draft Comprehensive Plan (Volume I) dated January 6, 2025

EXHIBIT B1 – Final Environmental Impact Statement dated January 6, 2025

EXHIBIT B2 - Draft Environmental Impact Statement dated March 1, 2024

EXHIBIT C - Transportation Management Plan dated January 6, 2025

EXHIBIT D - Capital Facilities Plan dated January 6, 2025

City of Sumner

2024 COMPREHENSIVE PLAN

JANUARY 6, 2025



**COMMUNITY & ECONOMIC
DEVELOPMENT DEPARTMENT**

1104 Maple Street
Sumner, WA 98390
www.sumnerwa.gov

CONSULTANT TEAM:

BERK Consulting
Parametrix
Transpo Group

MAYOR

Kathy Hayden

SUMNER CITY COUNCIL

Barbara Bitetto

Carla Bowman

Pat Clerget

Pat Cole

Andy Elfers

Greg Reinke

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Jason Wilson, City Administrator

Ryan Windish, Community and Economic Development Director

Ann Siegenthaler, Senior Planner

Derek Barry, Community Services Manager

Michael Kosa, Public Works Director

Andrea Marquez, City Attorney

Kassandra Raymond, Chief Financial Officer

Brad Moericke, Police Chief

SUMNER PLANNING COMMISSION

Sharon Fochtman

Rob Healy

Mark Isaacs

Kelly Locke

Bill Moody

Andy Elfers (through 2023)

Vincent Stoneking (through 2023)

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1. Introduction

A comprehensive plan is a community's guide to how it will grow and change, how people will live, work, get around, and how businesses and the economy will be supported and grow. The City of Sumner was one of the earliest communities in the region to begin planning with its first Comprehensive Plan completed in 1960. Sumner's Comprehensive Plan contains the community's goals and policies about land use, housing, transportation, environment, economic development, governance, historic/cultural preservation, capital facilities and other topics. The Plan has been updated throughout the years, following the State Growth Management Act requirements for updates.

Growth Management Act

Western Washington began to grow rapidly in the 1970s and 1980s leading to additional population, sprawl, and increased traffic congestion. Growth also resulted in impacts to the natural environment and threatened the state's quality of life. To address the increasing concerns of citizens, the Washington State Legislature passed, and the Governor signed into law, the Growth Management Act (GMA) of 1990. Subsequent amendments to the Act GMA have been made by the Legislature almost every year since.

The GMA requires urban counties and cities within the counties to do the following:

- Prepare Countywide planning policies. Each jurisdiction's comprehensive plan will be reviewed against the countywide policies for consistency.
- Prepare multi-county planning policies which are required for two or more counties with a population of 450,000 or more, and with contiguous urban areas. This has culminated in the VISION 2040 and 2050 plans prepared by the Puget Sound Regional Council (PSRC).
- Require coordination between counties and cities to define urban growth areas (i.e. the extent of urban development). Population is allocated among the urban growth areas (UGA) within the county. Each jurisdiction must plan appropriately in its UGA to accommodate the population growth expected.
- Define critical areas and adopt regulations for critical areas such as wetlands, mineral resources, aquifer recharge areas, geologic hazard areas, etc. and require that future updates to the critical areas regulations be based on "best available science" and give special consideration to habitat for anadromous fisheries.
- Prepare a comprehensive plan which must include the following elements:
 - Land Use
 - Housing – Recent changes to GMA require jurisdictions to identify sufficient capacity to meet housing needs of all income bands, identify local policies and regulations that result in racially disparate impacts, establish anti displacement policies, allow two or more units per lot in all residential zones, and allow two accessory dwelling units (ADUs) per lot in zones that allow single-family homes.
 - Transportation

- Capital Facilities
- Utilities
- Parks and Recreation and Economic Development are also identified elements under GMA, which should be incorporated when the state provides funding at least two years ahead of periodic reviews (RCW 36.70A.070 and RCW 36.70A.130).
- As an option, the comprehensive plans may include elements for Conservation, Solar Energy, and Sub-Area Plans. The elements must address State Planning Goals identified in the Growth Management Act and Countywide planning policies.
- Climate Change & Resiliency - In 2023, the State Legislature added a new requirement to GMA for local jurisdictions to include a Climate Change & Resiliency element to their comprehensive plan, along with the inclusion of new topics in other plan elements, such as wildfire risk and tree canopy cover.
- Adopt regulations consistent with and implement the comprehensive plan (e.g. revise the zoning ordinance, subdivision ordinance, etc., or prepare new implementation mechanisms).
- Prepare a Shoreline Master Program consistent with RCW 90.58. Its goals and policies are considered an element of the Comprehensive Plan and its regulations are considered part of the City's development regulations (RCW 36.70A.480)

The City has chosen, over the years, to implement the GMA in a number of ways with additional planning and guidance as follows:

- 1994–Community Character Strategy
- 1996–Design and Development Guidelines
- 2001–East Sumner Neighborhood Plan
- 2002–East Main Street Design Strategy
- 2015–East Sumner Neighborhood Plan Update
- 2018–Sumner -Pacific Manufacturing Industrial Center Subarea Plan
- 2018–Town Center Plan
- 2020–East Sumner Neighborhood Plan Update
- 2021–Main Street Visioning Plan
- 2021–Housing Action Plan

Coordination with State and Regional Goals and Policies

State Goals

Section RCW 36.70A.020 of the Growth Management Act lists the 15 planning goals which are to guide the preparation of a community's comprehensive plan and development regulations. The fourteenth goal was added to address climate change and a fifteenth goal was added to address the State's shoreline policy of appropriate shoreline uses, public access, and ecological conservation.

The goals address the following topics:

- Urban Growth
- Reduce Sprawl
- Transportation
- Housing
- Economic Development
- Property Rights
- Permits
- Natural Resource Industries
- Open Space and Recreation
- Environment
- Citizen Participation and Coordination
- Public Facilities and Services
- Historic Preservation
- Climate Change & Resiliency
- Shorelines

Each comprehensive plan should consider and be consistent with the State goals. The state goals were reviewed by staff and decision makers as this Comprehensive Plan was prepared. The EIS contains a policy analysis.

[Multi-County Planning Policies \(VISION 2050\)](#)

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

VISION 2050 is a regional plan facilitated by the Puget Sound Regional Council (PSRC) and adopted by local governments in the four-county Puget Sound region (King, Kitsap, Pierce, and Snohomish Counties). The original regional plan, VISION 2020, was adopted as the Multi-County Planning policies in March 1993 and amended in 1995. In April 2008, following several years of public process, PSRC adopted VISION 2040 as an update to VISION 2020, and later adopted VISION 2050 in October 2020.

VISION 2050 includes framework policies, designation of urban growth areas, contiguous and orderly development (including “Regional Growth Centers” and “Manufacturing/Industrial Centers”), transportation facilities and strategies, regional capital facilities, inter-jurisdictional planning, economic development, affordable housing, and open space linkages, resource protection and critical areas. VISION 2050 and the Multi-County Planning Policies were reviewed by staff and decision makers as this Comprehensive Plan was developed and for all subsequent amendments and updates. Further, the Draft EIS, and supplemental EISs, contain a policy analysis.

One of the important functions of the PSRC is to certify jurisdictions' Transportation Plans to ensure that they are consistent with the regional Transportation Plan and VISION 2050 and therefore eligible for federal funding.

Countywide Planning Policies for Pierce County

In accordance with the Growth Management Act, Pierce County and the cities and towns located in the County prepared Countywide Planning Policies (CPPs). They were ratified and adopted by the local jurisdictions and Pierce County Council in 1992. The CPPs were amended in 1996 to incorporate elements that are consistent with VISION 2050, namely providing policies specifically addressing the achievement of compact urban development and concentrated growth in centers served by multi-modal transportation systems. The CPPs have been amended over the years to include, among other things, an update to the designation of "Urban Centers" and "Manufacturing/Industrial Centers." The CPPs were again updated in May 2020, with input from the various jurisdictions in Pierce County, for consistency with the new VISION 2050. The CPPs address required topics outlined in the Growth Management Act as well as optional topics considered important to the region. The eleven areas addressed include:

- Affordable Housing
- Agricultural Lands
- Economic Development and Employment
- Education
- Fiscal Impact
- Historic, Archaeological and Cultural Preservation
- Natural Resources, Open Space and Protection of Environmentally Sensitive Lands
- Siting of Public Capital Facilities of a Countywide or State-Wide Nature
- Transportation Facilities and Strategies
- Urban Growth Areas
- Amendments and Transition

The CPPs provide a framework for the preparation of local jurisdictions' comprehensive plans. Since all jurisdictions must meet these policies, consistency between plans is more assured. The CPPs were reviewed as this Comprehensive Plan was originally prepared. Amendments and updates to the Comprehensive Plan have been reviewed for consistency with the CPPs.

The City of Sumner Comprehensive Plan promotes a sustainable growth pattern in support of VISION 2050 and the CPPs 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.

Sumner's Comprehensive Plan History

The City of Sumner was one of the earliest communities in the region to begin planning with its first Comprehensive Plan, completed in 1960. The Plan underwent major updates in the 1980s, 1994, 2004, 2010, and again in 2015. As needed, the City considers amendments to the Plan annually in accordance with the GMA.

1994 Comprehensive Plan

The Comprehensive Plan Advisory Committee was appointed by the Mayor in February 1992, consisting of 15 members, including 7 Planning Commissioners. Between February 1992 and October 1993, the Committee held over 40 public meetings, hearings, and workshops as they conducted visioning exercises, prepared a vision statement, determined urban growth boundary recommendations, prepared alternative plans, conducted environmental review, and lastly selected a preferred plan with accompanying goals, policies and objectives. Committee activities were advertised through newspaper articles, display ads, legal ads, posted agendas/notices, bulk mailings, and letters sent to those on a mailing list. In addition to regular meetings, the Committee members and City staff participated in an outreach process by attending 14 meetings of community groups such as Rotary, Sumner Promotion, Sumner Senior Center, Sumner Historical Society, neighborhood community halls, as well as others, during the visioning process and alternative plan review process. In addition, the City Council held three public hearings to consider comments on the Comprehensive Plan. The Plan was adopted via Ordinance No. 1625.

2004 Comprehensive Plan Amendments (Shoreline Master Program)

When the Shoreline Master Program was updated in 2004, the Comprehensive Plan was amended to include a Shoreline Master Program Element that contains the goals as presented in the Shoreline Master Program. The update to the Shoreline Master Program involved 13 public meetings and notice to all property owners along the rivers as well as notice in the newspaper and articles in the City newsletter. This amendment was outside the annual amendment process and is allowed per GMA. Ordinance No. 2091, July 25, 2004.

2004 Comprehensive Plan Update

The City provided information to the public through public hearing notices in the newspaper, articles in the community bi-monthly newsletter, mailed notice and posting information on the City's website. There were a total of nine location-specific Comprehensive Plan map amendment requests, as well as amendments to the East Sumner Neighborhood Plan area map designations and creation of a Town Center Plan. The 2004 Comprehensive Plan update involved the public in several ways and on two different "tracks". The most significant was the development of the Town Center Plan as part of this update. Public outreach included two public workshops one in July 2003 and one in September 2004; a focus group of consultants, business owners, residents and City representatives to discuss potential for downtown in December 2002; a housing charrette in January 2004 that included local stakeholders and developers and finally several public workshops with the community to finalize the recommendations in the Town Center Plan. The Economic Development element was also updated after a business survey,

individual interviews with businesses, and a workshop in May 2004 asking for recommendations on how the City could assist businesses. Both the Planning Commission and the City Council held public hearings. The amendments were adopted on June 20, 2005 via Ordinance No. 2133 for the Comprehensive Plan in general, and Substitute Ordinance No. 2133A was adopted on December 5, 2005 to include the Town Center Plan.

[Amendments to the 2004 Comprehensive Plan](#)

2007 Amendments

Ordinance No. 2221, adopted July 16, 2007, amended the Comprehensive Plan Map and Zoning Map as it pertains to three separate proposals; 1) amended the map to show changes in ownership between private to public entities and where necessary changes in the zoning; 2) amended the urban growth boundary line to include parcels that are more than 50% within the urban growth area; and 3) redesignated/rezoned property in the vicinity the 700 Block of Cherry and Narrow Streets.

2008 Amendments

Ordinance No. 2276, adopted December 1, 2008, amended the Comprehensive Plan Map and Zoning Map as it pertains to three separate proposals summarized as follows: 1) amended both maps such that 0.18 acres at 914 Meeker Street is redesignated/rezoned to Central Business District (CBD); 2) amended the Comprehensive Plan Map such that 90 acres in proximity of 14218 Stewart Road contains an Urban Village Overlay District; and 4) amended the Comprehensive Plan Map to add a Low Density Residential-3 designation on approximately 265 acres.

2009 Amendments

Ordinance No. 2298, adopted December 7, 2009, amended the Comprehensive Plan policy and text to include those related to: Community Linkages and the Community Linkages Map; City Mission, Vision, and Values; Code Enforcement; Staff Qualifications and Training; Low Impact Development; and Historic Preservation.

Ordinance No. 2299, adopted October 5, 2009 amended the Comprehensive Plan policy and text to include a Manufacturing/Industrial Center (MIC) designation on generally all the industrially zoned land in the northern area of the City. This MIC designation included areas within the City of Pacific and created an opportunity for the MIC to become a regional center. In 2016, the MIC was designated a Regional Manufacturing/Industrial Center. Such centers are characterized by a significant amount of manufacturing, industrial, and advanced technology employment uses. Being a regional MIC allows access to more funding sources for transportation improvements.

2010 Major Amendments-Update

Ordinance No. 2342, adopted November 15, 2010, amended the Comprehensive Plan policy and text and the Comprehensive Plan Land Use map to include amendments to the urban growth area that resulted in a net decrease of residential capacity. The urban growth area was expanded to the south by approximately 188 acres and reduced by approximately 250 acres on the east hill for a net reduction in

the overall UGA area of 62 acres. A Draft Supplemental Environmental Impact Statement (DSEIS) and a Final Supplemental Environmental Impact Statement (FSEIS) were prepared for this major amendment.

These amendments also included a private proposal to amend the MIC designation in the vicinity of the old Fleischmann Yeast Plant and was denied. The Fleischmann Industrial Park, LLC appealed the City's decision to the Growth Management Hearings Board and the Board ruled that the City had complied with GMA but not the procedural requirements of the State Environmental Policy Act and ordered the City to prepare further environmental review specific to the Fleischmann Industrial Park, LLC proposal for amending the MIC. The City completed a Supplemental EIS and on April 16, 2012 the City Council adopted the Supplemental EIS, but continued to deny the MIC amendment request. Minor clarifying amendments that had been in the original ordinance were retained.

In 2011 the City applied to Pierce County for an amendment to the urban growth area consistent with the 2010 amendments to the City's Comprehensive Plan. The amendment was approved by the Pierce County Council on October 25, 2011 and subsequently appealed to the Growth Management Hearings Board and denied.

2013 Amendments

Ordinance No. 2494, adopted September 15, 2014, amended the Comprehensive Plan as it related to the surplus of the city-owned Sumner Meadows Golf Course and subsequent sale. The amendments redesignated approximately 154 acres from a Private-Public Utility-Facilities designation to M-1 Light Manufacturing along with re-designating additional commercial and high-density residential zoning in the immediate vicinity. Additional policy amendments were made to reflect that the golf course was no longer operating and available as park and open space. A Draft Supplemental Environmental Impact Statement (DSEIS) and a Final Supplemental Environmental Impact Statement (FSEIS) were prepared for this annual amendment.

2015 10-year Update

In 2015 the City underwent a major 10-year update to the Comprehensive Plan as mandated by GMA. The Update included adopting updates to the East Sumner Neighborhood plan, adopting and updated Transportation Plan and Capital Facilities Plan, six Comprehensive Plan Map amendments including rezoning Agricultural lands to Residential Protection along with numerous minor text amendments. The Amendments were adopted on July 27, 2015, Ordinance No. 2530. Through Ordinance 2530, a Planned Action Ordinance was also adopted pursuant to RCW 43.21C.440 following completion of a Supplemental Environmental Impact Statement.

2017 Amendment

Ordinance No. 2645, adopted June 4, 2018, amended the Comprehensive Plan Map and Zoning Map as it pertains to two separate proposals summarized as follows: 1) amended both maps such that 23.05 acres at 5710 160th Avenue East is re-designated/rezoned to Low Density Residential 1 (LDR 1) and Low Density Residential 6,000 (LDR-6) respectively; and 2) amended both maps such that 2.78 acres located along the north portion of the 15800 block of Elm Street is re-designated/rezoned to Medium Density Residential (MDR).

2018 Amendments-Updated Town Center Subarea Plan

Ordinance No. 2652 adopted August 6, 2018 amended the Comprehensive Plan as it related to the Sumner-Pacific Manufacturing/Industrial Center. The amendments created a Sumner-Pacific Manufacturing/Industrial Center Subarea Plan with goals and policies that ensured a coordinated approach to development, environmental review, and strategic capital investments in the Sumner-Pacific Manufacturing/Industrial Center. A Determination of Non-significance for this amendment was issued on this proposal on June 6, 2018 in compliance with the State Environmental Policy Act.

2020 Amendments

Sumner Comprehensive Plan and Zoning Amendments 2020 and East Sumner Neighborhood Plan Update and Planned Action Ordinance 2773 amended the Comprehensive Plan and zoning addressing annual map and text amendments across the city, with a particular focus on East Sumner Neighborhood Plan. A Supplemental EIS was prepared and the 2015 Planned Action Ordinance for East Sumner was updated.

2022 Amendments

Amendments in 2022 consisted of City-initiated updates to: land use descriptions in the Comprehensive Plan related to density ranges; a zoning code update related to restricting gas stations in commercial areas; and a sign code update to electronic reader board sign allowances. The Planning Commission held a public hearing on the proposed amendments, and the City Council adopted the proposals with revisions in Ordinances No. 2822, 2823, and 2824.

2024 10-Year Periodic Update

The City began this update process in January 2023, inviting the public to submit proposals for text or map amendments. No private proposals were received. This update consisted primarily of updates to the Housing Element to address new State requirements for affordability, the Environment Element and Critical Areas Ordinance to address current Best Available Science, the Essential Public Facilities Element and related zoning code revisions to respond to State requirements for facilities, and a new Transportation Plan and Capital Facilities Plan. Information was provided to the public through public hearing notices in the newspaper; articles in the community quarterly newsletter and City e-news; information on the City's website; postcard mailings to agencies and service providers; flyers provided at community events; and information provided at several City open house drop-in sessions. In addition, both the Planning Commission and the City Council held public hearings with required notices published. The amendments were adopted on ____ via Ordinance No. ____ for the Comprehensive Plan in general, and Ordinance No. ____ for related zoning code amendments.

Plan Documents

The State Environmental Policy Act (SEPA) (RCW 43.21C) requires government officials to consider the environmental impacts of actions they are about to take and identify reasonable alternatives and mitigation measures that would avoid or minimize environmental impacts of the proposed action. They must consider whether the proposed action will have a probable, significant, adverse environmental

impact on the following elements of the natural and built environment: earth, air, water, plants and animals, housing, employment, aesthetics, energy and natural resources, environmental health, land and shoreline use, transportation, and public services and utilities.

The Growth Management Act (GMA) requires preparation of a Comprehensive Plan addressing several elements including Land Use, Housing, Transportation, Utilities, Capital Facilities, Economic Development, Parks and Recreation, and Climate Change.

SEPA and GMA requirements are similar in many ways. Integration of SEPA with GMA eliminates duplication of effort and assures consistency between SEPA and GMA requirements.

As adopted by Ordinance No. [REDACTED], the Sumner Comprehensive Plan consists of this Comprehensive Plan document, and the Draft and Final EIS as described below:

- Sumner Comprehensive Plan Update, Draft Environmental Impact Statement. In compliance with the State Environmental Policy Act, the Draft EIS analyzes 29 different environmental topics comparing the impacts of their plan alternatives: the Existing Comprehensive Plan (No Action Alternative) and two Proposed Action Alternatives. Since many requirements for SEPA analysis are similar to the analysis required by the Growth Management Act for plan elements, the Draft EIS was prepared in a manner to combine documentation as allowed in WAC 197-11-210 through 238 and 197-11-640. The background information to support the Plan Elements - as required by the Growth Management Act - is provided in this document. Many of the proposed mitigation measures have been incorporated as goals, policies, and objectives in this Comprehensive Plan.
- Sumner Comprehensive Plan Update, Final Environmental Impact Statement. The Final EIS analyzes the Preferred Alternative Sumner Comprehensive Plan. It provides an updated project description of the Preferred Alternative, supplements the Draft EIS analysis, and responds to comments received on the Draft EIS. It also documents how the Preferred Alternative incorporates many of the Draft EIS mitigation measures. With the provisions of Ordinance No. [REDACTED], the City Council adopted the Preferred Plan as the Comprehensive Plan.

Related Documents

The following documents support the Comprehensive Plan and should be consulted for more detailed information on strategies, planned facilities, financing, etc.:

- Sumner Parks and Open Space Plan. This plan, adopted February 2018, presents the recommendations of the Sumner Parks Board and Planning Commission. The plan includes an inventory of parks and facilities, recommended levels of service, open space programs, proposed park improvements, funding, a 20-year facility plan and a detailed 6-year capital improvement program, and goals, policies and objectives which have been incorporated in this Comprehensive Plan.
- Community Character Strategy. Prepared by A. Nelessen Associates, Inc. for the City of Sumner in May 1993, and amended and adopted on April 4, 1994. This Strategy documents the findings of the Community Character Workshops and uses ideas from the workshops on how to maintain and improve Sumner's character. Recommendations and implementation strategies are provided for Downtown, East Main Street, the Eastside Urban Village, West Sumner, various districts and

neighborhoods, and Employment Centers. The document also establishes a basis for a community linkage network between the various parts of the community. The Community Character Element chapter of this Comprehensive Plan is based upon this referenced document and utilizes many of the Community Design Principles and Implementation Strategies.

- Sumner Comprehensive Transportation Plan, 2025. Prepared by the Transpo Group, Inc. for the City of Sumner the plan addresses existing traffic conditions, future traffic conditions, and proposes a package of network improvements as well as goals, policies, objectives, and level of service standards for a variety of transportation modes. The plan also contains an analysis for transportation impact fees. The study area includes the City limits as well as a larger analysis area where development may impact the Sumner transportation system. Refer to the Transportation Element for the goals, policies, and objectives.
- Sumner Capital Facilities Plan, 2025. Prepared by BERK Consulting, Transpo Group, Inc., and Parametrix, the Capital Facilities Plan was updated to reflect data in the various system plans and to analyze future levels of service and funding impacts.
- General Water Plan, Update, 2020. Prepared by BHC Consultants for the City of Sumner, the Water System Plan details current water system facilities, water supply, water storage, water quality, and other issues for the City and future service area. A list of proposed capital facilities and funding mechanisms are included.
- Stormwater Comprehensive Plan, 2011. Prepared by Parametrix for the City of Sumner, this plan describes existing drainage facilities, deficiencies, water quality, proposed plan improvements, and funding mechanisms for the City and future service area and addresses NPDES requirements.
- Sewer Collection System Comprehensive Plan, Update 2020. Originally prepared by Parametrix for the City of Sumner in 2000, the plan describes existing sewer facilities, deficiencies, proposed plan improvements, and funding mechanisms for the City and future service area. The plan also discusses the wastewater treatment plant and contractual arrangement with the City of Bonney Lake regarding capacity. The Plan was updated by BHC Consultants in 2020.
- Critical Areas Ordinance, 2025. This document was updated with the periodic update to reflect best available science.
- Best Available Science Report, 2015. This document was updated and approved by the Department of Ecology in 2014. Its purpose is to protect the shoreline and increase public access. The plan includes five shoreline designations (urban, shoreline residential, urban conservancy, natural and aquatic) along the Puyallup and White Rivers and policy and development standards for each category. A periodic review was completed in 2020 to refresh the plan to address changed conditions including the Town Center Plan and associated building heights as well as updates to the Shoreline Management Act and implementing rules.
- Sumner Shoreline Master Program, 2014 and Periodic Review 2020. This document was updated and approved by the Department of Ecology in 2014. Its purpose is to protect the shoreline and increase public access. The plan includes five shoreline designations (urban, shoreline residential, urban conservancy, natural and aquatic) along the Puyallup and White Rivers and policy and development standards for each category. A periodic review was completed in 2020 to refresh the plan to address changed conditions including the Town Center Plan and associated building heights as well as updates to the Shoreline Management Act and implementing rules.

- School District Capital Facilities Plans, 2020 and 2021. Both the Sumner-Bonney Lake and Dieringer School Districts have adopted respective capital facilities plans that contain projected student population, demand for new facilities and costs over the next 20 years. Sumner-Bonney Lake's Plan was last updated in October 2021 and Dieringer's Plan was last updated in August 2020. These plans also provide the background documentation for the school impact fees adopted by the City of Sumner.
- Sumner-Pacific Manufacturing/Industrial Center Subarea Plan. Prepared by BERK Consulting for the City of Sumner in July 2018. The Plan details existing land use, transportation, environmental, economic, and market conditions, a shared vision, and goals, policies and objectives for the Sumner-Pacific Manufacturing Industrial Center, which have been incorporated in this Comprehensive Plan.

Implementing Plans and Strategies

To implement the Sumner Comprehensive Plan, the following plans and strategies have been completed:

- Sumner Urban Design Concept Plan, 1995. Prepared by Dennis Tate Associates and Kasprisin Pettinari Design, July 1995. It ensures a unified approach to community development to reinforce Sumner's small-town character and addresses City gateways, pedestrian linkages, building scale and character, signage, and streetscape.
- Urban Forestry Strategy, 1996. The City's Forestry Commission, this Strategy is intended to guide the community's investment in trees on public and private property for the subsequent 5 years. The Strategy inventories the state of the City's urban forest and proposes numerous projects to implement the policies of the Comprehensive Plan. The Strategy was adopted in February 1996 by Resolution No. 912.
- Cemetery Master Plan. Prepared by the Community Development Department, the Cemetery Advisory Committee, and the consulting firm of WCA Northwest, this Master Plan outlines the policies for operation and capital improvements to the City's cemetery. The Plan was adopted November 3, 1997 by Resolution No. 968. The Cemetery Plan is being updated in 2015.
- Sumner Parks and Trails Plan, 2018. This Plan provides the location, standards, and cost estimates for the trail system which extends from the King County Interurban Trail in the City of Algona to the Pierce County Foothills Trail in the City of Puyallup. The plan was originally adopted June 2, 2008 and updated in 2018.
- Sumner Capital Facilities Plan, 2024. Prepared by BERK Consulting, Transpo Group, Inc., and Parametrix. With approval by the Planning Commission and City Council, this document provides an inventory of existing capital facilities; establishes the level of service for transportation, water, sewer, storm sewer, parks, police, fire, schools, and general government facilities; analyzes them for deficiencies; and sets forth a 6-year financial plan for funding any improvements. A capital facilities plan is a required element of the Growth Management Act and was adopted with the 2024 Comprehensive Plan Update.
- East Main Street Design Strategy, 2002. The design strategy was originally adopted on May 16, 2002 (Ordinance No. 2056) and is intended to provide a framework for converting the section of Main Street from Valley Avenue to 160th Street East from a largely automobile oriented landscape to a

more walking friendly environment. The strategy was implemented in the zoning ordinance and will result in wider sidewalks, connected parking, reduced driveways and buildings closer to the street.

- Town Center Plan, 2018. The update to the 2005 subarea plan was completed with assistance from consultant team BERK, The Transpo Group and ECONW. This document provides the policy and real estate market analysis for revitalizing the downtown core and encouraging development of more housing to serve local businesses and utilize the Sounder station. The update included adoption of a Planned Action Ordinance per RCW 43.21C.440 following completion of a Supplemental Environmental Impact Statement
- Design and Development Guidelines, 2018. The design guidelines supplement the zoning code and provide a greater level of detail regarding landscaping, building and architectural treatments and pedestrian friendly amenities. The design guidelines were originally adopted in 1996 and underwent a major rewrite in 2008 with minor updates in 2018.

Plan Boundaries

The adopted Pierce County Comprehensive Plan, November 1994, which took effect January 1, 1995, establishes two types of boundaries: the Comprehensive Urban Growth Boundary (CUGA) and Urban Service Areas (USAs). The Comprehensive Urban Growth Boundary is Pierce County's 20-year Urban Growth Boundary for unincorporated Pierce County and for the cities and towns within the CUGA, which includes the cities of Edgewood, Fife, Fircrest, Lakewood, Milton, Puyallup, Ruston, Steilacoom, Sumner, Tacoma and University Place.

USAs are located within the CUGA as being those areas proposed by the cities where urban growth and urban services will occur. USA's do not extend beyond the CUGA.

Refer to Figure 9-1 regarding the location of the City's Urban Growth/Urban Service Area. In addition, the City identifies the area south of SR-410 and east of SR-162 be considered a joint planning area with Pierce County, although not included in Sumner's future urban service area. Also, negotiations with the City of Pacific include commitments to ongoing joint planning as it relates to the Sumner-Pacific Manufacturing/Industrial Center.

Definitions

This section describes the definitions of key words, the document format, and interpretation of the text.

Goal

A goal is a broad statement of what ought to exist in a community or what is desired to be achieved in the future, usually determined through a citizen involvement process. (Washington State Planning and Community Affairs Agency, The Language of Planning: A Glossary of Selected Land Use Planning and Zoning Words and Phrases, 1981)

Policy

A policy is a more specific statement than a goal which describes a particular course of action to accomplish the purposes of the comprehensive plan. Policies represent the will of the people translated into decision oriented statements which are continuously available to the legislative body while evaluating a new project or proposed change in ordinance. (Washington State Planning and Community Affairs Agency, The Language of Planning: A Glossary of Selected Land Use Planning and Zoning Words and Phrases, 1981)

Objective

An objective is something toward which effort is directed: an aim or end of action. (Merriam-Webster, Webster's Ninth New Collegiate Dictionary, 1986.

Format of Sumner elements

The text in the Comprehensive Plan includes:

- Goals, which are highlighted in a ***bold italic*** font;
- Policies with a related numbering system to the goals they support (e.g. # 1.1); and
- Implementation strategies which indicate quantified targets or specific actions with a related numbering system to the policies they implement (e.g. # 1.1.1).

Interpretation

The words and terms used in the Sumner Comprehensive Plan Update are defined as set forth in the Growth Management Act, Procedural Criteria, Countywide Planning Policies, and other Sumner plans and ordinances. Where terms are not defined in such documents, words and terms shall be given their plain and ordinary meanings.

It is understood that the City of Sumner is responsible for implementing the goals, policies, and objectives of this plan, unless otherwise stated. There is no prioritization of the goals, policies, and objectives; decisions based on the Plan will have to balance the applicable goals, policies, and objectives and apply whatever weighting that may be appropriate.

The timing of implementation and the amount of resources devoted to the goals, policies, and objectives shall be determined by the City Council through the budget and resource allocation process over the 20-year horizon of the Plan.

The Plan has been prepared with the understanding that it will be amended as needed in the future.

2. Community Vision

Through the Community Vision element, Sumner sets out its long-term aspirations for the community relative to the health and well-being of people, economic vitality, protection of resources and heritage, and maintaining community character. These vision statements are broad statements of desired outcomes and are not to be construed as policies or mandates.

Sumner: The Vision

Today and into the future, Sumner is bound together by its community pride, respect for neighbors, small-town heritage, support for small businesses as well as industry, and concern for protecting our community's natural resources. We recognize that there are community needs, such as the improvement of the Downtown business area, repair of streets and sidewalks and management of traffic, along with maintaining adequate public services, parks, and family and human services for our residents. In the coming decades, the community works together to maintain a high quality of life and to address community needs.

In 2050 Sumner shows strongly its unique "small-town" characteristics and appeal, even in the face of a changing world. In embracing our heritage while also looking forward, we set the standard of excellence for a progressive small city. Through ongoing cooperation and communication between residents, business, industry, schools, and local government, an environment exists which reflects the community's pride in itself. This environment reflects our small-town heritage, our desire for open space, our support for quality education and human services, our commitment to responsible governance, and our readiness for the future.

Community Layout

In 2050, the community is committed to planning for sustainability through our physical layout, the character of our residential districts, our growth patterns, the maintenance of our parks and recreation investments, and our continued economic development.

In 2050, the streets of Sumner are primarily a gridded layout of surfaced streets with curbs, gutters, sidewalks, and accessibility features. The City promotes a complete street grid and walkable neighborhoods that include alternative connections between residential and commercial areas, such as alleys and pedestrian access corridors.

The community recognizes the central role that the downtown transit station plays in providing alternate modes of transportation for Sumner residents, workers, and the region. Neighborhoods are connected to the transit station and each other through an efficient transit network. In 2050, streets are maintained, clean and have been improved to accommodate growth demands so that residents have adequate sidewalks and reduced congestion. Major streets in town are designed for vehicles, pedestrians, bicycles and transit.

Homeowners, residents and business owners take care of their properties, showing great pride in their surroundings as well as pride in the community as a whole. Buildings and property are maintained and in good repair, designed to encourage walking and community interaction, which promotes mental and physical wellbeing.

Sumner maintains its investments in an adequate water system, tertiary sewage treatment facility, and adequate storm water system. Utilities are provided to all neighborhoods and businesses and support everyday resident needs and economic growth.

Sumner retains its small-town atmosphere and walkability by taking appropriate steps to improve the street system and to reduce commuter traffic through town. Traffic calming and other measures have been taken to reduce speeds, making streets safer for pedestrians and bicyclists.

Where appropriate, Sumner has maintained the separation of incompatible uses by using and strengthening the Comprehensive Land Use Plan and Zoning Code. Where compatible, there are areas of “mixed-use,” predominately around the train/transit station and in the Town Center, where a mix of housing and businesses creates a vibrant and diverse living environment. Sumner has found a balance between parking for transit riders to gain access to a regional transit system and maintaining the City’s small-town atmosphere and character.

Through adequate planning for both jobs and housing, we strive to have a larger portion of the nearby workforce living in the City and using alternate modes of transportation. There are numerous options for commuters to use rail, buses, bicycles, and other choices to travel back and forth from work and shopping. Sumner neighborhoods are linked by a network of sidewalks, trails, bicycle routes and a small-scale inter-city transit system.

New parks, recreational areas, greenbelts, and buffers have been added to the landscape of the City to provide open space and recreational opportunities within walking distance of all neighborhoods.

Residential Character

In 2050, more residents are able to enjoy the benefits of homeownership, and others are able to find high quality, well-maintained residences close to services. The majority of residential areas consist of single-family and owner-occupied multifamily housing. A diversity of housing styles, sizes and types is found, creating housing opportunities for all of life’s stages and various incomes. Many homes include porches and yards where families and neighbors interact, adding to the community character and neighborhood connections. Where renter-occupied multifamily is found, the developments are well-designed with attractive features, and well managed and maintained. Such developments provide safe connections to schools and services, attractive amenities, and outdoor green spaces and recreation spaces for residents.

In 2050, Sumner continues to be a place where we and our children can afford to live and work, and where older residents can continue to age in place. To that end, we are willing to see lot sizes decrease and to allow other housing types in appropriate ways and areas to make lots, houses, and accompanying utilities affordable to our growing population. City codes and plans support a diversity of lot sizes and variety of housing types to meet the varied needs and lifestyles found in Sumner.

A higher density of small-lot single family homes in a more traditional neighborhood pattern is concentrated in the downtown area, where it reflects the overall small-town character of Sumner, and where it is within easy walking distance of downtown services and the train station. In the Town Center area and East Sumner area, higher-density multifamily is allowed, providing alternative housing options for a range of incomes and lifestyles. These neighborhoods include a mix of commercial uses that provide nearby services to residents and promote community interaction.

Growth

Sumner is the envy of many of our neighboring cities in the year 2050, as an outstanding model of many years of good planning and a commonsense approach to applying zoning and environmental codes, where community character has been maintained while allowing for growth. By listening to the people of the community, then passing and enforcing laws they desired, and providing incentives, Sumner has been able to encourage and promote the development of vacant and underutilized areas before allowing growth to stretch out and create sprawl. Infill is the rule, as far as practical, within the limits of our growth area.

Environment

Sumner has preserved its system of natural resources through innovative, sustainable and environmentally responsible practices. Infill, clustering, and other types of techniques help protect valuable natural resources and focus density away from valuable resource areas such as farmland, mineral resource lands, rivers, streams, wetlands, groundwater, and forested hillsides, while allowing site-sensitive, sustainable development. As appropriate to a site's constraints, lower density development is supported in environmentally sensitive areas. However, Sumner recognizes that the long-term needs of the City may necessitate further growth into our Urban Growth Area. While agriculture is no longer one of the mainstays of the area, Sumner is committed to the "right-to-farm" in certain areas where some agriculture is allowed to still exist.

Figure 2-1: Youth volunteers



Along with the desire to protect valuable resources and sensitive areas, City plans and ordinances ensure protection of property rights. Fair compensation practices are in place to compensate owners if property rights are taken for public use. Consideration is also given to environmental justice implications of proposed projects and policies, such as disproportionate exposure of underserved and low-income communities to pollution, noise, and other environmental and health hazards.

Parks, Recreation, and Open Space

In 2050, Sumner's park system is a unified system of a variety of parks and recreation opportunities, such as a major sports complex, community parks, and neighborhood parks situated in the various areas of the City. Each residential neighborhood has access to a neighborhood park which becomes a focal point for interaction. Residents and workers alike enjoy active and inclusive recreational facilities and programs such as baseball, soccer, tennis, or others. Picnic areas, grandstands and other amenities allow opportunities for concerts and community gatherings. Community partnerships, such as with the City, YMCA and school district, provide a cost-effective, collaborative approach to filling out the range of recreation facilities. Sumner's recreational facilities are linked by a safe network of sidewalks and trails along the Puyallup and White Rivers and connecting other areas throughout town.

The trail system provides recreational pleasure for all ages and abilities as well as aesthetic enjoyment of our natural resources and provides options for exercise and healthy living. Trails and park features are designed to protect riparian buffers and assist in the preservation of our natural resources. The City has preserved lands in a natural state along rivers and wetlands for passive enjoyment and to benefit fish and wildlife and biodiversity.

Sumner's park and recreational system is designed for the benefit of all ages, including persons with physical limitations. The safety of adults and children is considered in the design, maintenance and management of system parks and recreational areas. Maintenance of the parks and trails system is a cooperative effort of the City and community. Volunteer assistance by residents, youth, local organizations, and Adopt-a-Stream/Parks programs assist with the upkeep and enhancement of facilities, as well as promote community pride. Maintenance of existing recreational facilities is a priority ahead of the development of new facilities. Land is acquired as needed for future park needs.

History and Culture

Sumner expresses its history, heritage and uniqueness through historic preservation, the arts, and community events. Art is incorporated into the community through design and features of public spaces, entrance ways, concerts, events, murals, and sculptures. Preservation of historical and cultural landmarks helps sustain our city's heritage. Historical, cultural, and educational features are seen throughout our recreation system and throughout downtown in a variety of ways, such as interpretive signs on trails, an old-fashioned bandstand/gazebo in Loyalty Park, murals reflecting history and nature, and community events celebrating agricultural heritage and the traditions of indigenous and ethnic communities. Sumner's visual, cultural and environmental connection to Mt. Rainier is celebrated in the arts and events. The community supports organizations that help further awareness of Sumner's history and heritage. History and heritage are also maintained through established landmark and historic programs that preserve the character of buildings in the downtown. The City will have an

Figure 2-2: St. Patrick's Day Parade



active Historic Preservation Board that also helps promote the preservation of the historic downtown as the heart of and collective memory of the community. The City, in partnership with the downtown business association and others, promotes events such as parades and festivals that strengthen the sense of community and place that is Sumner.

Economic Development

In 2050, small businesses are supported and nurtured throughout the community. Essential business services are found within walking distance of most neighborhoods. Our City policies and strategies provide opportunities for businesses that conform to our small-town atmosphere. We also encourage innovative, incubator businesses that add variety to our economy through alternative products and workstyles. A viable, economically stable business community is promoted which includes and celebrates minority-, women-, and veteran-owned businesses and is distinct and separate from the manufacturing and industrial center.

In appropriate areas, planned industrial and commercial uses are encouraged and these uses employ measures to ensure compatibility with surrounding neighborhoods, such as landscaping and limiting noise, lighting, and traffic. Employment in manufacturing is encouraged over warehouse distribution for quality jobs and reduced truck traffic. The north end of the city has become a burgeoning, modern manufacturing and industrial center of regional significance that accommodates growth and redevelopment while integrating environmental sustainability. Through lasting partnerships with educational institutions, business interests, and developers the city has a well trained workforce for industry and manufacturing.

Downtown and the main commercial core of the city are enhanced with pedestrian amenities, landscape, streetscape, and other improvements which complement the efforts of Downtown businesses to create a coherent theme. These improvements play a major role in linking Downtown with West Sumner and East Main Street and help create a unified and seamless whole. New buildings along Main Street, both in the Downtown but further east on East Main Street, are built in close relation to the street with parking to the rear of buildings creating a place that is more welcoming for walking and interaction.

Governance

In 2050, all residences and businesses are served by full City services including water, sewer, storm drainage, fire protection, emergency medical care, police protection and others. The City government strives for equity, respect and accountability with the mission statement: "The City of Sumner will set the standard of excellence for a progressive small city." Sumner is a community that takes financial responsibility for its needs. New development contributes its fair share towards improvements in proportion to its impacts on the community.

Local government, the school district, and private schools work together in the planning process for quality education. Good leadership and educational programs are supported. A primary focal point of the community is the local schools. The school system serves Sumner and Bonney Lake, and these communities are able to partner and combine resources to the benefit of the entire school district and all students regardless of City boundaries and ethnic or demographic backgrounds. The community

supports integrated educational, recreational, and cultural activities at the performing arts center, stadium, gymnasium, sports complex, public library and other places. The City continues to work actively to address emerging issues related to land use, the environment, economic and business development, energy needs and engage the public to provide guidance for these decisions.

Communication between residents, businesses, industry, and government enables responsive, effective, thoughtful, and fair governance. City meetings are open and accessible to all. Town hall meetings provide a forum for community issues to be discussed in a relaxed setting. Sumner University, Police Citizen's Academy and other formats are utilized to educate youth and other residents about their community and government. The City strives to increase communication and uses a variety of established and innovative techniques to keep residents and local businesses informed. Our cooperative spirit maintains our community pride, builds community ties, and ensures our readiness for the future.

3. Community Values

The Sumner Values Statement is the result of the community developing its vision of who and what it aspires to be in the future, and from public participation during the various Comprehensive Plan updates over the years, which have elicited several main community values. The statements in this Element are broad statements of common values and are not to be construed as policies or mandates. Rather, these community values provide a framework for developing the policies in the Sumner Comprehensive Plan. These values are people, environment, security, community, economy, good government, foresight, stewardship, and education.

People

Sumner is made up of many diverse and valuable people with various backgrounds and differences in abilities, ages, race, ethnicity, gender, sexual orientation and religion. We value the shared commonalities and the differences. All people are recognized as vital to the future of the City and to the quality of life we strive to achieve. Residents, property owners, business owners and operators, industry, people who work here, people who play and shop here, children, seniors; all are vital to our collective future.

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 biologically rich and diverse area adjacent to the White and Puyallup Rivers 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, the region, and the world. We examine our daily activities to determine how we can do things differently to reduce our impact on the planet, climate change, and use of the earth's resources. We look at the long-term effects of our activities, and we strive to mitigate those effects. We are proactive and innovative about taking steps to improve the environment. We use our resources whenever possible to educate our children and our adults about the environment.

Security

Our security not only comes from our continuing investment in the public safety services available through the City government, but it comes from ourselves. The community's commitment to treating each other with kindness and respect helps keep us safe; our neighbors are our greatest source of security and a source of help when we need it. Through education, our children know the importance of avoiding drugs and alcohol, and are aware of the dangers of crime. Our schools, parks, families and community offer constructive alternatives for young and old alike. We keep our eyes and ears open, and we design places where we can be secure. Our security includes preparation for all types of emergencies. We will be ready when they happen.

Community

Our sense of community is our greatest strength. Our understanding and respect for each other, our commonalities, and our diversity make our community stronger and better able to handle the tough challenges we face. Our sense of community brings together the places we work, live, play, learn, worship and govern to create the true "City of Sumner."

Economy

The people of Sumner support a strong and diverse economy, the retention of existing businesses and recruitment of new businesses. As such, a variety of industrial, business and employment opportunities are supported within the city. Large employers are encouraged, and the services they require are provided. Similarly, small business is fostered and opportunities for entrepreneurship and innovation are created. A strong economy provides opportunity for our residents, tax base to support our services, employment for the region, security for our people and balance to our community. Our economy respects our values and does not overwhelm us.

Government

We value the role of good government in our society. We understand and appreciate its responsibilities and work with its limitations. Our government is responsive to the people, ethical and fair in its conduct, and fiscally responsible. We participate in solving regional problems and planning. Communication between government and the people exists in all forums. Government is 'by the people', invites the people to actively participate, and seeks innovation to solve complex problems. The people take the time to participate responsibly and address issues. City resources support participation and encourage citizen boards and commissions, public notice and information, and volunteerism.

Foresight

The City plans ahead for its future. Through comprehensive planning, utility and infrastructure planning, coordination with neighboring jurisdictions, and capital facilities programs, the City is able to ensure it has the resources for future needs. The City uses this foresight to maintain its vision of the future. We communicate regularly and determine if we are achieving the vision we desire.

Stewardship

The Sumner valley is filled with many beautiful and valuable resources. The rivers, streams, open spaces, historic buildings, parks, hillsides, watersheds, and downtown are all vital to the physical and mental well-being of our community. We use our skills, resources, and determination to preserve these as best we can as stewards for the future.

Education and Human Services

Our public school system is a source of pride and provides community identity, education to our young people, and a variety of resources for our residents. We strive to provide an inclusive educational system that meets the needs of diverse cultural groups. Our residents have access to a range of family and human services, particularly those services that support vulnerable youth and seniors.

4. Plan Monitoring and Amendment

Introduction

The Sumner Vision Statement mentions a number of measures that relate to governance and the role of City government in the community. The community vision anticipates a government that is representative, open, and responsible; and one that is fair and accessible to all segments of the community. The policies in this chapter are not exhaustive but attempt to address the role of City government in the community and in maintaining permitting and enforcement measures that support residents, employees, and business owners.

Goals, Policies, and Objectives

- 1. *Monitor implementation of the Comprehensive Plan for consistency with the City vision, Growth Management Act requirements and policies, Multi-County Planning Policies (VISION 2050), and Pierce County Countywide Planning Policies and make amendments to the plan as necessary.***
 - 1.1. Consistent with the reporting requirements of the Growth Management Act, report to the City Council and general public on implementation of the Comprehensive Plan, identifying the degrees to which City policies are being implemented.
 - 1.1.1. Develop and implement a system of benchmarks and indicators to track and communicate implementation of this Plan.
 - 1.2. Implement procedures for no more than annual amendment of the Comprehensive Plan, and less frequently after a periodic 10-year update. Specific plan amendments may be initiated by the City Council, Planning Commission, City staff, or the general public.
 - 1.2.1. Where the City determines that a Comprehensive Plan amendment is warranted as an emergency action under RCW 36.70A.130(2)(b), the City Council may adopt amendments or revisions to the Plan outside of the annual amendment process, after providing for adequate opportunities for public participation.
 - 1.3. Implement and adopt a public participation strategy appropriate for each amendment cycle.
 - 1.4. Review and revise the Comprehensive Plan on a 10-year cycle pursuant to the Growth Management Act.
 - 1.5. As required by the Countywide Planning Policies, inventory and monitor buildable lands and report such findings as necessary.

2. *Review Sumner's Urban Growth Area (UGA) boundaries, patterns of development within the UGA, and the densities permitted during the regularly scheduled comprehensive plan update cycle.*

- 2.1. During the update cycle, determine whether the UGA boundary warrants adjustment to accommodate development pressures.
- 2.2. Sumner's UGA shall only be reduced where it is determined that a) In the present and foreseeable future it will be infeasible to serve the area with utilities and other urban services; and b) The area will not likely be needed to accommodate future growth and needed housing for the next 20-year period.

5. Governance and Permit Process

Introduction

The Sumner Vision Statement mentions a number of measures that relate to governance and the role of City government in the community. The community vision anticipates a government that is representative, open, and responsible; and one that is fair and accessible to all segments of the community. The policies in this chapter are not exhaustive but attempt to address the role of City government in the community and in maintaining permitting and enforcement measures that support residents, employees, and business owners.

Goals, Policies, and Objectives

Governance

1. *Strive for a civic government that is broadly representative of the community, dedicated, participatory, open, visionary, and responsible.*

- 1.1. Recognize all members of the community, such as residents, property owners, business owners and operators, industry, people who work here, people who play and shop here, children, and older adults as stakeholders in the future of the City.
- 1.2. Strengthen communication between government, residents, and customers through the use of technology.
- 1.3. Seek broad and diverse representation on boards, commissions and advisory groups in terms of diverse backgrounds, ethnicity, ages, gender and geographical location.
- 1.4. Promote volunteerism to address appropriate public needs by providing for recruiting, training, organization and recognition of volunteers within the community including high school students.
- 1.5. The City shall strive for progressive and innovative solutions that involve partnerships and collaboration with affected parties.
- 1.6. Work with civic organizations and the school district to educate the general public on the responsibilities of government and the importance of their participation.
 - 1.6.1. Make available on the City's website information on appointed and elected bodies, and local civic organizations to inform citizens on how they may actively be involved.
 - 1.6.2. Continue to provide educational events such as Sumner University and the Police Academy.
 - 1.6.3. Actively engage the public in government processes and decisions in a manner that is inclusive, meaningful, educates, inspires, and empowers.

- 1.7. Ensure that City government sets the example for compliance and innovation in its own operations and facilities with regard to water and energy efficiency, sustainable building design, low-impact development, noise and glare reduction, water and air quality, and accessibility for people with disabilities.

2. *Equitably distribute City resources and the costs of regulations.*

- 2.1. Seek to equitably distribute City resources between existing, older areas of the City and newer growing areas.
- 2.2. In the decision process regarding distribution of City resources and services, consider impacts to and needs of underserved populations and groups vulnerable to displacement.
- 2.3. Compensate property owners when property is taken for public use.
- 2.4. Protect the rights of property owners from arbitrary and discriminatory actions, consistent with statutory requirements.

3. *Carry out the City of Sumner's adopted mission statement, vision statement and values through daily operations of the City.*

- 3.1. MISSION: To provide needed and valued services that promote our sense of community.
- 3.2. VISION: Sumner will set the standard of excellence for a progressive small city.
- 3.3. VALUES:
 - 3.3.1. We are collaborative and professional.
 - 3.3.2. We are innovative and visionary.
 - 3.3.3. We are responsive and accountable.
 - 3.3.4. We serve with respect and integrity.

4. *Employ well-trained and highly qualified staff.*

- 4.1. Provide opportunities for training and education to ensure that City staff have the necessary knowledge and skills for peak performance.
- 4.2. Provide training opportunities that expose employees to different government functions and disciplines to build a better team and collaboration.
- 4.3. Provide competitive salaries and benefits.
- 4.4. Provide training for, and increase awareness in City staff of, concepts related to diversity, equity and inclusion.

5. *Enforce the City's Municipal Code fairly and efficiently.*

- 5.1. Provide necessary resources to adequately and efficiently enforce code violations.

- 5.2. Seek innovative and collaborative solutions to code violations through communication and education of the public and focus on solutions that enable compliance versus punitive measures.
- 5.3. Ensure that regulations and enforcement measures are applied equitably across all segments of the community, considering unintentional impacts on diverse and underserved populations.

Permitting Process

The State Growth Management Act (GMA) provides a planning goal for permits, stating "Applications for state and local government permits should be processed in a timely and fair manner to ensure predictability." The policies below will support efforts to carry out this mandate. Further, the City's permitting policies encourage an inclusive and accessible process for all.

6. Communicate regularly with developers, landlords, business, industry and residents with regard to policies and regulations which could affect development.

- 6.1. Encourage City staff and elected officials to regularly attend civic and community organization meetings.
- 6.2. Provide information to the public about policies and regulations through a variety of means, such as a regular newsletter to the general public; electronic media such as social media, Pierce County TV, and on the City website; neighborhood forums and advisory committees; and City open houses.
- 6.3. Support and create communication avenues that reach underserved communities, such as providing City information in multiple languages and partnering with community organizations that serve these communities.

7. Develop and implement a permit process for land use and other local government approvals which is timely, efficient, and fair to all affected parties.

- 7.1. Adopt regulations that are clear, concise, and enforceable and periodically review regulations for improvement.
- 7.2. Review development regulations periodically to ensure they are necessary to implement the adopted Comprehensive Plan and other state and federal mandates.
- 7.3. Eliminate duplicative, unnecessary, and unclear regulations.
- 7.4. Provide procedures to process permits in a timely fashion.
- 7.5. Establish processes that streamline the permit process to the extent possible, such as combined permit processing, uniform applications, standardized public notices, and efficient permit review and appeal procedures.
- 7.6. Implement an online permit system that provides value and convenience to the applicant.

- 7.7. Prepare necessary documents based on the level of environmental impacts to allow for “planned action” as allowed by state law to expedite the review of projects in the Town Center, East Sumner Urban Village and other subareas.
- 7.8. Provide resources, staffing and procedures sufficient to ensure development permit review is adequate to achieve consistency with adopted City policies and regulations within reasonable timeframes.

Tribal Participation

Tribal treaty rights, like fishing and hunting, occur both within reservation lands and in the Tribes’ “Usual and Accustomed Areas” which were part of their traditional territory. In order to maintain the integrity of federal/Tribal treaties, local governments should recognize Tribal issues related to land use and planning that may affect treaty resources. In addition to adhering to federal laws regarding required Tribal consultations (e.g., Section 106 cultural resources) the Countywide Planning Policies require local jurisdictions to engage Tribes in the local land use planning processes.

8. *Recognize the importance of early and continuous Tribal government participation in local planning activities, acknowledging a Tribe’s status as a sovereign government with a unique history and interest in the land and natural environment,*

- 8.1. Provide meaningful and substantial opportunities for Tribal government participation and consultation in significant land use decisions that may have potential impacts to treaty rights.
- 8.2. Tribal governments shall be included in public notices and comment procedures for land use actions that require SEPA environmental review, comprehensive planning efforts, and long-range planning activities.

Figure 5-1. NW Indian Fisheries Commission Member Tribes in Sumner Area



Source: NW Indian Fisheries Commission

Stakeholder Involvement

9. Strive to involve the public in the permit process such that their comments may be heard and considered.

- 9.1. Consider accessibility in public notices, publications, and website content so that permit information is available to all segments of the community, including underserved populations.
- 9.2. Provide public notice of major development proposals through a variety of means, such as notices that are published in the newspaper, mailed, emailed, posted on site, and posted on the City's website.
- 9.3. Encourage, and facilitate where possible, early communication between developers and neighbors about the project and its impacts. When appropriate, organize meetings with residents to discuss concerns and potential impacts.
- 9.4. Educate the residents about development rules and help them effectively participate in the development and land use regulation process. Reports and documents should be available in advance and available at appropriate locations, such as City Hall, the library, and other public locations. Use the City's website as a resource for communication material.

6. Community Character

Introduction

Sumner's Community Vision chapter and neighborhood plans such as for the East Sumner Neighborhood, the Town Center, and the Manufacturing/Industrial Center identify key issues for the community, including maintaining and promoting Sumner's small-town atmosphere, enhancing downtown, providing beneficial employment, ensuring a compatible variety of uses, managing a reasonable rate of growth, protecting and enhancing cultural and environmental resources, providing adequate infrastructure, and promoting property maintenance, among others. This image of Sumner is consistent with the regional strategy (VISION 2050) by envisioning the City as having both a regionally designated town center and a regional manufacturing and industrial center. The variety and concentration of land uses in the downtown core, and proximity to the commuter rail and transit station, creates a strong town center. In addition, the manufacturing and industrial development on the north end of the city has become a regional center for this activity and has been formally designated by the Pierce County Council and Puget Sound Regional Council.

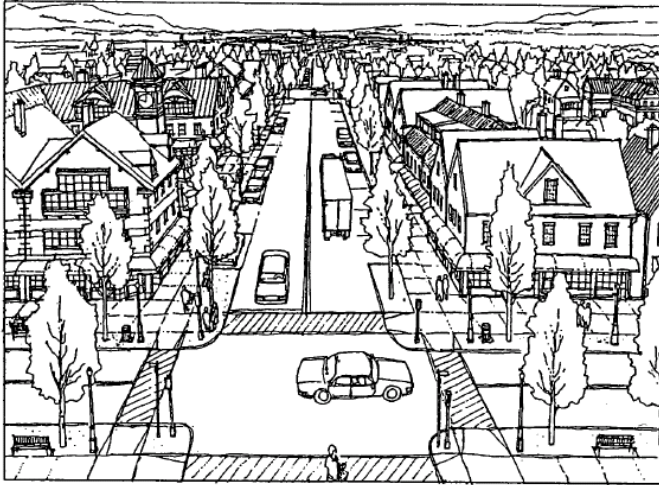
The goals, policies and objectives below are based on these themes and are intended to enhance the sense of community through design of the built environment.

Goals, Policies, and Objectives

- 1. *Maintain and enrich Sumner's quality of life encompassed in its walkable, friendly, small-town atmosphere, while allowing a more urban scale and density in key areas close to services.***
 - 1.1. Encourage development that enhances the human/pedestrian scale, creating a sense of community and place.
 - 1.2. Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, workplaces, schools, parks, civic facilities, and community services essential to the daily life of residents.
 - 1.3. Design Guidelines. Maintain design guidelines and/or a form-based code that address streetscape, landscape, and building design to ensure high quality and compatible development. Materials and methods of construction should be of high quality, be specific to the region, and be compatible with the climate. The design should reflect the historic context of Sumner, respect the historic character and scale of nearby development, and promote an attractive, pedestrian-scale streetscape.
 - 1.3.1. Implement design guidelines that discourage the use of franchise and corporate architecture that detracts from Sumner's unique sense of place.
 - 1.4. Implement and maintain a Zoning Code which implements the comprehensive plan and community vision.

- 1.5. Encourage in the community a commitment to natural resource conservation and stewardship, management of attractive streetscapes, property maintenance, and historic preservation, which enhance Sumner's community character and sense of place.
 - 1.6. Maintain a small-scale residential character along residential streetscapes through various means such as floor area ratio, small lots, and setback requirements.
 - 1.7. Maintain a Sign Code that allows reasonable and fair access to advertising for business owners, while protecting the community from adverse aesthetic impacts, including excessive clutter, distracting animation, and excessive lighting and glare.
 - 1.8. Maintain a consistent and prompt graffiti removal program and work with property owners to prevent and abate graffiti.
- 2. *The Sumner community should be designed so that housing, jobs, daily needs, and other activities are within easy walking distance of each other.***
- 2.1. **Urban Villages.** Establish and support Urban Villages in key areas that allow a mix of residential and commercial uses that support each other and help reduce automobile trips. Area plans shall be prepared to indicate in more detail allowable uses, design themes, buffering, public spaces, etc.
 - 2.1.1. Urban Villages include:
 - Town Center
 - East Sumner Neighborhood.
 - 2.1.2. In the East Sumner Urban Village, encourage mixed use development to expand the range of housing types available in the city and to support commercial development in that area.
 - 2.1.3. To encourage businesses that serve nearby residents in the Urban Village, support alternative approaches to required parking for retail, eating, and small commercial services establishments, such as reduced on-site private parking, credits for on-street and off-site parking, and parking in split zoning areas, where appropriate.

Figure 6-1. Urban Village Concept



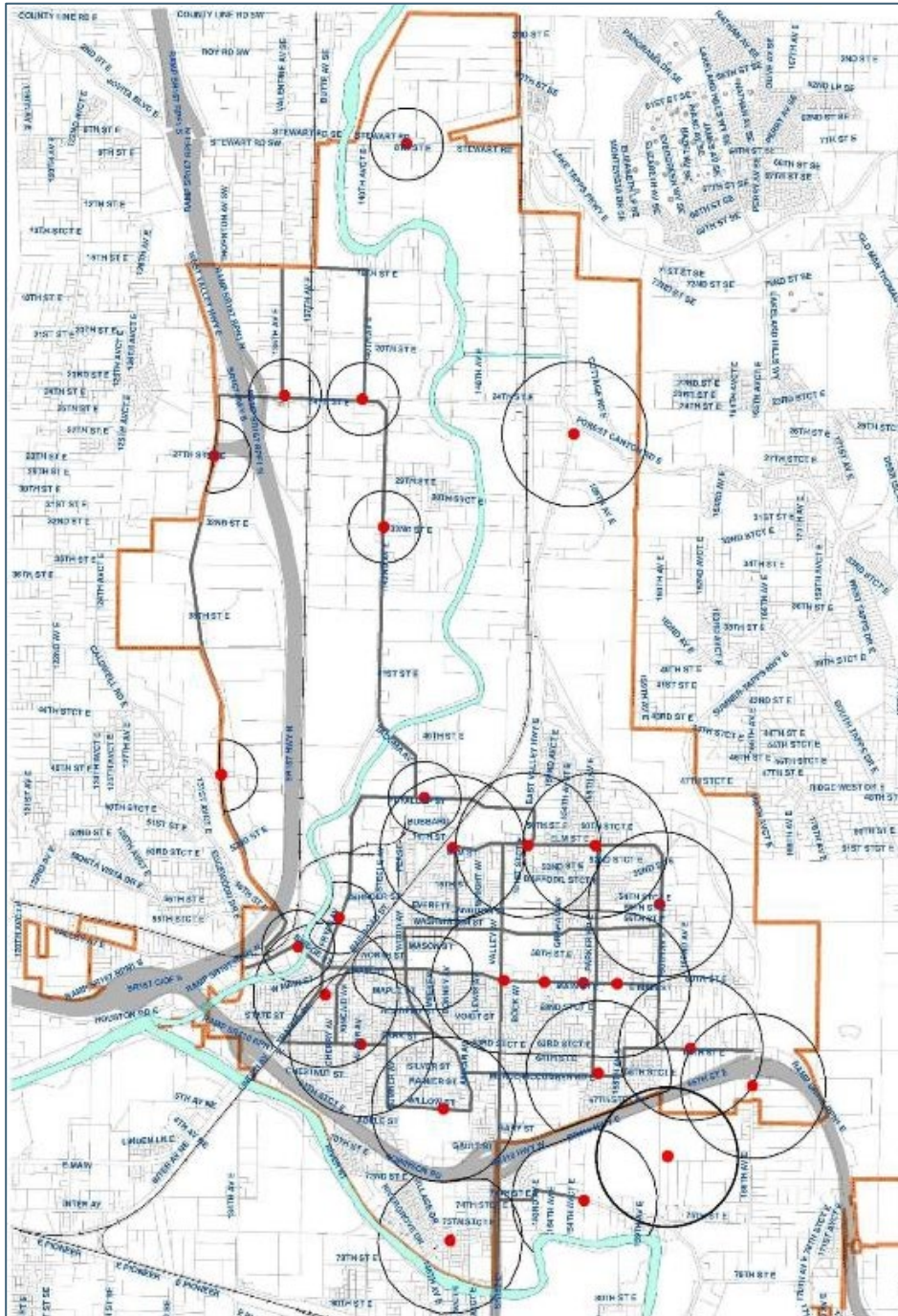
- 2.2. **Neighborhood Centers.** Identify neighborhood centers for residential neighborhoods as a durable focal point for the neighborhood. This may be a singly important building or a multiple-block area that provides an important “community amenity” to the neighborhood. Examples of community amenities are:
- Park or recreation facility, or community recreation center such as the YMCA;
 - Library, City Hall, or other civic/cultural center;
 - School;
 - Commercial services (neighborhood commercial zones);
 - Commuter transit station.
- 2.3. Identify for each neighborhood center a walking distance area. A walking distance area is indicated by a circle with a radius of generally 1,500 feet (one-quarter mile) and an estimated walking time of approximately 5 minutes.
- 2.3.1. Encourage a mix of residential-scale civic, commercial, and service uses and other community amenities to locate in neighborhood centers and within the walking distance area. Small community parks or greens, or similar neighborhood gathering spaces, should be established where appropriate.
- 2.3.2. Together with Pierce Transit and other agencies, explore the feasibility of a transit system for Sumner that is cost-effective and is based on a network of transit stops and transit linkages connecting the neighborhoods to each other and to the commuter rail stations.
- 2.3.3. In establishing transit stops and linkages, give priority to improvements located within walking distance of neighborhood centers and in neighborhoods most in need of transit options.
- 2.4. In recognition of the need for a variety of housing, allow through the Comprehensive Plan and Zoning Code a mix of residential uses as appropriate to the character of the particular neighborhood.

- 2.5. Through the use of form-based code, street and design standards, promote pedestrian and bicycle friendly streets with trees and other amenities that enhance the streetscape.
 - 2.5.1. Prioritize sidewalk improvements within neighborhood centers' walking distances, ensuring adequate and accessible sidewalks, ramps, and street crossings.
 - 2.5.2. Ensure that streetscape amenities, such as sidewalks and street trees, are equitably distributed amongst neighborhoods.
- 2.6. Create unique and safe pedestrian crossings at major intersections through street and crosswalk design and incorporation of art.
- 2.7. In conjunction with the Sumner-Bonney Lake School District, and the Dieringer School District, encourage the location of schools within walking distance of a majority of the population they are intending to serve.

Figure 6-2. Example of a Community Amenity



Figure 6-3: Neighborhood Centers and Walking Distance



3. Reinforce the Town Center Plan area as the commercial and cultural center of Sumner.

- 3.1. Establish the Town Center Plan area as the community core encouraging a combination of commercial, civic, cultural, recreational, and residential uses.
- 3.2. In cooperation with Pierce Transit and Sound Transit, establish the Town Center area as the intra-community transit hub.

- 3.2.1. Where feasible, create transit linkages from all neighborhoods in Sumner to the transit hub.
- 3.2.2. Prioritize the establishment of a transit service along Main Street between East Sumner and the Town Center.
- 3.3. Apply a form-based code and/or design review process for new and expanded uses in the Town Center. Any future amendments to the Sumner design guidelines should include consultation with the downtown business association(s), Chamber of Commerce, historic preservation organizations, other civic groups, and residents.
- 3.4. Within the Town Center area, promote the core area as the historic “downtown.” This is generally the area one block north and south of Main Street, within the Historic District and Station District boundaries.

Figure 6-4. Area of the Historic Downtown



- 3.4.1. Through the Comprehensive Plan and Zoning Code and form-based code, ensure a central role of the historic central business district, and limit competitive uses as appropriate.
- 3.4.2. Maintain a high quality and attractive appearance. Work with downtown business association(s), Chamber of Commerce and others to seasonally decorate Downtown with decorations, hanging baskets, lights, etc.
- 3.4.3. Provide and fund maintenance of public restroom facilities for the Downtown.
- 3.4.4. Implement the actions and strategies outlined in the 2021 Main Street Visioning Plan for the downtown core area.

- 3.5. Subject to a form-based code and design review, encourage infill residential development in the Town Center, such as “mixed use buildings” (multifamily units above ground-floor commercial), and “mixed use developments” (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core.

Figure 6-5. Mix of Uses - Commercial on ground floor, residential above



- 3.6. The City should, in partnership with the downtown business association(s) and Chamber of Commerce, actively recruit and promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in the Town Center, away from Main Street and Alder Avenue and designated Activity Nodes.
- 3.7. Encourage more housing in the Town Center to strengthen downtown businesses, take advantage of the commuter train, offer a range of housing in the community, and to provide an active, social character in the daytime and evenings.
- 3.8. Allow dining and other retail activities in the street right-of-way where adequate public sidewalk widths are found and explore the potential for seating space in the form of “parklets” in the right of way and in alleys where appropriate.
- 3.9. Provide for community festivals, outdoor markets, performing arts, or other community events and activities for all ages and backgrounds to promote business and activities in the Town Center, and particularly in the historic downtown core.
- 3.10. Ensure that the Town Center is a clean, safe, and convenient neighborhood, and that it maintains a high quality and attractive appearance.
- 3.11. Enhance “wayfinding” to and throughout the Town Center. Have signs on the State routes, at gateways, landmarks, the river trail, public spaces, public parking and other areas.

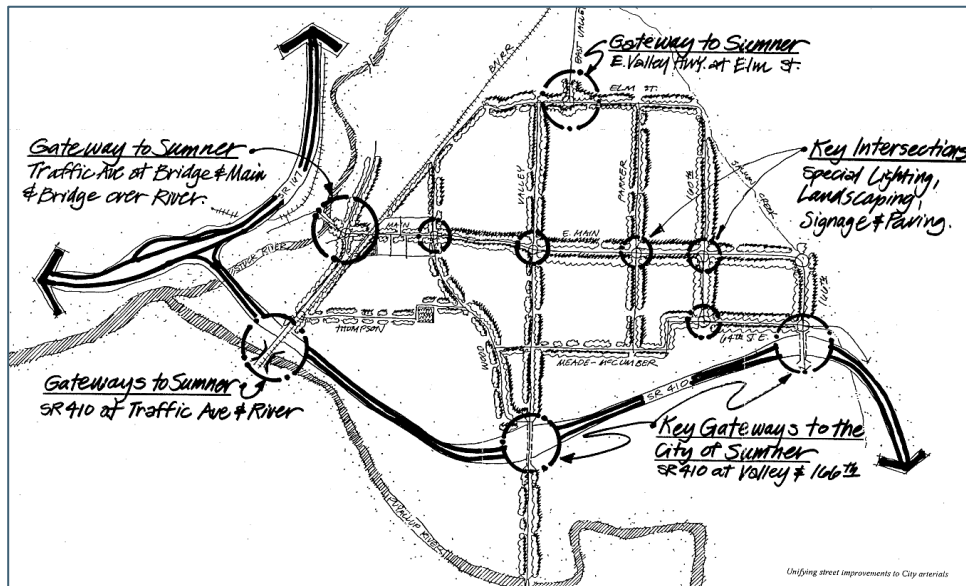
- 3.12. Improve existing public parking lots with signage, landscaping, lighting, and drainage.
- 3.13. Support alternative approaches to required parking for retail, eating and small commercial services establishments in the Town Center, such as reduced parking and credits for on-street and off-site parking, to encourage such businesses that are patronized by nearby residents.
- 3.14. Prohibit franchise architecture within the Town Center and regulate design through form-based code and design and development guidelines.
- 3.15. Discourage, and in some cases prohibit, drive-thru businesses in the Town Center and on Main Street to encourage pedestrian oriented design and uses.
- 3.16. Through the use of form-based code require new development within the Town Center to provide pedestrian amenities such as landscaping, plazas and fountains and buffers where appropriate.
- 3.17. Adopt a “form-based code” in the Town Center to ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.
- 3.18. Development along Traffic Avenue should be in a range of 4-6 stories and be of a mid-rise urban style and provide for underbuilding parking.
- 3.19. The height in the Historic Subdistrict should be 3-4 stories to protect and preserve the small-town character and scale of Main Street and reduce conflicts with adjacent residential uses.
- 3.20. Ensure that adequate off-street parking is provided for multi-family development that is reflective of the transit-oriented nature of the Town Center Plan area without requiring expensive construction of parking that exceeds demand.
- 3.21. Every 5 years following adoption of the Town Center Plan conduct a study reviewing parking utilization and parking issues and make policy adjustments as needed.

4. Establish a community entry statement into and out of Sumner.

- 4.1. Through street standards, design guidelines and land use regulations, promote all entrances to the City, including Traffic Avenue and Valley Avenue, 166th Street as gateways to the community. Gateways should be located at key street intersections or along major vehicular routes. Gateway design standards for community entrances, as described in the 2003 Urban Design Concept Plan, shall be applied.
 - 4.1.1. Gateway intersections identified in the 2003 Urban Design Concept Plan and in later years by the City Council include the following:
 - Traffic Avenue at SR410
 - Traffic Avenue at Old Cannery Bridge (now Cannery Way Bridge)
 - Valley Avenue at SR410/Orting Highway
 - 166th Avenue East at SR410

- East Valley Highway at Elm Street
- 24th Street at SR167 interchange (2024)
- Tacoma Ave at Puyallup Ave in MIC (2024)

Figure 6-6. Concept for Gateways



- 4.2. Require pedestrian and bicycle-oriented amenities and facilities at neighborhood centers and civic and community uses.
- 4.3. Work with stakeholders to visually and functionally link the Main Street Corridor from Highway 167 to the East Sumner Urban Village.
 - 4.3.1. Implement the actions and strategies in the 2002 East Main Street Design Strategy to promote pedestrian-oriented development and a pedestrian-friendly streetscape along Main Street.
 - 4.3.2. Establish a consistent and attractive streetscape along the extent of the corridor, such as through the use of flower baskets, pedestrian amenities and wayfinding features.

5. *Provide for open space and recreation and protect sensitive areas from degradation.*

- 5.1. In reviewing plans and development proposals, consider both long- and short-term environmental impacts and encourage design that complements the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.
- 5.2. Promote the preservation of the natural terrain, drainage, and vegetation of the community.
- 5.3. Provide appropriate infrastructure to ensure environmental quality.

- 5.4. Promote the efficient use of renewable resources, water and energy through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling.
- 5.5. Promote adequate provision of open space and recreation uses through implementation of the Parks and Trails plan.
- 5.6. Encourage tree planting in the Town Center and along major community streets and in public open spaces.
- 5.7. Maintain Sumner's Tree City USA designation through supporting the urban forestry program for maintaining and restoring tree canopy throughout the city.
- 5.8. Maintain Reuben A. Knoblauch Heritage Park as a key open space in the downtown and support activities and events that complement downtown businesses and residences.
- 5.9. Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.

6. *Promote a compatible and varied mix of land uses across the city.*

- 6.1. Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected and encouraged.
- 6.2. Where appropriate, utilize subarea planning to ensure that newly annexed and developed areas promote a walkable, transit-friendly neighborhood with pedestrian-friendly streets and a varied mix of land uses that are compatible with, and provide connections to, surrounding areas.

7. *Promote the movement of people and goods and lessen the reliance on the automobile.*

- 7.1. Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets, pedestrian paths, and bike paths should be provided to create a system of fully-connected and interesting routes to all destinations. Street design should encourage pedestrian and bicycle use and discourage high speed traffic.
- 7.2. All new development shall provide appropriate pedestrian connections that connect residential areas to nearby commercial areas, recreation areas, transit stops, and community or civic centers that provide services.
- 7.3. Transit station traffic should be discouraged and limited on neighborhood streets, and instead directed to arterials and freeways.
- 7.4. Work with Sound Transit, Pierce Transit and other providers to explore ways to reduce through-traffic in Sumner, such as additional park and ride sites outside of Sumner and shuttle services.
- 7.5. To lessen strip-commercial development and continued reliance on the automobile in new developments, encourage a balance of uses along East Main Street. Front-yard parking shall

be prohibited and interconnection of all parking lots shall be required where appropriate. Highway-oriented uses which rely on the private automobile for their primary source of access shall be limited.

- 7.6. Pedestrian-friendly streets with shade trees as well as landscaped boulevard medians shall be included in street standards for industrial and commercial areas where practicable.
- 7.7. New development shall provide appropriate improvements and connections to the city street grid, as shown in adopted City policies, City street plans, and neighborhood circulation plans, in order to promote a connected street system that increases walkability and diffuses traffic.
- 7.8. Enhance circulation in the Town Center by implementing the Town Center Plan street prototypes and cross-sections.
- 7.9. Complete Sumner's segments of the nonmotorized regional trail system along the White and Puyallup Rivers, and support connections from all neighborhoods, downtown and employment centers to this regional trail.

8. *Promote the development of the Manufacturing/Industrial Center (MIC) and ensure integration and compatibility of this area with adjacent neighborhoods and encourage pedestrian and transit connectivity and access.*

- 8.1. Require development in the MIC to provide adequate screening, landscaping, and pedestrian amenities, and to employ good design principles to ensure an attractive, functional employment center.

7. Family and Human Services

Introduction

The Growth Management Act (GMA) stipulates mandatory and optional elements in a comprehensive plan. Family and human services are among the optional elements considered by communities. The purpose of this element is to identify where the City of Sumner can support services through policies, programs, and actions to help empower community members to be healthy and safe.

Goals, Policies, and Objectives

1. Support collaborative and cost-effective human services to meet community needs.

- 1.1. Utilize the following criteria when supporting, funding, and evaluating human services:
 - 1.1.1. Demonstrated Need. Programs should address specific, identified needs.
 - 1.1.2. Priority Needs. Programs should serve the basic human needs of the community with a strong emphasis on affordable housing, food security, domestic violence prevention, and substance abuse prevention.
 - 1.1.3. Accountability. Support activities that meet applicable performance standards, are monitored and evaluated and provide measurable outcomes.
 - 1.1.4. Families. Emphasize programs which support strong, healthy, and nurturing families.
 - 1.1.5. Diverse Funding Support. Prioritize programs that have multiple funding sources so as not to be dependent on one. For example, municipalities could partner with private agencies, businesses and with public funding agencies to share the expense of providing service.
 - 1.1.6. Accessibility. Support local programs that are affordable, physically accessible, and help meet the needs of communities affected by poverty, exclusion, and discrimination, and other underserved communities.
 - 1.1.7. Feasibility. Prioritize programs that have a history of success and that have the necessary resources to provide the services.
 - 1.1.8. Coordination. Support programs that have demonstrated the ability to coordinate with other human service delivery systems on both the local and regional levels.
 - 1.1.9. Consistency with existing services and plans. Support proposals that are consistent with the goals of the Sumner Comprehensive Plan.
 - 1.1.10. Community Partnerships/Involvement. Encourage programs that promote the active participation of the Sumner community in their development and implementation.

- 1.1.11. Community Information and Education. Encourage programs and activities that develop and implement a community education plan to increase the community's awareness of services and resources.
- 1.2. Work collaboratively with the Sumner-Bonney Lake School District and other human service organizations (e.g., faith-based, human service providers, health care agencies, not-for-profits) to coordinate the implementation of these goals, policies, and objectives.
 - 1.2.1. Participate in an annual Sumner/Bonney Lake community summit.
 - 1.2.2. Following the community summit, meet with human service providers and citizens to advise and recommend to the City ideas and suggestions to address emerging issues.
 - 1.2.3. Support educational initiatives in the Sumner-Bonney Lake and Dieringer Schools that focus on violence prevention and reduction.
 - 1.2.4. Coordinate with human service providers to advise and recommend to the City Council ideas or suggestions to address needs and concerns identified by providers.
 - 1.2.5. Support the identification of community needs through a variety of accessible, inclusive methods that may include surveys, needs assessments, focus groups, or using existing data.
 - 1.2.6. Work with human service providers in their efforts to attain grants.
 - 1.2.7. Support the presence of school resource officers in our schools and other school safety programs.
 - 1.2.8. Support programs that provide after school and evening activities for youth.
 - 1.2.9. Partner with other human service agencies to regularly inventory community services and programs.
- 1.3. Support local food banks and other no-cost food support programs by disseminating information, creating supportive development regulations and fees, and pursuing funding sources.

2. *Support human services programs that focus on community health and safety.*

- 2.1. Provide human services that directly relate to other City services and programs and facilitate the delivery of services with emphasis on families, prevention and education.

Land Use and Zoning:

- 2.1.1. Develop land use policies, development codes, charges, system impact fees, and other actions that encourage human service programs for all segments of the population in the community.

Healthcare and Drug Prevention:

- 2.1.2. Use non-financial jurisdictional resources (i.e., grant applications, support letters, or shared space to support primary health facilities).
- 2.1.3. Continue to prohibit marijuana and cannabis businesses including retail sales, cultivation, and processing.
- 2.1.4. Promote basic safety education and activities that may include bicycle safety information, driver education for seniors and teens, and fire prevention.
- 2.1.5. Maintain a Comprehensive Emergency Management Plan.
- 2.1.6. Support school-based education programs that prevent alcohol and tobacco use.
- 2.1.7. Support substance abuse referral programs and local efforts to educate the public and City employees about substance abuse and local services.

Childcare Availability and Affordability

- 2.1.8. Support efforts for adequate and affordable childcare and adult care including:
 - Promote land uses, development codes, and fees that encourage day care.
 - Support neighborhood, school and business plans, and both public and public-private projects that include provision for childcare.
- 2.2. As prescribed in the City of Sumner's Housing Element, support the development and implementation of programs that increase access to housing for all stages of life.
 - 2.2.1. Support programs, partnerships, and regulations that promote adequate access to emergency and temporary housing.
 - 2.2.2. Support programs and regulations that increase access to housing for underserved populations and people of diverse backgrounds, ethnicities, and socioeconomic levels.
 - 2.2.3. Through the Housing Element, provide incentives for the development of affordable senior housing and other options to allow ageing in place.
- 2.3. Consistent with the City's Transportation Element, provide access to adequate and affordable transportation.

Figure 7-1: Sumner Senior Center



- 2.3.1. Work with Pierce Transit and Sound Transit to support programs for mass transit that is affordable, accessible, and safe.
- 2.3.2. Recognize the importance of adequate and accessible roads, and sidewalks.
- 2.4. Support programs that assist and empower older adults.
 - 2.4.1. Support the Sumner Senior Center and its programs.
 - 2.4.2. Encourage the development of programs to extend services to isolated older adults.
 - 2.4.3. Assist in activities that educate the community on aging concerns.
 - 2.4.4. Develop response and recovery procedures that speak to the specific needs of the population served by the Sumner Senior Center.
 - 2.4.5. Promote programs within City government, local businesses, and schools that provide opportunities for older adults to work and volunteer in the community.
- 2.5. Support youth programs and involve youth in planning and implementation.
 - 2.5.1. Support the development of youth activity programs that may include late-night, after-school, or vacation activities.
 - 2.5.2. Support and have city staff participate in forums as a method of hearing from youth about their concerns and to gain their involvement.
 - 2.5.3. Encourage involvement of Sumner staff, officials and the business community in outreach to Sumner-Bonney Lake and Dieringer Schools Districts to further career exploration activities for youth that may include mentoring, reading programs, and job shadowing.
 - 2.5.4. Encourage youth involvement in activities that raise awareness of government roles and services.

Figure 7-2: Youth at a local parade



3. Support better access to and education about counseling services and intervention.

- 3.1. Educate public safety staff on crisis intervention and referrals.
- 3.2. Support access to human services in the judicial system.
- 3.3. Encourage the coordination of police, fire and social service providers regarding local human service resources and referral programs.

4. *Support programs to address domestic violence.*

- 4.1. Support programs that provide referrals for victims of domestic violence.
 - 4.1.1. Support the training of public safety staff in appropriate response to issues and referral related to domestic violence.
 - 4.1.2. Work with other jurisdictions to coordinate prosecution responses to domestic violence cases.
 - 4.1.3. Support emergency shelter programs to provide a safe refuge for families in transition due to domestic violence.

5. *Support programs and services that promote a healthy and active lifestyle.*

- 5.1. Promote and encourage the location of a grocery store in the Town Center.
- 5.2. Remove barriers or provide incentives for the location of medical facilities in the community and promote other options for affordable medical care.
- 5.3. Encourage and promote events that encourage active lifestyles such as running and biking events.
- 5.4. Complete and expand the Sumner trail system and look for areas to partner with others on additional recreational facilities.
- 5.5. Ensure parks and recreation facilities are distributed equitably throughout the community and accessible within walking distance of most residences.
- 5.6. Maintain a safe, attractive, interconnected sidewalk system to increase neighborhood walkability and connections to services.

6. *Support programs and services that advance climate resiliency and emergency preparedness in the community.*

- 6.1. Develop resilience hubs for distribution of resources and aid during emergencies that are readily accessible to all neighborhoods.
- 6.2. Ensure that parks and recreation facilities serve as refuges during extreme heat, cold, and smoke events.
 - 6.2.1. Identify indoor recreation facilities and potential refuges with the YMCA, School District, Senior Center, and other partners.
 - 6.2.2. Provide tree canopy and shade elements in parks and public lands.
 - 6.2.3. Enhance shoreline public access as a refuge from heat island effects, while protecting natural functions/features.

8. Economic Development and Employment

Introduction

The Growth Management Act provides a planning goal for Economic Development, although an economic development element is not mandatory. There are standards proposed in the Act, should economic development elements be required in the future [RCW36.70A. (7) And (9)]. The Countywide Planning Policies provide a framework for economic development and employment policies within Pierce County. The Puget Sound Regional Council (PSRC) has adopted the Multicounty Planning Policies in VISION 2050 for a regional context.

The policies identified below are intended to satisfy the economic development requirements of the Growth Management Act, the Countywide Planning Policies, and the Multicounty Planning Policies. Economic development policies relate closely with other land use, infrastructure and environment policies and cannot be considered alone. Economic development should be used to drive the other goals and policies and never used solely for the sake of economic development.

As of 2021, an estimated 19,300 people commute to Sumner for work, while 4,300 residents work outside of city limits, and only about 500 people both work and live in Sumner (according to 2021 data from Census OnTheMap). Sumner's workers mostly live in other areas of Pierce County, with some commuting from King County as well. The city is a major employment hub regionally, largely due to the Sumner-Pacific Manufacturing Industrial Center (MIC), which has been designated as a "regional center" by PSRC. This creates a unique context for economic development in the city.

Goals, Policies, and Objectives

- 1. *Seek and maintain a strong and diverse economy for all people with a variety of different types and sizes of business, industry and employment.***
 - 1.1. Provide adequate land for different kinds of businesses and development to support this element and identify strategic redevelopment opportunities as land supply decreases.
 - 1.2. Implement this Element in order to provide jobs for local residents, build and sustain a broad long-term tax base, drive redevelopment, create short-term tax base and improve infrastructure as a means of achieving other goals and policies within this plan. The provisions of this Element shall be used solely to drive the other elements of this Plan.
 - 1.3. Work with the local Destination Marketing Organizations, such as downtown associations and regional visitor bureaus to promote and market the economic development potential and amenities of the City and recruit new businesses.

- 1.4. Work towards effective communication between the City and industrial and business interests through the city newsletter, annual visits, social media, and the City's website.
- 1.5. Build upon existing strength of community, small-town character, and location to drive future policy decisions and actions.
- 1.6. Encourage agritourism that expands options for local farms and open other markets for locally grown agricultural products such as farm-to-table programs and tourist activities to support farming around the City.
- 1.7. Encourage industries and industrial processes that are sustainable and environmentally responsible and that contribute to the local community.
- 1.8. Develop and sponsor a City-wide comprehensive and strategic economic development and marketing plan to implement the applicable sections of this plan.
- 1.9. In collaboration with regional partners, implement a business retention program, which would regularly communicate with and support existing businesses.
- 1.10. Recruit restaurants, cafés, microbreweries, public facilities and other similar uses, which serve as gathering spots within the community and encourage evening activity in commercial areas.
- 1.11. Maintain and enhance a partnership with stakeholders downtown including downtown associations, transit providers, business owners, property owners, residents, and others.
- 1.12. Provide and facilitate committed ongoing communication and collaboration between City and private sector leadership toward the goal of business development.
- 1.13. Monitor the success of programs and projects based on common performance measures and adjust as needed.
- 1.14. Periodically evaluate and review Town Center planning efforts. Adjust implementing methods to changing circumstances while using the Town Center vision as a continuing guidepost.
- 1.15. Explore the potential for and encourage the development of retail and shopping opportunities near major freeway interchanges that would serve a regional market.
- 1.16. Keep the momentum for Downtown revitalization through implementation of many economic development, infrastructure and housing initiatives identified in the "Projects and Actions" section in the Town Center Plan. Provide for strategies civic investment and an ongoing partnership with stakeholders to implement the various initiatives.
- 1.17. Work with Pierce County and other cities and towns to coordinate economic development strategies and activities to support regional goals and objectives.
- 1.18. Coordinate economic development policies and activities with other Comprehensive Plan Elements.

2. *Support the necessary infrastructure and programs to develop a talented and qualified workforce that can afford to live near where they work.*

- 2.1. Partner with educational providers to explore location of higher education opportunities, such as a college annex, within the city.
- 2.2. Partner with education and employment organizations and businesses to offer high-quality and accessible career exploration programs that give all people opportunities to learn, maintain, and upgrade skills necessary to ensure an adequate and trained labor pool.
- 2.3. Encourage cultural activities such as visual, literary and performance art that involve the community and create a regional identity that celebrates diversity.
- 2.4. Plan for adequate residential and commercial land to support a substantial work force and reduce worker commute times and maintain a good jobs to housing balance.
- 2.5. In conjunction with transit providers, encourage an adequate transit system to serve the employment centers to allow connections to the transit centers within and outside the City and ensure transit access for those coming to work in the city.
- 2.6. Encourage adequate childcare and adult care facilities to support a diverse work force.
- 2.7. Monitor demographic trends to ensure City policies and direction are consistent with the needs of the local populations, with an emphasis on communities affected by poverty, exclusion, and discrimination and other underserved communities.
- 2.8. Organize City government to provide a business contact or other mechanism to ensure businesses have easy and reliable communication with City officials and leadership.

3. *Assure that adequate public facilities and public services are available to support industrial and commercial development.*

- 3.1. Develop and maintain accurate and up-to-date capital facility plans for domestic water, storm sewers, sanitary sewers, transportation and parks.
 - 3.1.1. Work with new development and other agencies to utilize effective and cooperative measures to fund capital facility costs.
 - 3.1.2. Review permit procedures bi-annually in conjunction with preparing the City's budget to ensure fees, processing times and resources are sufficient to meet these goals.

4. *Encourage a supportive environment for small businesses, locally-owned businesses, and women- and minority-owned businesses as a vital part of the City's economic framework.*

- 4.1. Allow for home occupations within residential zones consistent with the residential character.
- 4.2. Encourage mixed-use areas where small scale commercial and light manufacturing uses can occur consistent with other Comprehensive Plan policies.

- 4.3. Ensure regulations accommodate a variety of lot sizes and land uses for small business development.
- 4.4. Market opportunities for small business and recruit small businesses for appropriate locations within the city.
- 4.5. Use land use and other regulatory controls to allow for a mix of small businesses, chain and franchises operations, light manufacturing, artisan shops, craft production, small research and development businesses, and other innovative and emerging trends. Promote “innovation districts” in appropriate locations.

5. *Improve the resiliency of the local Sumner economy to climate change and reduce its carbon emissions where practicable.*

- 5.1. As part of Sumner’s Comprehensive Emergency Management Plan, identify potential measures that could support a sustainable economic recovery for businesses after a disaster.
- 5.2. Support local businesses’ efforts to bolster climate preparedness and continuity of operations by connecting them with programs that increase resiliency, such as onsite renewable energy generation, energy storage, and back-up power.
- 5.3. Where possible, support programs and agencies that work with employees and businesses to facilitate a green jobs pipeline.
- 5.4. Support the resilience of the local food economy by encouraging farmers markets and expanding community gardening opportunities on private development sites and nonprofit agency sites.
- 5.5. Promote purchasing from local businesses to support economic development and reduce emissions associated with the transportation, production, and distribution of goods.

6. *Promote downtown as the town’s cultural, historic and activity center of the entire community.*

- 6.1. Invest adequate resources in ways that strengthen downtown. Whenever possible, these monies shall be used to leverage additional dollars from public and private sources for improvements.
 - 6.1.1. Partner with the Chamber of Commerce, downtown business association(s), and other agencies to work with local lenders to secure sources of capital for existing businesses’ building improvements and/or business expansion.
 - 6.1.2. Assist with business expansions and new establishments such as through pre-application review and consultation and permit fast track for businesses that are proven catalysts for economic growth such as:
 - Restaurants and eating establishments in the downtown.
 - Manufacturing and businesses that provide family-wage jobs.
 - Alternative energy that furthers the community’s commitment to new technologies.
 - Aerospace and other products or services that bring in money from outside the region.

- 6.1.3. Support investment in resources and programs that enhance public safety downtown.
- 6.2. Every 5 years, in conjunction with interested parties, examine the needs for downtown parking within the Town Center and develop methods for providing attractive, safe, accessible, effective and well utilized parking. Modify and adjust on and off-street parking which serves retailers, other businesses, residents, and major employers downtown shall be implemented based on the 5-year parking study.
 - 6.2.1. Redesign and install new parking lot signs that are strategically placed throughout the downtown area. Ensure designation of short and long-term parking, and enforcement of parking limitations.
 - 6.2.2. Improve safety by creating additional lighting and pedestrian facilities in parking areas.
 - 6.2.3. Implement short-term, medium-term, and long-term parking strategies as indicated by the 5-year parking study.
 - 6.2.4. Encourage businesses conducive to shared parking, or uses that provide onsite, under-building parking.
- 6.3. Promote a diversity of uses within the downtown, which support the activity base by providing employment, recreational, residential, and a variety of commercial activities.
- 6.4. Give downtown locations highest priority when siting city and government facilities such as libraries and administration offices, which have significant employment or destination potential.
- 6.5. Adopt incentives and actively seek out and recruit developers to construct more housing in and near Downtown to strengthen Downtown businesses that will in turn offer goods and services for residents.
- 6.6. In conjunction with interested parties, improve the visual appearance of downtown through public and private measures for beautification, facade improvements, and preservation of historic properties, design strategies, maintenance, and streetscape improvements.
- 6.7. Work with other organizations to promote civic and community events which foster community pride and promote the downtown and other critical commercial areas.
- 6.8. In conjunction with transit agencies, explore linking downtown with the other parts of the city with a community-based transit system, which compliments the special needs of downtown.
- 6.9. Work with building owners to encourage viable uses on the second floors of existing buildings by exploring options in the building and fire codes.
- 6.10. Work with downtown stakeholders and the Sumner Downtown Promotion Association to develop and implement a detailed downtown "Main Street"-based revitalization strategy addressing organization, design, economic restructuring and promotion.

- 6.11. Promote and market the redevelopment potential of key downtown through partnering with property owners, developers, Sound Transit, and other key parties.
- 6.12. Continue to provide and fund maintenance of public restroom facilities for the downtown business district.
- 6.13. Create 350-500 new housing units in the Town Center in close proximity to the train station and existing businesses.
- 6.14. Promote businesses that meet the daily needs of residents - markets, dry cleaners, laundromats, eateries, pharmacies, banks, pet stores, beauty salons/barbershops, etc.
- 6.15. Encourage more mixed commercial/service/housing uses in the Town Center, along Traffic and Fryar Avenues. Discourage light industrial zoning in the Town Center in favor of mixed-use zoning unless there is an educational or artist component.
- 6.16. Create a market strategy to attract new business compatible with long-range plan and zoning intents, and strengthen and increase the variety of commercial shopping and service opportunities for the community. Allocate resources to implement market strategy.
- 6.17. Coordinate with downtown business association(s) and Chamber of Commerce on education, e.g. business management, business promotion ideas, entrepreneurship, etc.
- 6.18. Create a mixed economy Downtown that provides basic and specialty retail, services, destination attractions, hospitality and entertainment uses.
- 6.19. Accommodate mixed use developments with commercial uses on the ground floor. Require that mixed use buildings within the Town Center and that have the potential for businesses on ground floor install ceiling heights and infrastructure for future conversion of residential to commercial spaces.
- 6.20. Reduce the parking requirement for multi-family developments within the Town Center to facilitate development that accommodates the transit rider, anticipates lower car ownership in this area because of transit, and changing trends and services related to transit and transportation such as on-demand services and autonomous vehicles.
- 6.21. Within the Town Center allow for visitor parking for multi-family and portions of commercial parking to be counted toward parking capacity for such developments. Smaller retail, restaurants, and other desirable pedestrian-oriented businesses should be allowed without an off-street parking requirement provided they agree to not protest the formation of a future local improvement district for the construction of public parking in the Town Center.
- 6.22. Pursue creative solutions to accommodate parking for development through the creation of local improvement districts and other means.
- 6.23. In the Town Center structured and in-building or under-building parking is preferred over surface parking. Limit the development of surface parking.

7. *Support the Sumner-Pacific Manufacturing/Industrial Center (SPMIC) as a vibrant and successful industrial employment area with regional and local significance.*

- 7.1. Partner with the Ports of Seattle and Tacoma on regional economic development initiatives related to the industrial sector.
- 7.2. Expand outreach to and maintain regular dialogue with the SPMIC business community.
- 7.3. Connect local businesses with workforce development programs of regional organizations like the Pierce County Workforce Development Council and the Washington State Department of Commerce.
- 7.4. Encourage partnerships between the local School District, Community College, and SPMIC employers to create paid internship programs for students interested in Manufacturing, Food Processing, or Warehousing employment.

8. *Encourage the SPMIC to retain and grow its existing industrial businesses and attract new businesses.*

- 8.1. Raise the SEPA categorical exemption thresholds for industrial buildings and associated parking and land clearing provided there are sufficient building, grading, and critical area protections in place.
- 8.2. Partner with the Department of Commerce on the Regulatory Roadmap Project, an online site selection tool that distills all local, regional, and state requirements into easy-to-understand checklists for gauging feasibility of sites for manufacturing facilities.

9. *The SPMIC should include a diverse range of small and large industrial businesses.*

- 9.1. Promote small business growth through incentives, business recruitment, and other forms of support.
- 9.2. Encourage small businesses' development and entrepreneurialism in the SPMIC by partnering with the Ports of Seattle and Tacoma to develop a local incubator for a range of industrial production uses, including food processing.
- 9.3. Encourage the creation of a "specialty manufacturing and artisan district" in the Pacific portion of the SPMIC and where appropriate in Sumner, that promotes the development, production, sale, and distribution of products and services in a street environment with coordinated pedestrian amenities, signage, landscaping, and increased attention to building and site design.
- 9.4. Encourage a modest level of small-footprint businesses in the SPMIC that provide close-by services for workers, such as food establishments, medical services, and childcare.

9. Land Use

Introduction

The Land Use Element plays the central role of correlating land use issues. It provides direction on land use patterns, compatibility, and orderly development. The potential for rapid and incompatible development can be minimized through the coordination with infrastructure plans and through site and building design and buffering techniques. Land Use Element goals, policies, and objectives relate directly to the other elements of the Sumner Comprehensive Plan particularly the Community Character Element, Capital Facilities and Public Services Element, and Transportation Element.

The Comprehensive Plan Land Use Map (Figure 9-3) category descriptions and statistics are found following the goals, policies, and objectives provided below.

The Land Use Element establishes the growth patterns and uses that the community anticipates will be needed to accommodate projected growth over the planning period (to 2044). Pierce County has adopted housing, employment, and population growth targets for Sumner for 2020-2044 as follows:

- 1,985 housing units
- 5,313 jobs
- 4,904 residents

The Sumner-Pacific MIC also must plan for 20,000 jobs total in order to maintain its status as a Manufacturing Industrial Center, per PSRC requirements.

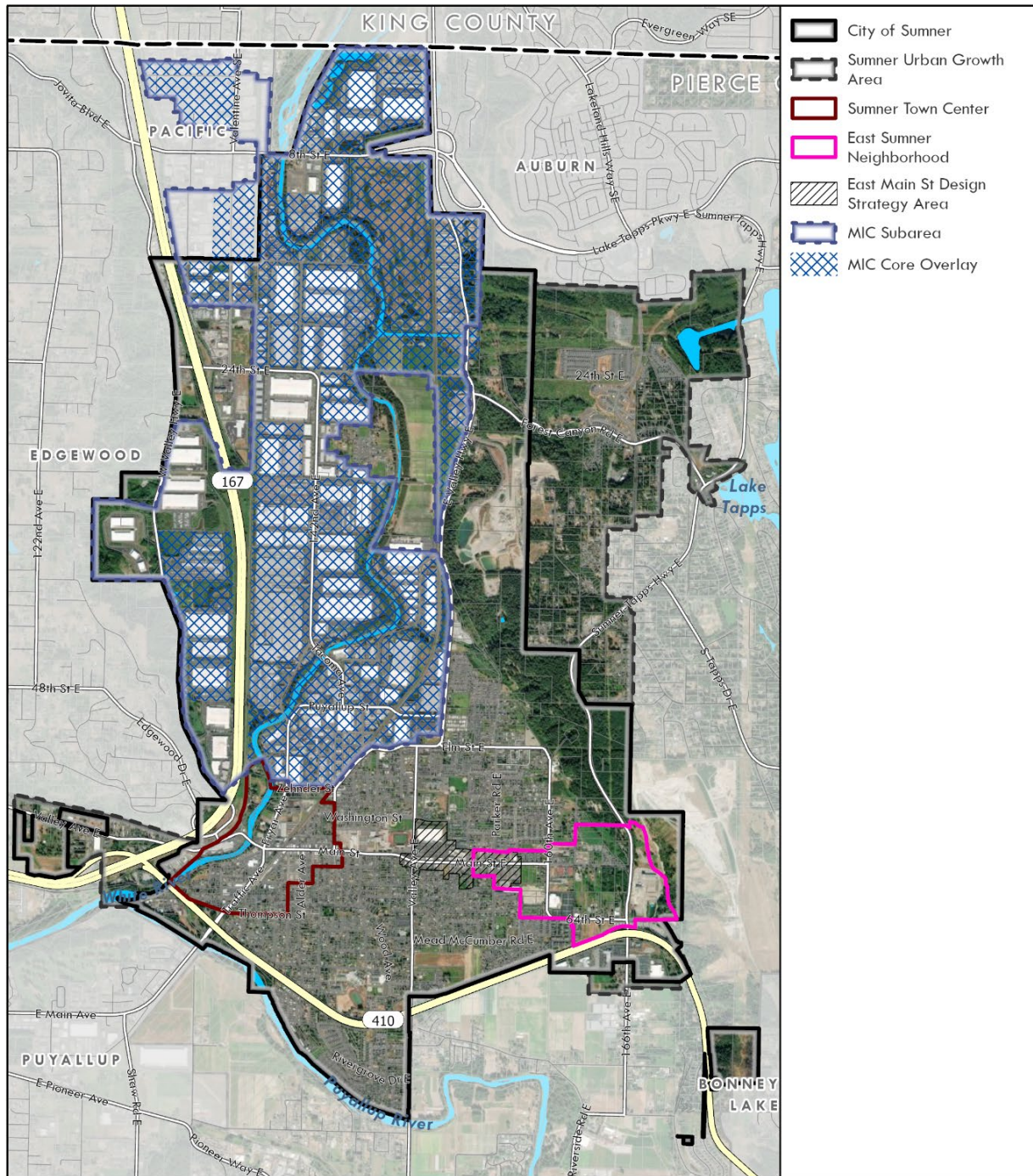
Goals, Policies, and Objectives

1. Provide for a variety of land uses in Sumner while preventing adverse impacts and ensuring consistent implementation of policies and regulations.

- 1.1. Ensure appropriate transitions between land uses so that more intensive uses do not adversely impact adjacent uses.
 - 1.1.1. Maintain the Sumner design and development guidelines and zoning provisions to achieve compatible and attractive new residential, commercial, and industrial uses.
 - 1.1.2. Maintain zoning and subdivision regulations to ensure adequate setbacks, landscaping, and buffering where land use conflicts and impacts may occur.
- 1.2. Encourage infill development on vacant properties with existing public services and public utilities, and new development in areas with existing or planned public facilities.
 - 1.2.1. Review existing capital facility plans and update them as necessary to ensure consistency with land use plans.

- 1.2.2. Review and develop incentive-based programs that would facilitate the development of vacant properties to leverage economic development potential.
 - 1.3. Through the Land Use Element and Community Character Element, strive to balance residential, commercial, industrial and public land uses.
 - 1.3.1. Periodically review development regulations to remove unnecessary requirements and to balance environmental protection, public participation, and housing and economic development goals.
 - 1.4. **Planning sub-areas.** Identify planning sub-areas that warrant further study and special design considerations and/or economic development focus.
 - 1.4.1. Planning sub-areas include:
 - Town Center Plan area
 - East Sumner Urban Village
 - East Main Street
 - Sumner-Pacific Manufacturing/Industrial Center.
 - 1.4.2. Where appropriate, prepare subarea plans to implement the Land Use and Community Character Elements of the Comprehensive Plan. Subarea plans shall specify in more detail the allowable uses, urban design quality, buffering, and protection of critical areas.
 - 1.4.3. Policies in other adopted City of Sumner plans that are identical to policies in the adopted Comprehensive Plan shall be updated automatically when those same Comprehensive Plan policies are updated through the legislative process.
 - 1.5. Integrate existing neighborhood plans, subarea plans, and design strategies into the Comprehensive Plan.
 - 1.6. Implement the land use map and accompanying designation descriptions as presented in the section titled "Land Use Designations" and Figure 9-3 titled "Comprehensive Plan Map" through the adoption and maintenance of the Zoning Map.
 - 1.7. Ensure new development is consistent with the policies of this Plan through implementation of regulations, programs, and project-specific review.
2. ***Consider the potential impacts to Tribal treaty rights related to fishing, hunting, and gathering grounds in land use decisions, including decisions on development patterns, comprehensive plans, and zoning designations.***
 - 2.1. When notified by Tribes of treaty rights in a particular location, incorporate ways to preserve and address treaty rights in land use decisions and designations.
 - 2.2. Ensure that the Tribes are provided timely and sufficient opportunity to comment on significant development projects and land use decisions.

Figure 9-1. Vicinity and Plan Boundaries Map



CITY OF SUMNER Vicinity Map

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

3. *Consistent with the Growth Management Act, designate an Urban Growth Area (UGA) within which urban growth must be encouraged and outside of which growth may occur only if it is not urban in nature.*

- 3.1. Include sufficient areas within the UGA to accommodate the city's projected urban growth and housing needs.
- 3.2. Coordinate with adjacent jurisdictions and Pierce County through joint planning to ensure service provision and development is consistent with the goals of this Plan.
- 3.3. In accordance with the Countywide Planning Policies, promote and participate in joint planning of unincorporated lands within the Sumner Urban Growth Boundary as shown on Figure 9-1.
- 3.4. Request joint planning of lands immediately adjacent to the City limits and the Sumner Urban Growth Boundary including land south of SR-410 and along SR-162. See Figure 9-1.
- 3.5. Joint planning would be completed prior to any modification of the Sumner Urban Growth Boundary and following review of growth demands and capacity.
- 3.6. Consider annexing unincorporated lands addressed in the Sumner Comprehensive Plan and located within the Sumner Urban Growth when initiated by a private party and in order to resolve service conflicts and avoid creating unincorporated "islands".
- 3.7. Ensure newly annexed lands are zoned in conformance with the Sumner Comprehensive Plan Land Use Plan Map.
- 3.8. A subarea plan should be required prior to any large annexation of the Urban Growth Area or request for expansion of the Urban Growth Areas to ensure that newly annexed areas are compatible with and do not adversely affect rural land uses.

4. *Support the Town Center Plan as a "Countywide Center" as it relates to transportation funding.*

- 4.1. Implement the Town Center Subarea Plan (TCP) and Form-Based Code, to support dense, mixed-use development and walkable neighborhoods near the transit center.

5. *Support the Manufacturing/Industrial Center as a designated Regional Manufacturing/Industrial Center.*

- 5.1. Implement the goals and policies in the Sumner-Pacific Manufacturing/Industrial Center Subarea Plan to ensure a coordinated approach to development, environmental review, and strategic capital investments in the Center.

6. *Encourage neighborhood development that supports healthy communities.*

- 6.1. Promote land use planning that supports walkability, tree canopy, access to services that meet daily household needs, access to parks and open space, and access to healthy and culturally relevant foods.

- 6.2. Consider the environmental health and other impacts of land use decisions on overburdened communities (i.e., minority, low-income, Tribal, or indigenous populations that potentially experience disproportionate environmental harms and risks). Encourage the participation of these communities in decision-making processes.
- 6.3. Ensure that adequate landscape screening and trees are provided around sources of significant noise and air pollutants that may affect schools and neighborhoods.
- 6.4. Where feasible, mitigate the environmental health effects of climate change, including air quality, stormwater, and heat impacts, through the acquisition of parks and open space and tree planting, prioritizing overburdened communities.
- 6.5. Engage with the community on the topic of climate impacts and adaptation strategies.
- 6.6. Support energy efficiency and upgrade programs that reduce health risks for vulnerable populations due to extremes of heat and cold.
- 6.7. Adopt land use standards and connect residents to informational resources to mitigate wildfire risk.
- 6.8. Study the potential impacts of a citywide tree retention program on climate resilience and housing development.
- 6.9. Support small-scale agricultural uses in residential developments and local community gardens sponsored by public agencies, nonprofit organizations, and private development.

Land Use Designations:

7. ***The land use designations and target densities described in the sections below are to be utilized in conjunction with the Comprehensive Plan Map, shown in Figure 9-3. These designations guide the zoning districts in the adopted zoning map. Figure 9-2 summarizes the categories and densities of particular districts.***

7.1. Residential

- 7.1.1. Resource Protection: The Resource Protection District applies to areas that have significant natural resources or potential for small- to -moderate-scale agricultural uses. The district's purpose is to: Protect natural resources such as agricultural, mineral resource, fish and wildlife habitat areas from the intrusion of non-resource based development; to promote the conservation of natural resource lands and related activities or operations; and to maintain large areas free of impervious surfaces in order to increase the potential for natural infiltration of rainfall and the retention of natural drainage water patterns, minimizing the need for storm water facilities and increasing the protection of ground water resources.
- 7.1.2. Residential Protection: This designation is applied to areas adjacent to lands in resource production (e.g. agriculture, mineral extraction, forestry) and in sensitive critical areas as appropriate (e.g. landslide/erosion hazard areas). Uses in Residential-

Protection act as a buffer between resource productions and environmentally sensitive areas and higher density/intensity developments. Property owners would be on notice that in adjacent areas resource uses will be encouraged.

The very low densities reflect the absence of City services and the desire to minimize potential land use conflicts when resource production areas cease extraction activities and become more urbanized in the future.

Allowable primary uses include single-family detached homes. Secondary uses include specialty farming, small-scale animal husbandry, home occupations, utilities subject to compatibility criteria, and other uses incidental to and compatible with the primary use.

- 7.1.3. Low Density: This designation (LDR) provides for primarily single-family dwellings and duplexes in areas with current or planned access to City facilities and services. At the higher end of the low density range (LDR-3 at 7-20 du/ac), public transit can more easily be supported. Through a planned residential development permit process, this base density may be increased significantly for affordable senior housing. Low density residential uses provide a transition from the Residential Protection district and protected critical areas to higher density uses. Primary uses include detached single-family dwellings, duplexes, private garages, and other accessory buildings. Secondary uses allowed typically with appropriate criteria include accessory dwelling units (i.e., "mother-in-law units"), adult family homes, assisted living facilities, senior apartments and retirement homes, manufactured home parks and subdivisions, hospitals, educational facilities, utilities subject to compatibility criteria, and churches and religious institutions. Many of these secondary uses may bring a higher number of residents, visitors and vehicle trips than normally associated with low density residential areas. However, allowing such secondary uses reflects the desire to accommodate needed housing and human services uses that can be integrated into the neighborhood.
- 7.1.4. Medium Density: The medium density designation (MDR) is intended to provide for multi-family living to ensure that opportunities to obtain reasonable-cost housing exist for community residents. Primary uses include multi-family housing of various types including duplexes, multiplexes, and low-rise apartments (three stories or fewer), zero-lot line structures, townhouses, condominiums, senior apartments and retirement homes, etc., and may also include single-family dwellings. Secondary uses allowed typically with appropriate criteria can include accessory dwelling units, adult family homes, day care, educational facilities, utilities subject to compatibility criteria, churches and religious institutions, assisted living facilities, limited office/professional buildings, and manufactured home parks and subdivisions. Through a planned residential development permit process, the base density in Medium Density Residential may be increased significantly for affordable senior housing. Medium density developments may require design review to ensure diversity of building

types/avoidance of building form repetition, plan goal consistency, and neighborhood compatibility.

7.1.5. High Density: This designation (HDR) allows for higher density multi-family developments to allow for a broad range of housing choices in areas with existing and planned infrastructure, and to allow for infill development and the reduction of sprawl. Primary uses include multi-family housing of various types including townhouses, condominiums, apartments, etc. Secondary uses can include low and moderate density residential developments, adult family homes, day care, manufactured home parks and subdivisions, and assisted living facilities. New single-family uses are prohibited so as not to take up housing capacity in the high density district, although existing single-family uses may remain. Through a planned residential development permit process, the base density in High Density Residential may be increased significantly for affordable senior housing. This designation should be applied where the following conditions exist:

- The area has access to appropriate services (e.g. near commercial services and transit);
- Where medium density residential or other moderate density use/mixed land use provides a buffer between low density and high density residential;
- A repetition of building forms is avoided in the proposed development;
- Design review will be required to ensure design appropriate to the neighborhood character;
- Adequate public and community facilities exist to support the density.

7.2. Mixed Use

7.2.1. Urban Village: Urban villages are intended to be self-contained mixed use areas with a compact street grid and interconnected pedestrian corridors that promote walkability throughout the neighborhood. They are intended to support a mix of residential, commercial and civic uses. An urban village in Sumner would be something like a “mini-downtown.”

The urban village(s) will provide a focus for neighborhoods outside of the downtown area. Urban villages promote development that is pedestrian scale, transit-oriented and in harmony with the character of the community. Primary uses include retailing and commercial services, banks (with no drive through facilities), professional offices, bed-and-breakfasts, hotels, civic uses, multi-family dwellings of various types including duplexes, townhouses, condominiums, apartments, etc. Secondary uses can include single-family dwellings and accessory dwelling units in residential zones only, and other dwellings such as duplexes and townhomes. Other secondary uses include adult family homes, day care, public and private educational facilities, utilities subject to compatibility criteria, churches and religious institutions, convalescent care and rest homes. Mixed uses, converted residential buildings, converted commercial buildings,

and variable lot sizes are encouraged to ensure pedestrian orientation, visual interest, and historic character protection.

7.3. Commercial

- 7.3.1. Neighborhood Commercial: This designation is intended to provide for neighborhood centers that include convenient retailing, small offices, and other commercial activities principally oriented to adjacent residential areas and neighborhoods. Primary uses include convenience stores, eating and drinking establishments, personal service shops, day care, dry cleaners, laundromats, and other uses that serve primarily the immediate neighborhood, and are not auto-oriented. Secondary uses include public/quasi-public uses such as parks and other similar facilities as well as utilities subject to compatibility criteria. Higher density residential developments may also be allowed in specified neighborhood commercial areas where integrated appropriately with the commercial uses and surrounding neighborhood.
- 7.3.2. General Commercial: This designation is applied to areas outside of the downtown area and urban villages where retailing, commercial, and office uses serving a larger market are promoted. While the uses accommodate automobiles to a greater degree, buildings with a street orientation, screened parking, and ample landscaping ensure more attractive commercial areas. Primary uses include retail businesses, automotive sales, professional offices, medical services and clinics, hotels, theaters, restaurants, personal service shops. Secondary uses include convenience stores, utilities subject to compatibility criteria, and light manufacturing, assembling, and repairing where accessory to retail uses. General commercial uses may occur in different forms to encourage specific uses. For example, retail or commercial uses near large employment centers may be limited to commercial uses to support workers. Multi-family residential uses may be incorporated (on second floors above retail) where they can be integrated into the proposed development and are compatible with the surrounding neighborhood. Existing general commercial areas will be encouraged to incorporate pedestrian-oriented elements and positive design features such as additional landscaping, reduced front setbacks, screened parking, and pedestrian scale street fronts, lighting and signage. New development in general commercial areas will require design review to ensure these goals are met. Areas with this designation should provide an appropriate mix of facilities for all transportation modes including transit, bicycle, and pedestrian modes.
- 7.3.3. Interchange Commercial: This designation applies to areas surrounding the 24th/28th street interchange on SR167 and the area south of SR410 near the 166th Avenue interchange. These areas are designated as Interchange Commercial (IC) because they function primarily as automobile dependent businesses, lack pedestrian connections to residential zoning and neighborhood services, and the future character is anticipated to be primarily automobile dependent. While not following as closely to the requirements for pedestrian oriented design, the design standards applied here will require attractive and high-quality development. Primary uses in this zone will be

similar to General Commercial such that there will be automotive sales, equipment sales, gas/convenience stores, automotive repair and maintenance, hotels/motels, theaters, and grocery stores. The area will have greater setbacks allowed than in General Commercial and have less emphasis on pedestrian connections to the street while internal pedestrian amenities will still be required.

7.4. Manufacturing and Industrial

- 7.4.1. Light Manufacturing: Principle uses in this district include light manufacturing (particularly assembling and manufacturing of products from previously prepared material), warehouse/distribution, and packaging plants, and limited office uses. Secondary uses include retail services, restaurants, government uses, agricultural activities, and utilities subject to compatibility criteria.

Goals for landscaping are to ensure adequate landscaping/screening:

- Along streets
- Within parking lots
- Buffers next to lower intensive zones, public open space and critical areas
- Screening of outdoor storage
- Alongside lot lines when not immediately adjacent to a parking lot/truck maneuvering area.

Goals for site and building design are:

- Quality building materials and modulation along street fronts
- Screening of parking and loading
- Discourage multiple curb cuts.

- 7.4.2. Heavy Manufacturing: This district provides areas for heavy industrial uses which are located to ensure minimal impacts to residential and commercial areas. Typical uses include processing of natural and manmade materials for use in general manufacturing, assembly, warehousing, and distribution. Secondary uses include office, limited retail establishments, agricultural activities, and utilities subject to compatibility criteria.

- 7.4.3. Public and Private Facilities and Utilities: The primary purpose of this designation is to identify lands utilized to provide public and private utilities, facilities, and services. Allowable uses include parks, schools, medical facilities, nonprofit service uses/organizations, public and private utilities, and government buildings. In some cases, properties designated as Public and Private Facilities and Utilities are also located within the Manufacturing/Industrial Center Overlay area; however, these properties have natural resource restoration and recreation uses only. See Figure 9-3 Comprehensive Plan Map. Proposed parks are indicated in the Parks Plan.

7.5. Overlay Designations

- 7.5.1. Shoreline: This overlay references the Sumner Shoreline Master Program which indicates required setbacks and allowable uses for land within the shoreline jurisdiction (generally 200 feet from ordinary high-water mark). In Sumner, land along the Puyallup and White (Stuck) Rivers is governed by the State Shoreline Management Act and Sumner's Shoreline Master Program. There are three shoreline designations: urban, shoreline residential and urban conservancy. Refer to Figure 19-1 in the Shoreline Element.
- 7.5.2. Manufacturing/Industrial Center: The Manufacturing/Industrial Center (MIC) is part of the larger Sumner/Pacific MIC, (Figure 9-2) an area that is targeted for high intensity industrial land uses to create an employment and economic center on a local, county, and regional level. This area is characterized by light and heavy manufacturing uses, limits on retail uses, and a prohibition of residential uses in this area. The Sumner/Pacific MIC is designated a Regional MIC, giving it special status for infrastructure funding, and is a priority for infrastructure improvements to promote the industrial and economic development in the area.
- 7.5.3. Innovation District and Enterprise Area: The Innovation District and Enterprise Area (IDEA District) is a flexible overlay designation that may be applied to non-residential areas at the request of a property owner. An IDEA overlay provides greater flexibility in the allowable uses and development standards than the underlying zone, in order to encourage and to expand economic opportunities for innovative, small-scale businesses to locate in Sumner. Criteria are established to ensure that proposed uses are compatible with surrounding properties. The IDEA District could contain a combination of office, retail, residential, co-working spaces, a makerspace and entrepreneur support services.
- 7.5.4. Planned Mixed Use Development: The Planned Mixed Use Development (PMUD) overlay area requires a mix of commercial and residential development that will undergo extensive public process including design review, hearing examiner recommendation, and City Council approval. The PMUD offers greater flexibility to develop a mix of ground floor commercial, walkable neighborhoods, increased density as appropriate, adequate open space, complete street designs and opportunities for green and environmentally friendly development. The result is a development that fits the character of the surrounding neighborhood as a whole and is an asset to the community. A PMUD may have a mix of commercial, mixed use structures, and stand-alone multi-family residential in a variety of configurations from live/work units, residential over ground floor commercial, to townhouses, and cottages. Buffer areas can also be configured within a PMUD to minimize conflicts between uses such as large-lot single-family or between more intense uses such as industrial, depending on the neighborhood.
- 7.5.5. Planned Residential Development: The Planned Residential Development (PRD) overlay is similar to a PMUD but for residential developments. The PRD offers greater

flexibility to develop a mix of housing types with varying lot sizes and dimensions, increased density as appropriate, adequate open space, and building setbacks and heights that are compatible with adjacent residential uses. The result is a development that allows for a high level of variety in housing and flexibility in site design while remaining compatible with the character of the surrounding neighborhood.

- 7.5.6. Town Center Plan Area: The Town Center Plan covers an area within approximately one-half mile radius of the Sumner commuter rail station. This is an area that is targeted for future residential and mixed use development that takes advantage of being near transit and amenities and conveniences in the downtown core. The increased population in the downtown would add to the market for an “everyday” downtown and further strengthen the economic vitality of Main Street. The Town Center Plan also envisions a mixed of uses along Main Street, Traffic and Fryar Avenues and Activity Nodes. The Town Center Plan area has a greater increase in heights and residential densities than other areas of the city. The Town Center Plan Subarea is implemented through design standards, and a “form based code.” The Town Center is also designated a “Countywide Growth Center.” A Form Based Code, adopted for the Town Center, contains design details on building forms and streetscapes.

There are four districts within the Town Center Plan subarea:

- Historic Central Business District (HCBD)
- Station District (SD)
- West Sumner District (WSD)
- Riverfront District (RD)

- 7.5.7. Manufactured Home Park Overlay: The Manufactured Home Park (MFHP) Overlay district applies to properties primarily in manufactured home park use where the MFHP was created prior to 2024. The purpose of the overlay is to support the continuation of manufactured homes as the primary use on the property and to help ensure that MFHPs continue to provide an affordable housing option for Sumner residents. The overlay is not intended to apply to new MFHPs but may be applied in the future to MFH subdivisions if residents become vulnerable to displacement and apply to the Director for designation. The overlay is a land use designation only and is not intended to include provisions for rent control or tenant protections.

Figure 9-2: Land Use Designations

CATEGORY	DENSITY
<u>Residential</u>	
Resource Protection (RES)	1 du/20 acres
Residential-Protection (R-P)	1 du/20 acres
Low Density Residential-1 (LDR-1)	2.9 - 10.0 du/acre*
Low Density Residential-2 (LDR-2)	5.1 - 13.0 du/acre*
Low Density Residential-3 (LDR-3)	7.0 - 20.0 du/acre*
Medium Density (MDR)	8.1 - 22.0 du/acre*
High Density (HDR)	12.1 - 25 du/acre*
<u>Commercial</u>	
General Commercial (GC)	12.1-25 du/acre*
Interchange Commercial (IC)	--
Neighborhood Commercial (NC)	12.1-25 du/acre*
Town Center Plan area	Unlimited density per TCP Form Based Code
Urban Village (UV)	26-40 du/acre*
<u>Manufacturing</u>	
Light (M-1)	--
Heavy (M-2)	--
<u>Public/Private Facilities & Utilities (P)</u>	
<u>Overlay Designations</u>	
Shoreline	Refer to Sumner SMP
Planned Residential Development (PRD)	Based on underlying zone
Planned Mixed Use Development (PMUD)	5-37.5 du/acre
Town Center Plan Subarea Sub-Districts	Unlimited if height, open space, setbacks, and parking are met.
Innovation District & Enterprise Area	Based on underlying zone

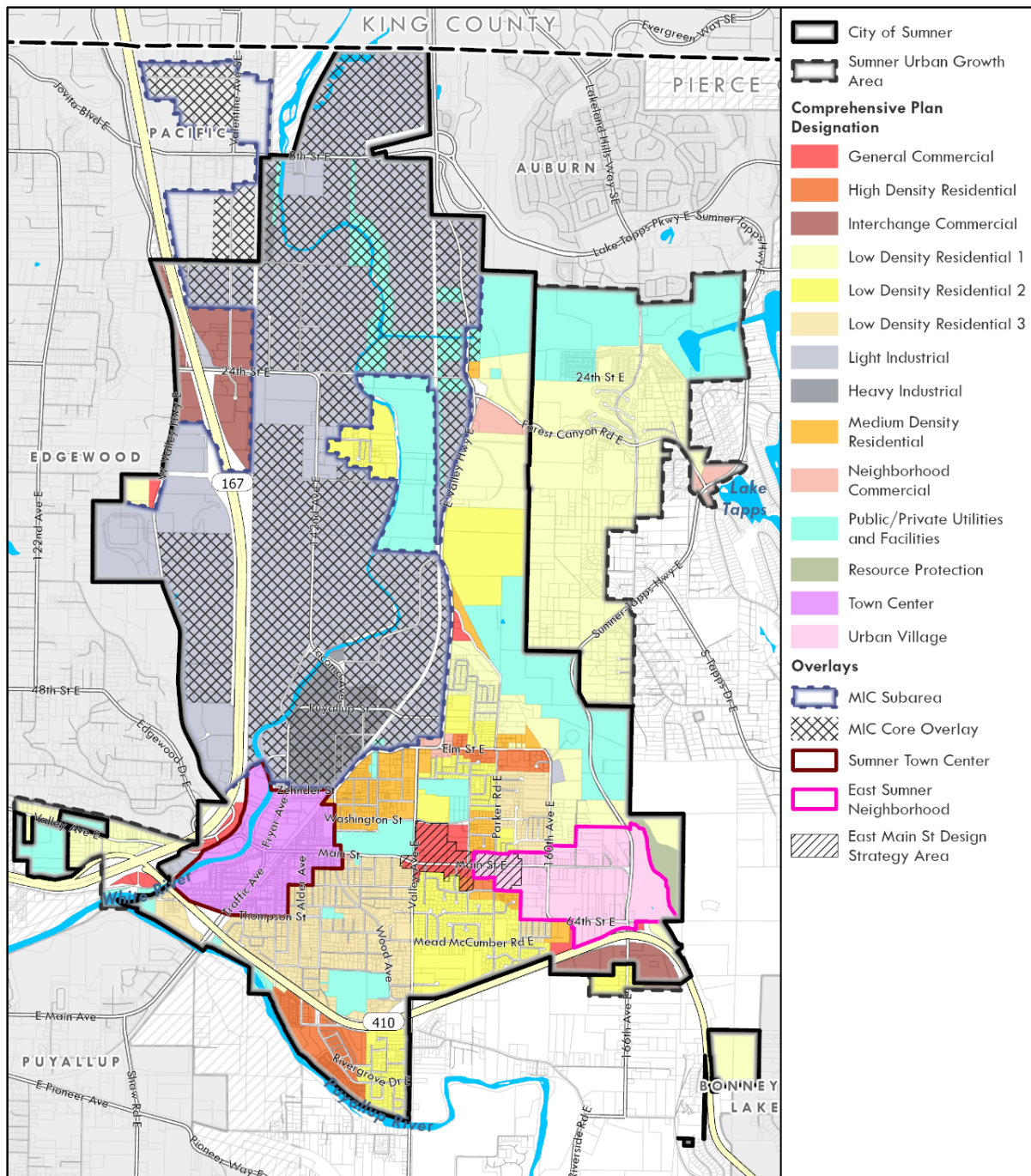
Source: Sumner Community Development Department

Notes: du = dwelling unit

SMP = Shoreline Master Program

*Density may be increased to 30-50 du/ac for affordable senior housing through a PRD process, or for affordable housing on properties owned by religious organizations.

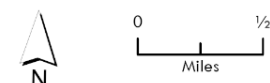
Figure 9-3. Comprehensive Plan Map



CITY OF SUMNER

Comprehensive Plan Map

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

10. Essential Public Facilities

Introduction

The State Growth Management Act requires that local government comprehensive plans include a process for identifying and siting of essential public facilities. Essential public facilities are typically difficult to site and include facilities such as airports; state educational facilities; state or regional transportation facilities; state and local correctional facilities; solid waste handling facilities; opioid treatment programs (including both mobile and fixed-site medication units); harm reduction programs excluding safe injection sites; substance use disorder treatment facilities; and mental health facilities, group homes, recovery residences, community facilities, and secure community transition facilities. No local comprehensive plan or development regulation may preclude the siting of essential public facilities per State law. In addition, the State encourages local jurisdictions to provide criteria for the siting of other behavioral health facilities.

Goals, Policies, and Objectives

- 1. *Establish a process and criteria for the appropriate siting of essential public facilities of a State-wide or Countywide nature.***
 - 1.1. Identify essential public facilities based upon the Growth Management Act, State Office of Financial Management list of essential public facilities required or likely to be built, Countywide Planning Policies for Pierce County, and any City lists which may be developed.
 - 1.2. Through the Land Use Plan identify publicly owned lands and quasi-public uses on lands useful for public purposes and incorporate such designations into the Land Use Plan.
 - 1.3. Work with the County and other cities to establish a cooperative inter-jurisdictional approach to the siting of essential public facilities in accordance with the process established in the Countywide Planning Policies for Pierce County. Joint planning agreements shall be sought where appropriate. Through joint planning or interlocal agreements, the City shall seek to mitigate disproportionate financial and environmental burdens due to the siting of essential public facilities, particularly in communities that face disproportionate shares of noise, light, and air quality pollution impacts.
 - 1.4. Public review shall be carried out in accordance with the public process established by the state, regional, or local agency. When possible, public review materials should be made available in the most commonly spoken languages in Sumner.
 - 1.5. Facilities shall provide mitigative measures and amenities, including fiscal mitigation, as appropriate, for neighborhoods in which the facilities are located.

- 1.6. Siting of facilities in the City of Sumner and Sumner Urban Growth Area shall be made in accordance with the following principles:
 - The State, regional, or local agency proposing the facility (Agency) shall demonstrate a justifiable need for the public facility and for its location in the Sumner Planning Area or adjacent areas based upon forecasted needs and a logical service area;
 - In consultation with the City of Sumner, the Agency shall establish a public process by which the residents of the County and the City have a reasonable opportunity to participate in the site selection process and review of the impacts and benefits of the proposed facility; and
 - Facilities shall be sited consistent with the siting criteria below and Sumner Municipal Code.
- 1.7. Siting criteria for essential public facilities. To promote consistency in essential public facility siting across Pierce County, adhere to the essential public facilities siting criteria laid out in the Pierce County Countywide Planning Policies for new or expanded essential public facilities in the Sumner Planning Area, including the following identified criteria:
 - Specific facility requirements.
 - Impacts of the facility.
 - Impacts of the facility siting on urban growth area designations and policies.
- 1.8. In addition to the siting criteria in the Pierce County Countywide Planning Policies, agencies shall consider the following when siting essential public facilities in the Sumner Planning Area:
 - Consistency with the Sumner Comprehensive Plan policies, capital facility plans, environmental regulations, and other implementing ordinances.
 - Impacts and benefits associated with the facility to ensure these impacts and burdens are equitably distributed.
 - Reduction and/or mitigation of risk of displacement of overburdened residents, affordable commercial space, small businesses, and housing.

2. *Establish a process and criteria for the appropriate siting of local behavioral health facilities.*

- 2.1. Siting criteria for behavioral health facilities shall provide for site design and buffering techniques to ensure compatibility with surrounding uses.
- 2.2. The following criteria will be considered when siting behavioral health facilities:
 - Proximity and/or access to social services and other services to meet the needs of residents and support facility operations.

11. Historic and Cultural Resources

Introduction

Sumner's beginnings and cultural features provide a source of pride for the community and a context for understanding Sumner today. The City of Sumner is located within the traditional homelands of the Coast Salish Tribes, including the Puyallup Tribe and the Muckleshoot Tribe. Sumner continues to be a place of cultural importance for local Tribes. However, despite the Tribal history of the area, few Tribal archaeological resources have been found due to the lack of surveys.

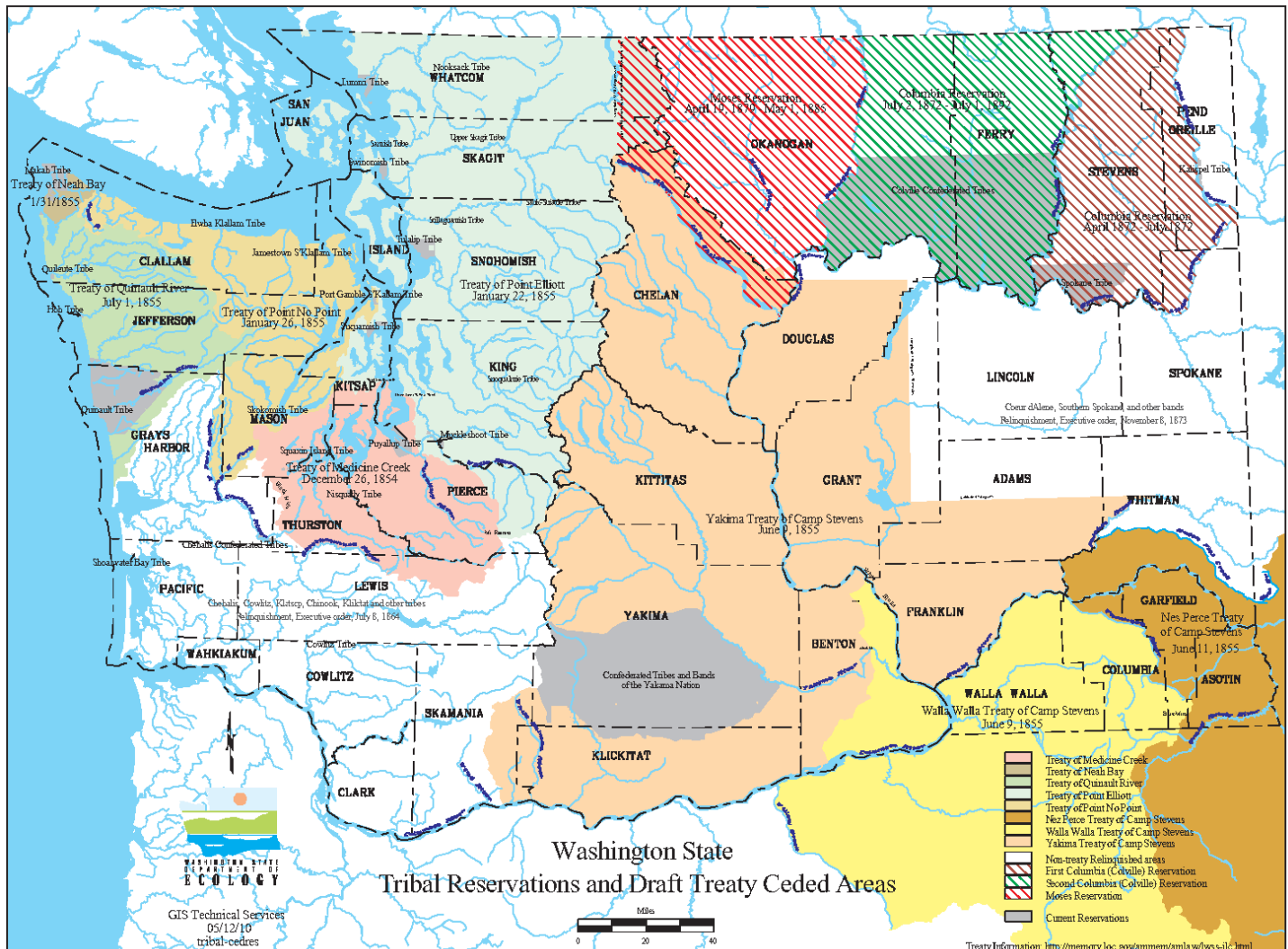
Adequate planning during a project is important, in order to avoid, where feasible or practical, development that could disturb historic and cultural resources. In 2008, the City adopted the historic preservation ordinance that provides the ability for property owners to voluntarily place their properties on the Sumner Historic Register.

Goals, Policies, and Objectives

- 1. *Identify, preserve, protect, and enhance restore areas of Sumner with historical, cultural, educational, or scientific values.***
 - 1.1. Preserve and maintain the historic, cultural, scientific, or educational integrity of known resources of local, state, or national significance to the extent feasible, including properties listed on the National or State Register of Historic Places. Developers should plan and design development on sites having historic, cultural, or archeological resources in a manner that prevents impacts to the resource and provides educational benefits to the public, where appropriate.
 - 1.1.1. Through the permitting and environmental review process, document how impacts to archaeological, historic, and cultural sites and resources were considered and how impacts were avoided or how avoidance is infeasible.
 - 1.1.2. Consider the potential impacts of development on culturally significant Tribal sites and collaborate with the affected Tribes, such as the Puyallup Tribe and Muckleshoot Tribe, to ensure the protection of Tribal cultural resources.
 - 1.1.3. Request consultation with the State Department of Archeology and Historic Preservation (DAHP) for demolition or construction projects on sites located in Town Center, with structures older than 45 years old, or with structures identified by DAHP as potentially eligible for listing.
 - 1.1.4. Require developers to immediately stop work and notify the City, DAHP, the Puyallup Tribe, and the Muckleshoot Tribe if any artifacts of possible historic, cultural, or archeological value are uncovered during excavation.

- 1.1.5. Require Inadvertent Human Remains Discovery Language recommended by DAHP to be added to permits as a condition of project approval.
- 1.2. Work with Tribes, agencies and property owners to encourage measures that protect, enhance, and restore ecosystems that could be adversely impacted by climate change, in order to make available cultural foods and other resources for indigenous Tribes.
- 1.3. Encourage the efforts of historic preservation organizations, such as the Sumner Historical Society, Puyallup Historical Society, the Japanese American Citizens League, the Tribes, and other community groups to promote historic preservation, historic and cultural education, and recognition of Sumner's history.
 - 1.3.1. Consider partnerships with historical preservation organizations, such as the Sumner Historical Society, that could allow, where appropriate, an agreement for the use of city facilities.
 - 1.3.2. Encourage historical societies, historic preservation agencies, community groups, and others to provide access to historic documents, such as maps, photos, and newspapers, for landowners, residents, and others.
 - 1.3.3. Encourage community programs for the collection and preservation of oral histories of the community through partnerships with schools, the senior center, and other groups.
 - 1.3.4. Encourage public awareness and understanding of prehistory and the history of Tribes in the Sumner area.

Figure 11-1. Tribal Reservations and Draft Treaty Ceded Areas (Washington Department of Ecology)



- 1.4. Coordinate with community organizations, property owners, and residents to protect, acquire, and/or restore key historic properties where feasible.
 - 1.4.1. Promote the preservation and revitalization of significant lands, historic sites and structures, and historic trees through a combination of techniques such as landmark programs, incentives, and local government historic preservation programs.
 - 1.4.2. Implement design guidelines that protect and promote the historic and community character of Sumner.
 - 1.4.3. Maintain a historic preservation program to support Sumner's designation as a Certified Local Government for historic preservation purposes.
 - 1.4.4. Encourage the historic preservation commission to develop a local register of historic places and, with permission from the Tribes, a list of traditional cultural properties.

- 1.4.5. Analyze and consider a historic overlay zone in the downtown area as a tool for preserving the character of Main Street.
- 1.5. Identify state and federal grants and other funding sources to support historic preservation in Sumner.
- 1.6. Encourage private property owners with eligible properties to voluntarily seek Register listing.
- 1.7. Work with property owners and historic preservation societies toward protecting or adapting significant historic sites prone to floods, extreme snow events, and other hazards worsened by climate change through building retrofits, green infrastructure, and other strategies.

2. *Enhance and improve the cultural arts environment.*

- 2.1. Work with other organizations to promote visual, literary, and cultural arts and events in the community.
- 2.2. Maintain a cultural arts strategy reflective of Sumner's history and diverse communities to implement the goals of this Plan.
- 2.3. Partner with community or volunteer organizations, businesses, and supporters to promote cultural arts throughout the community.
- 2.4. Encourage a diverse range of cultural arts and events that recognize the experiences and contributions of various ethnic groups throughout Sumner's history.

3. Recognize the role of the historic downtown as the historic center of Sumner and heart of the community.

Figure 11-2. Historic Downtown Sumner



- 3.1. Ensure the character of the historic downtown is retained as new businesses and buildings are established, such as through design standards, historic preservation ordinances, or other means.
- 3.2. Encourage the incorporation of street furniture and features along streets in the historic downtown, such as streetlights and benches, that are compatible with the historic character of the area.
- 3.3. Enliven and refresh historic downtown by encouraging adaptive reuse of buildings and new construction that acknowledges the historic character of the area.
- 3.4. Provide ongoing support and expansion of walking tours that highlight public art, architecture, history, trees, and other icons of the historic downtown.

12. Environment

Introduction

The Growth Management Act (GMA) requires that critical areas, natural resource lands, and the environment be protected. Countywide Planning Policies and the Multi-County Planning Policies (VISION 2050) also establish mandates for protection of the environment in the planning process. Updates to policies and regulations are required to be based on “best available science” and give special consideration to conservation or protection measures necessary to preserve or enhance habitat for anadromous fisheries. Legislation further requires jurisdictions to address climate change and greenhouse gas reduction in their policies and regulations. In addition, the Draft Environmental Impact Statement, prepared for the Comprehensive Plan in compliance with the State Environmental Policy Act (SEPA), discloses a variety of environmental impacts that could result from implementing the Comprehensive Plan. The policies below are intended to satisfy these statutory and regional policy directives.

Critical Areas within the City of Sumner include wetlands; critical aquifer recharge areas; fish and wildlife habitat conservation areas; frequently flooded areas; and geologically hazardous areas. The beneficial functions and values they provide include water quality protection; fish and wildlife habitat; flood storage; groundwater recharge and discharge; drinking water protection; erosion control; protection from natural hazards; and recreation.

Goals, Policies, and Objectives

Overall

1. Practice environmental stewardship by protecting, enhancing and promoting the natural environment in the City of Sumner.

- 1.1. Maintain up-to-date regulations that protect critical areas, the function and values of the natural environment, and/or safeguard the public from hazards to health and safety.
- 1.2. Incorporate the use of “best available science” as required by the Growth Management Act in developing policies and development regulations to protect the functions and values of critical areas. Give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.
- 1.3. Promote cultural events that celebrate and inform the community about natural areas, such as salmon-related events and tours of restoration sites.
- 1.4. Work with the Sumner-Bonney Lake School District and other organizations to promote environmental education on topics such as local ecology, conservation, waste reduction, and environmental justice.

- 1.5. Through the Parks Board, new development permits, community organizations, other agencies and other resources, promote equitable public access to unique and valuable natural areas, where access is designed to minimize impacts to the natural area.
- 1.6. Consider environmental justice in future project and policy decisions and ensure the benefits associated with environmental stewardship projects are equitably distributed throughout the city.
- 1.7. Develop a continuing program to assist the public with preventing storm damage through the proper use of vegetation and trimming of dangerous limbs.
- 1.8. Work with Pierce County to continue education programs related to winter preparedness as part of their preparedness education program.
- 1.9. Expand public education campaigns regarding fire safety, including information on wildfire hazards and protecting homes.
- 1.10. Maintain a program of street tree planting to boost carbon sequestration, improve air quality, and counter heat island effects, particularly in overburdened communities.

Air Quality

2. Protect air quality from adverse impacts.

- 2.1. In order to reduce emissions and reliance on the automobile as the primary method of transportation, encourage alternative modes of transportation.
- 2.2. Require air quality impact analysis for major new developments which could adversely impact the air quality levels in the vicinity.
- 2.3. Work with other agencies to educate the public about air quality impacts.
- 2.4. Work with other agencies to monitor air quality within the planning area.
- 2.5. Support infrastructure, codes and permit processes that encourage alternative fuels and electric vehicles.
- 2.6. 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.
- 2.7. Engage with the community, particularly overburdened populations, to understand and respond to local needs and concerns regarding air quality.

Noise

3. Encourage a reduction in noise impacts associated with human activity and development.

- 3.1. Require new developments which could generate substantial levels of noise or could expose people to noise impacts sufficient to cause environmental health problems to submit an analysis of potential noise impacts and to propose mitigation.

- 3.2. Maintain the noise ordinance to address various noise sources, and periodically update it for consistency with industry standards and new environmental health data.

Natural Resource Lands

4. *Protect viable long-term natural resource lands, including commercial agriculture and mining.*

- 4.1. In coordination with other jurisdictions, protect viable mining areas through allowances for permits, provisions for mitigation of impacts and restoration, notice to adjacent property owners, and compatibility of uses.
- 4.2. Cooperate with Pierce County in protecting lands designated by the State as agricultural lands of long-term commercial significance, through conservation tools such as transfer of development rights, purchase of development rights, cluster zoning, and limitations on the extensions of public utilities and public facilities.
- 4.3. Establish right-to-farm legislation to protect agricultural lands with significant long-term commercial significance, including adjacent agricultural lands in the county.

Surface Water

5. *Protect surface water quality and quantity from significant degradation as required by state and federal law.*

- 5.1. Implement development regulations and a surface water quality management plan to protect water quality.
- 5.2. Maintain regulatory requirements for adequate vegetated stream buffers to protect functions and values such as temperature reduction, as well as filtration and attenuation (slow release) of surface water runoff.
- 5.3. Protect wetlands and wetland buffers to protect functions and values, such as flood attenuation, through water storage and water filtration.
- 5.4. Monitor surface water quality discharges to provide a sufficient data base for determining if water quality is being degraded.
- 5.5. Work with other agencies to educate the general public and developers on the potential surface water quality degradation resulting from development and human activity and how to reduce impacts.
- 5.6. Maintain consistency with local, regional and federal water quality protection plans and permits.
- 5.7. Continue to implement wetland regulations as an essential part of water quality protection.
- 5.8. Continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development.

- 5.9. Incorporate low impact development principles and practices into the design, construction and operation of all city facilities and city-funded projects when economically feasible.
- 5.10. Require residential and commercial developers to incorporate low impact development techniques, where feasible, that preserve a site's natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.
- 5.11. Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.

Groundwater

6. *Protect groundwater quality within the aquifer recharge area from substantial degradation.*

- 6.1. Implement regulations to prevent groundwater quality degradation.
- 6.2. Support inclusive education of the public about potential groundwater quality issues resulting from development and human activity within the critical aquifer recharge areas (CARA).
- 6.3. Collaborate with adjacent jurisdictions and agencies within watersheds of the White and Puyallup Rivers to protect groundwater resources which support the Sumner water supply.
- 6.4. Protect trees and vegetation in areas that contribute to groundwater discharge and recharge.

Geologically Hazardous Areas and Special Flood Hazard Areas

7. *Protect life and property in geologically hazardous areas and special flood hazard areas. Geologically hazardous areas include landslide, erosion, seismic, and volcanic hazard areas.*

- 7.1. Work with other agencies to develop and implement inclusive public education and notification systems related to geologically hazardous areas.
 - 7.1.1. In conjunction with other agencies, including Pierce County, school districts, and East Pierce Fire & Rescue, implement an emergency notification system and evacuation plan to provide early warning of impending disasters. As necessitated by new development, the system and plan shall be periodically revised.
 - 7.1.2. Use title and plat notices for new development to inform current and future property owners of potential risk from applicable geologically hazardous areas and special flood hazard areas.
 - 7.1.3. In conjunction with Pierce County, the federal government, the Red Cross, and other applicable agencies, educate the public about the risks associated with geologically hazardous areas and special flood hazard areas and methods to reduce risk.
 - 7.1.4. Create a disaster resistant and resilient community through proper design of critical facilities, inclusive public education of the public, and land use planning.

- 7.1.5. Emergency notification systems and evacuation plans should consider the diverse needs of the population to address accessibility, access to technology, and language.
- 7.2. Minimize the potential for loss of life and damage to public and private investments resulting from flooding in special flood hazard areas, such as along the White (Stuck) and Puyallup Rivers.
 - 7.2.1. Work with the appropriate agencies to secure easements and make the necessary improvements along the riverbanks to ensure damage is minimized and environmental impacts are mitigated.
 - 7.2.2. Work with other agencies to modify the operational mandate of the Mud Mountain Dam to reduce flood risk.
 - 7.2.3. Work with appropriate agencies to develop and implement regulations to reduce flood damage, including reinforced building design, compensatory flood storage, limitations on the location of building in floodplains, and adoption of a “zero-rise” standard or floodplain development.
 - 7.2.4. Continue to implement wetland protection and stormwater management regulations to help mitigate flooding impacts to the community.
 - 7.2.5. Acquire property that is located within flood-prone areas as necessary to implement flood protection projects and plans.
 - 7.2.6. Continue and expand public education related to floods.
- 7.3. Implement and enforce the wetlands and floodplain regulations to retain the existing flood storage capacity.
- 7.4. Seek mitigation projects to increase flood storage as necessary to meet the adopted level of service for stormwater and flood conveyance.
- 7.5. In partnership with Tribes, Pierce County, and private business, plan and develop a flood protection and habitat restoration area on 170 acres of city owned property generally east of the White River and south of Stewart Road.
- 7.6. Work with surrounding jurisdictions including the Dieringer and Sumner-Bonney Lake School Districts; East Pierce Fire & Rescue; Pierce County; and nearby cities and towns to coordinate and collaborate where possible on the creation and implementation of appropriate flood hazard mitigation measures.
- 7.7. Continue to update and implement floodplain development regulations which limit the opportunity for new homes and businesses to be constructed in flood hazard areas through the City’s Flood Damage Prevention Ordinance, Critical Areas Regulations, and Shoreline Master Program.
- 7.8. Continue to include and update mitigation requirements in floodplain development regulations, which can significantly reduce the potential for flooding to negatively impact

drinking water sources, pipelines, septic systems, sewer lines, and water lines that intersect flood hazard areas.

- 7.9. Take measures to reduce risk and hazard from volcanic hazards off Mount Rainier.
 - 7.9.1. Take measures to reduce the location of large occupancy assembly uses in areas of volcanic hazard risk.
 - 7.9.2. Require analysis of volcanic hazard risk and mitigation to accompany substantial new development in areas of identified volcanic hazard risk.
- 7.10. Take measures to reduce risk and hazard from earthquakes (seismic hazards) and associated effects through disaster preparedness and public education, and facility design.
- 7.11. Require new development to address potential landslides, runoff, and other geologic hazards, to protect hillsides and surrounding development from landslides or other geologic hazards and the impacts associated with building on steep slopes.
- 7.12. Take measures to reduce erosion and other geologic hazards in all areas, particularly in areas with high risk of erosion, and the associated impacts.
- 7.13. Implement land use and environmental regulations with flexibility to include protecting geologically hazardous areas.

Fish and Wildlife Habitat Conservation Areas

8. Protect and enhance unique, valuable, and critical plant, fish, and wildlife habitat conservation areas and promote biodiversity.

- 8.1. Implement regulations and programs to protect unique, valuable and critical plant, fish, and wildlife habitat conservation areas, including flexible design standards.
- 8.2. Protect shorelines, fish and wildlife habitat conservation areas, and wetlands through appropriate regulations, acquisition, and non-regulatory policies such as education, stewardship, density credits, restoration, etc.
- 8.3. Maintain an urban forestry strategy to encourage the planting of trees on public and private property.
 - 8.3.1. Within the urban forestry strategy develop specific standards for planting of public trees such as minimum size, type, minimum soil conditions, and maintenance requirements.
 - 8.3.2. Incorporate climate resilience strategies into the City's urban forest management, such as increasing citywide species diversity, native or climate resilient species, and increasing tree planting in areas with low canopy cover.
 - 8.3.3. Manage City watershed lands on forested hillsides to improve climate resiliency and resistance to extreme events such as wildfires.

- 8.4. Take measures to protect forested hillside areas, which provide environmental benefits such as slope stability, wildlife habitat, water filtration, and attenuation (slow release), from the impacts of development.
- 8.5. Work with other agencies and the public to support restoration of the White River and its tributaries including Salmon Creek and continue to support and implement the White River Restoration Project to restore salmon habitat and reduce flood risks.
- 8.6. Give priority consideration to conservation and protection measures that preserve and enhance areas where anadromous fisheries and endangered, threatened, and sensitive species have a primary association.
- 8.7. Allow for the clustering of development at higher densities on a portion of a property when preserving fish and wildlife habitat conservation areas or wetlands on site.

Air Quality and Emissions

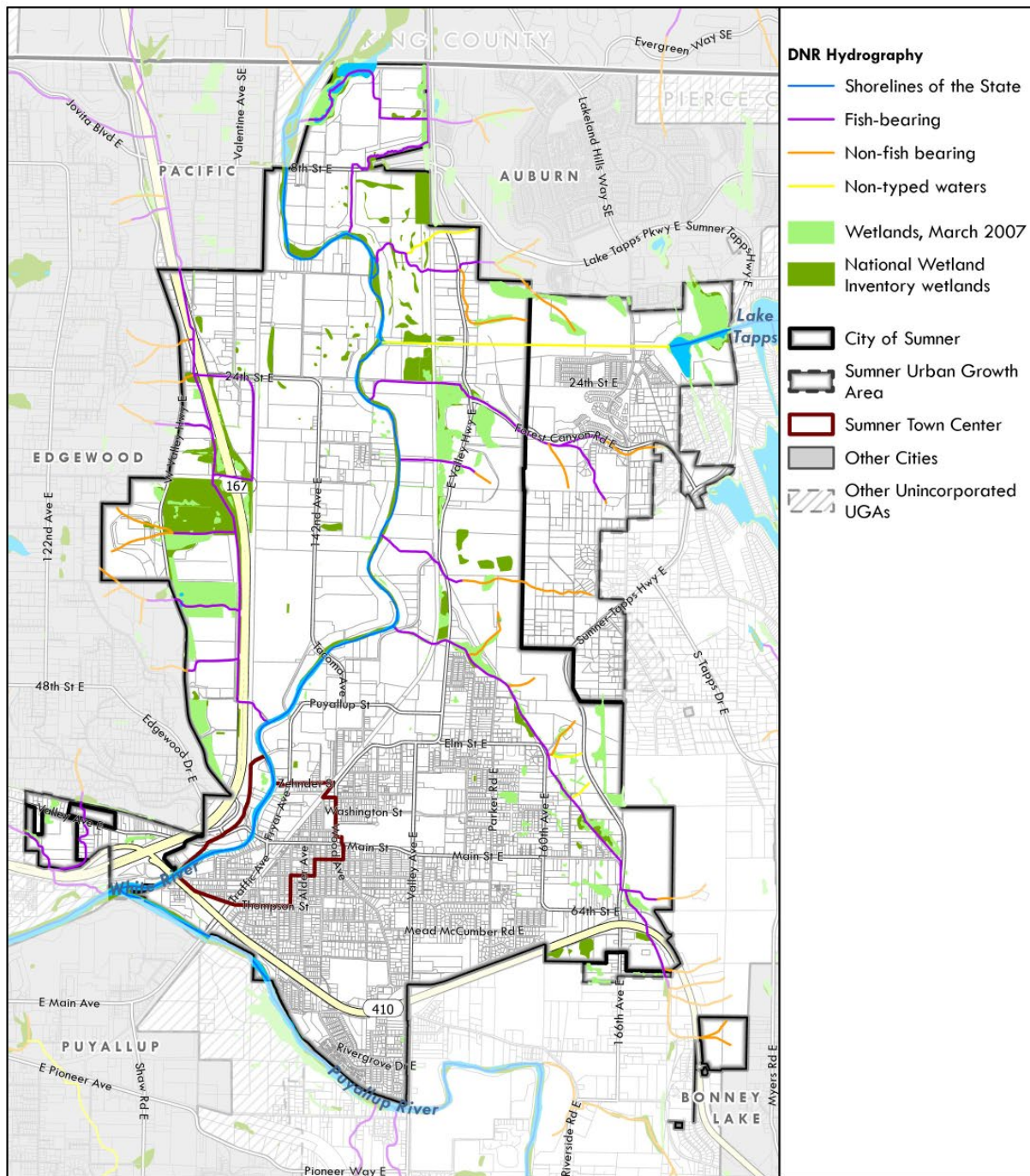
9. Reduce greenhouse gas emissions and encourage energy efficiency.

- 9.1. Through incentives and technical support, encourage energy conservation, energy efficiency, efficiency in building materials and site design, and the application of sustainable, or “green” design practices in all public and private development including large commercial and industrial projects, residential subdivisions, and infrastructure such as streets within the city.
- 9.2. Identify and evaluate potential changes to land use and development regulations to support and promote energy-efficient, sustainable, and green development.
 - 9.2.1. Ensure that the Sumner design guidelines and zoning regulations have the flexibility to accommodate and provide incentives for the installation of green energy features.
 - 9.2.2. Require street trees and on-site landscaping in all new developments, as appropriate to the development.
- 9.3. Require proposed rezones that significantly increase vehicle miles traveled to conduct a greenhouse gas emissions analysis and to propose mitigation.
- 9.4. Promote a healthy and sustainable environment in terms of air quality and climate, energy resources, and active lifestyles by using prudent building design and construction methods such as recycled construction materials, reducing space heating and electricity usage, reducing water consumption and waste generation, and encouraging alternative travel modes such as transit, walking, and biking.
- 9.5. Consider adopting City purchasing policies that prioritize sustainable and recycled products.

10. Establish regulations and processes to allow and streamline permits for new energy technologies, such as battery storage facilities, small- and large-scale solar facilities, and similar alternative technologies.

- 10.1. Explore ways to streamline and reduce costs in the permitting process for residential-scale solar facilities.

Figure 12-1. Critical Areas Map



CITY OF SUMNER

Streams and Wetlands

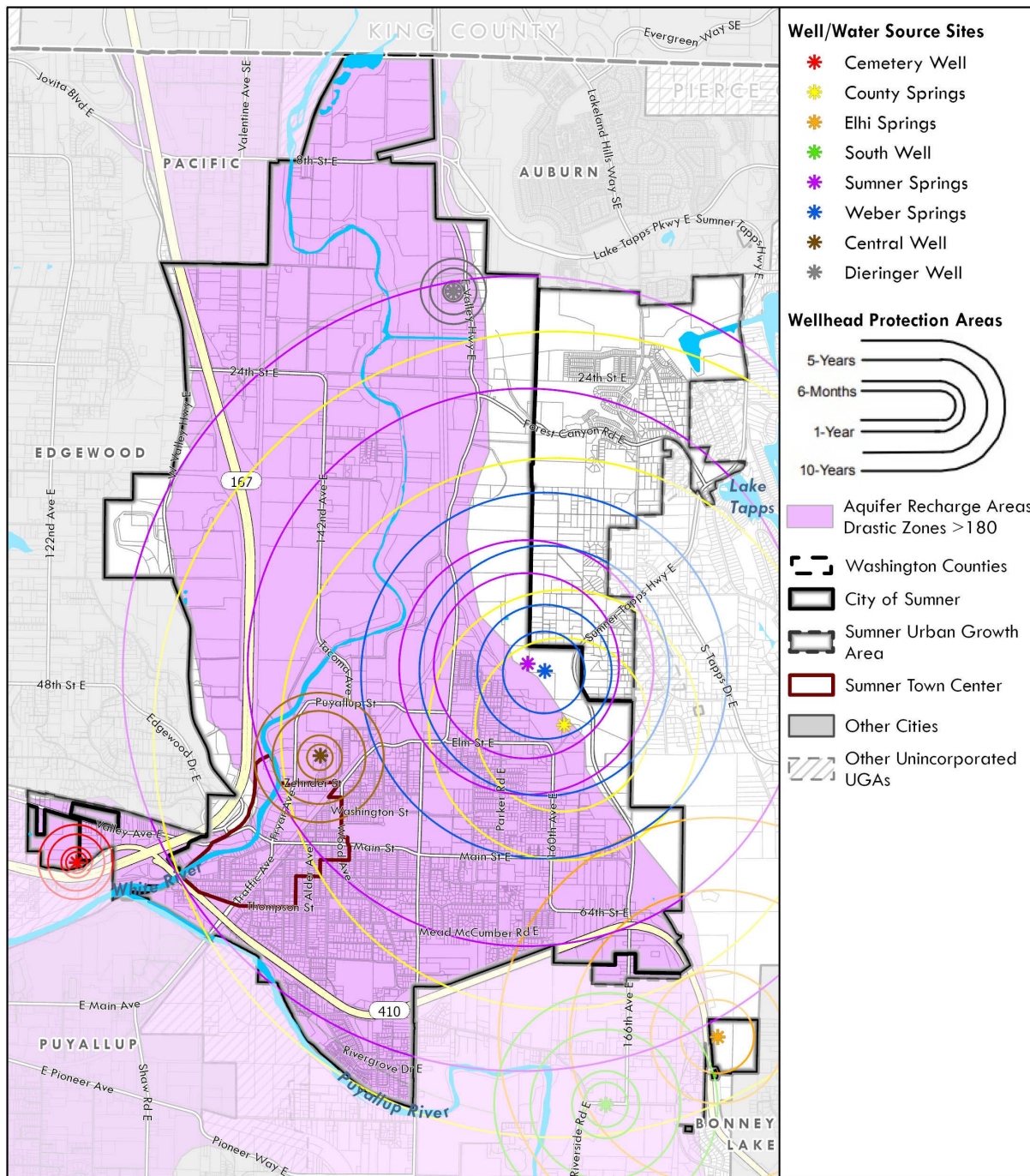
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



CITY OF
SUMNER
WASHINGTON

Map Date: February 2024

Figure 12-2. Aquifer Recharge Areas and Groundwater Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

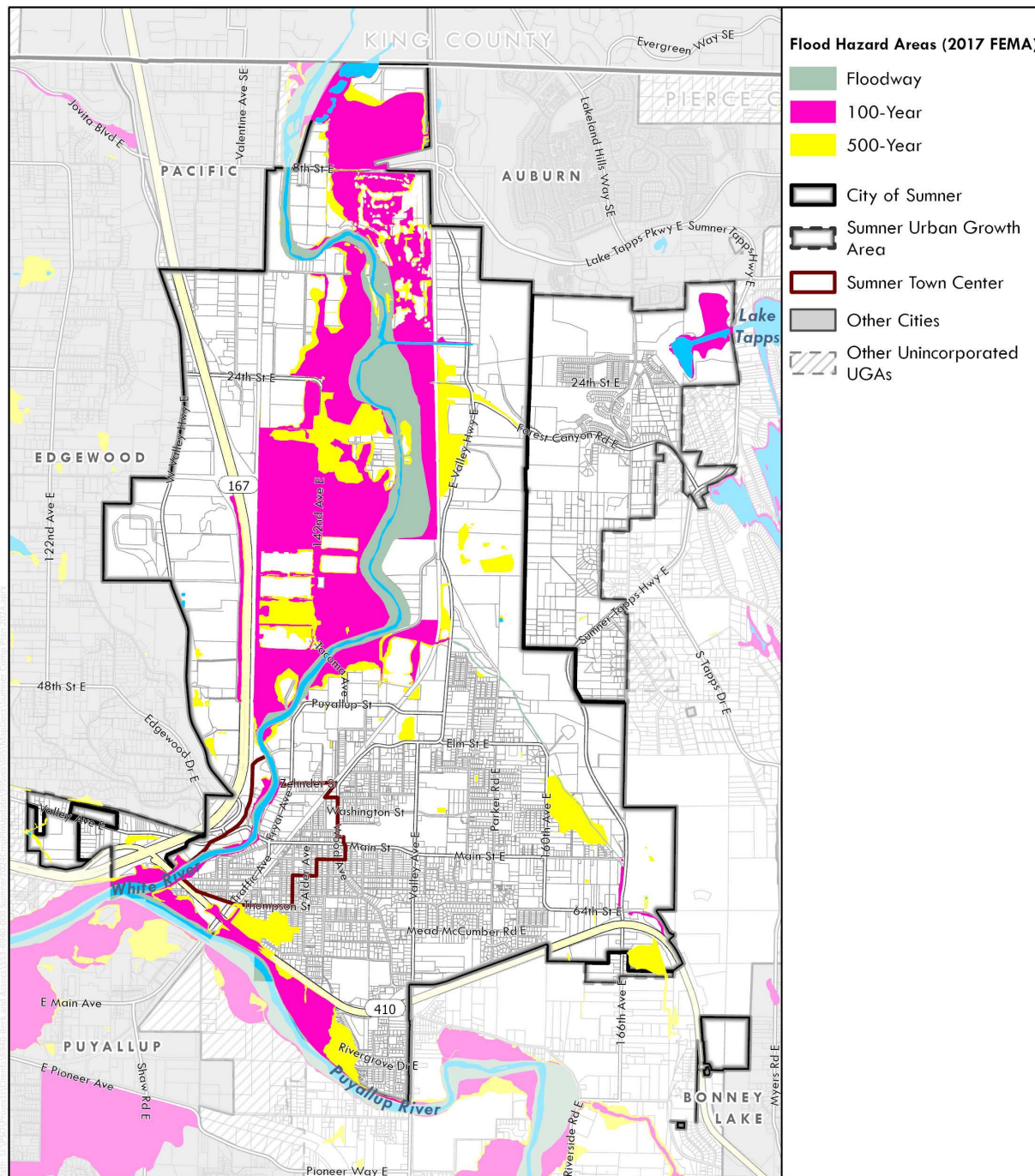
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CITY OF
SUMNER
WASHINGTON

Map Date: August 2023

Figure 12-3. Flood Hazard Areas



CITY OF SUMNER

Flood Hazard Areas

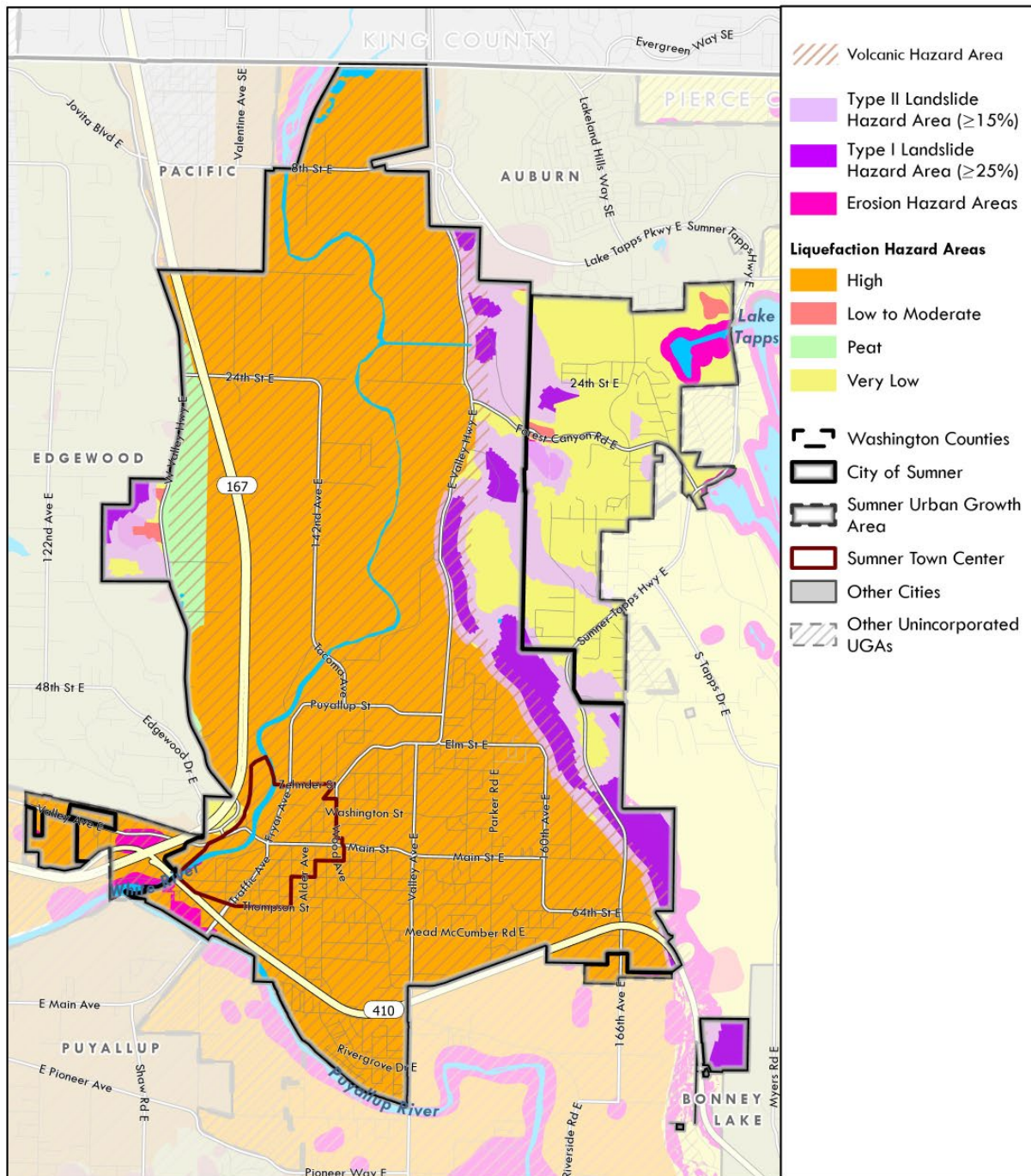
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CITY OF
SUMNER
WASHINGTON

Map Date: August 2023

Figure 12-4. Geologically Hazardous Areas



CITY OF SUMNER

Geologically Hazardous Areas

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

13.Climate Change and Resiliency

Introduction

As of 2023, the Growth Management Act (GMA) requires comprehensive plans to include a Climate Change and Resiliency element, with two subelements: greenhouse gas reduction and resiliency. The greenhouse gas emissions reduction subelement identifies actions the City will take to reduce greenhouse gas emissions and per capita vehicle miles traveled. The resiliency subelement includes policies that enhance resiliency to the impacts of climate change. Both elements must prioritize actions that benefit communities overburdened by environmental health and climate change impacts.

Climate Change and Resiliency goals and policies are integrated throughout the Comprehensive Plan and cross-referenced in this element.

Greenhouse Gas Emissions Reduction

Key sources of greenhouse gas emissions in Sumner include electricity, heating, and cooling; transportation; solid waste and wastewater processing; natural gas and propane transport and use; industrial processes; land use; and tree loss. The Comprehensive Plan includes goals and policies intended to reduce these emissions that contribute to climate change.

Goals and policies that reduce greenhouse gas emissions include:

Governance and Permit Process: 1.7

- Key topics: energy efficiency

Community Character: 1.1, 2.3, 2.3.1, 2.3.2, 2.3.3, 2.5, 2.5.1, 2.5.2, 2.6, 2.7, 3.2, 3.2.1, 3.2.2, 3.6, 5.4, 5.6, 5.7, 6.1, 6.2, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.9

- Key topics: walkability and pedestrian scale; bicycle-friendly streets; transit-oriented development; efficient use of water and energy; tree planting and urban forestry

Family and Human Services: 5.4, 5.6

- Key topics: walkability and bikeability

Economic Development and Employment: 1.7, 5.3, 5.5

- Key topics: sustainable industries and practices; reducing emissions

Land Use: 4.1, 6.1

- Key topics: walkability and transit-oriented development

Environment: 1.10, 2.1, 2.5, 8.3, 8.3.1, 8.3.2, 9, 9.1, 9.2, 9.2.1, 9.2.2, 9.3, 9.4, 9.5, 10.1

- Key topics: tree planting and carbon sequestration; alternative energy technologies; alternative modes of transportation; alternative fuels and electric vehicles; energy conservation and efficiency; recycled materials

Housing: 3.1, 3.2, 3.3, 3.4, 3.4.1, 3.5, 3.6

- Key topics: energy conservation and efficiency; alternative modes of transportation; transit-oriented development; reducing pavement area to prevent heat loss

Parks: 1.1.2, 2.1.1, 2.2.1, 3.1, 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5, 3.3, 3.3.1, 3.3.2, 3.4, 3.4.1

- Key topics: walkability and bikeability

Transportation: 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 7.2, 7.5, 7.7, 7.9, 8.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7, 10.3.1, 10.6, 10.7, 10.8, 10.9, 11.8

- Key topics: alternative fuels; electric vehicles; transportation demand management; walkability and bikeability; transit-oriented development

Capital Facilities: 3.1, 3.2, 3.3, 3.4, 3.6, 3.8, 16.1, 16.2

- Key topics: recycling; energy efficiency and green development practices in City projects; tree planting for energy efficiency; alternative energy

Utilities: 1.4, 1.4.1, 1.4.2, 1.4.3

- Key topics: alternative energy

Resiliency

Sumner and the rest of Pierce County are expected to be impacted by climate change over the next 20 years and beyond. The area can expect increased precipitation, higher temperatures in the summer months, more high fire danger days, and increased streamflows. This is likely to increase the risk of heat waves, flooding, and wildfires, which can impact infrastructure, the natural environment, and human health. The goals and policies in this plan are intended to make Sumner more resilient to these impacts.

Goals and policies relating to resiliency include:

Governance and Permit Process: 1.7

- Key topics: water and air quality; sustainable building design; low impact development; energy efficiency

Community Character: 1.5, 5.4, 5.6, 5.7, 5.9

- Key topics: natural drainage; energy efficiency; recycling; tree planting; parks and open space preservation; natural resource conservation

Family and Human Services: 1.3, 2.1.5, 2.2.1, 2.4.4, 5.5, 6.1, 6.2, 6.2.1, 6.2.2, 6.2.3

- Key topics: emergency preparedness and management; food access; parks and open space; tree canopy and shade; refuges for heat, cold, and smoke

Economic Development and Employment: 5.1, 5.2, 5.3, 5.4, 5.5

- Key topics: economic resiliency to climate change; food economy resiliency

Land Use: 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9

- Key topics: tree canopy; landscape screening for air and noise pollutants; parks and open space; tree planting; reducing health risks; mitigating wildfire risk; supporting small-scale agricultural uses

Historic and Cultural Resources: 1.1.4, 1.2, 1.7

- Key topics: protocol for artifact discovery; ecosystem protection; cultural foods and resources; protection of historic sites from climate impacts

Environment: 1.6, 1.7, 1.8, 1.9, 1.10, 5.1, 5.2, 5.3, 5.5, 5.7, 5.8, 5.9, 5.10, 5.11, 6.1, 6.3, 6.4, 7.1, 7.1.1, 7.1.2, 7.1.3, 7.1.4, 7.1.5, 7.2, 7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5, 7.2.6, 7.3, 7.4, 7.5, 7.6, 7.7, 7.8, 7.11, 7.12, 7.13, 8.1, 8.2, 8.3, 8.3.1, 8.3.2, 8.3.3, 8.4, 8.5, 8.6, 8.7, 9.1, 9.2, 9.2.1, 9.2.2, 9.4, 10.1

- Key topics: green energy; emergency preparedness; fire safety and wildfire prevention; water quality; low impact development; stream cooling; wetland protection; tree protection; flood resilience; protection of plants and animals; recycling; energy and resource efficiency

Housing: 3.3, 3.4, 3.4.1, 3.5, 3.6, 6.1

- Key topics: energy efficiency; shade; reducing pavement area; minimizing utility costs for residents

Parks: 1.1.4, 2.1.3, 2.2, 2.2.1, 2.2.2, 2.2.3, 2.2.4, 2.3, 3.1.2, 3.1.5, 3.4, 3.4.1

- Key topics: habitat protection; open space protection; parks and recreation; urban tree canopy; stormwater filtration; accessibility

Transportation: 1.5, 3.4, 10.1, 10.1.1, 10.4, 10.5

- Key topics: stormwater filtration; habitat protection; infrastructure resilience

Capital Facilities: 3.2, 3.3, 3.5, 3.6, 3.10, 3.11, 15.2.2, 15.4, 16.1, 16.2

- Key topics: recycling; resiliency of capital facilities projects; energy efficiency; tree planting, stormwater management and water quality; solid waste reduction; generators for critical facilities; flood protection

Utilities: 4.1.1, 4.1.2, 6.2, 6.4, 6.5, 7.1, 7.2

- Key topics: energy efficiency; weatherization; service continuity; emergency response; cost effectiveness

Shoreline: 2.1, 6.1, 6.2, 7.1, 8, 8.1

- Key topics: water access; shoreline protection; flood protection

14. Housing

Introduction

The Growth Management Act (GMA) requires consideration of housing needs through the State Planning Goals and through the requirements for a housing element. Housing Elements are required to recognize the vitality of existing neighborhoods, inventory existing and projected housing needs, identify sufficient land for a variety of housing types and needs, and make adequate provisions for the existing and projected needs for all economic segments of the community.

The 2021 Sumner-Bonney Lake Housing Action Plan identified existing and future housing needs in Sumner. These needs include: increasing numbers of the elderly, female-headed households, smaller household sizes, and the homeless; very low vacancy rates for single-family units and somewhat low vacancy rates for multi-family units; a large percentage of households which earn less than the County median income; and single-family housing costs above county median and rental costs below the county median. Additional 2024 analysis as part of the Comprehensive Plan's environmental review found that racially disparate impacts appear to be present in Sumner, particularly around homeownership and housing cost burden. Housing cost burden is also higher for renter households. Additionally, displacement risk is considered to be high in Sumner relative to other parts of Pierce County. Policy revisions as part of the 2024 Comprehensive Plan periodic update aim to reduce barriers to affordability and homeownership to address these impacts.

The Land Use Element and Comprehensive Plan Map (Figure 9-3) provide for a variety of housing densities and housing types including single-family, multi-family, and mixed uses. The goals, policies and objectives below are intended to reinforce other elements of the Comprehensive Plan, and to describe the community's commitment to housing.

Pierce County has adopted housing targets for Sumner for each income band, per state requirements in the Growth Management Act (Figure 14-1).

Figure 14-1. Adopted Housing Targets by Income Band (2020-2044)

	Total	0-30% AMI Non- PSH*	0-30% AMI PSH*	30-50% AMI	50-80% AMI	80-100% AMI	100- 120% AMI	>120 % AMI	Emergency housing needs (beds)
<i>Estimated Supply (2020)</i>	4,492	73	0	445	1,334	1,049	518	1,073	0
<i>Allocation (2020-2044)</i>	1,985	256	347	368	291	125	114	484	121

Source: Pierce County Ordinance No. 2023-22s.

Goals, Policies, and Objectives

1. *Encourage public and private reinvestment in older residential neighborhoods and private rehabilitation of housing.*

- 1.1. Consider waiving or reducing permit fees for low-income housing rehabilitation projects.
- 1.2. Review and revise regulations to encourage rehabilitation instead of demolition of existing homes, where feasible.
- 1.3. Equitably invest in municipal infrastructure capital replacement, repair, and maintenance, including sidewalks, street trees, and parks.
- 1.4. Promote safety and deter vandalism in residential neighborhoods through environmental design best practices in development permits and “safe street” concepts.
- 1.5. Promote County and local programs that reduce maintenance and rehabilitation costs for residents.
- 1.6. Accommodate local nonprofit housing agencies’ efforts to purchase and rehabilitate housing to meet affordable housing needs and special needs of the community.
- 1.7. Support the preservation of existing mobile home/manufactured home parks as affordable housing.

2. *Provide a range of housing types for all life stages and economic segments of the Sumner community.*

- 2.1. Promote the development of senior housing units in proximity to needed services.
- 2.2. Provide incentives for developing senior housing such as permit fee waivers and reductions, parking requirement reductions, and multi-family tax exemptions.
- 2.3. Encourage design elements in housing that support transit access, pedestrian connections, and universal access features for populations with special needs, older adults, populations with lower incomes, and residents with limited access to an automobile.
- 2.4. Provide residents with information on County, State, and other programs that support homeownership, such as loan and down payment assistance for first-time homebuyers, veterans, and residents with disabilities.
- 2.5. Plan for an adequate supply of land to accommodate projected housing needs for all income bands.

- 2.5.1. Through the Comprehensive Plan, Zoning Code, Subdivision code, Design Guidelines, and other regulations and standards, allow for a variety of housing types and lot configurations including government-assisted housing; housing for moderate-, low-, very low-, and extremely low-income households; manufactured housing; multifamily housing; group homes; foster care facilities; emergency housing; emergency shelters; permanent supportive housing; and duplexes, triplexes, and townhomes.
- 2.5.2. Allow for a variety of lot sizes in low density residential districts including a percentage of lots larger and smaller than the minimum lot size.
- 2.5.3. Allow for at least two dwelling units on all lots zoned predominantly for residential use.
- 2.5.4. Provide flexibility for larger lots in low density residential districts to build triplexes and fourplexes.
- 2.5.5. Allow for two accessory dwelling units per lot in low density, medium density, and high density residential districts.
- 2.5.6. Support the development of accessory dwelling units by reducing regulatory obstacles and streamlining permit procedures such as providing pre-approved plan sets and reduced permit fees.
- 2.5.7. Incorporate reasonable measures as necessary to accommodate the projected population growth.
- 2.5.8. Establish lot sizes and standards that maintain Medium- and High-Density Residential zoning districts for higher density residential development.
- 2.5.9. Review the Zoning Code, Subdivision Code, Building Codes, and other development-control ordinances to identify and address excessive, duplicative, unclear, or unnecessary regulations. The analysis should consider in particular unit type

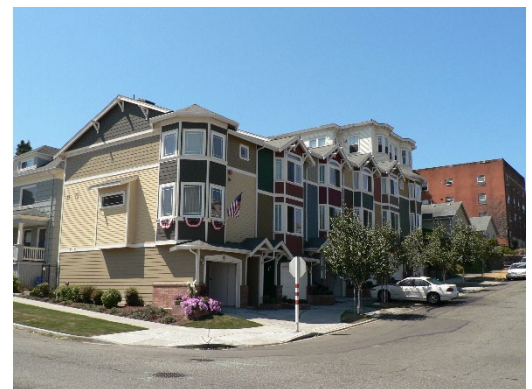
Figure 14-2: Duplex Example
(Google Street View)



Figure 14-4: Triplex Example
(Sightline Institute)



Figure 14-3: Townhouse Example



allowances; lot, site, and building dimensions; street improvement standards; parking; common service lines; and other development standards.

- 2.5.10. Review the City's administrative procedures and streamline the permit process for housing development, with affordable housing as a priority.
- 2.5.11. Consider implementing strategies such as an inclusionary housing program, minimum densities, density bonuses, adaptive re-use, and others to promote affordable housing.
- 2.5.12. Participate, where appropriate, with developers and agencies in the preparation of applications for federal or state housing funds.
- 2.5.13. Identify and catalogue real property owned by the City that is no longer required for its purposes that might be suitable to assemble, reutilize, or redevelop for affordable housing projects.
- 2.5.14. Implement, where feasible, the strategies in the 2021 Sumner-Bonney Lake Housing Action Plan or as amended in the future.
- 2.5.15. For SEPA environmental reviews of housing construction, establish thresholds for SEPA exemptions to streamline the review process, consistent with allowed State thresholds.
- 2.5.16. Support affordable housing development by religious organizations through density bonuses and consider fee waivers.
- 2.5.17. Evaluate potential impacts and benefits of short-term rentals on the use of ADUs and other housing units.
- 2.6. Collaborate with other Pierce County jurisdictions on housing affordability through the South Sound Housing Affordability Partnership (SSHA³P) or similar housing agencies.
- 2.7. Support the reclamation of mine sites for housing once mining operations end.
- 2.8. Provide a jobs and housing balance that satisfies the local need for employee housing and affordability.
- 2.9. Promote fair and equal access to housing for all persons in accordance with state law by connecting residents to information on tenant protections.
- 2.10. Five years after the comprehensive plan periodic update, make a report to the City Council, Pierce County Regional Council, and Washington State Department of Commerce regarding the progress made in permit processing timelines, housing affordability, and housing availability.
- 2.11. Participate in the development of data for buildable lands analysis as required by the Growth Management Act.

3. *Encourage energy efficiency in housing developments.*

- 3.1. Encourage, through incentives and technical support, energy conservation, energy efficiency in building materials and site design, and the application of sustainable, or “green” development practices.
- 3.2. Reduce reliance on automobiles by promoting higher density and infill developments that are located near major transportation links such as the Sumner Commuter Transit Station, and by supporting a network of transit stops connecting neighborhoods to the station.
- 3.3. Continue to enforce the energy efficiency requirements in the State Energy Code and other Washington State building codes.
- 3.4. Establish standards for street widths, landscaping, and parking lots to reduce heat loss or provide shade.
 - 3.4.1. Adopt flexible street standards to allow for narrower streets in appropriate locations to reduce pavement area.
- 3.5. Recognize and support energy conservation and efficiency programs.
 - 3.6. In cooperation with the County, Puget Sound Energy, and other providers, promote programs that help minimize utility costs for residents, particularly seniors and households with lower incomes, such as bill assistance, permitting and fee assistance, weatherization programs, pipe repairs, and installation of energy efficient heating and cooling appliances in existing housing.

4. *Provide for a variety of housing types and densities in the Town Center Plan area in close proximity to the train station.*

- 4.1. Promote the construction of housing stock in the Town Center by at least 500-1000 dwelling units by 2035.
- 4.2. Adopt greater height limit, 5-6 stories, for development at higher density in West Sumner and west of the White River to promote re-development of the area for transit-oriented development.
- 4.3. Adopt greater height limits, 4-5 stories, east of the BNSF Railroad with a transition area to low density residential at a maximum of 3 stories as appropriate.
- 4.4. Maintain the Town Center “transition areas” that will be at reduced height (maximum 3 stories) to create a more compatible transition between low density residential zones and areas with increased height.
- 4.5. Encourage land assembly allowing for feasible and attractive housing or mixed housing/commercial developments. Waive permit fees associated with lot consolidation such as lot line adjustments. Facilitate matching compatible owners that can work jointly to consolidate and sell/develop.
- 4.6. Prohibit garden style apartments in the Town Center that would promote surface parking.

- 4.7. In order to promote redevelopment to desired densities, prohibit new single-family residential development and limit expansion of existing single family.
- 4.8. Maintain the Multi-family Tax Exemption allowance and create other substantial incentives for re-development in the Town Center by providing property tax relief for qualified affordable housing developments for 12 years.

5. *Support high-density multifamily development and apartments in key locations in East Sumner Neighborhood Plan area.*

- 5.1. Apply the Multi-Family Tax Exemption allowance to the East Sumner Urban Village area to create incentives for affordable housing.

6. *Support measures to prevent or mitigate residential displacement through tenant protections and existing programs.*

- 6.1. Consider working with agencies to provide public information on County/State programs on eviction prevention, property tax assistance, mortgage assistance, energy assistance, and foreclosure prevention counseling.
- 6.2. Consistent with state and federal law, consider supporting tenant protections such as tenant relocation assistance, just cause eviction protections, and notice of intent to sell.
- 6.3. Consider adopting provisions in the zoning code such as special zones or development standards that protect manufactured home parks over other types of housing developments.

15. Parks and Open Space

Introduction

The Parks and Trails Plan (2024) is adopted by reference into the Comprehensive Plan. Goals and policies are as follows below.

Goals, Policies, and Objectives

1. Ensure facilities are safe and comfortable for a wide range of users.

1.1. Provide amenities people need.

1.1.1. Restrooms

1.1.2. Parking

- Further develop trailheads.
- Add parking improvements, including ADA options.
- EV charging/parking.

1.1.3. Accessibility

- Inclusive playgrounds and amenities

1.1.4. Weather

- Covered court & shade structures
- Spray park

1.2. Maintain facilities for safety.

1.2.1. Playgrounds

1.2.2. Vandalism prevention

1.2.3. Industry safety standards

1.3. Keep spaces comfortable & inviting.

1.3.1. Lighting

1.3.2. Landscape features

1.3.3. Maintenance levels of service/standards

1.3.4. Develop consistent and sufficient placemaking and wayfinding signage (Tourism Plan)

2. Foster spaces that are attractive and inviting, balancing a variety of needs and uses.

- 2.1. Provide spaces for exercise and physical health.
 - 2.1.1. Paths/trails for walking and jogging.
 - 2.1.2. Diversify courts for basketball, volleyball, pickleball, and tennis.
 - 2.1.3. Fix drainage issues to increase availability of fields for soccer, football, lacrosse, and other sports as well as passive use.
- 2.2. Provide spaces for people to experience nature.
 - 2.2.1. Construction/maintenance of Sumner Link Trail.
 - 2.2.2. Find places in new park designs to incorporate nature, potential Tribal horticulture.
 - 2.2.3. Continue nursery to replace lost trees with mature trees.
 - 2.2.4. Find strategies to protect White River Restoration habitat areas from unauthorized use.
- 2.3. Provide spaces to build community.
 - 2.3.1. Strategies to foster individuals using spaces together.
 - New seating
 - Create informal yard game areas
 - Off-leash dog park
 - 2.3.2. Strategies to foster personal meetings/celebrations (e.g., birthday parties).
 - Move gazebo to...
 - Possible purchase of Rotary Scout Hall
 - Heritage Park building
 - Evaluate reservation system
 - Update Senior Center fixtures/explore expanded use
 - 2.3.3. Strategies to foster/support community events
 - Resign Heritage Park—new stage area & building
 - Activate Hops Alley
- 2.4. Provide spaces that foster art and culture.
 - 2.4.1. Develop unique pocket parks and plazas with Sumner-specific murals and programming (Tourism Plan).
 - 2.4.2. Redesign Heritage Park stage for better entertainment options.
 - 2.4.3. Include acoustical design in new event spaces for maximum uses.

3. *Integrate and connect parks, trails and open spaces with various users for easy access.*

3.1. Biking routes for recreation/transportation

3.1.1. Develop bike lanes to encourage non-vehicular transportation and links (TMP, Tourism Plan).

3.1.2. Promote bike trails linking downtown and industrial area (Tourism Plan).

3.1.3. Complete Rivergrove Pedestrian Bridge to reconnect Rivergrove to amenities (TMP).

3.1.4. Complete bridge over Puyallup River to connect Sumner/Rivergrove to regional system.

3.1.5. Work with region to further connect and promote regional trail system.

3.2. Parking access

3.2.1. Explore the parking needs and options to access the trail and future trailhead locations.

3.2.2. Improve parking access/safety.

3.2.3. Continue alley activations to improve safety, experience of downtown parking.

3.3. Pedestrian access

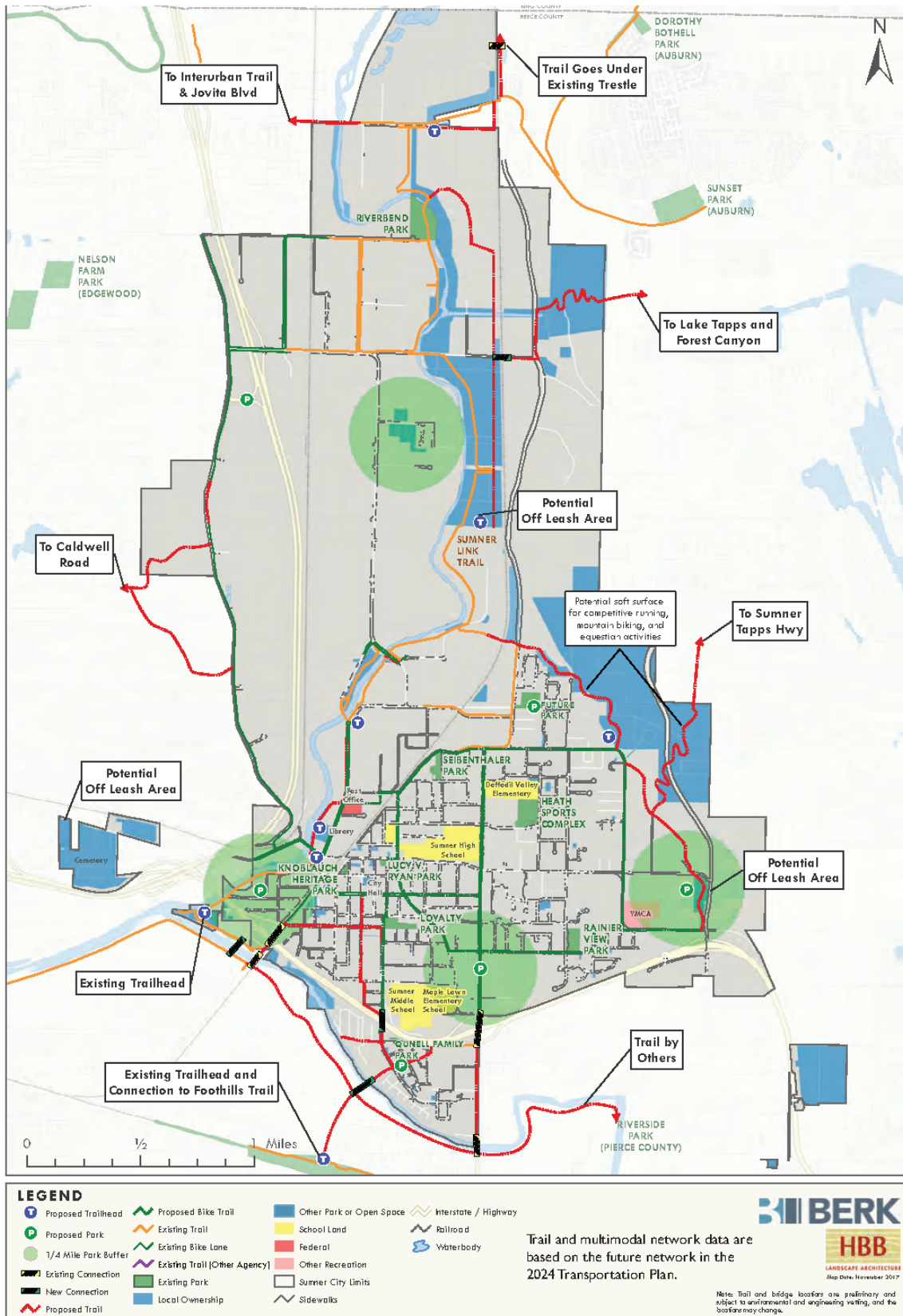
3.3.1. Activate alleys to balance pedestrian access from Main Street.

3.3.2. Complete Rivergrove Pedestrian Bridge to reconnect Rivergrove to amenities (TIP).

3.4. ADA, Senior access

3.4.1. Blend of improvements for ADA and senior access.

Figure 15-1: Parks and Trail System



16. Transportation

Introduction

The Transportation Element provides the link between the Land Use Element and the transportation facilities and services that the City of Sumner needs to support forecast growth during the next 20 years. It addresses issues related to mobility and access, safety, the impact of transportation systems on the natural environment, and the intrinsic relationship between transportation and land use. The availability of transportation facilities and resources is a major factor in determining land use development patterns. Similarly, the use of land influences the need for and location of new or expanded transportation facilities and the required scope of ongoing repair and maintenance of existing facilities. A conscious effort shall be made to ensure a coordinated planning effort between land use and transportation to ensure that Sumner's transportation system is effective, efficient, and modally integrated.

The Transportation Element identifies the City of Sumner's goals and policies for transportation including future transportation system and facilities, level of service (LOS) standards, and a concurrency monitoring system. Future land uses proposed as part of the Land Use Element inform the selection of transportation strategies and necessary transportation facilities (e.g., roadways, sidewalks, trails, bike lanes). Similarly, the Capital Facilities Element and the City's ongoing Transportation Improvement Program (TIP) present specific facility recommendations based on the goals and policies stated in the Transportation Element.

The City of Sumner transportation system is part of the larger Metropolitan Transportation Plan (MTP) assembled by the Puget Sound Regional Council (PSRC). Major improvements to arterials, freeways, nonmotorized facilities, and transit system facilities and services identified by the City of Sumner need to be included in the MTP to be eligible for certain funding programs. Furthermore, inclusion of key projects in and around Sumner in the MTP provides for a regionally compatible system of multimodal improvements.

In accordance with PSRC's focus on people and sustainability, the Transportation Element strives to emphasize the importance of pedestrians and bicycles and prioritize the creation of a network of multimodal transportation-related improvements and policies to ensure that vehicle traffic can coexist with the community's need for a safe and comfortable active transportation environment. It also recognizes the need for the City to work with other transportation service providers to plan, design, fund, and implement transportation projects and programs to serve the community.

Forecast land use alternatives were evaluated for the City of Sumner and used to develop improvements to the motorized and nonmotorized facilities in the City of Sumner. Future 2044 traffic forecasts were developed through the modeling process, which converts land use estimates of housing and employment (by category) into daily person trips by trip purpose. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Under the planned growth, there are expected to be approximately 12,550 weekday PM peak hour vehicle trips and 30,016 weekday PM peak hour vehicle miles traveled by 2044, which is an increase of almost 2,500 vehicle trips and 6,400 vehicle miles traveled over 2024 conditions.

Goals, Policies, and Objectives

Overall

- 1. *Provide an efficient and safe multimodal transportation system to improve mobility for all residents, employees, and visitors of Sumner while balancing Sumner's quality of life, needs related to growth, and supporting the economic vitality of the city consistent with the Regional Transportation Plan.***
 - 1.1. Provide a multimodal transportation system that is compatible with State and regional growth plans, plans of adjacent jurisdictions, and with public transit providers.
 - 1.2. Support a range of travel modes: auto and truck vehicles, pedestrian, bicycle, and bus and rail transit.
 - 1.3. In managing transportation improvements that might increase regional traffic through the community, balance the desire to maintain the city character with future growth and diverse needs of the community.
 - 1.4. Design the transportation system to provide adequate access to the industrial and commercial areas while reducing freight conflicts in residential areas.
 - 1.5. Adopt construction guidelines that will reduce the potential failure of key bridges and transportation routes.

Public Involvement

- 2. *Involve and educate the residents, employees, and business/property owners of Sumner in planning for and implementing transportation projects and programs in and around the city.***
 - 2.1. Encourage and solicit public participation in transportation-related decisions to help ensure planning and implementation have public support.
 - 2.2. Continue to educate the community on the transportation system including traffic laws, transportation planning concepts, future Sumner transportation system needs for all travel modes, and other topics to help the community in understanding transportation and making decisions.

Agency Coordination

- 3. *Coordinate the planning and implementation of the Sumner Transportation Plan with the Regional Metropolitan Transportation Plan (MTP) and State and local agency plans.***
 - 3.1. Coordinate with the State and other major providers of regional infrastructure such as freight corridor operators to identify and implement improvement needs along the State highway system and other regional facilities serving Sumner.
 - 3.2. Coordinate planning and implementation of transportation improvement projects and programs with local agencies.

- 3.2.1. Plan, design, and construct the improvements to provide continuity for vehicular and nonmotorized transportation modes.
- 3.2.2. Jointly fund significant improvements that serve regional travel patterns.
- 3.2.3. Ensure compatibility of improvement projects and the timing of their implementation.
- 3.3. Work with Sound Transit, Pierce Transit, and other transit providers to support and expand a multimodal transportation system by ensuring that the City's transportation plans and facilities are consistent with public transit plans and programs.
- 3.4. Work in conjunction with the County to continue its Bridge Retrofit Program.

Transportation System Mobility and Efficiency

4. Develop a transportation system that provides safe and cost-efficient mobility and accessibility of goods, services, and people for the community of Sumner.

- 4.1. Maintain a LOS D standard or better for selected arterials and collectors in the city where analysis indicates such LOS is warranted.

The levels of service shall be measured using methodologies identified in the *Highway Capacity Manual* (HCM).
 - 4.1.1. Provide reasonable levels of traffic operations while optimizing the impacts and costs of creating wider roadways and intersections to improve transportation capacity and efficiency.
 - 4.1.2. Allow left turns and through movements on side streets intersecting with arterials to operate below the adopted LOS D standard when the LOS affects relatively low traffic volumes and may not meet warrants for traffic signals.
- 4.2. Construct multimodal transportation improvements to ensure that an adequate transportation system is in place to serve increased travel demands.
 - 4.2.1. Concurrency shall be defined as having a financial commitment in place to resolve the deficiency within six years. Concurrency shall be implemented as part of the City's development review process under SEPA. The City will not approve new developments unless the LOS standards or concurrency requirements are met.
 - 4.2.2. Concurrency shall not be applied to Highways of Statewide Significance per State guidelines.
- 4.3. Streets and arterials shall be classified to reflect their desired functional use and be designed consistent with the design guidelines in the Sumner Transportation Plan and the City of Sumner Development Specifications and Standard Details.
- 4.4. Plan for, design, construct, operate, and maintain an appropriate and integrated transportation system as outlined in its adopted Complete Streets Policy.

- 4.5. To minimize impacts of freight and commercial traffic on the city transportation system and the community, maintain truck route restrictions based on functional classification, connectivity, and land uses and work with freight and regional partners to identify options for truck parking.
- 4.6. Ensure the efficient movement of goods and services to and from the Sumner-Pacific Manufacturing Industrial Center (MIC) and along truck routes. Consider freight needs along truck routes including identifying existing areas that need improvements and accommodating truck travel with new transportation projects.
- 4.7. Provides efficiencies in traffic circulation through a flexible, interconnected grid system that avoids the use of cul-de-sacs, dead-end streets, loops, and other designs that form barriers. Provide an interconnected system of sidewalks, trails and other nonmotorized corridors that encourage travel between neighborhoods and community centers.

To achieve an interconnected transportation network, the City should:

- Allow cul-de-sacs only where the natural or built environment would preclude a grid street system.
 - Require new development to provide full or partial/half street improvements.
 - Seek to establish a maximum interval between local access streets in residential and pedestrian-oriented commercial areas of 500 feet.
 - Prohibit private roads and gated access drives in new subdivisions, multifamily and mixed-use developments, except where there is a demonstrated need.
 - Support multimodal travel by encouraging streetscape that enhances the pedestrian and bicycle environment.
- 4.8. Retain existing and identify, acquire, and preserve rights-of-way to implement the interconnected transportation system identified in the Transportation Plan.
 - 4.8.1. The vacation of public right of way should not be approved unless there will be an overriding public benefit.
 - 4.9. Implement the access management strategies including those in the East Main Street Design Strategy while balancing the rights of property owners with the public purpose of safe and efficient movement of vehicles and pedestrians.
 - 4.10. Provide for the efficient movement of traffic through transportation system management strategies such as advanced traffic control measures, intelligent transportation system technologies, speed management, access management, channelization improvements and multimodal design features. Use advanced technologies to better manage traffic volumes on major arterials and improve the efficiency and coordination of traffic signals. Advocate for technology upgrades in adjacent jurisdictions and on state highways that affect the City's transportation network.
 - 4.11. Prioritize maintenance, service needs, and enforcement of the transportation system so that it is safe and functional and preserves the existing facilities.

- 4.11.1. Maintain the existing and future arterial and street transportation system and associated facilities (e.g., sidewalks, transit stops, landscaping) through transportation maintenance and preservation programs.
- 4.11.2. Coordinate with service providers and developers on the location of major utility and transportation corridors and the construction of roadway improvements to help minimize transportation disruptions caused by construction, reduce costs, and maintain pavement integrity.
- 4.11.3. Continue to review and implement traffic control and pedestrian safety improvements in residential areas. Define and prioritize locations for improvements based on:
 - Traffic engineering studies
 - Traffic speeds
 - Safety and crash data, and police department observations
 - Input from the community
- 4.11.4. Include mapped inventories of Sumner's transportation system, conduct studies, and review data to support operational changes and designs that improve safety.
- 4.12. Accommodate the transportation needs of special events, such as alley activation projects, temporary street closures, and construction zones, while safeguarding public safety and property. Follow the Federal Highway Administration Manual on Uniform Traffic Control Devices or other guidelines and standards in planning for special event accommodations.
- 4.13. Allow food truck parking within City right-of-way, where appropriate and after consideration of public safety and health and impacts to private property.

Subarea Plan Transportation and Circulation System

5. *Support implementation of the multimodal transportation system identified in adopted Sumner Subarea Plans.*

- 5.1. For the Town Center Plan Area, apply form-based code and street design standards in new and upgraded street improvement projects, to promote a pedestrian-friendly, bicycle-friendly, landscaped, active streetscape.
 - 5.1.1. Implement the specific street designs in the form-based code for arterial streets, collector streets, local streets, and West Main Street as specified in the Town Center Plan.
- 5.2. For the East Sumner Neighborhood Plan Area, implement the transportation objectives of the plan and the circulation map.
 - 5.2.1. Provide vehicular routes through the neighborhood to diffuse traffic, reduce congestion, and complete the street/sidewalk grid.

- 5.2.2. Improve local and regional transit service to reduce vehicle traffic and connect residential and commercial areas.
- 5.2.3. Provide a nonvehicular network of sidewalks and pathways that supports alternate modes of travel and connects key amenities, such as the central wetlands and the YMCA, to residences and businesses.
- 5.3. Support the Sumner-Pacific MIC as a primary hub for regional, national, and international goods movement by ensuring the integrated development and operation of trucking and rail terminals to enhance the freight transportation system.
- 5.4. Recognize the critical role of safe, reliable and efficient movement of people and goods by identifying and addressing areas within the MIC or connecting corridors where access and circulation is hindered by infrastructure gaps and inadequate design. Ensure future transportation improvements allow for safe and efficient movement of both freight and people.
- 5.5. Pursue the expansion of the Pierce Transit benefit district to serve Sumner and eastern Pierce County and provide options for access to the Sumner Sounder Station.

Pedestrians and Bicycles

6. *Promote the design of multimodal transportation facilities that support local and regional growth centers by providing an interconnected system of pedestrian and bicycle facilities.*

- 6.1. Develop pedestrian and bicycle level of service guidelines to assess completion of the established pedestrian and bicycle network in the Sumner Transportation Plan.
- 6.2. Maintain the Sumner Link Trail as a regional nonmotorized corridor and prioritize projects that enhance the trail with neighborhood connections, trailheads, and amenities.
- 6.3. Ensure design standards for the transportation system facilitate and encourage access and circulation by pedestrians and bicyclists and provide connections to schools, parks, community facilities, transit, and commercial districts.
- 6.4. Development proposals shall provide for convenient nonmotorized connections where feasible, commensurate with the scale and occupancy of the development.
- 6.5. Sidewalks will be provided on both sides of all City streets unless special circumstances, such as topography or environmental constraints, make it cost prohibitive.
- 6.6. Construct a separate system of multipurpose trails to serve transportation and recreation needs of the community. Connect the system with adjacent communities to facilitate regional connectivity. Implement the trail system and connections to the arterial, collector, and other pedestrian and bicycle facilities per the Sumner Parks and Trails Plan.
- 6.7. Develop and maintain street cross-section designs that promote street trees, separated sidewalks, and wide sidewalks along commercial uses; and develop and maintain cross-

section designs for mid-block pedestrian and bike corridors that encourage non-auto circulation.

Commuter Rail and Transit

7. *Reduce the need to expand the general capacity of arterials and collector streets in the city by developing and expanding an integrated system of public transportation options and strategies to provide mobility alternatives.*

- 7.1. Monitor growth and development for changes in transit demand and address needs through a local transit system.
- 7.2. Continue working with transit providers to expand and enhance bus transit service and a regional park-and-ride system that serves regional destinations and neighborhoods and employment areas of Sumner.
- 7.3. Prioritize agency coordination and funding for commuter connections to Sumner's primary employment center, the Sumner-Pacific Manufacturing Industrial Center (MIC).
- 7.4. Preserve existing railroad rights-of-way within the City's Urban Growth Area and connections to the national rail system.
 - 7.4.1. Promote safety upgrades at railroad crossings to improve safety of the traveling public.
- 7.5. Support construction of improved pedestrian and bicycle connections with local and regional transit service. Work to provide pedestrian safety improvements along arterials and bike lockers and facilities at transit connections.
- 7.6. Enhance safety and operations of rail service (freight and passenger) through grade separation of roadways and improving at-grade crossings.
- 7.7. Support a shuttle or autonomous transit that would connect the Historic Downtown area with eastern areas of the city.
- 7.8. Ensure that the commuter rail station does not have an unreasonable adverse impact on the residential character of the neighborhood.
- 7.9. Support the use of high-capacity transit and commuter train by the entire Sumner community. Encourage housing near the train station for households desiring transit availability, provide services and businesses that cater to residents and train commuters, and provide safe connections for pedestrian and bicycle commuters.

Commute Trip Reduction and Transportation Demand Management

8. *Promote programs that reduce the demand on the transportation system.*

- 8.1. Encourage the use of high occupancy vehicles (HOV) programs (e.g., buses, carpools, and vanpools) through both private programs and under the direction of Pierce Transit and Sound Transit.

- 8.2. Promote the use of transit, carpools, or vanpools.
- 8.3. Promote reduced employee travel during the daily peak travel periods through flexible work schedules and programs for telecommuting or at an alternate work site closer to home.
- 8.4. Encourage employers to provide TDM measures in the workplace through such programs as preferential parking for HOVs, transit pass subsidies, improved access for transit vehicles, and employee incentives for using HOVs.
- 8.5. Implement the provisions of the State Commute Trip Reduction Act.
- 8.6. Consider pricing programs as an option for reducing reliance on single-occupancy vehicle travel.
- 8.7. Incentivize transit oriented and higher density land uses that encourage walking or biking near transit stations.

Equity in Transportation-Related Decisions

9. Consider the impacts of transportation on underserved populations and provide transportation in an equitable manner.

- 9.1. Prioritize improvements that will improve multimodal transportation in underserved neighborhoods.
- 9.2. Incorporate social equity in planning for transportation improvements, programs, and services in historically underserved neighborhoods and vulnerable populations.
- 9.3. Ensure mobility for all residents within the UGA by providing an accessible and affordable transportation system and encouraging public and private transportation operators to meet the needs of such persons. The City shall ensure that its transportation system meets the requirements of the Americans with Disabilities Act (ADA), apply design standards responding to the diverse community needs and improve existing City transportation facilities to meet these needs.

Land Use and Environmental Considerations

10. Establish a transportation system with minimal environmental impact and energy consumption that provides for a high quality of life to be enjoyed by the residents.

- 10.1. Incorporate environmental factors into transportation decision-making, including attention to human health and safety by designing transportation facilities within the Sumner UGA minimizing adverse environmental impacts resulting from both their construction and operation.
 - 10.1.1. The City shall fulfill this need by:
 - Considering environmental costs of development and operation of the transportation system.

- Aligning and locating transportation facilities away from environmentally sensitive areas.
 - Working with the State to incorporate appropriate structural and vegetative sound abatement as part of highway widening projects.
 - Mitigating unavoidable environmental impacts wherever possible.
 - Soliciting and incorporating the concerns and comments of interested parties.
 - Considering the social equity and environmental justice impacts of transportation projects.
 - Evaluating street cross-sections for efficient and effective use of pavement and landscaping features and low-impact design.
- 10.2. Ensure that transportation system improvements are compatible with adjacent land uses, minimize potential conflicts, and create safe and adequate connections to adjacent land uses. The City shall:
- Prevent new residential driveways from having direct access to arterials, unless no other options exist.
 - Incorporate transit, pedestrian, and bicycle access to major developments.
 - Provide landscaping and noise buffers along major roadways.
 - Provide facilities for bicyclists and pedestrians to access transit.
 - Promote development site plans that encourage pedestrian travel.
- 10.3. Support continuing efforts for improving air quality and reducing greenhouse gas emissions throughout the Sumner area and develop a transportation system compatible with the goals of the Federal and State clean air acts.
- 10.3.1. The City shall:
- Support vehicle emissions reduction and cleaner burning fuels programs.
 - Coordinate with Sound Transit and other jurisdictions on Commute Trip Reduction (CTR) programs for major employers in the Sumner planning area.
 - Require air quality studies of new major developments likely to have significant impacts created by site-generated traffic.
 - Promote other TDM Programs.
 - Work with the private and other public sectors to introduce cleaner burning fuels for the existing motorized fleet, and vehicles powered by alternate fuel sources.
 - Support and implement projects that promote cleaner burning and alternative fuels such as providing electric vehicle charging infrastructure.
- 10.4. Promote, through regulations and incentives, the use of low-impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems. Low impact development should be included in new transportation projects where possible.

- 10.5. Increase the resilience of the transportation system and support security and emergency management to protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.
- 10.6. Reduce greenhouse gases by expanding the use of conservation and alternative fuel sources and by reducing vehicle miles traveled by increasing alternatives to driving alone.
- 10.7. Evaluate converting public fleets to zero-emission vehicles where feasible.
- 10.8. The City should promote and allow telework wherever possible.
- 10.9. Expand public electric vehicle charging stations and encourage and incentivize private electric vehicle charging stations.

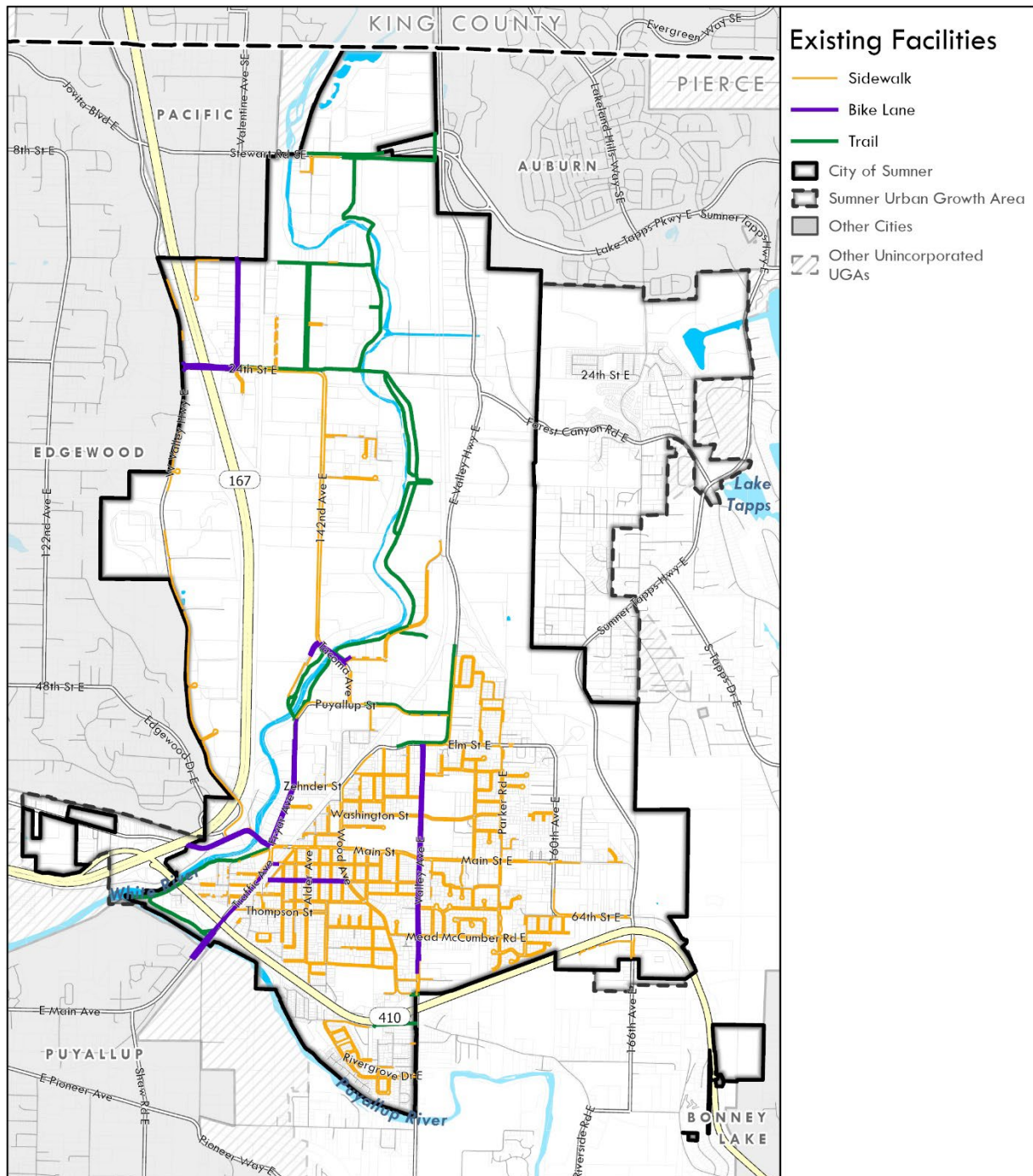
Program Financing and Implementation

11. Fund and implement the transportation plan based on the relative benefits to various user groups and the community and regional priorities, benefits, and cost allocation.

- 11.1. Prioritize city improvement projects and participation in State and regional projects based on the following objectives:
 - Human health and transportation safety of all modes.
 - Maintenance and preservation of existing transportation system facilities.
 - Meet current and future demands to support growth within Sumner and maintain transportation concurrency.
 - Expand facilities and services to improve connectivity of the transportation system.
 - Environmentally beneficial.
 - Addresses a need identified for underserved and/or vulnerable populations.
- 11.2. Funding programs that should be considered by the City include:
 - Local, State, and Federal grant programs.
 - Development mitigation.
 - Local city transportation and general tax funds.
 - Local Improvement Districts (LIDs).
 - Expanded business license fees.
 - Other local option taxes fees that are currently allowed or that may be available in the future.
- 11.3. Work with other transportation service providers and agencies to fund and implement transportation projects and programs to serve the community and connect to major transportation hubs.
- 11.4. Ensure that new growth pays a proportionate share of the costs of transportation facilities needed to support growth. Where applicable, new development shall contribute to the costs of needed improvements through such means as:

- SEPA-based mitigation.
 - Transportation Impact Fees.
 - Frontage Improvements.
 - Low Impact Development (LID) that reduces public impacts and costs.
 - Other means allowed by State and local law.
- 11.5. Ensure that the annual Six-Year Transportation Improvement Program (TIP) is financially feasible, leverages available City Funds, and is consistent with the priorities of the Transportation Plan.
- 11.6. Reassess improvement needs, priorities, level of service standards, and the land use plan if available and achievable funding falls short of meeting the identified needs.
- 11.7. Approve major land use changes only when those proposals accompany specific documentation or plans showing how the transportation system can adequately support existing and proposed development needs based on concurrency, access, safety, and level of service standards or guidelines.
- 11.8. Develop and charge a multimodal transportation impact fee for the purposes of building a transportation network that supports multiple travel operations.
- 11.9. Balance 20-year financing of transportation improvements between both existing and future users based on the principle of proportional benefit to all users.
- 11.10. Update the Transportation Plan when the Sumner Comprehensive Plan is revised or updated in such a way that it affects the city's transportation demands or projects outside the city's control, such as special transportation related projects led by the WSDOT, PSRC, transit agencies, or Pierce County, cause a fundamental shift in transportation demands or capacity within the Sumner UGA.

Figure 16-1: Existing Nonmotorized Facilities



CITY OF SUMNER

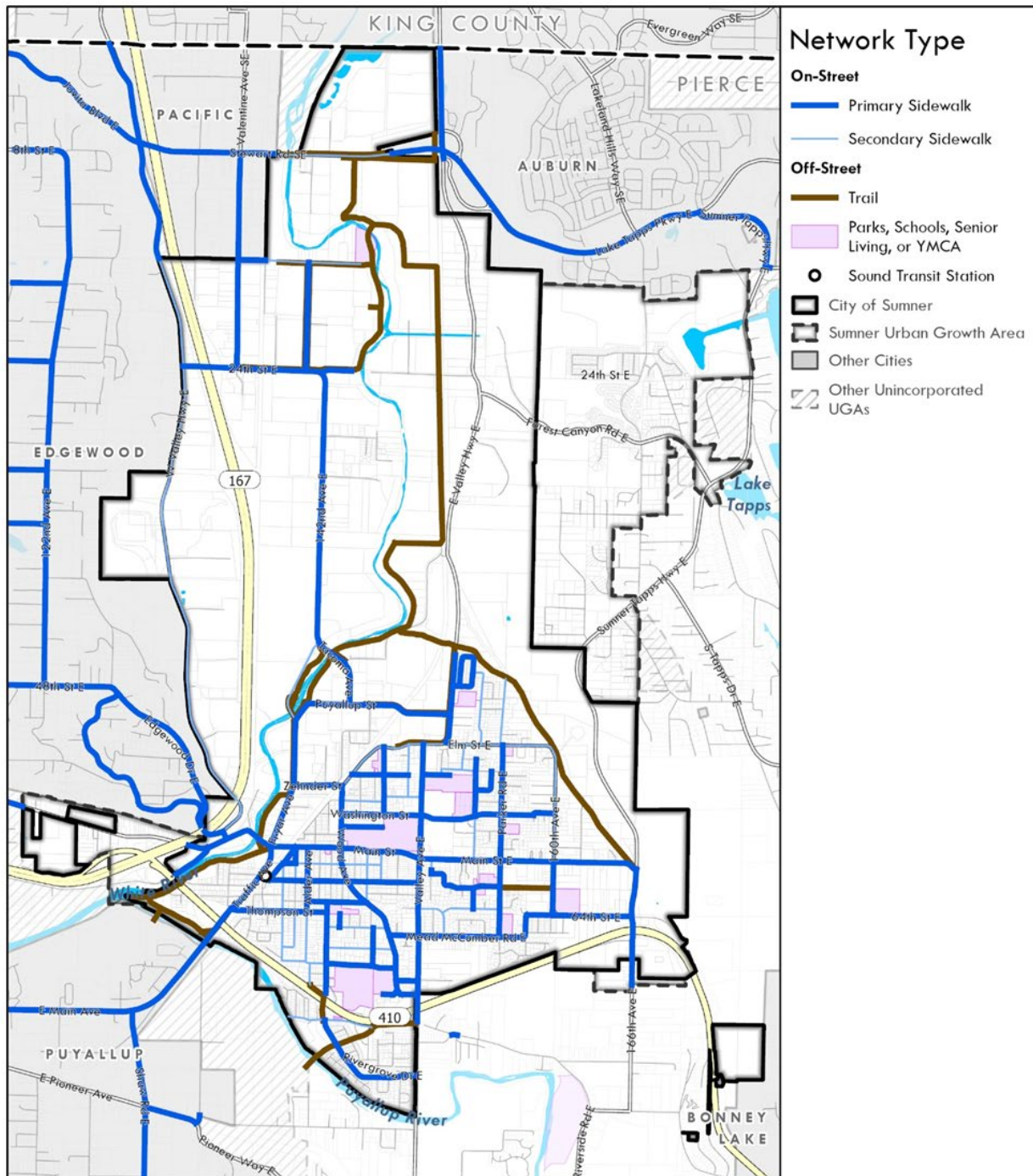
Existing Non-Motorized Facilities

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: August 2024

Figure 16-2: Future Pedestrian Network



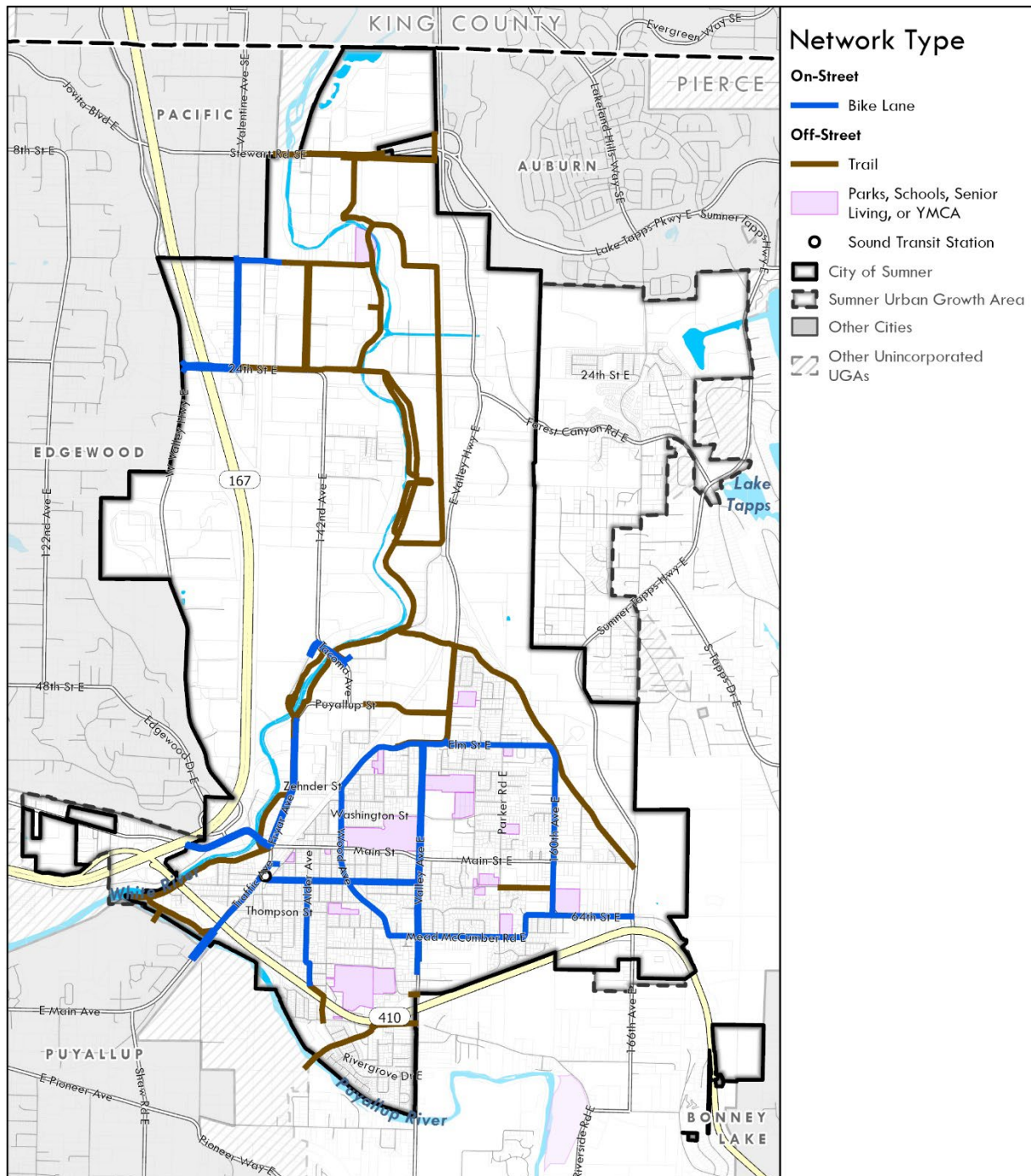
CITY OF SUMNER Future Pedestrian Network



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Map Date: February 2024

Figure 16-3: Future Bike Network



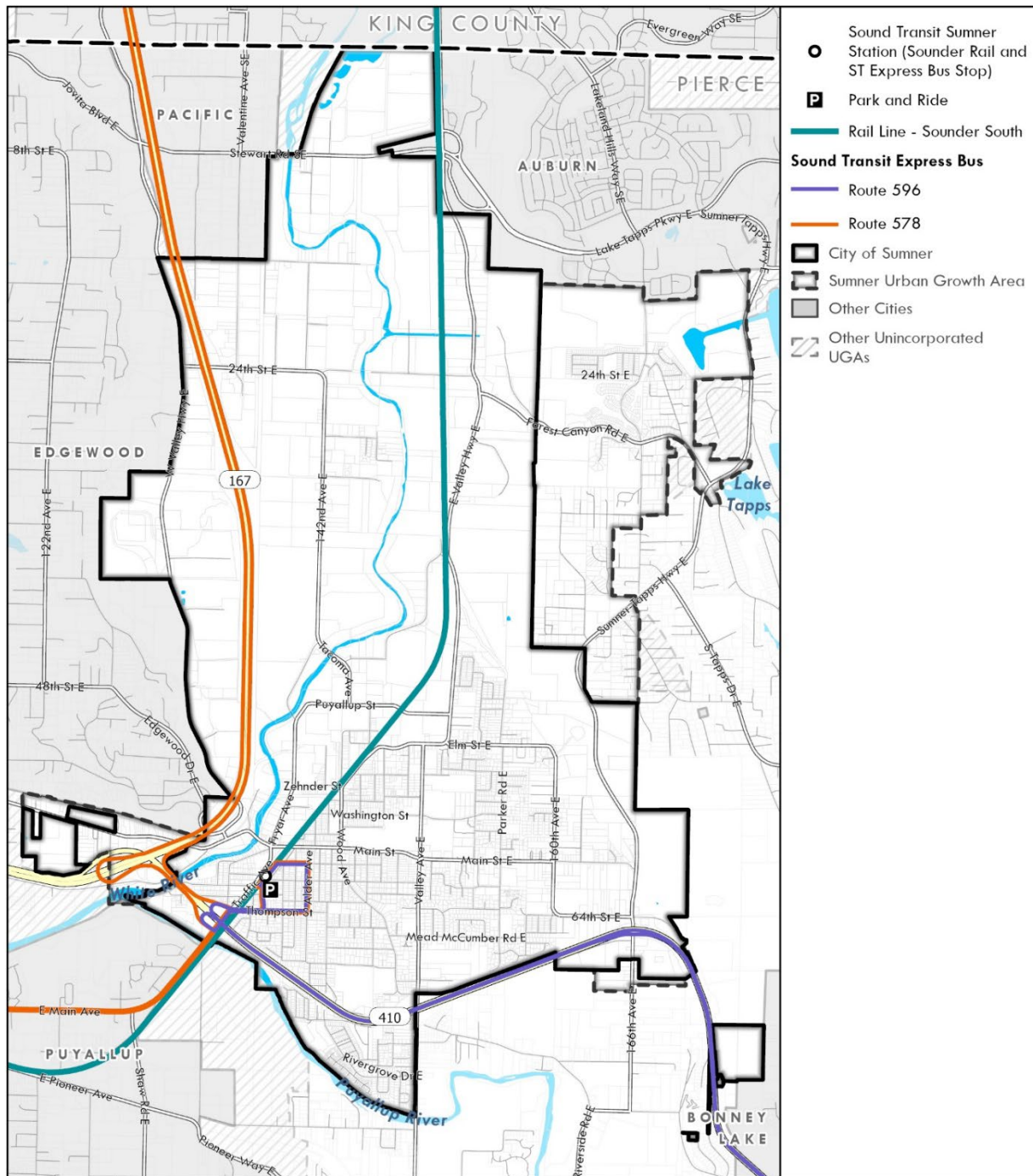
CITY OF SUMNER Future Bike Network



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Map Date: August 2024

Figure 16-4: Existing Transit Service



CITY OF SUMNER

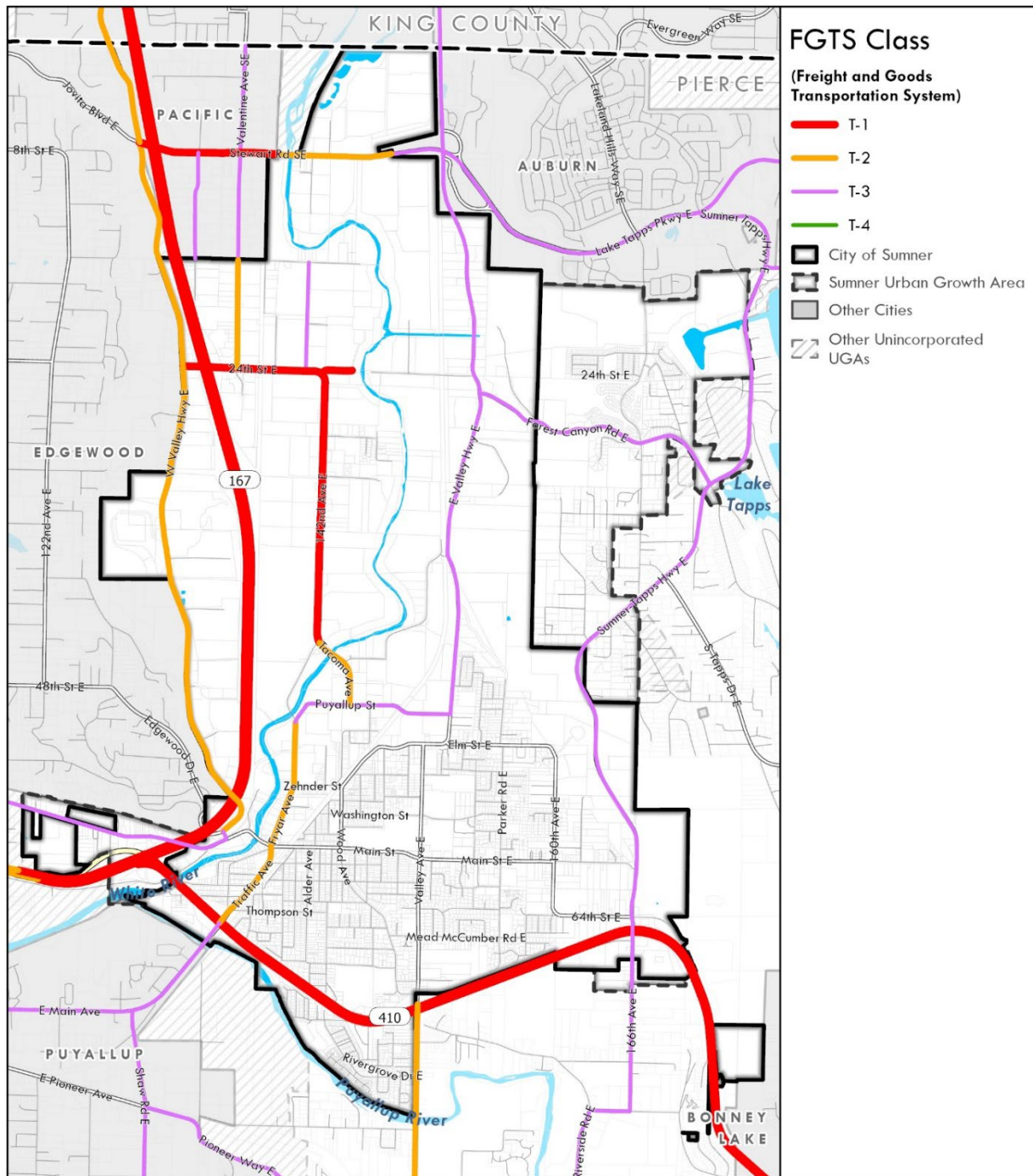
Existing Transit Service

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Map Date: February 2024

Figure 16-5: Existing Truck Routes



CITY OF SUMNER

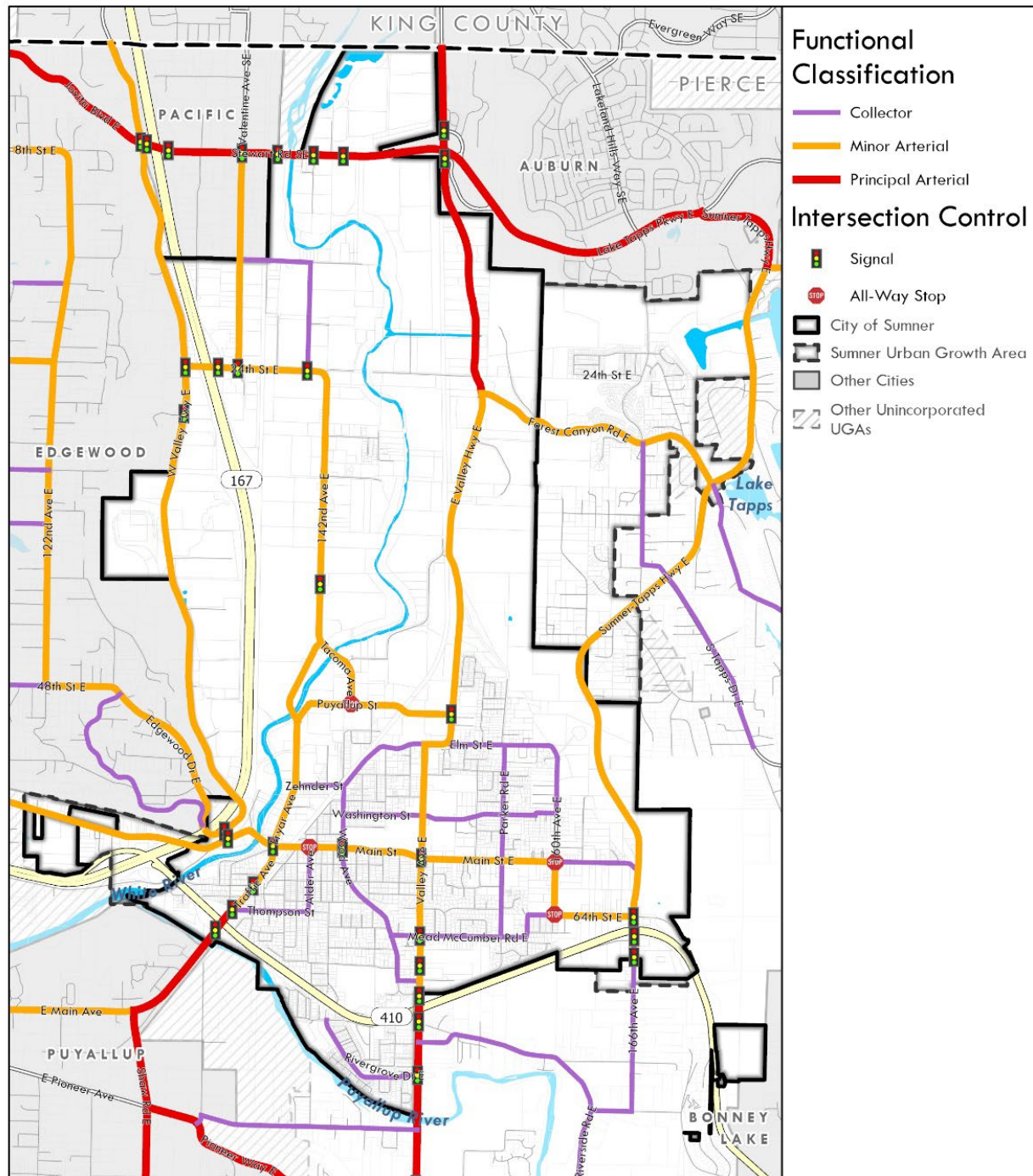
Existing Truck Routes

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Figure 16-6: Existing Traffic Control and Functional Classification



CITY OF SUMNER

Existing Traffic Control and Functional Classification

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

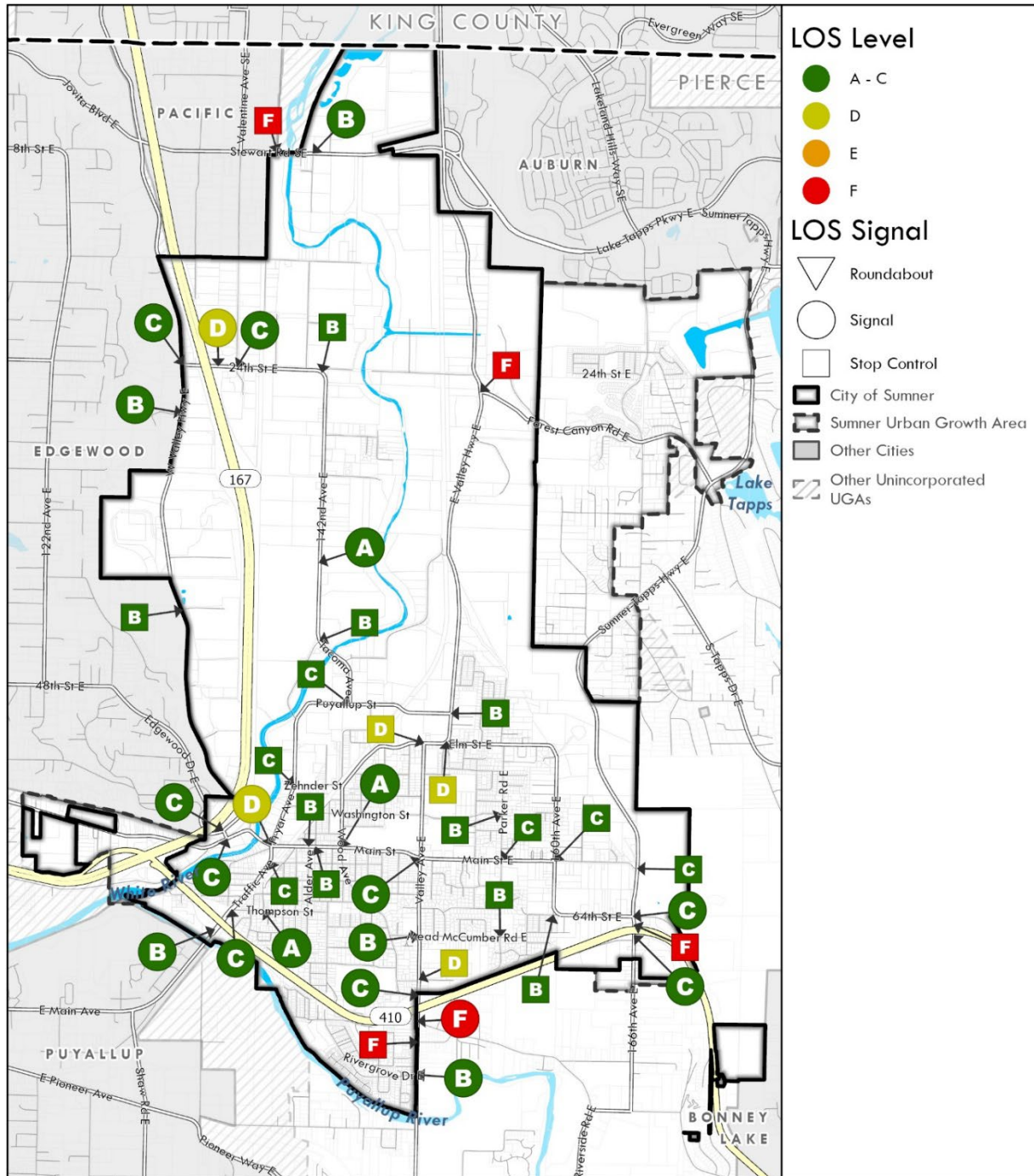


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Miles



Map Date: February 2024

Figure 16-7: Existing Weekday PM Peak Hour Level of Service



CITY OF SUMNER

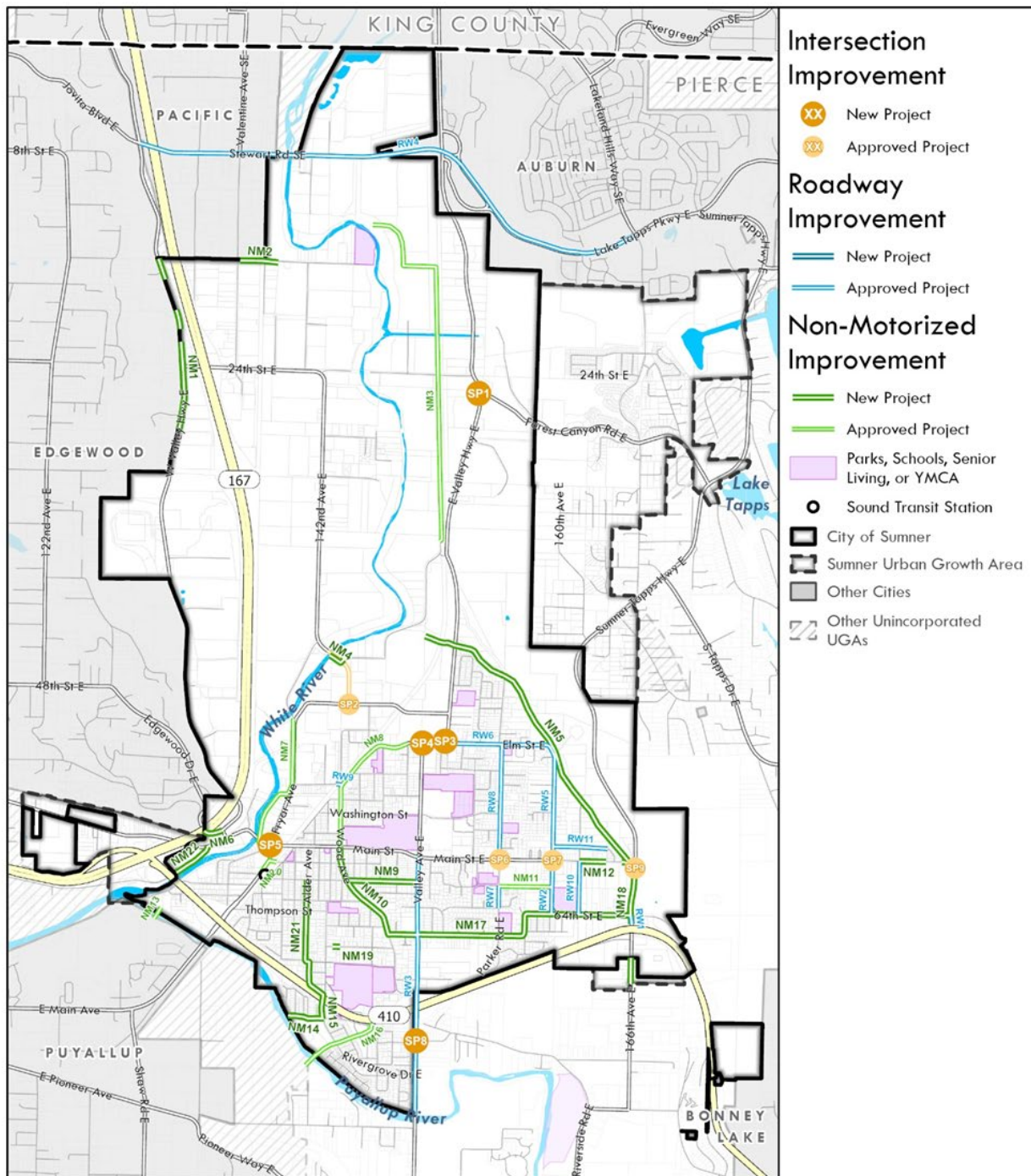
Existing Weekday PM Peak Hour Level of Service

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

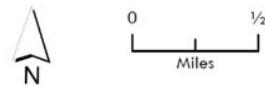


Map Date: February 2024

Figure 16-8: 20-Year Transportation Improvement Projects



CITY OF SUMNER 20-Year Improvement Projects



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

17. Capital Facilities

Introduction

The Growth Management Act (GMA) requires that comprehensive plans include a Capital Facilities Element, which addresses the capital facility needs sufficient to support the designated land use intensities. The following policies establish the levels of service for the necessary capital facilities and the policy directives that implement the specific capital facility items. Public services have also been included because of their close ties to capital facility plan development. Comprehensive analysis of Sumner's facilities is provided in the city's Capital Facilities Plan, the Draft EIS, and Final EIS, and in the various capital facility plans prepared for Sumner addressing sewer, water, and stormwater drainage.

Goals, Policies, and Objectives

- 1. *Provide effective, efficient, affordable, and quality capital facilities and public services at the level necessary to support a growing community.***
 - 1.1. Consider access and economic, social, environmental, and health impacts when locating community facilities and services, including civic places like parks, schools, and other public spaces.
 - 1.2. Encourage planning and coordination of emergency management and public safety programs.
- 2. *Consider present and future impacts of capital facilities and public services decisions on underserved populations to improve quality of life for all Sumner residents and address past inequities.***
 - 2.1. Ensure impacts and burdens associated with capital facilities and public services are equitably distributed throughout the city.
 - 2.2. Prioritize improvements to public facilities and services in communities where there are lower levels of service, populations with limited incomes, and/or populations at greater risk of disparate impacts, such as poor health outcomes.
 - 2.2.1. Through cooperative and coordinated planning with other jurisdictions and districts, ensure efficient and equitable siting of essential regional capital facilities.
 - 2.3. Actively seek input on public facility and service proposals from communities where there are lower levels of service, populations with limited incomes, and/or populations at greater risk of disparate impacts, such as poor health outcomes. Provide engagement materials in the languages most commonly spoken in Sumner.

3. *Consider the impacts of climate change and incorporate climate resiliency measures in capital facilities projects.*

- 3.1. Reduce the City's carbon footprint by incorporating, where practicable, green development practices in all buildings the City constructs, remodels and renovates.
- 3.2. The City should meet a LEED® Silver certification for new construction or additions or major renovations of City facilities over 5,000 gross square feet in area only when long-term economic benefits may be realized, including the reduction of operating costs, enhanced asset value, optimized building performance and a healthier workplace for its employees.
- 3.3. Implement energy-saving technologies in all City facilities as facilities are built or remodeled, such as energy efficient lighting, water-conserving appliances.
- 3.4. Leverage the City's purchasing power related to capital improvement projects to help expand the markets for green building products, including recycled-content materials and clean, renewable energy technologies.
- 3.5. Initiate programs to replace and upgrade stormwater systems to accommodate future increased conveyance requirements due to climate change and urban flooding.
- 3.6. Support the planting of trees along street edges and parking lots and large expanses of asphalt to create a pleasing environment and to increase energy efficiency by reducing heat absorbed by asphalt that increases ambient temperatures.
- 3.7. Facilitate and encourage conservation of resources to delay the need for additional facilities.
- 3.8. Facilitate the conversion to cost-effective and environmentally sensitive alternative technologies and energy sources.
- 3.9. Support the development of infrastructure for alternative fuels that reduce vehicular pollution.
- 3.10. Install generators for all identified critical facilities without adequate generators.
- 3.11. Construct a floodwall or setback levee on the Puyallup River in the Rivergrove Drive neighborhood to reduce flooding on adjacent properties.

4. *Ensure new public facilities and services to support new development are provided concurrent with the development.*

- 4.1. Develop procedures to ensure that public facilities and services necessary to support development and established Levels of Service are available at the time of development.
- 4.2. Work with other service providers and adjacent jurisdictions to coordinate service provision and improvements to capital facilities.
- 4.3. Coordinate with adjacent jurisdictions through joint planning to ensure service provision and development is consistent with the goals of this plan.

- 4.4. Generally make new development responsible for providing the services necessary to support the demands created by the development.
- 4.5. Encourage infill development which takes advantage of existing public facility capacity.
- 4.6. Establish and maintain a current 6-year capital improvement plan to finance the necessary capital improvements identified in the applicable capital facility plans.
- 4.7. Provide for regular monitoring of capital facility and public service needs and make appropriate amendments to capital facility plans.
 - 4.7.1. Update, as necessary, the capital facility plans used in the preparation of the Comprehensive Plan to reflect the final land use designations and assumptions. Utilize the Capital Facilities Plan to make capital budget decisions and development of the city's biennial budget.
 - 4.7.2. Communicate with other service providers on population projections and growth in order to maintain accurate coordination of service provision.
 - 4.7.3. Update the Capital Improvement Program periodically.
 - 4.7.4. Monitor implementation of the Capital Facility Plan and Capital Improvement Program against the rate of growth and development to determine if adequate public facilities are being provided. If adequate facilities and services are not available, the land use element shall be adjusted accordingly.

5. *Ensure adequate funding is available to meet capital facility and public service needs.*

- 5.1. Explore funding from a mix of sources, changes to regulatory, pricing, taxing, and expenditure practices, and other fiscal tools to meet capital facility and public service needs.
- 5.2. Seek broad funding for the construction, maintenance, and replacement of water services and facilities, stormwater system improvements, and sanitary sewer services and facilities, as needed, to ensure reliable service.
- 5.3. If funding is insufficient, adjustments should be made to the levels of service, Land Use Element, revenue sources, or any combination thereof.

Parks

6. *Maintain a safe, attractive, equitable, enjoyable, and diverse park system that meets the needs of the City's residents, businesses, and visitors consistent with the City's adopted Parks and Trails Plan.*

- 6.1. Implement the facilities and improvements identified in the adopted Parks and Trails Plan.
- 6.2. Maintain the following minimum levels of service for the parks system (based on 2024 conditions):

Investment: Maintain a level of investment per capita (resident equivalent) that is consistent with the current value of the system per person. The 2024 value is included in the Capital Facilities Plan and may be adjusted periodically for system value, inflation, or annexation.

Recreation Facilities: Provide for a mix of parks and recreation facilities at a level consistent with the community's current level of facilities:

Active Recreation Facilities (fields, courts, skate parks, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 0.4 facilities per 1,000.

Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 3.4 facilities per 1,000.

Parks: Sumner park acres per 1,000 resident equivalents consistent with the 2024 ratio of 3.2 acres per 1,000.

- 6.3. Aim for the following target levels of service for the parks system:

Investment: Achieve a level of investment per capita (resident equivalent) that is consistent with a 30% increase in the current value of the system per person. The 2024 value is included in the Capital Facilities Plan and may be adjusted periodically for system value, inflation, or annexation.

Recreation Facilities:

Active Recreation Facilities (fields, courts, skate parks, and similar): 0.5 facilities per 1,000 resident equivalents.

Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): 4.4 facilities per 1,000 resident equivalents.

Parks: 5.4 acres per 1,000 resident equivalents.

Open Space: (including increases to tree canopy cover): 3.8 acres per 1,000 resident equivalents.

Access: 10-minute maximum walk to a park for all Sumner residents.

Police

7. *Provide and maintain a police system sufficient to meet the community's public safety needs. This system may include normal police functions, responding to calls for service, community policing, care and custody of prisoners, and animal control.*

- 7.1. Level of Service:

- Maintain a ratio of at least two (2) commissioned officers per 1,000 population.

- Maintain a ratio of not less than 1 commissioned patrol officer for every 1000 calls for service per year. Patrol Officers should have at least 40% of their patrol shift available for proactive policing activities.
 - Provide one sergeant for every 5 commissioned patrol officers.
 - Provide and maintain one detective position at a ratio of 1/400 part A offenses.
- 7.2. Provide support to Sumner Schools through the continued School Resource Officer program.
- 7.3. Consider including environmental design best practices for safety and vandalism prevention in site design guidelines for new development.
- 7.4. Maintain public safety staffing to support community events such as parades, festivals, concerts, community gatherings, etc. that promote Sumner's sense of community.

Fire

8. *Through the inter-local agreement with East Pierce Fire & Rescue (EPFR), provide and maintain suppression, prevention, education, and medical response, including advanced life support response system.*

- 8.1. Support implementation of the EPFR capital facilities plan (refer to the plan for a complete list of levels of service and planning assumptions).
- 8.2. EPFR shall strive to maintain sufficient personnel and equipment, strategically located such that the first-due response units arrive at fire and emergency medical incidents in urban areas served by staffed fire stations (as characterized by the City of Sumner) within 8 minutes, 30 seconds to the 90th percentile.
- 8.3. EPFR shall strive to maintain sufficient personnel and equipment, strategically located to provide a minimum acceptable (effective) response force capable of arriving at emergency incidents within 13 minutes, 30 seconds to the 90th percentile. "Sufficient personnel" is further defined in the EPFR Capital Facilities Plan.

Library

9. *Through the Pierce County Library District, provide a library and access to library services consistent with the Pierce County Library Systems Capital Facilities Plan.*

- 9.1. The City of Sumner adopts by reference the Pierce County Library Systems Capital Facilities Plan as adopted and periodically amended, including any level of service guidelines contained therein.

General Facilities

10. *Provide sufficient City facilities to meet the needs of City operations.*

- 10.1. Establish and provide the following Level of Service for City government buildings:

- General Government 1.36 s.f./capita
- Police 294 s.f./employee
- City Shops (buildings only) 1.8 s.f./capita

10.2. Seek innovative and shared financing for City facilities, including lease arrangements and impact fees.

10.3. Maintain services and a rate structure adequate to keep the cemetery self-sufficient.

Water, Sewer, and Stormwater

11. Maintain an efficient water system to meet the needs of the community's residential, commercial and industrial community as set forth in the City's most recently adopted Water System Plan.

11.1. Establish the following Levels of Service for water supply:

Demand:

- Residential Demand 72.73 gallons per day (gpd)
- Employee Demand 25.28 gpd/employee¹

Fire Flow:

Use	Min. Flow (gallons per minute - gpm)	Required Duration (hours)
Medium and low density residential	1,000	2
High density residential and commercial	1,500	2
Industrial	3,500	3
Several existing buildings	4,500	4

Reliability:

WATER SYSTEM - RELIABILITY LOS

<u>Criteria</u>	<u>Level of Service</u>			
	<u>A</u>	<u>B</u>	<u>C</u>	<u>E</u>
Conveyance Reliability; Loop (min. 6" pipe) System	95% + of services on loop lines	90% + of services on loop lines	80% + of services on loop lines	Less than 80% of services on loop lines

Source Reliability;	Meets peak day w/largest supply out	Meets peak day w/all supplies on	Meets 95% of peak day - use storage	Water restriction required
Distribution System Reliability; Isolation valves a min of 660 ft.	95% + of services meet these criteria	90% + of services meet these criteria	80% + of services meet these criteria	<80% of services meet these criteria
Power Backup for Supply Pumps;(standby generators)	100% of pumps with backup gen.	Sufficient backup for meeting MMADF	Sufficient backup for avg. daily flow	Less backup than needed for ADF
Emergency Response by Repair Crew	< 4 hrs. on 24-7 basis	< 8 hrs. on 24-7 basis	< 24 hrs. on a 24-7 basis	> 24 hrs. on a 24-7 basis

The minimum LOS for reliability is "B" as outlined above.

- 11.2. Deliver a high degree of water quality which satisfies federal, state and local regulations as follows:

LOS "A": Water quality meets both Primary and Secondary Public Health Standards.

LOS "B": Water quality meets only Primary Drinking Water Standards.

For water quality, Sumner chooses a LOS "A".

- 11.3. Require water services for new development, unless otherwise allowed by state or county regulations.

11.3.1. Encourage the design, siting, construction, operation, and relocation or closure of water infrastructure in a manner that is cost-effective, environmentally sensitive, appropriate to the location and need, minimizes and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.

- 11.4. Require all new development to avoid or mitigate adverse impacts to functioning water systems.

Water Conservation

- 11.5. Implement water conservation programs consistent with the Sumner Water Plan.

- 11.5.1. Require new and existing businesses to use water at or below the average per capita employee level and businesses that use higher than average rates of water to mitigate their impacts.
- 11.5.2. Implement water service technologies, such as “smart meters,” that assist customers in monitoring and reducing water usage.
- 11.5.3. Support existing public education and outreach campaigns to address and promote water conservation.

Sanitary Sewer

12. Provide a sanitary sewer system adequate to meet the demands of the community that ensures public health and safety and protects the environment.

- 12.1. Establish and provide for a Level of Service as defined in the adopted Sanitary Sewer Plan.
- 12.2. Require sanitary sewer services for new development, unless otherwise allowed by state or county regulations.
 - 12.2.1. Encourage the design, siting, construction, operation, and relocation or closure of sanitary sewer infrastructure in a manner that is cost-effective, environmentally sensitive, appropriate to the location and need, minimizes and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.
 - 12.2.2. Require all new development to avoid or mitigate adverse impacts to functioning sanitary sewer systems.

Septic Systems

- 12.3. Ensure existing on-site septic systems may continue to serve existing residents as long as they are properly functioning, well maintained, and remain in compliance with Tacoma-Pierce County Health Department requirements.
 - 12.3.1. Require all new development to avoid or mitigate adverse impacts to functioning septic systems.
 - 12.4. Encourage homeowners to connect to the sanitary sewer system where available.
 - 12.5. Require homeowners to connect to the sanitary sewer system if existing onsite septic systems fail to maintain compliance with Tacoma-Pierce County Health Department requirements.
- ### ***13. Seek cooperative planning approaches among jurisdictions, agencies, federally recognized Tribes, adjacent regions, and special purpose districts to address regional issues of water and sanitary sewer, future development needs, regional issues, and emergency response.***
- 13.1. Coordinate emergency response across jurisdictions to ensure adequate water and sanitary sewer service, with priority given to minimal service disruptions for historically underserved populations.

- 13.2. Ensure that the City's Emergency Response Plan is coordinated with regional jurisdictions and the City's Public Works Department to include local measures for communicating and addressing emergencies.
- 13.3. Coordinate and prioritize messaging that is in plain language, short, culturally appropriate, in language prevalent in the area, and in multiple formats, such as audio, large print and captioning.

14. Implement strategies, appropriate regulations, and new technologies that balance cost and benefits for the City, health and safety, and promote affordability and equitable access to water and sanitary sewer services to all communities.

- 14.1. Promote incentive programs, strategies, and appropriate regulations to provide equitable access of water and sanitary sewer services to underserved areas, with particular priority investments to address disparities in underserved communities.
- 14.2. Provide utility bill or deposit assistance or subsidies to supplement tenant-based rental assistance to increase protection for vulnerable households.
- 14.3. Prioritize use of new technologies, programs, and applications that increase the reliability, affordability, and accessibility of water and sanitary sewer services and pay options.

15. In conjunction with existing system providers, provide surface and storm drainage collection systems to protect water quality, public and private property, and the natural environment.

- 15.1. Establish and maintain the Level of Service as the 25-year storm event, except in those areas where the 100-year storm design is appropriate to protect the natural environment.
- 15.2. Require new development to provide for facilities to reduce water quantity and quality impacts associated with new development.
 - 15.2.1. Encourage the design, siting, construction, operation, and relocation or closure of storm drainage infrastructure in a manner that is cost-effective, environmentally sensitive, appropriate to the location and need, minimizes and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.
 - 15.2.2. Encourage the use of low impact development (LID) and stormwater best management practices to manage stormwater runoff where feasible.
- 15.3. Participate in coordinated regional watershed-based efforts with goals of achieving local drainage health, protection, preservation of water quality, and resources in watersheds.
- 15.4. Review, develop, and implement design and development standards to meet the City's goals to improve water quality and reduce flooding and reflect the requirements and manuals of state and federal agencies, as appropriate.

Solid Waste

16. Consistent with adopted Solid Waste Management Plans, provide solid waste collection and disposal services to the community.

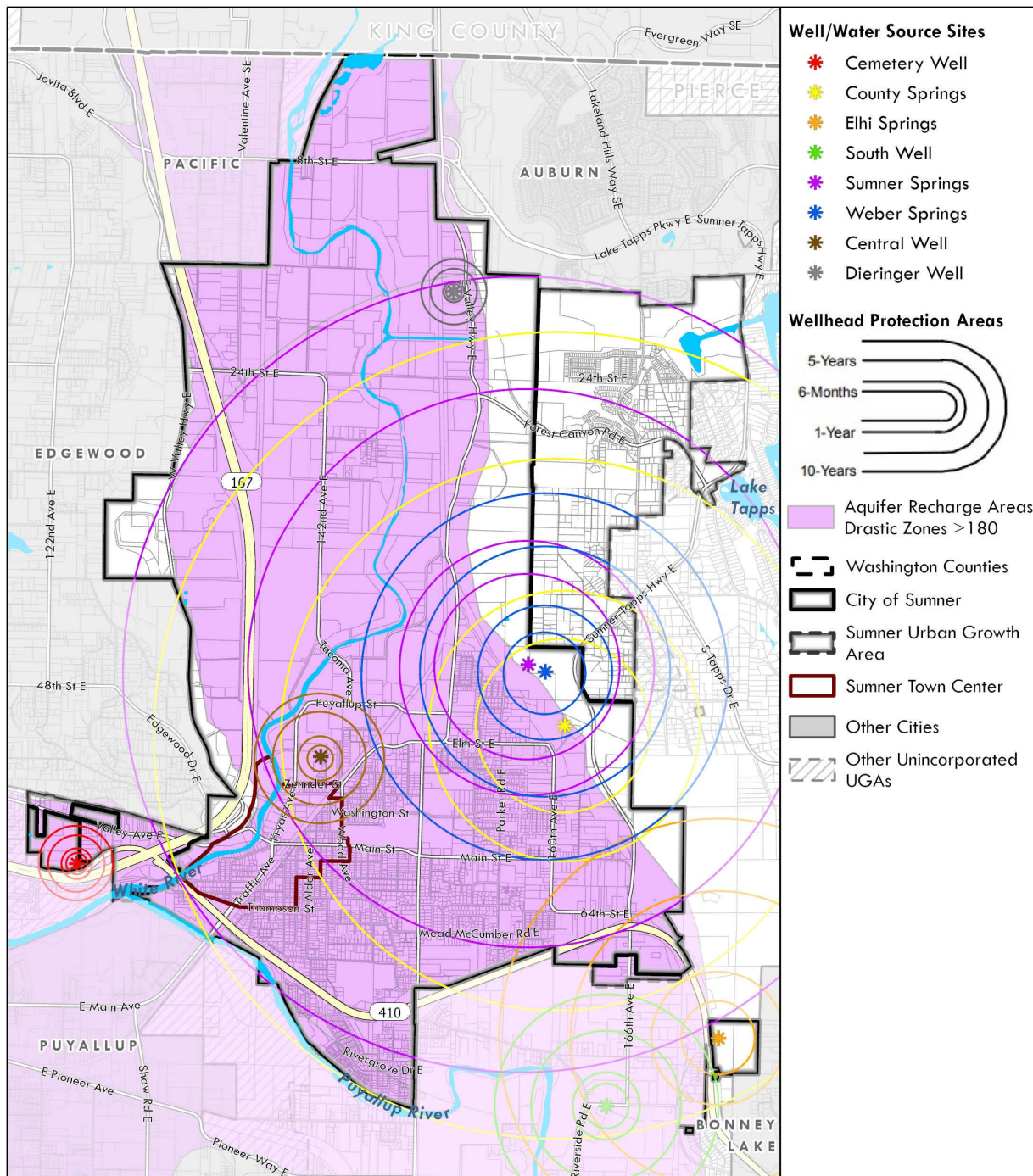
- 16.1. Support recycling within the community through a curb-side program, education and using recycled products for City purposes wherever feasible.
- 16.2. Implement programs for waste reduction in accordance with the adopted Solid Waste Plan.

Schools

17. Support the Sumner-Bonney Lake and Dieringer School Districts in providing the best education for all students in the districts.

- 17.1. Coordinate and communicate with the appropriate school districts on issues of mutual interest, including school facility location, impacts of new development, impacts of school facilities and activities on the community, parks and recreation programs, population and growth projections, and school involvement in the community.
- 17.2. Based on the Sumner-Bonney Lake School District Capital Facilities Plan establish impact fees to mitigate the demands on the school systems of new development.
- 17.3. Promote working with school districts on school siting and design to support safe, walkable access, including strategies to provide adequate urban capacity for new schools and to avoid serving urban students with schools in the rural area.

Figure 17-1: Water Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

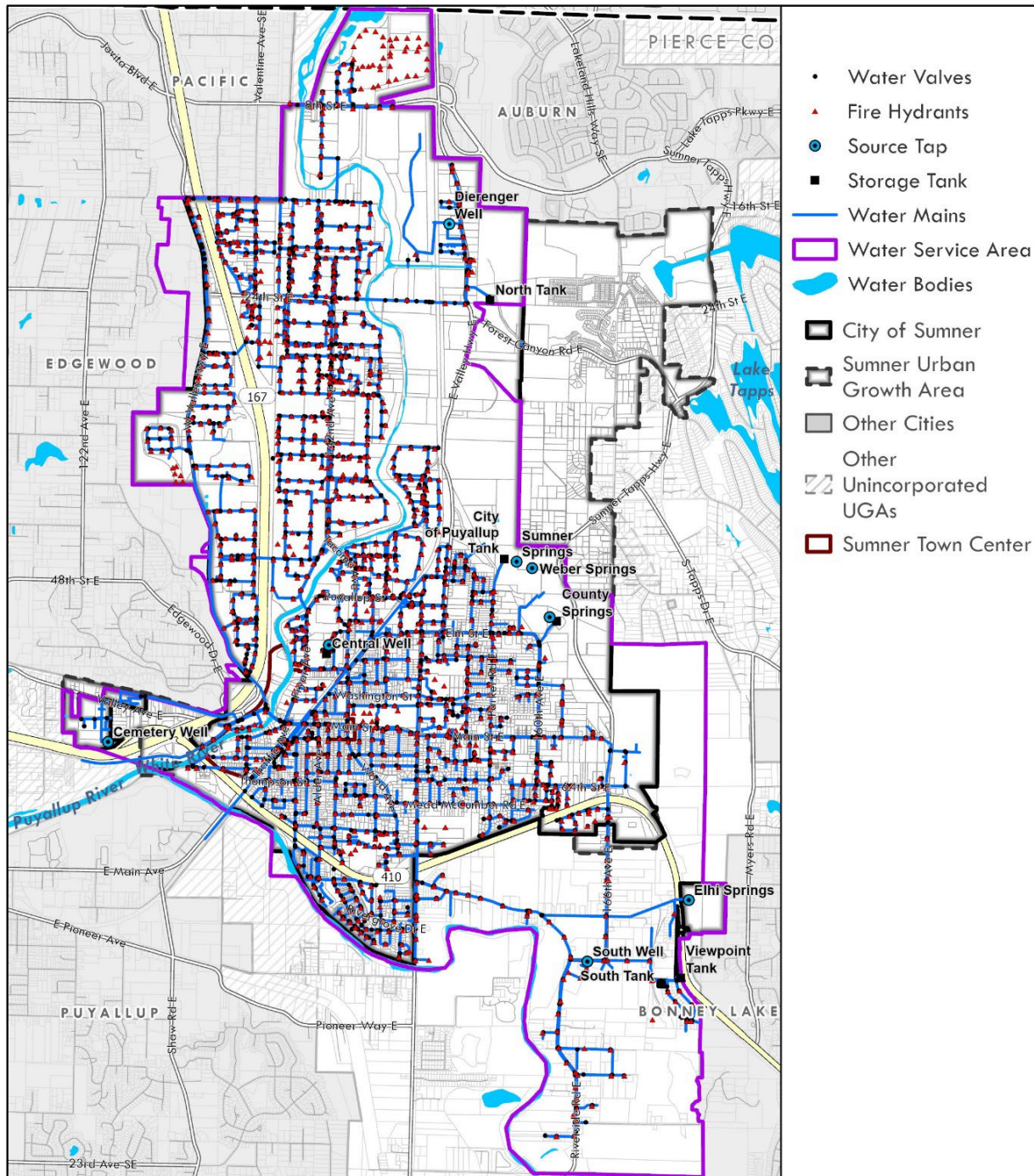


0 1/2
Miles



Map Date: August 2023

Figure 17-2: Water Utility and Infrastructure



CITY OF SUMNER Water Utility & Infrastructure Area

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



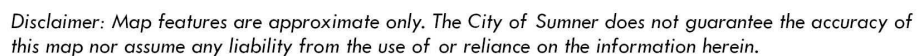
Map Date: November 2023

LEGEND:

- Subbasin Boundary
- Intermittent Pond
- Water Bodies
- City of Sumner
- Sumner Urban Growth Area
- Other Cities
- Other
- Unincorporated UGAs
- Sumner Town Center

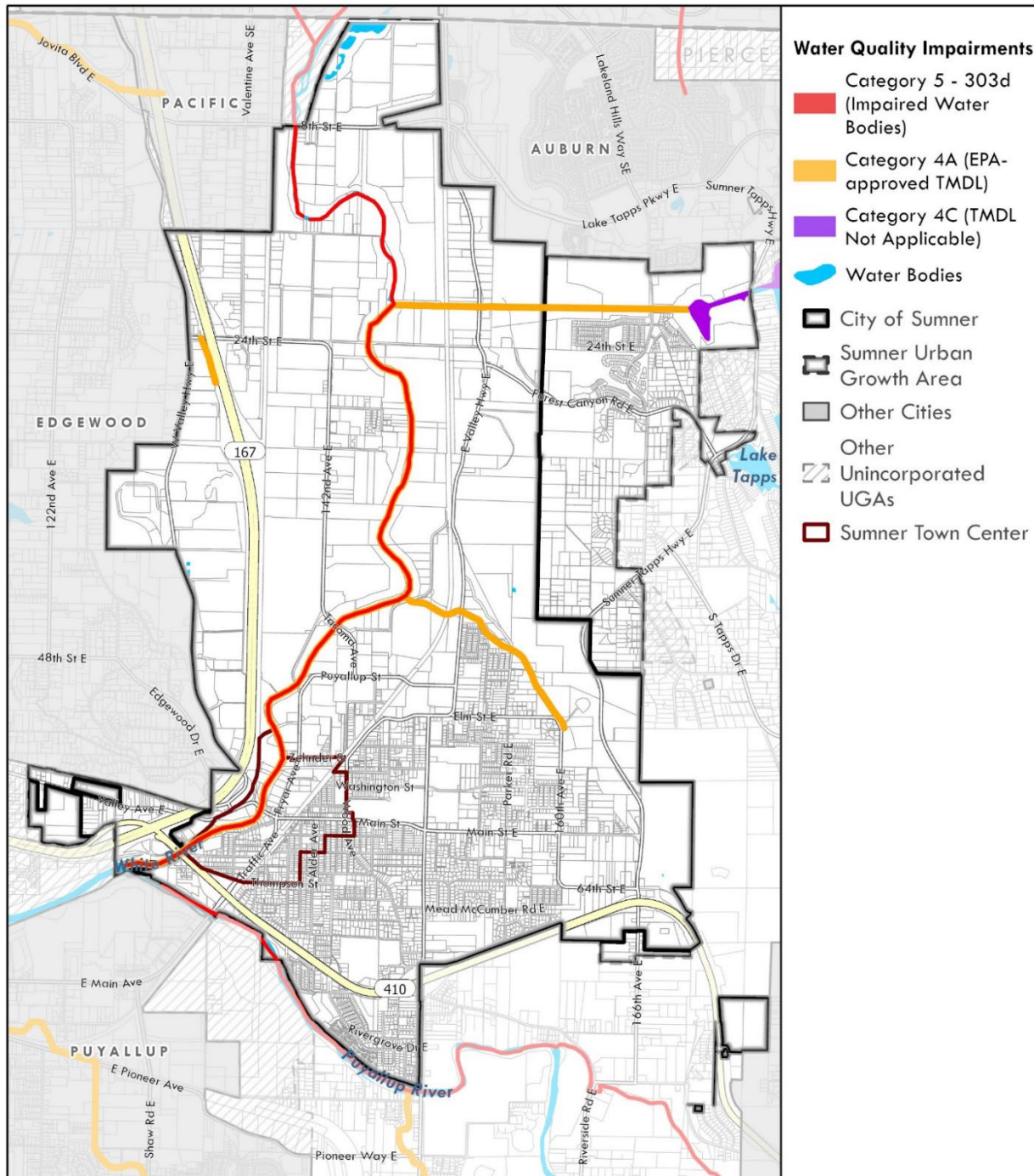
City of Sumner
Public Works Department

Stormwater Subbasin Boundaries



128

Figure 17-4: Impaired Water Bodies



CITY OF SUMNER

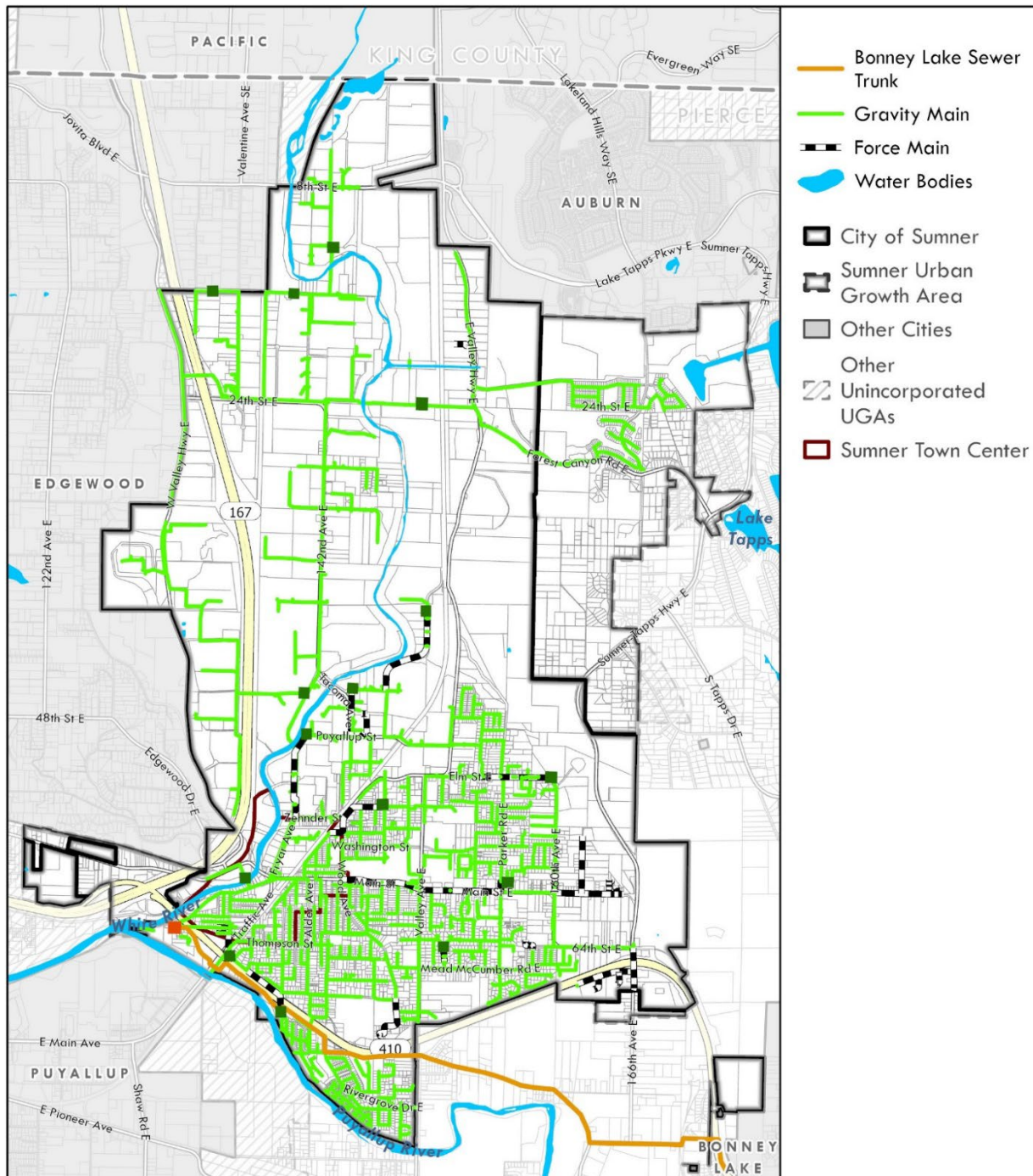
Impaired Water Bodies

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Figure 17-5: Sewer System



CITY OF SUMNER Sewer System

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

18. Utilities

Introduction

The Growth Management Act (GMA) requires that a utility element address "the general location, proposed location, and capacity of all existing and proposed utilities, including, but not limited to electrical lines, telecommunication lines, and natural gas lines." City-provided utilities, like water and sewer, are addressed in the Capital Facilities chapter. Private entities provide utilities such as natural gas, electric, standard telephone, and cellular telephone services and these are addressed in this Element. The Utilities Element establishes policies for providing, supporting, and partnering with providers to ensure that Sumner will be adequately served and will have access to new technology and more efficient services over time. In addition to ensuring adequate utility services, State legislation requires jurisdictions to address climate change and greenhouse gas reduction in their policies and regulations. Policies related to utilities and climate change are included in this element and elsewhere in the Comprehensive Plan.

Goals, Policies, and Objectives

- 1. *Facilitate the development of natural gas and alternative energy utilities at the appropriate levels of service to accommodate the growth that is anticipated to occur in Sumner.***
 - 1.1. Assist service providers to ensure land will be made available for the location of natural gas lines, including location within transportation corridors.
 - 1.2. Accommodate the extension of natural gas distribution lines to and within the Urban Growth Area. Coordinate land use and facility planning with service providers to allow eventual siting and construction of natural gas distribution lines within rights-of-way which are being dedicated or within roads which are being constructed or reconstructed.
 - 1.2.1. Periodically review and amend existing regulations, including sensitive area regulations, as necessary to allow maintenance, repair, installation, and replacement of gas lines.
 - 1.2.2. When requested provide the natural gas utility with updates of population, employment, and development projections. The City will seek to jointly evaluate actual patterns and rates of growth and compare such patterns and rates to demand forecasts.
 - 1.3. Encourage system design practices intended to minimize the number and duration of interruptions to customer service.
 - 1.4. Facilitate conversion from natural gas to cost-effective and environmentally sensitive alternative technologies and energy sources.

- 1.4.1. Review design and development standards to determine improvements to encourage alternative energy sources.
- 1.4.2. Develop strategies to enhance existing public education and outreach campaigns to promote sustainable practices and alternative energy.
- 1.4.3. Promote existing state-level policies and initiatives, funding programs, and incentive programs for renewable energy technologies.

2. *Plan and allow for regional and local improvements to electric facilities sufficient to support projected growth and desired land use patterns in Sumner.*

- 2.1. Make decisions with respect to electric utility facilities so that safe, adequate, and efficient availability of electrical service in other jurisdictions is not negatively affected.
- 2.2. Accommodate facilities needed to support residential areas and sufficient to support economic development in Sumner.
- 2.3. Encourage underground utility networks in new developments in the city and in locations where significant work in the right-of-way has the potential to accommodate undergrounding. Where appropriate, require undergrounding of utilities in targeted areas such as Town Center and in other areas as appropriate for the type, size, and location of the development.
- 2.4. Undergrounding of distribution lines should be in accordance with approved franchise agreements and Puget Sound Energy applicable tariffs on file with the WUTC.

3. *Coordinate with telecommunication services to provide new and cost-effective emerging information and technologies and provide the community equitable access to options and reliable service.*

- 3.1. Maintain appropriate telecommunication facility regulations in the Zoning Code and ensure that proposal review considers setbacks, land use compatibility, aesthetics, fencing and vegetative buffering, and other concerns, consistent with State laws.
- 3.2. Allow telecommunication utilities only where impacts of their infrastructure size and appearance can be mitigated or relocated to nonresidential areas while prohibiting new cellular towers in residential areas.
- 3.3. Encourage utility partnerships to take advantage of the City's fiber optic network to facilitate service delivery and encourage other broadband services throughout the City.

4. *Adopt incentives, strategies, actions, and regulations that encourage equitable development and access to utilities.*

- 4.1. Promote equitable access of utility services to all residents, prioritizing services and access to historically underserved communities.

- 4.1.1. Connect residents to State and local resources such as utility bill or deposit assistance programs and subsidies to supplement tenant-based rental assistance to increase protection for vulnerable households.
 - 4.1.2. Support programs that assist low-income households with utility-related home repairs, weatherization, and other energy-efficient improvements to owner-occupied and rental housing.
- 4.2. Prioritize design, siting, construction, operation, and relocation or closure of utility systems in a manner that is cost-effective, environmentally sensitive, and minimizes and mitigates impacts to vulnerable populations and communities that have been disproportionately affected by noise, air pollution, or other health impacts.
- 5. *Promote, when reasonably feasible, colocation or joint use of public and private utility in shared trenches, conduits, or poles so that utilities may encourage expansion, maintenance, and upgrading while minimizing disruptions to the public and reducing cost to the public of utility delivery, and consistency with limitations as may be prescribed by applicable law and prudent utility practice.***
 - 5.1. Work with the utility to appropriately place utility facilities on public rights-of-way when reasonably feasible.
 - 5.2. Provide timely effective notice to utilities to encourage coordination of construction, maintenance, or repairs to roadways or other facilities.
- 6. *Seek cooperative planning approaches among jurisdictions, agencies, federally recognized Tribes, adjacent regions, and private utility providers to address regional issues of utility needs and resources and emergency response.***
 - 6.1. Coordinate land use decision-making with utility providers to ensure consistency in timing and standards.
 - 6.2. Prioritize utilities-related actions to ensure adequate service and minimal service disruptions for historically underserved populations.
 - 6.3. Assist local utilities in their planning and emergency responses by providing updates on population, demographics, and employment, if needed.
 - 6.4. Ensure that the City's Emergency Response Plan is coordinated with regional jurisdictions and utility providers to include local measures for communicating and addressing utility outages and emergencies.
 - 6.5. Coordinate and prioritize messaging that is in plain language, short, culturally appropriate, in languages prevalent in the area, and in multiple formats, such as audio, large print, and captioning.

- 7. Implement new technologies that balance costs and benefits for the city, health and safety, aesthetics, protection of the environment and economy, and promote affordability and equitable access of utilities to all communities.***
- 7.1. Prioritize the provision of cost-effective and energy-efficient new technologies to underserved populations.
 - 7.2. Prioritize the use of new technologies, programs, and applications that increase the reliability, affordability, and accessibility of utility services and pay options.

19. Shorelines

Introduction

The State Shoreline Management Act requires that jurisdictions with rivers and lakes that are considered “shorelines of statewide significance” prepare a Shoreline Master Program to protect shoreline areas and guide development located in the 200-foot-wide State “shoreline jurisdiction” area that surrounds a water body. Shorelines within Sumner consist of the White River, Puyallup River, and a portion of Lake Tapps within the Sumner Urban Growth Area.

The City of Sumner Shoreline Master Program was adopted in accordance with State law under RCW 90.58.

As required by the Shoreline Management Act, the following elements (topic areas) have been considered in the preparation of Sumner’s Master Program: Economic Development, Public Access, Circulation, Recreation, Shoreline Use, Conservation, and Historical/Cultural Resources. The major goals and policies in the Master Program are organized under these seven elements. These form the basis for more specific policies and regulations in the Master Program that are applicable to shoreline uses.

The Growth Management Act requires that the Shoreline Master Program goals and policies be included as a separate element (chapter) of the Comprehensive Plan. These goals and policies are organized under the seven elements contained in the Master Program and are shown below. Note that these are overarching and comprehensive in nature. For specific policies and requirements for all development within the Shoreline Jurisdiction, refer to the Shoreline Master Program.

Goals, Policies, and Objectives

Economic Development Element

1. *Provide for economic activity that is water-dependent, water-related, or that provides an opportunity for a substantial number of people to enjoy the shoreline (water-enjoyment).*

1.1. **Objective:** To plan for uses that benefit from a shoreline location.

Public Access Element

2. *Increase public access to the shoreline and preserve and enhance views of the shoreline.*

2.1. **Objective:** To provide for public access to publicly owned shoreline areas, except where deemed inappropriate due to safety hazards, inherent security problems, environmental impacts, or conflicts with adjacent uses. Require dedication of property or easements to provide for public access across private property as a condition of non-water dependent development.

Circulation Element

3. *Provide safe and adequate vehicular circulation systems to shorelines where routes will have the least possible adverse effect on unique or fragile shoreline features and existing ecological systems, while contributing to the functional and visual enhancement of the system.*

- 3.1. **Objective:** To allow vehicular circulation systems within shoreline jurisdiction that benefit permitted uses without degrading the environment or aesthetic values of the area.

Recreational Element

4. *Provide public access and opportunities for recreation along the shoreline wherever appropriate.*

- 4.1. **Objective:** To develop public access and recreation opportunities that are compatible with adjacent uses and that protect the shoreline environment.

Shoreline Use Element

5. *Ensure that the overall design of land use patterns will locate activity and development in areas of the shoreline that will be compatible with adjacent uses and will be sensitive to existing shoreline environments, habitat, and ecological systems.*

- 5.1. **Objective:** To promote the best possible pattern of land and water uses consistent with the Shoreline Management Act of 1971, the City of Sumner Comprehensive Plan, the City of Sumner Parks and Trails Plan, and the Sumner Zoning Code.

Conservation Element

6. *Preserve, protect, and restore to the greatest extent feasible the physical, biological, and visual attributes of the shoreline environment.*

- 6.1. **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.
- 6.2. **Objective:** To designate and develop areas where there is an opportunity to restore, enhance, and conserve the natural shoreline for the benefit of fish and wildlife habitat.

Historic/Cultural Element

7. *Identify, preserve, protect, and restore shoreline areas having historical, cultural, educational, or scientific values.*

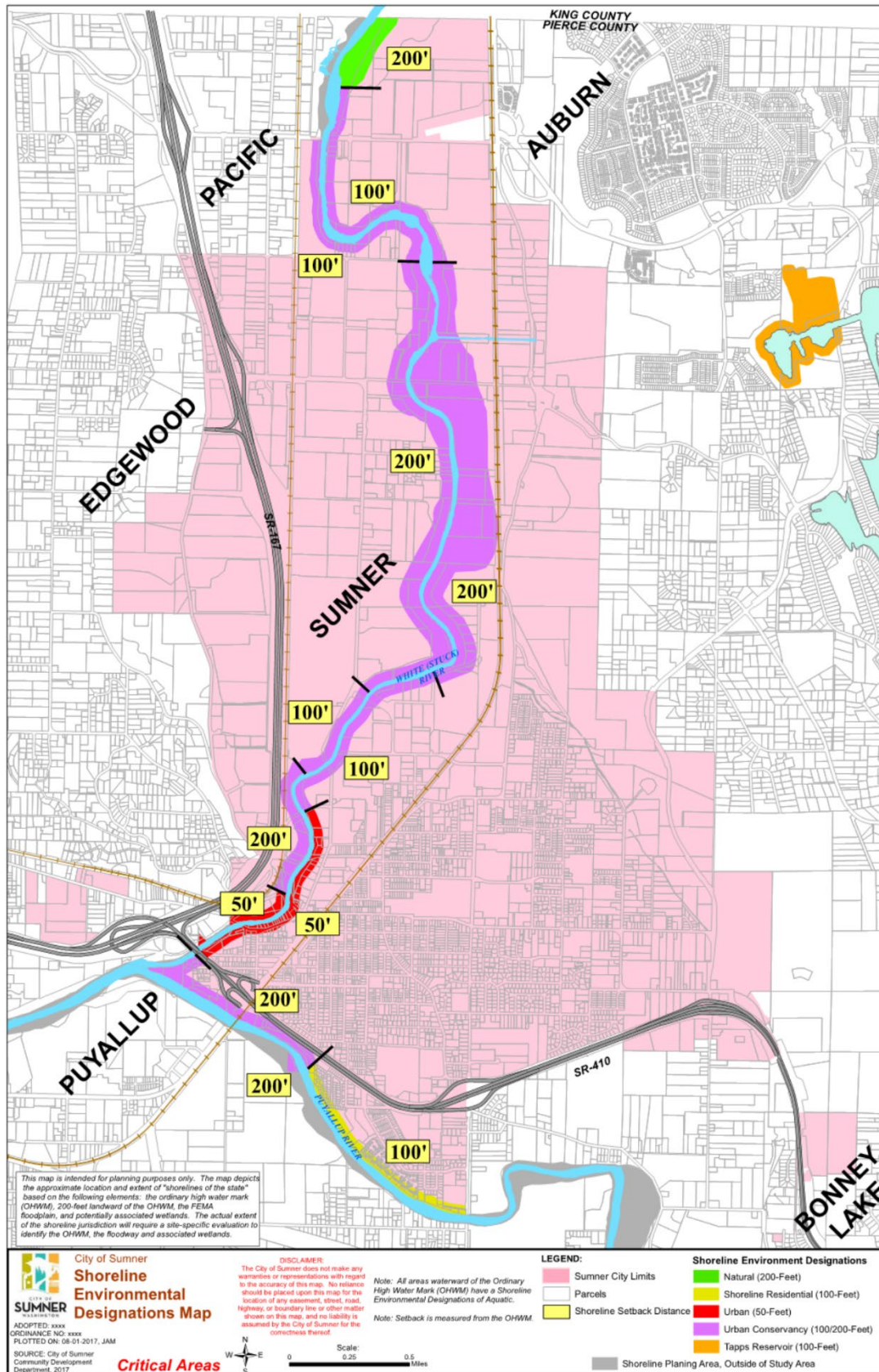
- 7.1. **Objective:** To ensure the recognition, protection, and restoration of shoreline areas that have historical and or cultural value to the City of Sumner and that contribute to a unique “sense of place” for public facilities, recreation areas in the shoreline jurisdiction.

Flood Hazard Management

8. *Protect the City of Sumner from losses and damage created by flooding.*

- 8.1. **Objective:** To seek regional solutions to flooding problems through coordinated planning with state and federal agencies, other appropriate interests, and the public. To ensure that flood hazard protection projects have a positive environmental benefit and that emphasize long-term solutions over short term solutions.

Figure 19-1: Shoreline Environmental Designations Map (2020)



City of Sumner

Final Environmental Impact Statement

2024 Comprehensive Plan Periodic Update
(Volume II)

January 2025 [tentative]



Consultant Team

BERK Consulting

Parametrix

Transpo Group



1104 MAPLE STREET, SUMNER WA 98390

DATE: January 6, 2025 [tentative]

SUBJECT: Final Environmental Impact Statement (EIS)
Sumner Comprehensive Plan Update for 2024

Dear Reader:

The City of Sumner is updating its Comprehensive Plan in 2024 to plan for the city's growth through the year 2044. The updated plan will address requirements of the Growth Management Act (GMA), Puget Sound Regional Council (PSRC) VISION 2050 plan, and Pierce County Countywide Planning Policies (CPPs). This includes accommodating population, housing, and employment growth targets allocated by Pierce County. As part of the Comprehensive Plan update, the City proposes to update related plans and codes, such as the Capital Facilities Plan, Transportation Plan (TMP), and zoning and other development regulations in the Sumner Municipal Code (SMC). The City has prepared an integrated Comprehensive Plan (Volume I) and Final Environmental Impact Statement (Final EIS, Volume II). WAC 197-11-210 et seq. authorizes counties and cities planning under GMA to integrate the requirements of State Environmental Policy Act (SEPA) and GMA.

Four growth alternatives are examined in the Final EIS:

Alternative 1 (No Action): Carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly on Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). This is a required alternative under the State Environmental Policy Act (SEPA).

Alternative 2: Updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing, and on the Cava Mine site when mining activities are complete. Housing policies emphasize incentives for affordability, support for religious organizations building affordable housing, greater diversity of allowed housing types, and expanded opportunities for middle housing citywide.

Alternative 3: Updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Housing policies emphasize mandatory affordability in Town Center and East Sumner, support for religious organizations building affordable housing, greater diversity of allowed housing types, and expanded opportunities for middle housing citywide (even more so than Alternative 2).

Preferred Alternative: The Preferred Alternative, like Alternatives 2 and 3, also updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies, including a new Climate Change element and an updated CAO for best available science. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Housing growth is focused mostly in Town Center and East Sumner subareas, though is also distributed throughout the city as middle housing. Housing policies emphasize incentives for affordability, support for religious organizations building affordable housing, greater diversity of allowed housing types, and expanded opportunities for middle housing citywide. For each alternative, the Final EIS programmatically addresses: Land Use, Population and Employment (Socioeconomics), Aesthetics, Housing, Public Services and Utilities, Transportation, and Natural Environment. The Final EIS compares the alternatives and provides mitigation measures for identified impacts.

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that:
 - Offers more affordable housing opportunities and places to retain and grow businesses.
 - Promotes a healthy environment and climate resilience strategies and avoids displacement of overburdened households and businesses.
- Approval of a Comprehensive Plan including a vision, goals, and policies that fulfills Sumner's vision and meets state and regional requirements.
- Identification of transportation investments to be included in the TMP that improve mobility and resilience.
- Approval of development regulations that implement the Comprehensive Plan goals and land use plan, including providing for quality housing choices, and integrating the best available science to protect critical areas.

Affected agencies, tribes, and members of the public were invited to comment on the Draft EIS issued March 1, 2024. This Final EIS has been prepared following the comment period and includes responses to comments.

If you have questions, please contact: Ryan Windish, Community & Economic Development Director, City of Sumner, (253) 299-5524, ryanw@sumnerwa.gov.

For more information, please see the project website: connects.sumnerwa.gov/planning-sumners-future.

Sincerely,



Ryan Windish, Community & Economic Development Director and SEPA Responsible Official

Fact Sheet

Project Title

Sumner Comprehensive Plan Update 2024

Proposed Action and Alternatives

The City of Sumner is updating its Comprehensive Plan to plan for the city's growth through the year 2044. The updated plan will address requirements of the Growth Management Act (GMA), Puget Sound Regional Council (PSRC) VISION 2050 plan, and Pierce County Countywide Planning Policies (CPPs). This includes accommodating population, housing, and employment growth targets allocated by Pierce County. As part of the Comprehensive Plan update, the City also proposes to update:

- Capital Facilities Plan
- Transportation Plan
- Zoning and other development regulations in the Sumner Municipal Code (SMC)

Four alternatives are analyzed in this Final Environmental Impact Statement:

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the assigned Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Both alternatives include a new Climate Change element and an updated CAO to include best available science.

Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044, meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies.

- **Preferred Alternative.** The Preferred Alternative, like Alternatives 2 and 3, also updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies, including a new Climate Change element and an updated CAO for best available science.

Housing growth is focused mostly in Town Center and East Sumner subareas, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

The Preferred Alternative plans for the same amount of new housing and population growth as Alternative 1 (1,985 units and 4,904 residents) and the same job growth as the other three alternatives (5,313), consistent with growth targets adopted by Pierce County. The Preferred Alternative includes a mix of the housing and land use policies studied for Alternatives 2 and 3 in the Draft EIS. The Preferred Alternative creates adequate capacity to accommodate housing targets for each income band.

Exhibit 0-1: Action Alternatives and Preferred Alternative Housing Policies

Topic	Alternative 2	Alternative 3	Preferred Alternative
Cava Gravel Mine Site	Plans for some housing growth on the site, when mining activities complete.	Does not plan for housing growth on the site.	Does not plan for housing growth on the site.
Town Center and East Sumner	Affordability incentives	Mandatory affordability	Affordability incentives
LDR zones	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots
MDR and HDR zones	Small apartments allowed (up to 3 stories) Maximum density raised to 22 du in MDR	Small apartments allowed (up to 3 stories) Maximum density raised to 17 du in MDR	Small apartments allowed (up to 3 stories)

Topic	Alternative 2	Alternative 3	Preferred Alternative
			Maximum density raised to 22 du/a in MDR
Religious organizations affordable housing	Policies supporting religious organizations building affordable apartment housing	Policies and incentives supporting religious organizations building affordable apartment housing	Policies supporting religious organizations building affordable apartment housing
Other	Other updates in alignment with state housing law	Other updates in alignment with state housing law	Other updates in alignment with state housing law

Proponent and Lead Agency

City of Sumner

Location

Sumner city limits and urban growth area

Date of Implementation

The 2024 Comprehensive Plan periodic update and Final EIS were adopted on **January 6, 2025**.

Responsible Official

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Required Approvals

All Comprehensive Plan amendments and implementing regulations require a 60-day review by the State of Washington Department of Commerce and other state agencies. The Puget Sound Regional Council (PSRC) will also conduct a comprehensive plan review and transportation certification review for consistency with VISION 2050.

The Sumner Planning Commission has reviewed the draft Comprehensive Plan update and all related plan and regulatory updates. The Planning Commission's recommendations were forwarded to the City Council for deliberation and approval.

Principal EIS Authors and Contributors

Under the direction of the Sumner Community Development Department, the consultant team prepared the Draft and Final EIS as follows:

- [BERK Consulting](#): prime consultant, alternatives, land use, population and employment, housing, aesthetics, public services and utilities (general government, police, fire/EMS, schools, parks)
- [Parametrix](#): public services and utilities (water, sewer, stormwater, power and natural gas, telecommunications), natural environment (earth, water resources, plants and animals).
- [Transpo Group](#): transportation

Draft EIS Date of Issuance

March 1, 2024

Draft EIS Comment Period

The City of Sumner requested comments from members of the public, agencies, tribes, and all interested parties on the DEIS from March 1, 2024 to April 30, 2024 utilizing a 60-day comment period. Comments were due by 5 pm on April 30, 2024. Comments received and City responses are detailed in Appendix E. In total, 44 comment letters from agencies and members of the public were received, and nine people gave public testimony at the Planning Commission public hearing on April 4, 2024.

Public Meeting

Consistent with SMC 18.56.110 a public hearing was held on April 4, 2024 with the Sumner Planning Commission. Participants were able to join in person or via a virtual link to a Zoom webinar shared on the City's website.

Date of Final Action

The City adopted the Comprehensive Plan on **January 6, 2025 [tentative]**.

Prior Environmental Review

The City has previously issued SEPA documents for its Comprehensive Plan including but not limited to:

- Sumner Comprehensive Plan Supplemental EIS (issued: February 2015)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Areas Ordinance Update, and East Sumner Neighborhood Planned Action
- Sumner Town Center Plan Update and Planned Action Supplemental EIS (issued: November 2018)
 - Prepared for: Sumner Town Center Subarea Plan Update and Planned Action, form-based code, associated Comprehensive Plan and Municipal Code Amendments
- Sumner Comprehensive Plan Supplemental EIS (issued: November 2020)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Zoning Amendments, East Sumner Neighborhood Planned Action

Location of Background Data

You may review the City of Sumner's website for more information at connects.sumnerwa.gov/planning-sumners-future. If you desire clarification or have questions, please contact [Ryan](#) Windish at (253) 299-5524 or ryanw@sumnerwa.gov.

Availability of Final EIS

The Final EIS is posted on the City of Sumner's website at connects.sumnerwa.gov/planning-sumners-future. Contact the staff person above if you are unable to access the documents online; alternate formats may be available at cost.

Notice of the Availability of the Final EIS was sent to agencies and reviewers listed in the Distribution List below, and to the general public via City emails and City website.

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1 Summary

1.1 Introduction

The City of Sumner is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA). This Final EIS (FEIS) identifies environmental impacts that are likely to occur with the growth alternatives proposed in the Draft Comprehensive Plan and mitigation to address these impacts.

The proposed update to the City's Comprehensive Plan will plan for growth of at least an additional 1,985 housing units and 5,313 additional jobs by 2044, per the growth targets adopted by Pierce County. This non-project FEIS includes the development of four plan alternatives, environmental analysis of those alternatives, and identification of potential impacts and mitigation measures.

The proposal evaluated in this FEIS includes Sumner's Comprehensive Plan Update for the time period 2024-2044.

1.2 Project Purpose, Desired Outcomes, and Exclusions

This FEIS provides a qualitative and quantitative analysis of environmental impacts associated with the City of Sumner, 2024-2044 Comprehensive Plan Update. The purpose of the FEIS is to inform and assist the public and City of Sumner decision-makers in considering future growth throughout the city.

The update to Sumner's Comprehensive Plan will meet state and regional requirements and align with community and City Council vision and priorities.

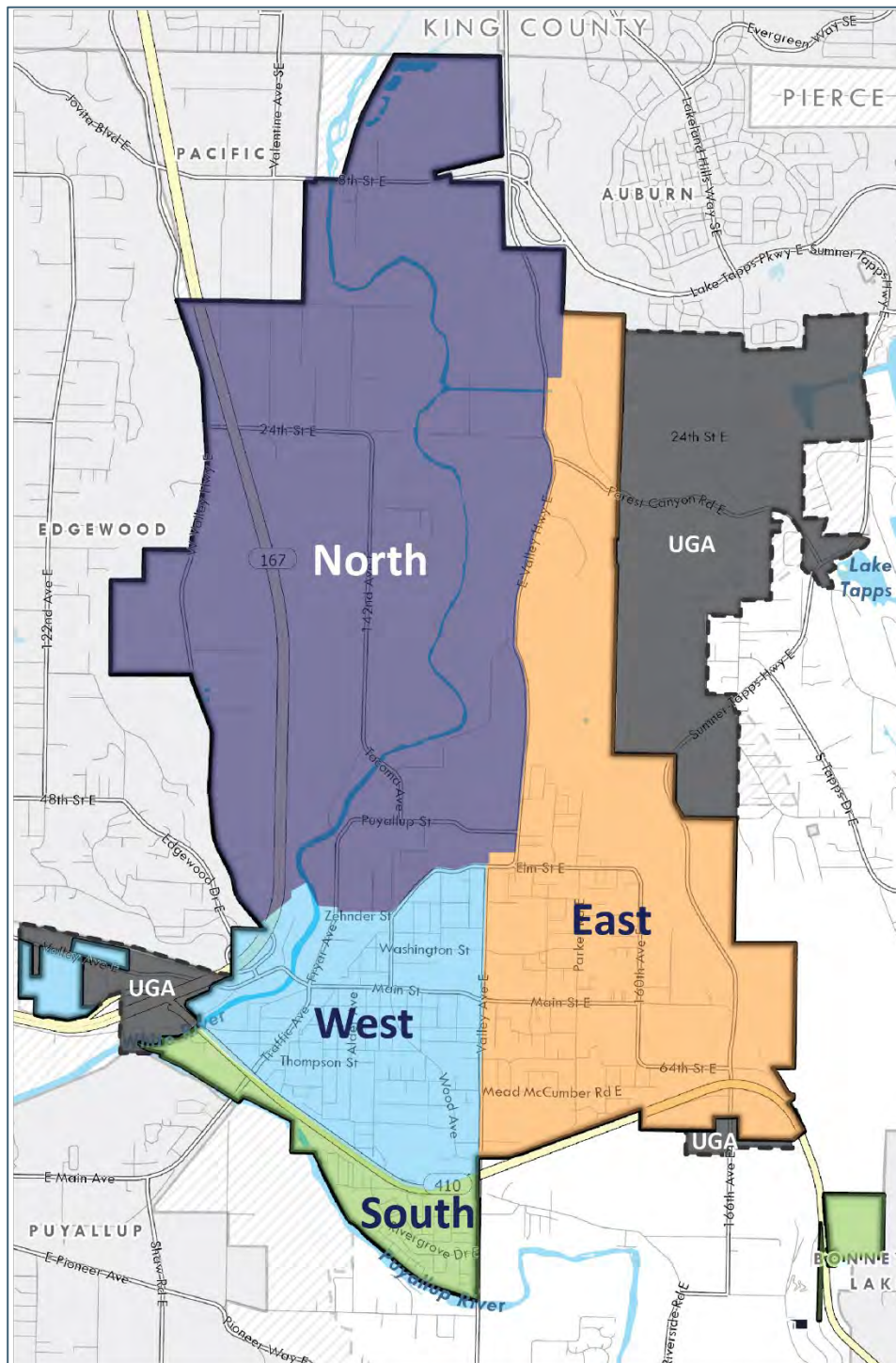
1.3 Study Area

The study area is the City of Sumner. The FEIS also examines potential impacts to the unincorporated Urban Growth Area (UGA) where relevant.

For the purposes of environmental analysis, the FEIS discusses current conditions and potential impacts by "portion" of the City, as defined in Exhibit 1-1. These portions are only used for structuring the analysis; they are not adopted subareas. This structure, where applicable, ensures the FEIS discussion is

comprehensive and considers all areas of the city. The city and UGA are divided into the following portions for discussion:

- **Citywide.** The entire area within Sumner city limits.
- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.
 - The area to the west of Sumner surrounding the interchange of SR 410 and SR 167.
 - The area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps.
 - The area to the south at the east end of the city encompassing approximately fourteen parcels.

Exhibit 1-1: Portions for FEIS Analysis

Source: City of Sumner, 2024; BERK, 2024.

1.4 SEPA Process and Public Involvement

1.4.1 Environmental Review Process

Process

The State Environmental Policy Act (SEPA) is in the Revised Code of Washington (RCW) [Chapter 43.21C](#) and is a Washington State law that helps agency decision-makers, applicants, and the public understand how a proposal would affect the environment. The EIS process is a tool to inform decision-makers and the public of the affected environment, potential impacts, reasonable alternatives, as well as mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

An EIS is required for both project and non-project actions that have the potential to cause significant impacts to the environment. This document is a non-project FEIS that analyzes the proposals and alternatives across the study area. The City of Sumner has determined that this periodic update to the City's Comprehensive Plan would likely have a significant adverse impact on the environment and is required to prepare an EIS (RCW 43.21C.030).

The FEIS describes:

- Existing conditions in the study area
- Proposed alternatives (i.e., new growth strategies)
- Potential significant, unavoidable, and adverse impacts
- Mitigation measures to reduce or eliminate adverse impacts

The EIS process includes the following steps:

1. Initial research; issuing a Determination of Significance; and scoping the contents of the EIS with feedback from agencies, tribes, and the public
2. Preparing a DEIS with a comment period
3. Responding to comments and developing a Preferred Alternative
4. Issuing a Final EIS (FEIS) to inform decision-making

Community involvement is an important part of the EIS process. Community members have the opportunity to review and provide comments during two stages of the process:

- **Scoping:** Scoping is the first step in the EIS process. Scoping for this EIS was held between May 18, 2023 through June 8, 2023. The City proposed the topics and alternatives to be studied in the EIS. During this period, members of the public had the opportunity to learn more about the Comprehensive Plan Periodic Update and the draft growth alternatives and provide comments. Comments received are used to refine the topics and alternatives in the DEIS. More information on scoping can be found in Section 1.4.2.
- **DEIS:** The DEIS reviews the alternatives for environmental impacts. The purpose of this analysis is to estimate the nature, severity, and duration of impacts that might occur and compare impacts between the different alternatives. The DEIS is available for the public to review and comment. Comments received help refine the EIS.

- **FEIS:** The FEIS includes additional analysis on the Preferred Alternative recommended by the Planning Commission. It is adopted with the Comprehensive Plan Periodic Update.

Non-Project EIS

This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. SEPA identifies that a non-project EIS is more flexible than a project EIS and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs ([WAC 197-11-442](#)). A non-project EIS does not provide site-specific detailed analysis. Additional environmental review will occur as other project or non-project actions are proposed in the city in the future. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

Integrated Plan and EIS

GMA jurisdictions are authorized, but not required, to combine SEPA and GMA processes and/or to integrate documents per WAC 197-11-210 et seq. The goal is to ensure that environmental analysis under SEPA occurs concurrently with, and as an integral part of, the planning and decision-making process under GMA. The City has elected to integrate SEPA and GMA in both the process and the document. Integration of the environmental analysis with the planning process informs the preparation of GMA comprehensive plan amendments and facilitates coordination of public involvement activities. The information contained in this FEIS will assist the City in refining a preferred alternative, related comprehensive plan amendments, and implementing regulations.

The integrated Comprehensive Plan/Final EIS document is structured as shown below. This FEIS comprises Volume II of the integrated document. See Chapter 2 for additional description of how the Draft Plan and FEIS have been developed in an integrated manner.

Exhibit 1-2. Sumner Integrated SEPA/GMA Plan and EIS

Volume	Contents
Volume I: Sumner Comprehensive Plan—A Policy Document	▪ Summarizes the key issues identified in Volume II. ▪ Contains all policies and plans.
Volume II: Environmental Impact Statement	▪ Contains all inventories required by GMA and SEPA in the “Affected Environment” discussions. ▪ Analyzes the proposal and alternatives. ▪ Summarizes the comprehensive plan policies and adopted regulations that serve as mitigation measures.

Source: BERK, 2023.

Prior Environmental Review

The City has previously issued SEPA documents for its Comprehensive Plan including but not limited to the following:

- Sumner Comprehensive Plan Supplemental EIS (issued: February 2015)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Reas Ordinance Update, and East Sumner Neighborhood Planned Action
- Sumner Town Center Plan Update and Planned Action Supplemental EIS (issued: November 2018)
 - Prepared for: Sumner Town Center Subarea Plan Update and Planned Action, form-based code, associated Comprehensive Plan and Municipal Code Amendments.
- Sumner Comprehensive Plan Supplemental EIS (issued: November 2020)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Zoning Amendments, East Sumner Neighborhood Planned Action

1.4.2 Scoping

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The following topics were proposed for review in the EIS at the time of scoping:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics (land use, population, and employment)
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping for the DEIS began on May 18, 2023, and ended on June 8, 2023 (21-day scoping period). A correspondence list consisting of state and local agencies, Tribes, and other parties of interest was notified by email or mail at the beginning of the scoping period. Two comments were received from agencies regarding transportation and energy; the comments were considered in the development of the Draft Comprehensive Plan and DEIS; no other comments were received from other interested parties. See Appendix A.

1.5 Summary of Description of Alternatives

The alternatives describe four different policy directions that the City could take in planning through 2044. These alternatives are analyzed in this FEIS for their potential environmental impacts.

Environmental analysis involves studying each alternative and identifying potential impacts on the different elements of the environment studied. These alternatives are described in greater detail in Chapter 2.

The alternatives include one No Action Alternative, in which the City does not make any policy changes, and two Action Alternatives, in which the City does make policy changes. As part of the FEIS, a Preferred Alternative is also included, which is within the range of growth of the other alternatives studied in the DEIS. Because the No Action Alternative does not include any policy changes, it does not respond to, or comply with, recent changes in state law. Action Alternatives allow the City to understand the impacts, benefits, and implications of different growth scenarios and compare them to the No Action Alternative.

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the assigned Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Both alternatives include a new Climate Change element and an updated CAO to include best available science.

Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044, meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies.

- **Preferred Alternative.** The Preferred Alternative, like Alternatives 2 and 3, also updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies, including a new Climate Change element and an updated CAO for best available science.

Housing growth is focused mostly in Town Center and East Sumner subareas, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

The Preferred Alternative plans for the same citywide growth as Alternative 1 (1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044), but includes new housing

and land use policies that create adequate capacity to accommodate housing targets for each income band.

The alternatives in this FEIS are based on the following legal frameworks, policies, and options:

- **Consistency with regional policy guidance.** The Pierce County Countywide Planning Policies (CPPs) include housing, job, and population growth targets for cities across the County, including Sumner. The adopted growth targets for Sumner for 2020-2044 include 1,985 housing units, 5,313 jobs, and 4,904 residents. The County set these targets using projections from the Washington State Office of Financial Management, guidance from the Washington State Department of Commerce, Puget Sound Regional Council's VISION 2050, and calculated capacity for new development.
- **Consistency with state law.** Changes to the Growth Management Act have been made in recent years that the City must respond to in order to be consistent with state law. The Action Alternatives and the Preferred Alternative update the Comprehensive Plan for new requirements to plan for housing at all income bands, middle housing and accessory dwelling units (ADUs), and climate change resilience and emissions reduction. The Action Alternatives and the Preferred Alternative also include updates to the Critical Areas Ordinance (CAO) for best available science.
- **Flexibility in meeting housing requirements.** The Action Alternatives provide two different approaches to meeting the adopted housing targets for each income band. Each alternative includes a different combination of policies to achieve the required capacity. The Preferred Alternative includes a mix of the housing and land use policies studied under Alternatives 2 and 3 that also achieves the necessary capacity to meet adopted housing targets by income band. The Action Alternatives also plan for additional housing above the overall housing target, in recognition that many new housing units have been permitted or are in the pipeline since 2020 that will not be affordable to lower income bands and therefore not provide capacity for these needs. However, based on input from the Puget Sound Regional Council during the DEIS comment period, the Preferred Alternative plans for the adopted target and not higher, in alignment with regional planning. See Exhibit 1-3.

Exhibit 1-3. Action Alternatives and Preferred Alternative Housing Policies

Topic	Alternative 2	Alternative 3	Preferred Alternative
Cava Gravel Mine Site	Plans for some housing growth on the site, when mining activities complete.	Does not plan for housing growth on the site.	Does not plan for housing growth on the site.
Town Center and East Sumner	Affordability incentives	Mandatory affordability	Affordability incentives
LDR zones	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots
MDR and HDR zones	Small apartments allowed (up to 3 stories)	Small apartments allowed (up to 3 stories)	Small apartments allowed (up to 3 stories)

Topic	Alternative 2	Alternative 3	Preferred Alternative
	Maximum density raised to 22 du in MDR	Maximum density raised to 17 du in MDR	Maximum density raised to 22 du in MDR
Religious organizations affordable housing	Policies supporting religious organizations building affordable apartment housing	Policies and incentives supporting religious organizations building affordable apartment housing	Policies supporting religious organizations building affordable apartment housing
Other	Other updates in alignment with state housing law	Other updates in alignment with state housing law	Other updates in alignment with state housing law

Source: BERK, 2024.

1.6 Additional Analysis

The City conducted additional analysis in support of the Comprehensive Plan Periodic Update process and FEIS. The following are included as appendices to this FEIS:

- **Appendix A: Scoping Information.** This appendix includes the scoping notice and comments received during scoping.
- **Appendix B: Supporting Analysis for HB 1220 Requirements.** This appendix documents the analysis and assumptions used to address the requirements of House Bill (HB) 1220 relating to housing.
- **Appendix C: Climate Analysis Findings.** This appendix documents the analysis used to define climate change policies, using guidance from the State Department of Commerce.
- **Appendix D: Public Participation Summary.** This documents the public participation completed as part of the plan update thus far.
- **Appendix E: Responses to DEIS Comments.** This includes all comments received as part of the DEIS comment period and City responses.

1.6.1 Draft EIS Comments

This FEIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any adverse impacts that could result from the City of Sumner, 2024-2044 Comprehensive Plan Periodic Update.

Written and verbal comments from the public and agencies were invited on the DEIS during the 60-day public comment period following its issuance on March 1, 2024. The comment period ran from March 1, 2024 to April 30, 2024. Public comments have been considered and addressed in the Final EIS. Comments received and City responses are detailed in Appendix E. In total, 44 comment letters from agencies and members of the public were received, and nine people gave public testimony at the Planning Commission public hearing on April 4, 2024.

1.6.2 Final EIS

The City of Sumner has issued this Final EIS (FEIS) with the adoption of the Comprehensive Plan Periodic Update. The FEIS includes responses to public comments received during the DEIS public comment period. The FEIS studies a Preferred Alternative that is within the range of growth studied in the DEIS alternatives. The FEIS and Comprehensive Plan are the subject of public meetings and hearings held by the Sumner City Council prior to adoption.

1.7 Summary of Key Findings, Impacts, and Potential Mitigation Measures

One of the essential roles of this FEIS is to identify potential impacts associated with a proposal and alternatives and identify appropriate mitigation measures. The following sections describe how the FEIS analyzed each element of the environment, what impacts have been identified, how the alternatives are different from one another, and what measures are proposed to mitigate impacts. The information and analysis in the DEIS has guided City of Sumner decision-makers in selecting the appropriate Preferred Alternative for the FEIS.

Exhibit 1-4 summarizes the environmental analysis conducted for this FEIS. The Alternatives are described in greater detail in Chapter 2 and specific environmental topics are discussed in greater detail in Chapters 3-9. Where potential impacts have been identified, mitigation is provided in the following forms:

- **Incorporated Plan Features:** Components of the alternatives that self-mitigate (such as design standards that address height and bulk)
- **Regulations and Commitments:** Regulations and commitments that the City must adhere to (such as its Shoreline Master Program)
- **Other Potential Mitigation Measures:** Any additional mitigation measures that the City could consider applying through policies or other strategies

The remaining impacts, if any, following mitigation are also described in the Unavoidable Adverse Impacts section. The reader is encouraged to read through the summary in Exhibit 1-4 to find areas of interest and read the more-detailed analysis in the following chapters.

Exhibit 1-4: Summary of Impacts and Mitigation Measures

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
2020-2044 Growth	1,985 new housing units, 5,313 new jobs, and 4,904 new residents	3,000 new housing units, 5,313 new jobs, and 6,700 new residents	3,000 new housing units, 5,313 new jobs, and 6,700 new residents	1,985 new housing units, 5,313 new jobs, and 4,904 new residents
<i>(Chapter 1: Summary and Chapter 2: Alternatives do not include impacts analysis and mitigation)</i>				
3. Land Use	Impacts			
	- Can accommodate the job growth target and overall housing target Cannot accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner - Generally consistent with Growth Management Act Planning Goals, but does not meet new requirements (including planning for housing at all income levels, planning for climate change, and updating critical areas regulations for best available science) - Somewhat consistent with the Pierce CPPs and PSRC VISION 2050 goals but does not include updates	- Can accommodate the job growth target and overall housing target - Can accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner. More housing growth and density throughout the city than Alternative 1, so potentially more residents near industrial and commercial uses. More density abutting the Sumner-Pacific MIC than other alternatives (Cava Mine site designation change from low density to medium density) but still a residential use like the current designation. - Consistent with Growth Management Act Planning Goals and new requirements	- Can accommodate the job growth target and overall housing target - Can accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner. More housing growth and density throughout the city than Alternative 1, so potentially more residents near industrial and commercial uses. - Consistent with Growth Management Act Planning Goals and new requirements - Consistent with PSRC VISION 2050 including new areas of emphasis - Consistent with the Pierce CPPs and PSRC VISION	- Can accommodate the job growth target and overall housing target - Can accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner. - Consistent with Growth Management Act Planning Goals and new requirements - Consistent with the Pierce CPPs and PSRC VISION 2050 goals including new areas of emphasis No significant unavoidable adverse impacts

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	for consistency with new areas of emphasis Significant adverse impacts to capacity to accommodate growth targets and plans and policies that could only be mitigated through features of Alternatives 2 and 3	Consistent with the Pierce CPPs and PSRC VISION 2050 goals including new areas of emphasis No significant unavoidable adverse impacts	2050 goals including new areas of emphasis No significant unavoidable adverse impacts	
Mitigation Measures				
	- Pierce County's Buildable Lands Program ensures ongoing review and monitoring of vacant and underutilized land capacity - Sumner's design review process includes landscaping and screening requirements for some uses - Conditional use review in some zoning districts is an opportunity for site-specific mitigation - Height, setback, and yard requirements can mitigate compatibility issues - Sumner-Pacific MIC includes a goal on preventing industrial activity from adversely impacting adjacent uses and neighborhoods - The adopted Comprehensive Plan aligns	- Same as Alternative 1 - Alternatives 2 and 3 include a revised policy to encourage industries and industrial processes that are sustainable, environmentally and socially responsible, and contribute to the local community	Same as Alternative 2	Same as Alternatives 2 and 3

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	with previous Pierce County CPPs, VISION 2050, and the GMA, which had many policies and requirements that still apply			
4. Population & Employment	Impacts			
	▪ All alternatives including Alternative 1 add population growth in areas of high air or noise pollution ▪ All alternatives including Alternative 1 meet overall population and employment targets ▪ All alternatives including Alternative 1 are expected to meet the MIC criteria for at least 20,000 jobs ▪ All alternatives including Alternative 1 expect some economic displacement as a result of growth ▪ Lower impacts than Alternatives 2 and 3 due to less population growth No significant unavoidable adverse impacts (impacts can be mitigated)	▪ Greater displacement impacts than Alternative 1 due to more growth ▪ Greater impacts than Alternatives 1 and 3 to population growth in areas of high air or noise pollution due to redesignation of Cava Mine site to moderate density from low density No significant unavoidable adverse impacts (impacts can be mitigated)	▪ Greater displacement impacts than Alternative 1 due to more growth No significant unavoidable adverse impacts (impacts can be mitigated)	▪ Similar to Alternative 1 No significant unavoidable adverse impacts (impacts can be mitigated)

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	Mitigation Measures			
	▪ The adopted Comprehensive Plan's Environment element contains multiple goals and policies aimed at protecting air quality and reducing noise impacts. ▪ The Sumner zoning code (Title 18) establishes zoning and development regulations that govern allowed uses and site development standards. ▪ The Sumner SEPA code (Title 16) establishes a framework for analyzing environmental impacts of development projects. ▪ The City enforces the noise ordinance in the Sumner Municipal Code (SMC 18.14). ▪ The County has adopted designated growth targets for the city. ▪ The Cities of Sumner and Pacific have committed to accommodating significant shares of regional employment growth in the MIC. ▪ PSRC's Centers Criteria guides planning and growth for MICs.	▪ Same as Alternative 1. ▪ Alternatives 2 and 3 include a revised policy to require new developments that generate noise impacts to submit analysis of impacts and mitigation ▪ Alternatives 2 and 3 include a new Climate element and revised Transportation policies to reduce vehicle miles traveled. ▪ Alternatives 2 and 3 include a revised goal to plan for a variety of land uses and prevent adverse impacts between neighboring uses. ▪ Alternatives 2 and 3 include a revised goal on supporting local and women- and minority-owned businesses and to incorporate goals and policies from the MIC Subarea plan, which promote business retention and mix of businesses of all sizes.	▪ Same as Alternative 2.	▪ Same as Alternatives 2 and 3.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ The Economic Development Element includes goals and policies to promote a strong and diverse economy. ▪ The City could address growth in air or noise pollution areas through transit-oriented development, land use buffers, enhanced vegetated screening, or roadside barriers for sound. ▪ The noise from the train horns could be mitigated with implementation of quiet zones within the west portion of the city. ▪ The City could study creating a program to identify and preserve commercial spaces that are suitable for small businesses.			
5. Aesthetics	Citywide Impacts			
	▪ All alternatives have the potential for an increase in building sizes where existing buildings don't maximize the allowable buildable envelope. ▪ All alternatives would have some impacts on views, shadows, and scale/bulk transitions due to growth.	▪ Similar to Alternative 1, but housing growth is higher, and growth occurs throughout the city as middle housing ▪ Allows two housing units per residential lot, and two ADUs per lot, per state requirements, which is likely to increase the density of	▪ Same as Alternative 2, except for Cava Mine site impacts No significant unavoidable adverse impacts (impacts can be mitigated)	▪ Similar to Alternative 1, but growth occurs throughout the city as middle housing ▪ Allows two housing units per residential lot, and two ADUs per lot, per state requirements, which is likely to increase the density of housing in lower density areas ▪ Modifies MDR and HDR zones to allow low-rise apartments, which has potential

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	No significant unavoidable adverse impacts (impacts can be mitigated)	housing in lower density areas - Modifies MDR and HDR zones to allow low-rise apartments, which has potential for view, shadow, and bulk/scale transition impacts - Allows apartment housing to be developed on church properties, which has potential for view, shadow, and bulk/scale transition impacts - Changes land use designation of Cava Mine site to MDR from LDR, which could result in greater view, shadow, and bulk/scale transition impacts than the other alternatives No significant unavoidable adverse impacts (impacts can be mitigated)		for view, shadow, and bulk/scale transition impacts Allows apartment housing to be developed on church properties, which has potential for view, shadow, and bulk/scale transition impacts No significant unavoidable adverse impacts (impacts can be mitigated)
Mitigation Measures				
	- Sumner's adopted Comprehensive Plan has policies that aim to preserve views. - The Sumner SEPA code (Title 16) establishes a framework for analyzing environmental impacts of	- Same as Alternative 1. - Alternatives 2 and 3 limit ADU regulation changes to those required by state law. ADUs would still be required to be the same or lower height than the principal unit.	Same as Alternative 2.	Same as Alternatives 2 and 3.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	development projects, including views. - Conditional use review in some zoning districts provides an opportunity for site-specific mitigation. - Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues. - Sumner's adopted Comprehensive Plan has existing policies and regulations to mitigate impacts on urban form, community character, and lighting. - Sumner's zoning and development regulations govern uses, building and site design, and land use compatibility. - Sumner could consider requiring areas with higher building heights to have upper-story setbacks to minimize shadow, view, height, and bulk impacts. - Sumner could consider requiring additional landscaping on major streets to screen development.	- Alternatives 2 and 3 do not propose height increases to any zones, except those required for ADUs. - Alternatives 2 and 3 require new housing units on church property to meet the same requirements as senior apartments.		

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
6. Housing	Citywide Impacts			
	1,985 housing units above 2020 conditions Does not meet requirement for planning for and accommodating housing at all income levels Does not address racially disparate impacts, displacement, displacement risk, and exclusion in housing (as required by GMA) Inconsistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters Does not meet middle housing and accessory dwelling unit (ADU) requirements (HB 1110, HB 1337) Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) Significant adverse impacts to meeting state requirements that could only be mitigated through	3,000 housing units above 2020 conditions - Addresses requirement for planning for and accommodating housing at all income levels - Addresses racially disparate impacts, displacement, displacement risk, and exclusion in housing - Consistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters - Meets middle housing requirements (HB 1110, HB 1337) Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) No significant unavoidable adverse impacts (displacement impacts can be mitigated through plan features)	3,000 housing units above 2020 conditions - Addresses requirement for planning for and accommodating housing at all income levels - Addresses racially disparate impacts, displacement, displacement risk, and exclusion in housing - Consistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters - Meets middle housing requirements (HB 1110, HB 1337) Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) No significant unavoidable adverse impacts (displacement impacts can be mitigated through plan features)	1,985 housing units above 2020 conditions - Addresses requirement for planning for and accommodating housing at all income levels - Addresses racially disparate impacts, displacement, displacement risk, and exclusion in housing - Consistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters - Meets middle housing requirements (HB 1110, HB 1337) Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) No significant unavoidable adverse impacts (displacement impacts can be mitigated through plan features)

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	features of Alternatives 2 and 3			
	Mitigation Measures			
	- The City's adopted comprehensive plan includes some policies related to housing affordability and availability. - The Housing Action Plan identifies strategies to address housing needs. - Pierce County has some existing programs to assist residents with energy and housing costs. - The City could consider additional anti-displacement strategies.	- Same as Alternative 1 - Alternatives 2 and 3 include anti-displacement and housing affordability policies, and adequate capacity to meet housing needs by income band.	Same as Alternative 2.	Same as Alternatives 2 and 3.
7. Public Services	Citywide Impacts			
	Growth under all alternatives will increase the demand for public services, including city facilities, police, fire and emergency medical services, schools, parks, and utilities. No significant unavoidable adverse impacts (impacts can be mitigated)	Similar to Alternative 1, but Alternatives 2 and 3 add more housing growth, which results in greater demand for public services. No significant unavoidable adverse impacts (impacts can be mitigated)	Similar to Alternative 1, but Alternatives 2 and 3 add more housing growth, which results in greater demand for public services. No significant unavoidable adverse impacts (impacts can be mitigated)	Similar to Alternative 1. No significant unavoidable adverse impacts (impacts can be mitigated)

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	Mitigation Measures			
	- Under all alternatives, the City is planning to construct new public works shops totaling 83,050 square feet, which is adequate square footage to meet the adopted level of service. - All alternatives propose retaining the existing City Hall and Public Works Shops in public land use designation. - The East Pierce Fire and Rescue Capital Facilities Plan outlines future projects to improve service. - The Sumner-Bonney Lake and Dieringer School Districts have capital facilities plans that outline future projects to address capacity issues. - The City of Sumner implements school impact fees in permits for new development. - Sumner has adopted a park impact fee. - Public sanitary sewer system operations in Washington are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington.	- Same as Alternative 1. - Alternatives 2 and 3 include an update of the Capital Facilities Plan, which identifies future needs and funding sources. - Alternatives 2 and 3 include a new Climate Change Resiliency element, which includes some hazard mitigation policies that could better prepare the city for emergencies, and energy conservation and efficiency policies. - Alternatives 2 and 3 include new comprehensive plan policies that address regional sewer, water, and utility planning and emergency response, and strategies that balance cost, benefits, health and safety, and promote affordability and equity. - Alternatives 2 and 3 include revised comprehensive plan policies, including supporting proactive water conservation efforts throughout the City and septic system policies based on best practices. - Alternatives 2 and 3 include new and revised comprehensive plan	Same as Alternative 2.	Same as Alternatives 2 and 3.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ The City manages its sewer system under SMC Title 13, Public Services. ▪ The City has adopted the 2020 Sanitary Sewer Comprehensive Plan. ▪ The Capital Facilities Element of the adopted Comprehensive Plan contains policies relating to level of service for the City's sanitary sewer, water, and stormwater. ▪ The 2023-2024 City of Sumner Biennial Budget includes long-term goals relating to wastewater treatment and water planning. ▪ The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years. ▪ Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater. ▪ The City is required to comply with the National Pollution Discharge Elimination System (NPDES permit program).	policies to encourage low-impact development, upgrade systems to address flooding, and retain flood storage capacity. ▪ Alternatives 2 and 3 update critical areas regulations for the latest best available science, which could better protect structures from flooding through updated stream buffers. ▪ Alternatives 2 and 3 include a new policy to facilitate the conversion from natural gas to alternative technologies and energy sources and support advancement of telecommunications in the City.		

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ The City has adopted the 2020 Water System Plan. ▪ The Capital Facilities Element of the Comprehensive Plan and the Capital Facilities Plan contain policies relating to water system level of service. ▪ All alternatives retain existing buffers along rivers, streams, and wetlands. ▪ Pierce County Hazard Mitigation Plan includes Sumner-specific strategies to expand flood storage capacity and limit new homes and businesses from being sited in flood hazard areas. ▪ Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls. ▪ The City has adopted stormwater standards requiring 25-year storage with the 2-year predevelopment release rate. ▪ All alternatives retain goals, policies, and implementing regulations that support			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	the development and implementation of stormwater management techniques such as low impact development (LID). ▪ The City applies stormwater standards including in the 2019 Ecology Stormwater Management Manual for Western Washington, and the 2012 Puget Sound Partnership Low Impact Development Technical Guidance for Puget Sound. ▪ Sumner implements floodplain regulations required by the National Flood Insurance Program through its Shoreline Master Program and critical areas regulations. ▪ The City reviews impacts on the Endangered Species Act on a permit by permit basis. ▪ The White River Restoration Project is a major flood protection project that will restore floodplain habitat, replace the Stewart Road Bridge, and improve flood protection in the Lower White River reach. ▪ The City should continue to implement the Washington State Energy Code.			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ The adopted Comprehensive Plan includes some policies around energy conservation and efficiency. ▪ The City could implement recommendations of the Sanitary Sewer Plan to correct deficiencies. ▪ The City could identify additional improvements to the sewer system for the 20-year planning period. ▪ The City could partner with the City of Bonney Lake if another sewer plant expansion becomes necessary. ▪ The City could implement an aggressive water conservation program. ▪ The City could expand watershed protection by acquiring additional land around the existing watershed. ▪ The City could choose to fund more public education and outreach to water conservation programs, public education on water quality, and education and outreach to promote renewable energy technologies.			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ The City could conduct an update to the Stormwater Comprehensive Plan or ensure development demonstrates compliance with standards set in Ecology's 2019 Stormwater Manual as adopted by the City. ▪ The City could implement stronger code and design incentives for LID. ▪ The City could choose to fund more public education on water quality for residents and businesses. ▪ The City should provide annual updated population, employment, and development projections to Puget Sound Energy. ▪ The City could coordinate the cooperate with other jurisdictions in the implementation of multijurisdictional electric utility facility additions and improvements.			
8. Transportation	Citywide Impacts			
	▪ Under all alternatives, the pedestrian LOS analysis shows most of the future	▪ Pedestrian and bicycle impacts similar to Alternative 1	▪ Pedestrian and bicycle impacts similar to Alternative 1	▪ Impacts similar to Alternative 1 due to same amount of growth.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors with missing sidewalk (Elm Street and 160th Avenue E). - Under all alternatives, bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. - Alternative 1 results in an estimated 12,544 vehicle trips and 30,015 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT). - Most intersections operate at LOS D or better during the weekday PM peak hour under Alternative 1, but eight intersections are forecast to degrade below LOS D during the weekday PM peak hour. If making improvements like for Alternatives 2 and 3, impacts can be mitigated. Significant unavoidable adverse impact due to increase in traffic congestion.	- Alternative 2 results in an estimated 13,626 vehicle trips and 31,122 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT) Intersection operations are similar to Alternative 1. Alternative 2 would have increases in delay due to additional growth but the intersections not meeting the LOS D standard would be the same. Planned improvements <u>can</u> meet established levels of service for all modes. Significant unavoidable adverse impact due to increase in traffic congestion like for Alternative 1.	- Alternative 3 results in an estimated 13,542 vehicle trips and 30,907 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT) Intersection operations are similar to Alternative 2. Planned improvements <u>can</u> meet established levels of service for all modes. Significant unavoidable adverse impact due to increase in traffic congestion like for Alternative 1.	Planned improvements <u>can</u> meet established levels of service for all modes. Significant unavoidable adverse impact due to increase in traffic congestion like for Alternative 1.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	Mitigation Measures			
	▪ 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. ▪ SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to reflect multimodal transportation impact fees. ▪ The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places. ▪ The City collects impact fees for trails (see Section 3.10). ▪ The City policies indicate commitment to pursue expansion of the Pierce Transit benefit district. If transit service is implemented within Sumner, the City will develop a transit LOS standard.	▪ Same as Alternative 1. ▪ Alternatives 2 and 3 include updates to the vehicle LOS policy. ▪ Alternatives 2 and 3 includes new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Comprehensive Plan Land Use Element. ▪ The Transportation Plan update provides a comprehensive list of improvement projects and programs to meet the existing forecast transportation needs of the City.	▪ Same as Alternative 2.	▪ Same as Alternatives 2 and 3.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
9. Natural Environment	Citywide Impacts			
	- Most of the city is within seismic and volcanic lahar areas, so growth under all alternatives would expose new development to these hazards. - Under all alternatives, construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs. Susceptibility to landslide and erosion primarily affect growth in the East Portion and West Portion, under all alternatives. - Growth under all alternatives may impact water quality in rivers and streams, due to increased traffic volumes and reduction in vegetation coverage, particularly in the North Portion and East Portion. - Growth under all alternatives will affect plants and animals due to development impacts to habitat. This includes removal of trees, shrubs, and other vegetation. Disturbance of vegetation	- Similar to Alternative 1, but more growth under Alternative 2 is likely to result in greater impacts citywide relating to earth, plants and animals, water quality, and vulnerability to wildfire - Increased density on the Cava Mine site would create the potential for increased development in an area with steep slopes at risk of landslide and erosion, greater impervious surface and habitat impacts, and greater vulnerability to wildfire. Significant impacts to tree canopy are likely due to development on this site. Seismic and volcanic hazards create significant unavoidable adverse impacts. Tree canopy impacts under Alternative 2 are also significant and unavoidable. Other impacts can be mitigated.	Similar to Alternative 1, but more growth under Alternative 3 is likely to result in greater impacts citywide relating to earth, plants and animals, water quality, and vulnerability to wildfire Seismic and volcanic hazards create significant unavoidable adverse impacts. Other impacts can be mitigated.	Similar to Alternative 1. Seismic and volcanic hazards create significant unavoidable adverse impacts. Other impacts can be mitigated.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	can also lead to establishment of non-native and invasive plants. - Development of vacant and larger low density properties can lead to habitat loss, fragmentation, and reduced habitat connectivity under all alternatives. - Increased impervious surface cover under all alternatives can reduce the quality of aquatic habitat. - All alternatives include some amount of growth in Wildland Urban Interface (WUI) intermix areas, which could expose more people to wildfire hazards. This is particularly true in the East Portion. Similar to other areas in Pierce County and the Puget Sound, seismic and volcanic hazards poses an increased risk to structures and the people living or working therethrough building codes, critical area regulations, and other programs can reduce potential risks. There are no significant unavoidable adverse			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	impacts related to other geologically hazardous areas.			
	Mitigation Measures			
	▪ The City has adopted the International Building Code. ▪ The City's critical areas regulations provide restrictions and regulations on certain types of development and provide notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas. ▪ Critical areas regulations also provide provisions for the protection of critical aquifer recharge areas, wetlands, streams, and fish and wildlife habitat conservation areas. ▪ SMC 16.05 provides regulations relating to the control of erosion and sedimentation pollution from construction. ▪ The 2020-2025 Pierce County Hazard Mitigation Plan includes an addendum for Sumner-specific strategies, which address a range of hazards	▪ Same as Alternative 1. ▪ Alternatives 2 and 3 include updates to critical areas regulations based on best available science, which could better protect water resources and protect plants and animals than existing code. ▪ Alternatives 2 and 3 add new comprehensive plan policies and policy updates related to the environment and climate change, including policies to better protect vegetated stream and wetland buffers, to restore ecosystems, and to support tree planting and enhancing urban tree canopy. ▪ Alternatives 2 and 3 include climate resilience policies relating to wildfire risk mitigation.	▪ Same as Alternative 2.	▪ Same as Alternatives 2 and 3.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	including geologic hazards and fire mitigation. ▪ 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. ▪ The City's stormwater management regulations (SMC 13.48) include water quality protections. ▪ The City has Development Specification and Standard Details. ▪ The adopted Comprehensive Plan incorporates goals and policies that protect water quality. ▪ The City updated the Shoreline Master Program in 2020, which regulates development within shoreline areas and includes protections for surface water bodies. ▪ Federal and state regulations to protect water quality apply in Sumner, including the Safe Drinking Water Act, which requires water quality			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	reporting, and the EPA's Phase II regulations for stormwater management. ▪ On the Cava mine site, a reclamation plan would be developed, likely including plans for final slopes, drainage patterns, site hydrology, removal of mining-related structures, contamination, and water management. ▪ Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River. ▪ The City complies with the National Flood Insurance Biological opinion, to meet the requirements of the Endangered Species Act. ▪ The City has stormwater regulations that implement the National Pollutant Discharge Elimination System (NPDES) permit requirements. ▪ SMC 18.41 requires maintaining at least 10% of a development site as landscaping. ▪ Sumner's Forestry and Parks Commission advises the City on issues related to urban forestry.			

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3	Preferred Alternative
	▪ SMC 12.42 includes regulations for planting, preservation, and maintenance of trees on City-owned lands and public right-of-way. ▪ The City should implement a plan to manage the forested hillsides in the public watershed for climate resiliency and controlled fuel load. ▪ The City could conduct a Tree Canopy Assessment to better understand canopy loss and identify strategies to address canopy loss. ▪ The City could consider development of a tree ordinance designed to protect, enhance, or replace trees located on private property. ▪ The City would apply the Wildland Urban Interface Code as part of its building code adoption and/or incorporate the defensible space guidelines into its landscaping code.			

1.8 Significant Unavoidable Adverse Impacts

Based on the full analysis presented in Chapters 3-9 of this FEIS, implementation of the alternatives would result in the following significant unavoidable adverse impacts for the following elements of the environment:

- **Land Use:** Alternative 1 would have significant unavoidable adverse impacts because it does not provide enough capacity to accommodate housing needs for all income bands and it does not update the Comprehensive Plan and development regulations for consistency with regional and state requirements.
- **Housing:** Alternative 1 would have significant unavoidable adverse impacts because it does not provide enough capacity to accommodate housing needs for all income bands and it does not address other housing requirements for accessory dwelling units (ADUs) and middle housing.
- **Transportation:** All alternatives would have the significant unavoidable adverse impact of increased traffic.
- **Natural Environment:** All alternatives would have significant unavoidable adverse impacts because most of Sumner is within seismic and volcanic hazard areas and growth will increase the population exposed to these hazards. Implementing building codes and critical areas regulations will reduce potential risks. Implementation and updates to the Hazard Mitigation Plan will direct early notification of earthquakes and volcanic eruptions. Alternative 2 also has significant unavoidable adverse impacts to tree canopy due to development on the Cava Mine site, which has some forested areas remaining on and near the site.

1.9 Significant Areas of Controversy and Uncertainty, and Issues to Be Resolved

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that:
 - Offers more affordable housing opportunities and places to retain and grow businesses.
 - Promotes a healthy environment and climate resilience strategies and avoids displacement of overburdened households and businesses.
- Approval of a Comprehensive Plan including a vision, goals, and policies that fulfills Sumner's vision and meets state and regional requirements.
- Identification of transportation investments to be included in the Transportation Plan that improve mobility and resilience.
- Approval of development regulations that implement the Comprehensive Plan goals and land use plan, resulting in quality housing choices, and integrating the best available science to protect critical areas.

2 Alternatives

2.1 Summary of Alternatives

This Chapter describes the proposal and alternatives evaluated in this Final Environmental Impact Statement (FEIS).

The alternatives are different scenarios for growth in Sumner through 2044. The alternatives serve as a basis for environmental analysis for each element of the environment studied.

Four alternatives are analyzed in this FEIS. While they all anticipate the same amount and general distribution of job growth, the housing growth, types, and affordability vary across the alternatives. They also vary in how they do or do not update the comprehensive plan for consistency with regional plans, state requirements, and other frameworks. The four alternatives include:

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as “middle housing.” Alternative 2 plans for some housing growth on the current Cava gravel mine site, when the site transitions from mineral extraction to residential uses in the future. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044 meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies (see details in *Alternatives* below).

Both alternatives include a new Climate Change element and an updated CAO to include best available science.

- **Preferred Alternative.** The Preferred Alternative plans for the same housing and job growth as Alternative 1, in alignment with targets adopted by Pierce County. The Preferred Alternative, like Alternatives 2 and 3, updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Housing growth is focused mostly in Town Center and East Sumner subareas, though is also distributed throughout the city as “middle housing.” No land use changes are proposed for the Cava gravel mine site. Housing and land use policies under the Preferred Alternative include a combination of those studied in Alternatives 2 and 3 (see details in *Alternatives* below).

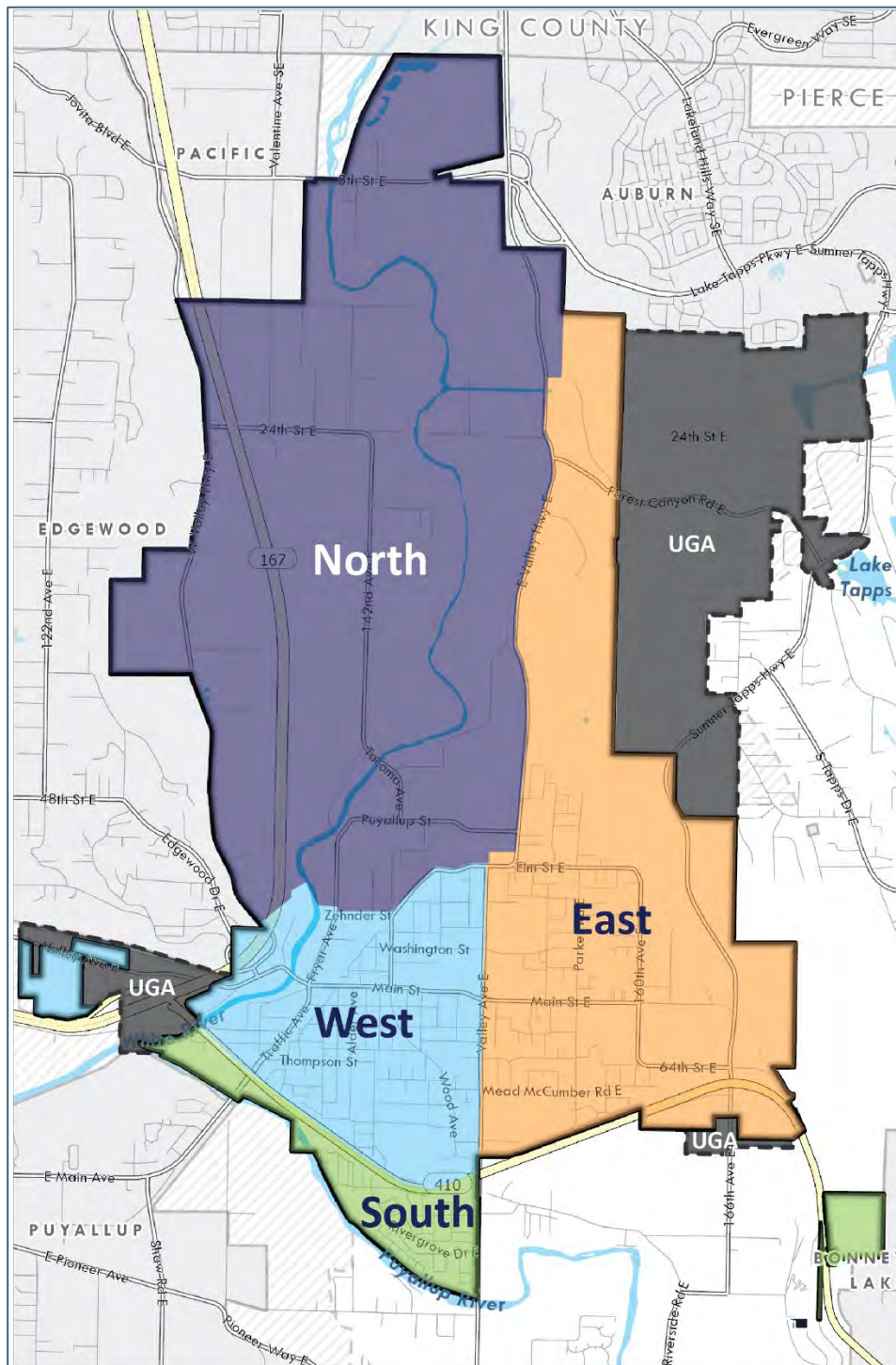
2.2 Description of the Study Area

The study area is the City of Sumner. The FEIS also examines potential impacts to the unincorporated Urban Growth Area (UGA) where relevant.

For the purposes of environmental analysis, the FEIS discusses current conditions and potential impacts by “portion” of the City, as defined in Exhibit 2-1. These portions are only used for structuring the analysis; they are not adopted subareas. This structure, where applicable, ensures the FEIS discussion is comprehensive and considers all areas of the city. The city and UGA are divided into the following portions for discussion:

- **Citywide.** The entire area within Sumner city limits.
- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.
 - The area to the west of Sumner surrounding the interchange of SR 410 and SR 167.
 - The area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps.
 - The area to the south at the east end of the city encompassing approximately fourteen parcels.

Exhibit 2-1: Areas for Analysis



Source: City of Sumner, 2023; BERK, 2023.

2.3 Objectives

The primary objectives of the alternatives for analysis in this Final Environmental Impact Statement (FEIS) are to:

- Meet the Sumner Vision Statement and Values as amended based on community input.
- Comply with Comprehensive Plan periodic review requirements to meet state laws including recent changes to the Growth Management Act (GMA) regarding housing, climate change, and other updates.
- Align with the regional growth strategy in the Puget Sound Regional Council (PSRC) VISION 2050 and centers requirements.
- Demonstrate housing and job capacity to accommodate growth targets through 2044 consistent with Countywide Planning Policies.
- Update policies that are inconsistent, outdated, duplicative, or unclear.

2.3.1 Growth Management Act (GMA)

The GMA, adopted in 1990, provides a framework for land use planning in Washington State and requires many jurisdictions, including Sumner, to create a comprehensive plan for the next 20 years of expected growth. Required comprehensive plan elements include land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change. The GMA also requires cities and counties to coordinate their planning efforts.

The Washington State Legislature has made major changes to the GMA in recent years. Key changes that Sumner will have to respond to in its Comprehensive Plan in order to maintain compliance include:

HB 1220 (2021 legislative session)

- Identify sufficient capacity of land to meet the housing needs of all income bands.
- Make adequate provisions for housing to meet housing needs of all income bands, including a review of potential barriers to housing development.
- Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
- Identify areas that may be of higher risk of displacement and establish antidisplacement policies.

HB 1110 (2023 legislative session)

- Allow two or more units per lot in all residential zones.

HB 1337 (2023 legislative session)

- Allow two Accessory Dwelling Units (ADUs) per lot in zones that allow single-family homes.
- Remove owner-occupancy and other prohibitive requirements for ADUs.

HB 1181 (2023 legislative session)

- Revise the Transportation element to include policies for greenhouse gas emissions and per capita vehicle miles traveled.
- Add a Climate Change and Resiliency Element to the comprehensive plan.

2.3.2 VISION 2050

Puget Sound Regional Council (PSRC) is a regional body for King, Pierce, Snohomish, and Kitsap counties that coordinates decisions about regional growth, transportation, and economic development planning. VISION 2050 includes multicounty planning policies (MPPs) and a strategy to plan for regional growth through 2050.

2.3.3 Pierce County CPPs

Per the GMA's requirement for counties and cities to coordinate, Pierce County has a set of Countywide Planning Policies (CPPs) that local Comprehensive Plans should be consistent with. The CPPs have been ratified by the City of Sumner and other cities.

The CPPs also include Pierce County's allocations of the countywide growth targets (as projected by the Washington Office of Financial Management) to the cities and unincorporated areas. The growth targets (2020-2044) for Sumner are 1,985 housing units, 5,313 jobs, and 4,904 residents. The housing target is broken down further by income band.

2.4 SEPA Process

2.4.1 Purpose of the EIS

An Environmental Impact Statement (EIS) is a document that provides environmental information about a proposal before a decision is made. An EIS is required, under the State Environmental Policy Act (SEPA), where the proposal is likely to have a significant environmental impact. An EIS provides an opportunity for the public, tribes, and government agencies to comment on proposals. In an EIS, multiple alternative scenarios relating to the proposal, or "alternatives", are evaluated. An EIS considers existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

Environmental Review Process

The EIS process consists of a scoping period, DEIS, and FEIS.

- **Scoping:** The scoping period is when the City proposes the topics and alternatives to be studied in the EIS. This includes a scoping comment period. Comments received are used to refine the topics and alternatives for analysis in the DEIS.
- **DEIS:** The Draft EIS (DEIS) reviews the alternatives for impacts. A public comment period opens upon the publication of the DEIS.

- **FEIS:** The Final EIS (FEIS) analyzes the Preferred Alternative for environmental impacts and refines the DEIS analysis based on public comments from the DEIS comment period. The FEIS informs the Comprehensive Plan Periodic Update.

2.4.2 Scoping

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The following topics were proposed for review in the EIS at the time of scoping:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics (land use, population, and employment)
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping for the DEIS began on May 18, 2023, and ended on June 8, 2023 (21-day scoping period). A correspondence list consisting of state and local agencies, Tribes, and other parties of interest was notified by email or mail at the beginning of the scoping period. Two comments were received from state agencies and no other comments were received from other interested parties.

2.4.3 Integrated Plan and EIS

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

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

- *Public participation.* Both SEPA and GMA recognize public participation and governmental agency coordination as critical to the planning process.
- *Documents.* Both SEPA and GMA require preparation of documents for the public participation and decision-making process, but they each have specific guidelines on the information and analysis that must or should be included.
- *Existing conditions.* Both SEPA and GMA require collection and analysis of information regarding existing conditions.
- *Goals, objectives, and policies.* Planning goals, objectives, and policies play an important role in the development of a GMA comprehensive plan and the SEPA evaluation of plan alternatives. SEPA mitigation measures can also contribute to policy amendments in the GMA documents.

- *Impact analysis.* GMA requires collection and analysis of data for critical areas and comprehensive plan topics (e.g., land use, transportation, utilities, capital facilities). SEPA requires analysis of significant adverse impacts on elements of the natural and built environment that are identified during scoping.
- *Mitigation.* GMA requires strategies to reduce the impacts of growth on the natural and built environment. The same strategies should satisfy SEPA requirements for identifying ways to mitigate the significant adverse impacts identified during environmental review.

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

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

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

The integrated Comprehensive Plan/Final EIS document is structured as shown below. This FEIS comprises Volume II of the integrated document.

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

Volume	Contents
Volume I: Sumner Comprehensive Plan—A Policy Document	▪ Summarizes the key issues identified in Volume II. ▪ Contains all policies and plans.
Volume II: Environmental Impact Statement	▪ Contains all inventories required by GMA and SEPA in the “Affected Environment” discussions. ▪ Analyzes the proposal and alternatives. ▪ Summarizes the comprehensive plan policies and adopted regulations that serve as mitigation measures.

Source: BERK, 2024.

2.5 Alternatives

The alternatives describe four different policy directions that the City could take in planning through 2044. These alternatives are analyzed in this FEIS for their potential environmental impacts.

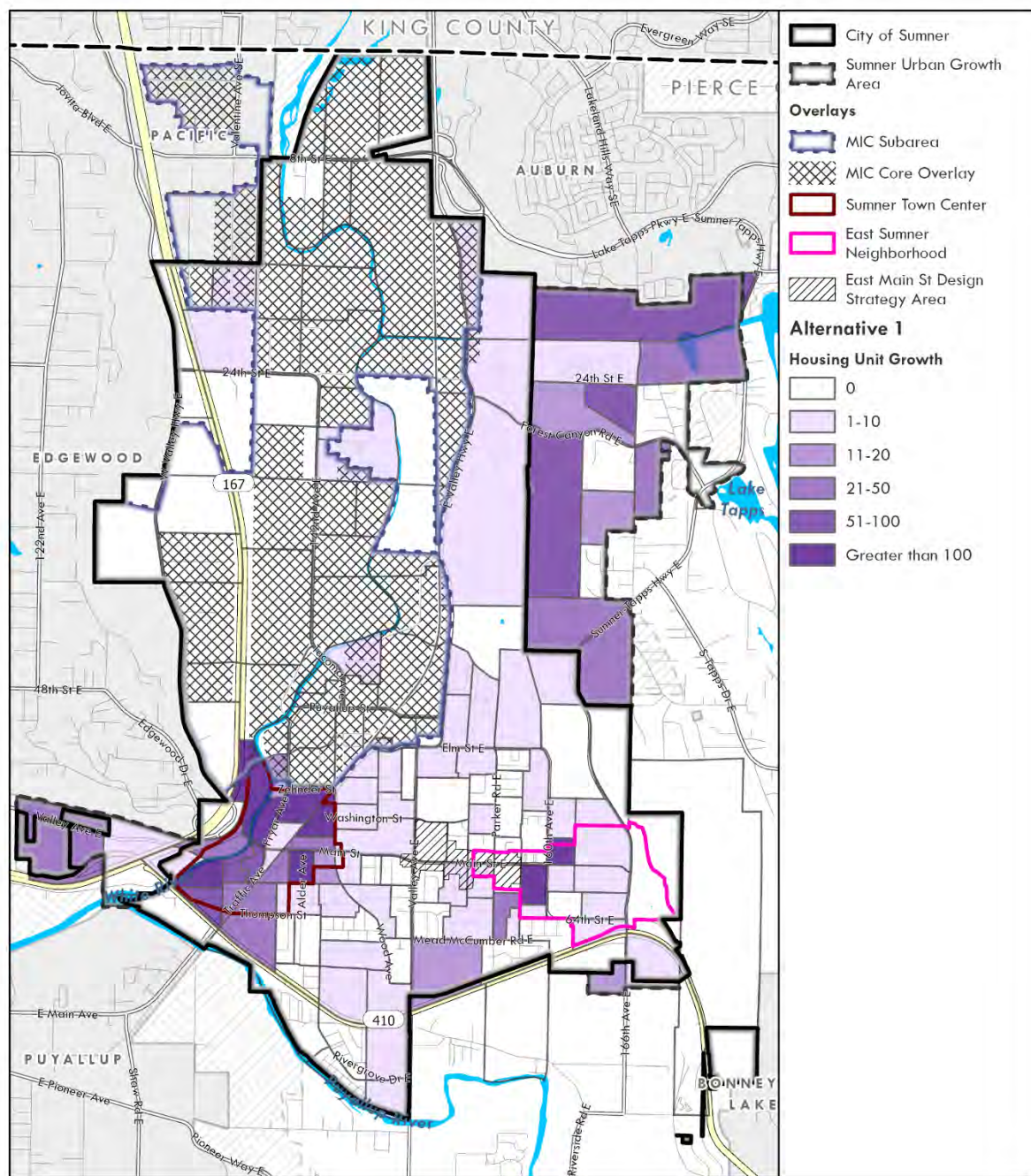
2.5.1 Alternative 1 (No Action)

The State Environmental Policy Act (SEPA) requires the EIS to consider a No Action Alternative. Under Alternative 1, the City continues forward its existing policies with no major changes.

Growth and Targets

Alternative 1 plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Exhibit 2-3: Alternative 1 Housing Growth



CITY OF SUMNER

Future Housing Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

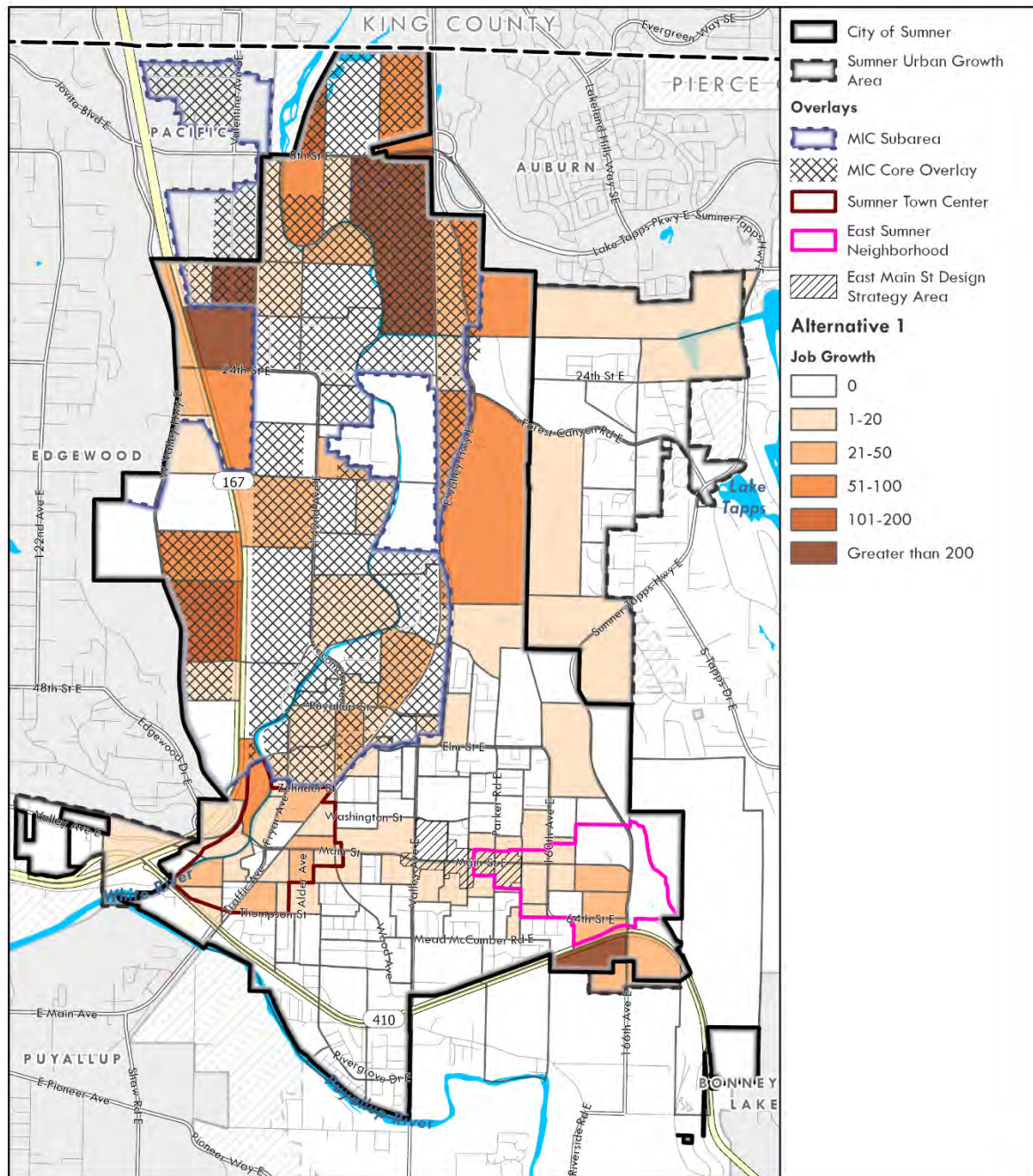
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2023; BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-4: Alternative 1 Job Growth



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2023; BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 1 carries forward existing land use and housing policies and regulations. It does not include updated policies and regulations to improve housing affordability and capacity for housing at all income levels, as is now required under the GMA.

Climate Change

Alternative 1 does not include new comprehensive plan policies to address climate change, as is now required under GMA.

Transportation

Alternative 1 carries forward existing transportation policies with no updates.

CAO Update

Alternative 1 maintains the existing City CAO and does not update it for the latest best available science, as required by the GMA.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 1 does not update plans and regulations for consistency with updates to GMA, VISION 2050, or the Pierce County CPPs.

2.5.2 Alternative 2

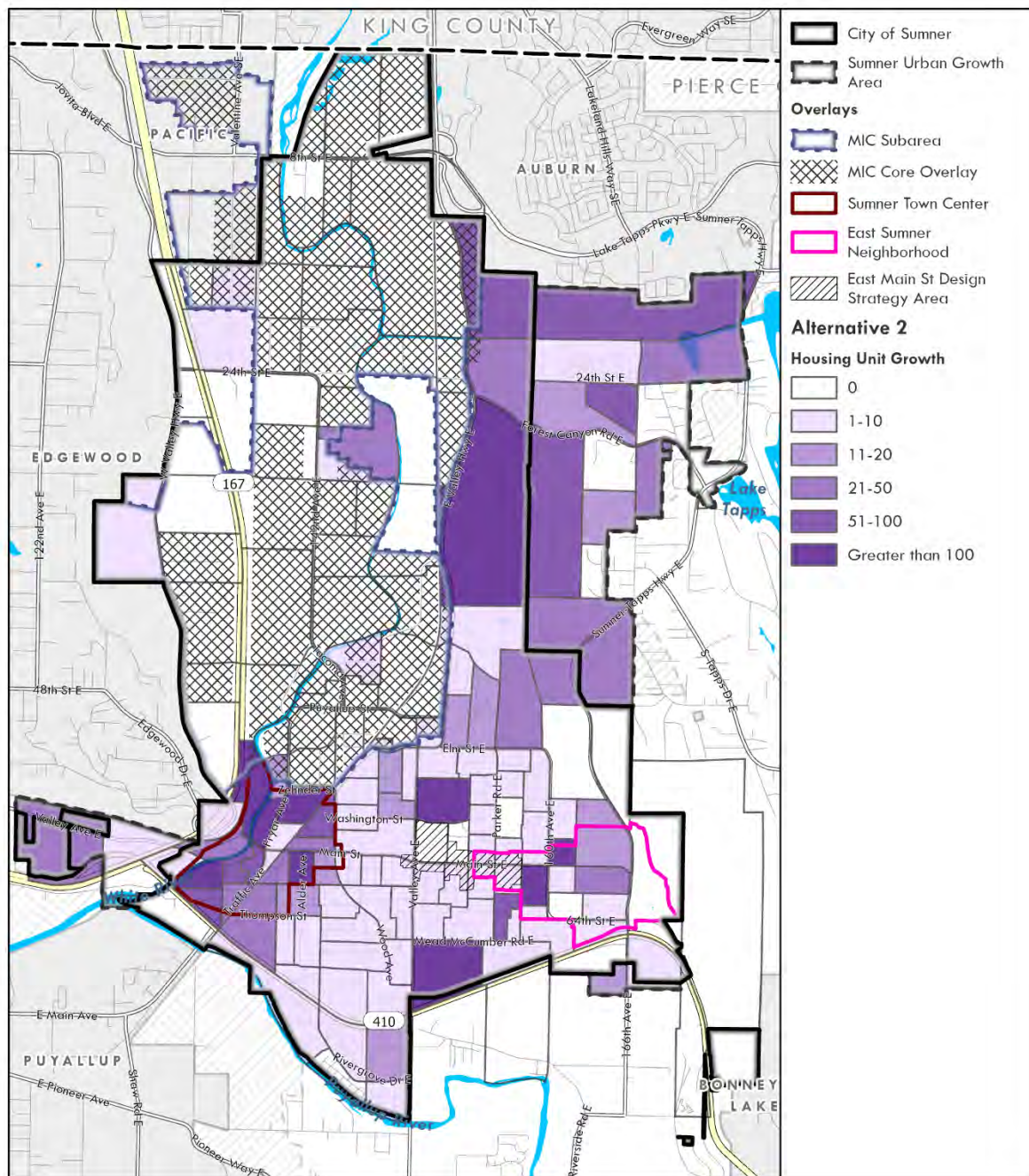
Under Alternative 2, the city revises its policies, particularly its housing and land use approach, in order to meet new state requirements.

Growth and Targets

Alternative 2, like Alternative 3, plans for growth of 3,000 units, 5,313 jobs, and 6,700 residents. Job growth amount and distribution is also consistent with Alternative 1 and the Preferred Alternative. Planned growth under Alternative 2 meets the Pierce County job target and exceeds the housing and population targets. The planned housing growth under Alternatives 2 and 3 reflects the need to accommodate housing affordability targets for 2020-2044, considering that some market-rate development has already occurred since 2020 or is in the pipeline. The resulting growth number is similar to the 2020 Sumner Comprehensive Plan Supplemental DEIS. This was an amount of growth studied in prior City plans in 2018 and 2020 and accounts for prior adopted plans and ordinances for centers in Town Center, East Sumner, and the Manufacturing Industrial Center.

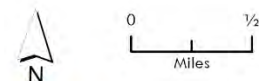
Housing growth in Alternative 2 is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Alternative 2 also plans for some housing growth on the current Cava gravel mine site. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Exhibit 2-5: Alternative 2 Housing Growth



CITY OF SUMNER

Future Housing Growth



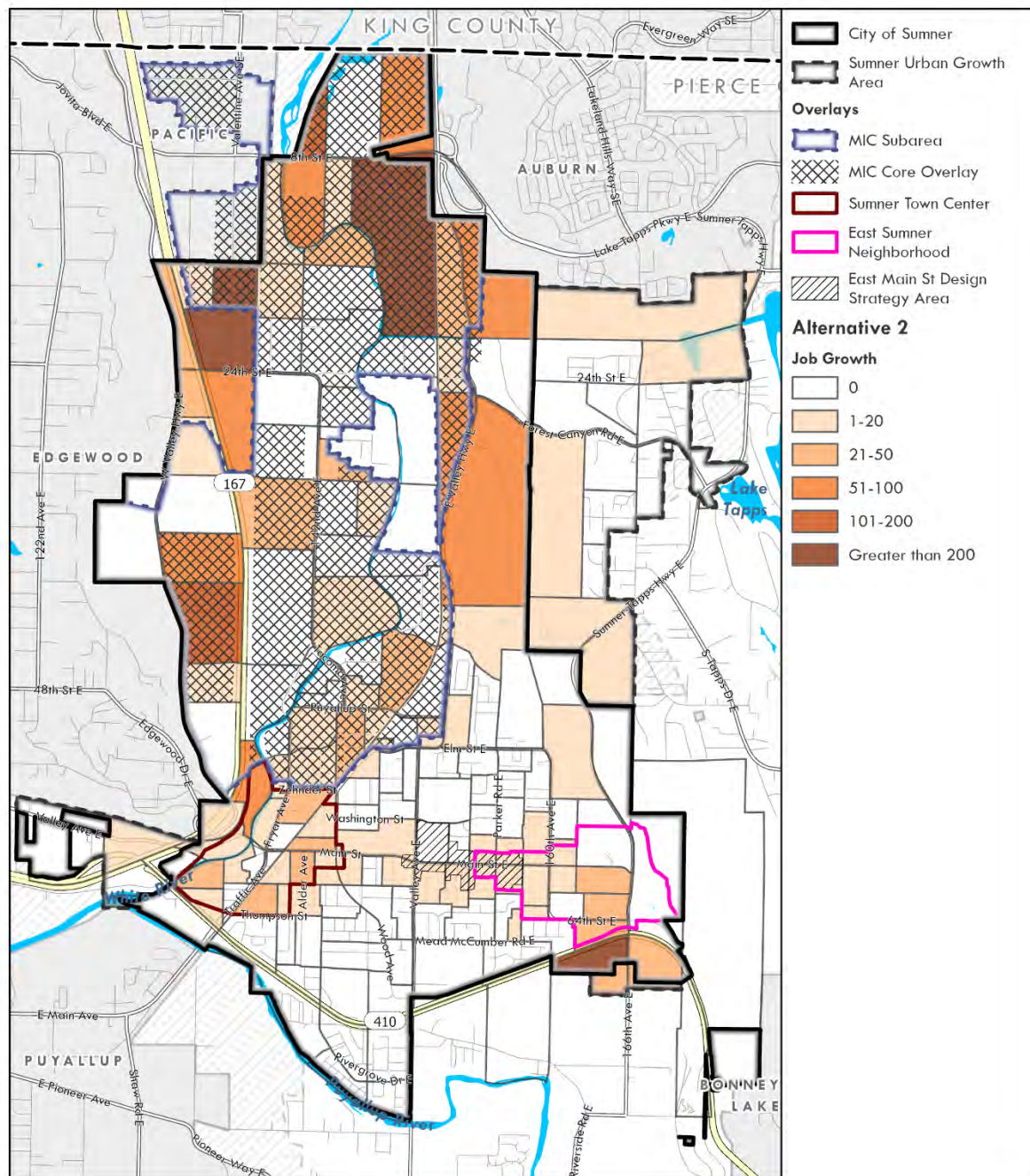
Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2023; BERK, 2023.

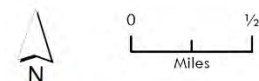
Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-6: Alternative 2 Job Growth



CITY OF SUMNER

Future Job Growth



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2023; BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 2 includes new policies that increase housing capacity for all income levels and improve affordability:

- Affordability incentives in Town Center and East Sumner.
- Two units per residential lot allowed citywide. This would allow duplexes in all Low Density Residential (LDR) designations.
- Two accessory dwelling units (ADUs) per lot allowed citywide, in any combination of detached and attached.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12.
- Multiplexes / small apartments allowed in all Medium Density Residential (MDR) and High Density Residential (HDR) areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 22 dwelling units an acre).
- Reclamation of the Cava gravel mine and rezone to MDR.
- Policies supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies and policies to remove barriers to middle housing, multifamily housing, and ADUs.

This combination of policy changes creates adequate capacity to accommodate housing targets for all income bands, as allocated by Pierce County.

Climate Change

Alternative 2, like Alternative 3 and the Preferred Alternative, includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled, like Alternative 3 and the Preferred Alternative.

CAO Update

Alternative 2, like Alternative 3 and the Preferred Alternative, includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 2, like Alternative 3 and the Preferred Alternative, includes updates for consistency with the regional and state planning frameworks.

2.5.3 Alternative 3

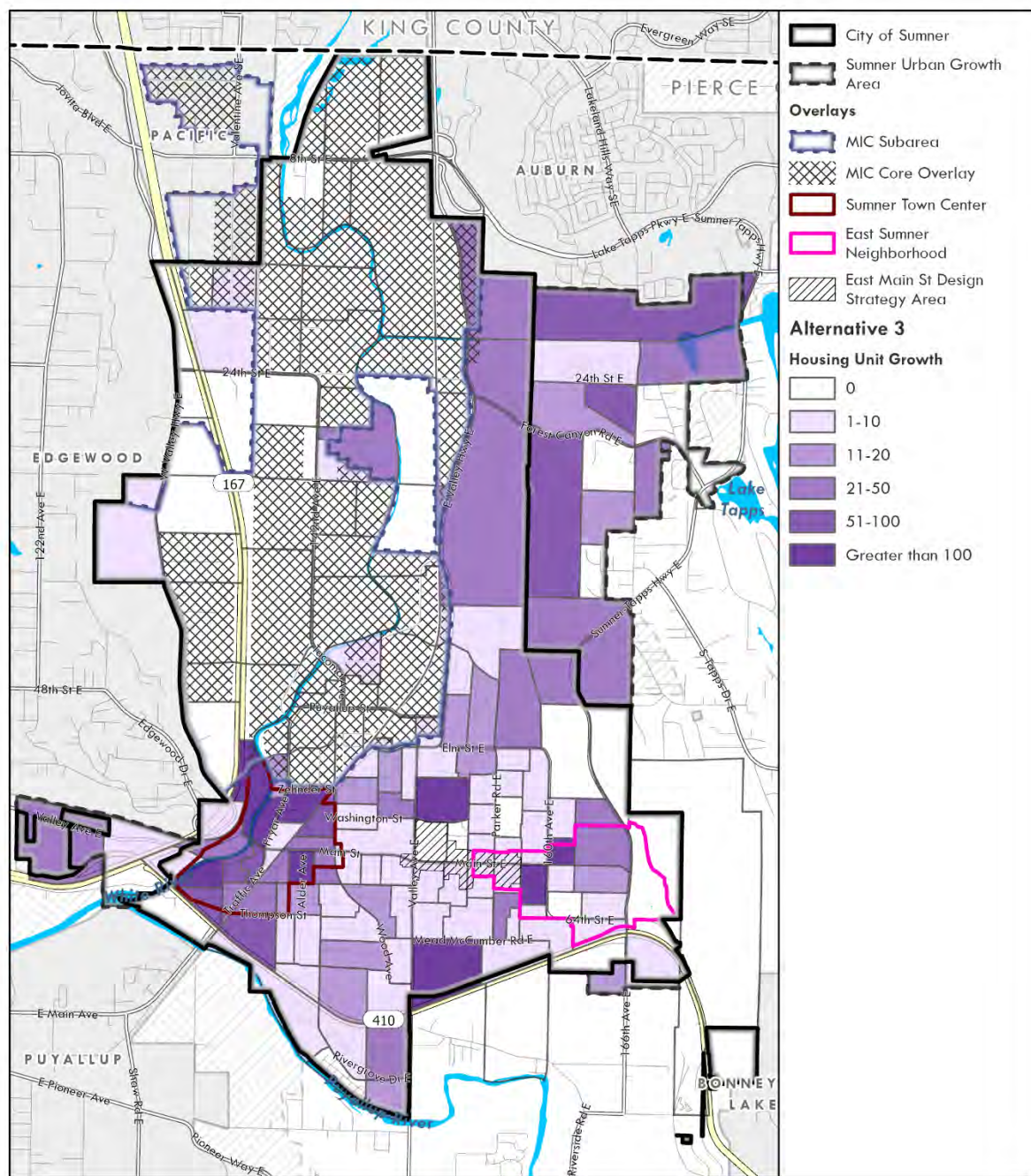
Under Alternative 3, the city revises its policies, particularly its housing and land use approach, in order to meet new state requirements.

Growth and Targets

Alternative 3, like Alternative 2, plans for growth of 3,000 units, 5,313 jobs, and 6,700 residents. Job growth amount and distribution is also consistent with Alternative 1 and the Preferred Alternative. Planned growth under Alternative 3 meets the Pierce County job target and exceeds the housing and population targets. The planned housing growth under Alternatives 2 and 3 reflects the need to accommodate housing affordability targets for 2020-2044, considering that some market-rate development has already occurred since 2020 or is in the pipeline. The resulting growth number is similar to the 2020 Sumner Comprehensive Plan Supplemental DEIS. This was an amount of growth studied in prior City plans in 2018 and 2020 and accounts for prior adopted plans and ordinances for centers in Town Center, East Sumner, and the Manufacturing Industrial Center.

Housing growth in Alternative 3 is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

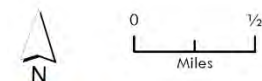
Exhibit 2-7: Alternative 3 Housing Growth



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

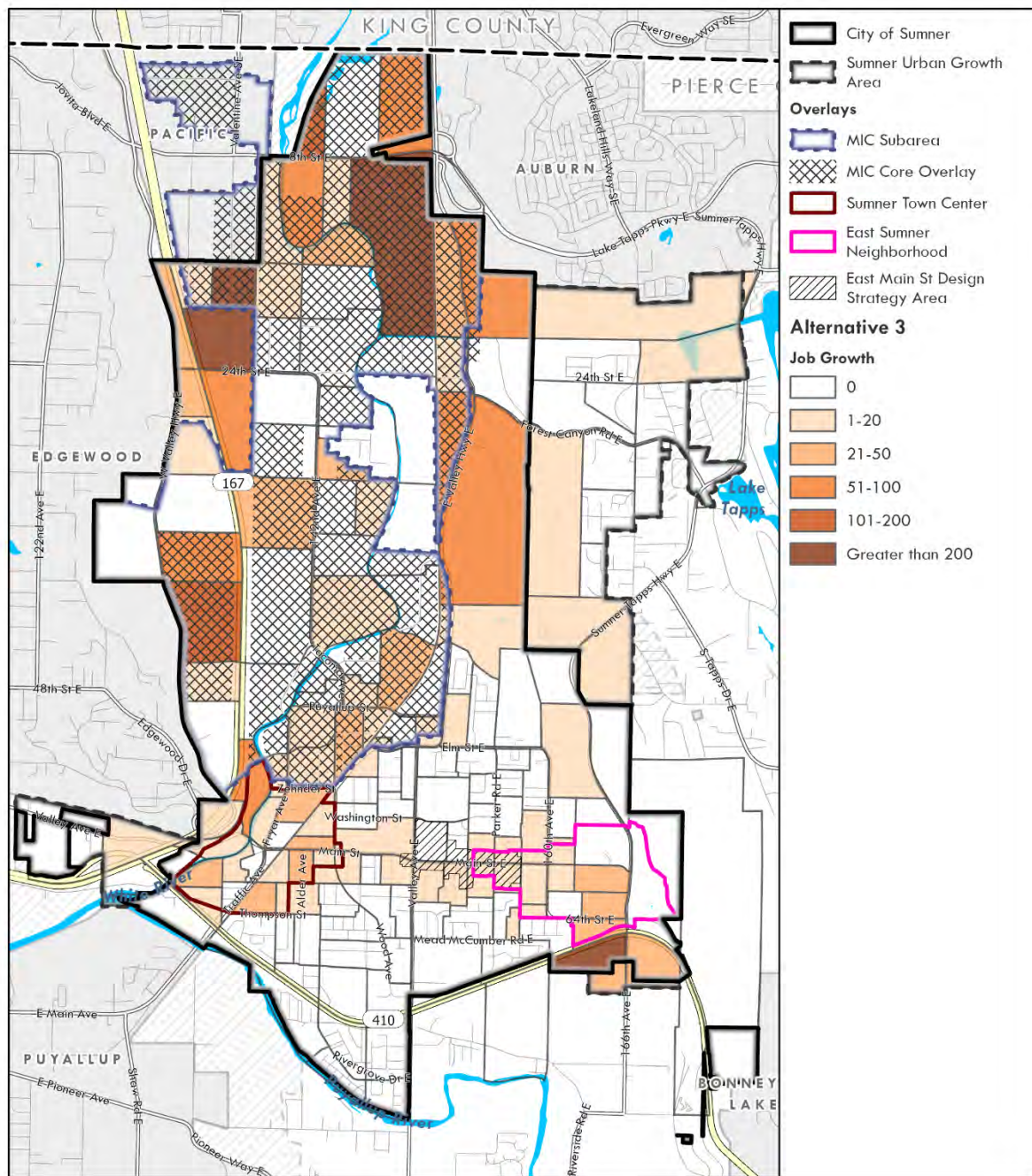


Map Date: February 2024

Source: City of Sumner, 2023; BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-8: Alternative 3 Job Growth



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2023; BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 3 includes new policies that increase housing capacity for all income levels and improve affordability:

- Mandatory affordability in Town Center and East Sumner (20% of units).
- Two units per residential lot allowed citywide. This would allow duplexes in all LDR designations.
- Two ADUs per lot allowed citywide, in any combination of detached and attached. Incentives provided for ADUs such as fee waivers.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12, where one unit is dedicated affordable.
- Multiplexes / small apartments allowed in all MDR and HDR areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 17 dwelling units an acre).
- Policies and incentives, such as fee waivers, supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies and policies to remove barriers to middle housing, multifamily housing, and ADUs.
- This combination of policy changes creates adequate capacity to accommodate housing targets for all income bands, as allocated by Pierce County.

Climate Change

Alternative 3, like Alternative 2 and the Preferred Alternative, includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled, like Alternative 2 and the Preferred Alternative.

CAO Update

Alternative 3, like Alternative 2 and the Preferred Alternative, includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 3, like Alternative 2 and the Preferred Alternative, includes updates for consistency with the regional and state planning frameworks.

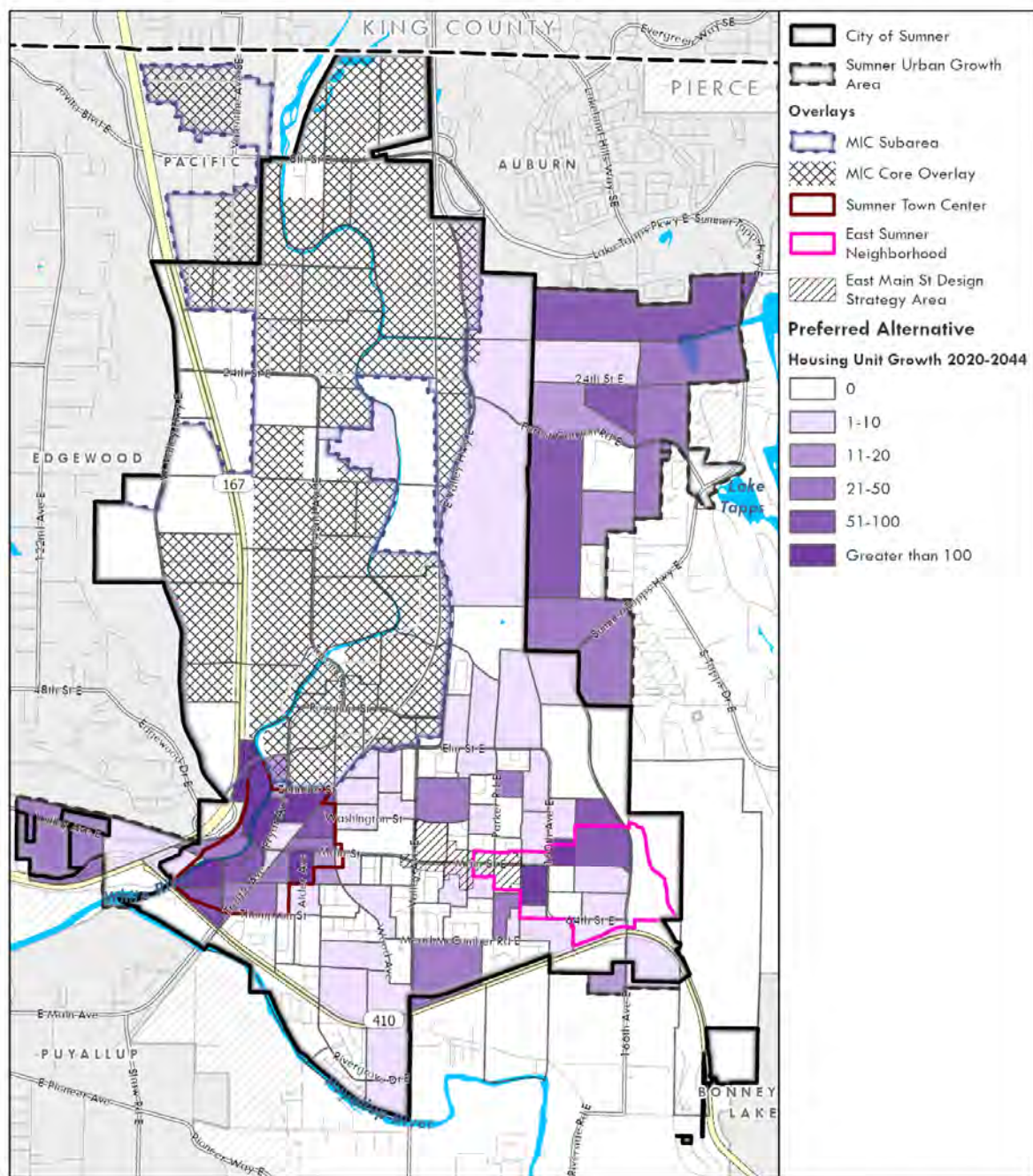
2.5.4 Preferred Alternative

Under the Preferred Alternative, the city revises its policies, particularly its housing and land use approach, in order to meet new state requirements.

Growth and Targets

The Preferred Alternative plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. This is the same job growth as Alternatives 1, 2, and 3 and the same housing growth as Alternative 1, in alignment with Pierce County's adopted growth targets. Housing growth is focused mostly in Town Center and East Sumner subareas, though is also distributed throughout the city as middle housing. Like Alternatives 1, 2, and 3, job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Exhibit 2-9: Preferred Alternative Housing Growth



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

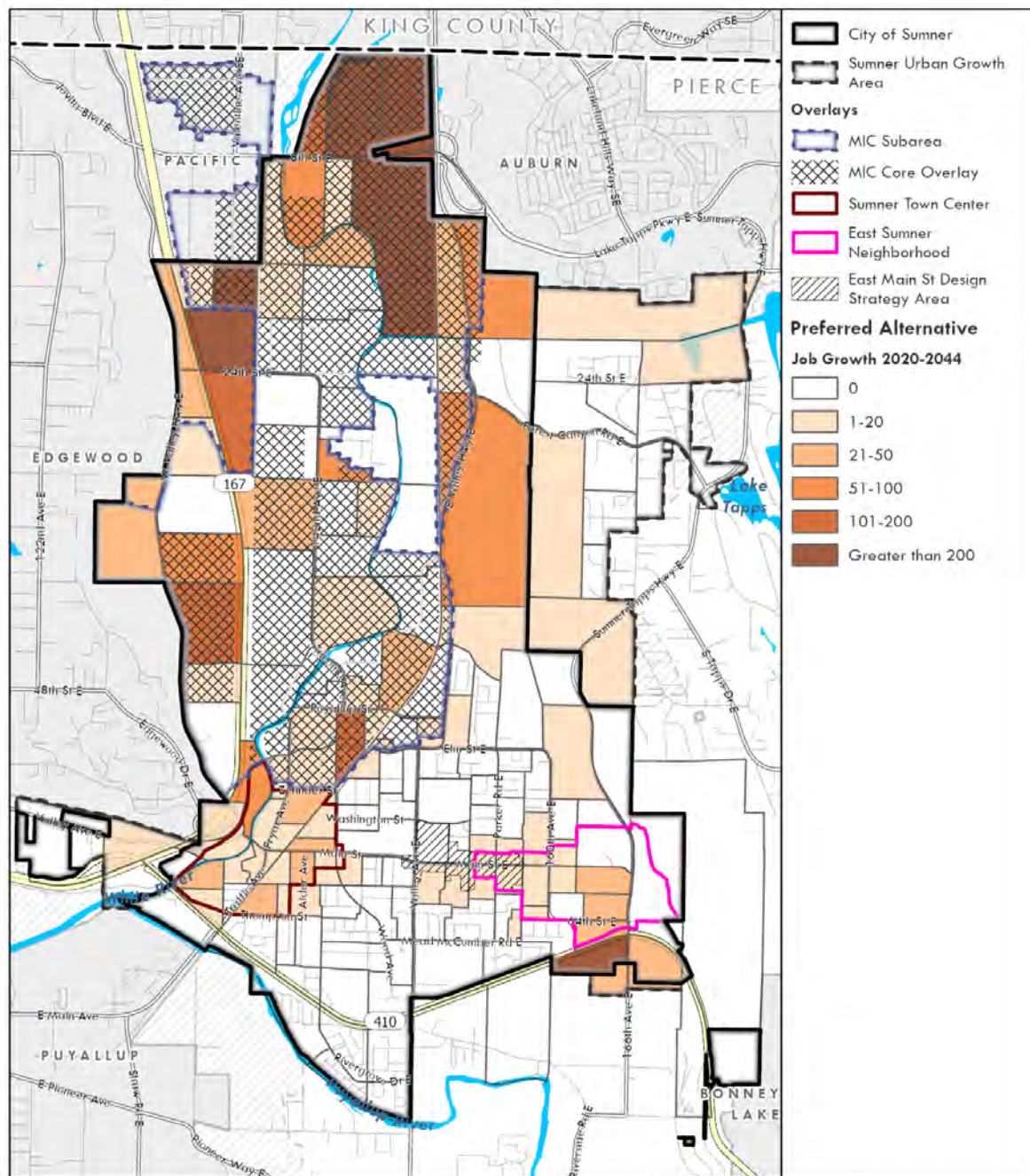


Map Date: July 2024

Source: City of Sumner, 2024; BERK, 2024.

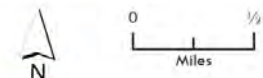
Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-10: Preferred Alternative Job Growth



CITY OF SUMNER

Future Job Growth



Map Date: July 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2024; BERK, 2024.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

The Preferred Alternative includes new policies that increase housing capacity for all income levels and improve affordability:

- Affordability incentives in Town Center and East Sumner (including limiting the Town Center MFTE to affordable projects and expanding the affordability MFTE incentive to all of East Sumner).
- Two units per residential lot allowed citywide. This would allow duplexes in all Low Density Residential (LDR) designations.
- Two accessory dwelling units (ADUs) per lot allowed citywide, in any combination of detached and attached.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12.
- Multiplexes / small apartments allowed in all Medium Density Residential (MDR) and High Density Residential (HDR) areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 22 dwelling units an acre).
- Policies supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies (including policy on manufactured home park preservation) and policies to remove barriers to middle housing, multifamily housing, and ADUs.

Climate Change

The Preferred Alternative, like Alternatives 2 and 3, includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled, like Alternatives 2 and 3.

CAO Update

The Preferred Alternative, like Alternatives 2 and 3, includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

The Preferred Alternative, like Alternatives 2 and 3 includes updates for consistency with the regional and state planning frameworks.

2.5.5 Comparison of Alternatives

Exhibit 2-11: Comparison of Alternatives

Topic	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
Housing Growth (2020-2044)	1,985 units Focused in Town Center and East Sumner Does not meet housing targets by income band	3,000 units Focused in Town Center and East Sumner, with moderate density added citywide; greater growth on Cava mine site with increased density. Meets housing targets by income band	3,000 units Focused in Town Center and East Sumner, with gentle density added citywide, some growth on the Cava gravel mine site at current LDR density Meets housing targets by income band	1,985 units Focused in Town Center and East Sumner, with gentle density added citywide, some growth on the Cava gravel mine site at current LDR density. Meets housing targets by income band
Employment Growth (2020-2044)	5,313 jobs Most job growth in the MIC.	5,313 jobs Most job growth in the MIC.	5,313 jobs Most job growth in the MIC.	5,313 jobs Most job growth in the MIC.
Population Growth (2020-2044)	4,904 residents	6,700 residents	6,700 residents	4,900 residents
Housing Capacity / Affordability Strategies	No changes to existing.	Affordability incentives in Town Center and East Sumner Two units per residential lot allowed citywide Two ADUs per lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots Small apartments (up to 3 stories) and multiplexes allowed in all MDR and HDR Maximum density raised in MDR (22 du)	Mandatory affordability in Town Center and East Sumner Two units per residential lot allowed citywide Two ADUs per lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable Small apartments (up to 3 stories) and multiplexes allowed in all MDR and HDR Maximum density raised in MDR (17 du)	Affordability incentives in Town Center and East Sumner Two units per residential lot allowed citywide Two ADUs per lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots Small apartments (up to 3 stories) and multiplexes allowed in all MDR and HDR Maximum density raised in MDR (22 du)

Topic	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
		Cava mine reclamation and rezone to MDR Policies supporting religious organizations building affordable apartment housing Other updates in alignment with state housing law	Policies and incentives supporting religious organizations building affordable apartment housing Other updates in alignment with state housing law	Policies supporting religious organizations building affordable apartment housing Other updates in alignment with state housing law
New Climate Change Element	No.	Yes.	Yes.	Yes.
Transportation Policies	No updates.	Updated to address emissions and vehicle miles traveled.	Updated to address emissions and vehicle miles traveled.	Updated to address emissions and vehicle miles traveled.
CAO Update	No.	Yes.	Yes.	Yes.
Consistency with GMA, VISION 2050, and Pierce County CPPs	No, no updates for consistency with the regulatory framework.	Yes.	Yes.	Yes.

2.6 Benefits and Disadvantages of Delaying the Proposed Action

If the proposal is delayed, Sumner's growth would be guided by the current Comprehensive Plan, zoning code, and other adopted regulations. This would allow for growth at the minimum overall targets for jobs and housing, and with lower infrastructure and service demand, but would not be consistent with regional planning, including the Pierce County Countywide Planning Policies and VISION 2050 regarding planning for affordable housing, climate change, and other newer policies. It would also not contain the changes needed to meet housing targets by affordability band. The City would also not be consistent with GMA, due to changes since the last periodic update, including requirements related to planning for housing at all income levels. Infrastructure investments would also follow existing plans instead of being aligned with the city's expected share of county growth. These inconsistencies could hinder the City's ability to attain state and federal grants and loans for infrastructure.

3 Land Use

3.1 Introduction

This section examines land use changes proposed by the alternatives and addresses potential impacts associated with land capacity, land use compatibility, and consistency with regional plans and policies.

3.2 Affected Environment

3.2.1 Plans, Policies, and Regulations

Growth Management Act

Sumner's Comprehensive Plan and development regulations must be consistent with the provisions in the GMA. Adopted in 1990, the GMA directs coordinated regional and countywide planning to inform city and county comprehensive plans and development regulations. The GMA is primarily codified in Chapter 36.70A RCW but has been amended and added to in other parts of the RCW and Washington Administrative Code (WAC). In 2021, GMA goals and element requirements for housing and land use were amended (see Chapter 6: Housing). These and other amendments between 1995 and 2022 are described in the Washington State Department of Commerce (Commerce) summary of amendments. A new requirement was also added in 2023 for a climate change and resiliency element.

Key provisions of the GMA include:

- Planning Goals
- Land Designations: Urban, Resource, and Rural Lands
- Consistency with Multicounty Planning Policies (MPPs)
- Buildable Lands Program
- Consistency with Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The 15 Planning Goals help guide the development and adoption of local comprehensive plans and development regulations. They include:

- **(1) Urban growth.** Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

- **(2) Reduce Sprawl.** Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- **(3) Transportation.** Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
- **(4) Housing.** Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
- **(5) Economic Development.** Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
- **(6) Property Rights.** Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
- **(7) Permits.** Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
- **(8) Natural Resource Industries.** Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
- **(9) Open Space and Recreation.** Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
- **(10) Environment.** Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
- **(11) Citizen Participation and Coordination.** Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
- **(12) Public Facilities and Services.** Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
- **(13) Historic Preservation.** Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
- **(14) Climate Change and Resiliency.** Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and Chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to

climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

- **(15) Shorelines.** For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Required elements of the comprehensive plan under GMA include land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change and resiliency. Jurisdictions may choose to include other elements in addition. City development regulations must also be consistent with the comprehensive plan. The comprehensive plan must comply with the requirements of the GMA in order to be eligible for grants and loans from some state programs.

VISION 2050

VISION 2050 is the multi-county-level planning document for King, Kitsap, Pierce, and Snohomish Counties. Puget Sound Regional Council (PSRC) adopted VISION 2050 in October 2020 and the plan is endorsed by over 100 member cities, counties, ports, transportation agencies, and Tribal governments in the region. VISION 2050 contains multicounty planning policies (MPPs), as required by GMA, and a regional growth strategy through 2050. About 216 MPPs are included in the document, organized by topic area goals including Regional Collaboration, Regional Growth Strategy, Environment, Climate Change, Development Patterns, Housing, Economy, Transportation, and Public Services.

VISION 2050 calls for focusing housing and job growth within regional growth centers and near high capacity transit. Sumner is designated as a "High Capacity Transit Community" in VISION 2050 and the Sumner-Pacific Manufacturing Industrial Center is identified as an industrial employment center.

Countywide Planning Policies

The GMA requires counties and cities to collaborate on countywide planning policies (CPPs) to coordinate planning and ensure consistency between county and city comprehensive plans (RCW 36.70A.210). The Pierce County CPPs were adopted in May 2022 and are consistent with the MPPs and Regional Growth Strategy in VISION 2050. The CPPs address:

- Affordable housing
- Agricultural lands
- Economic development and employment
- Education
- Fiscal impact
- Historic, archeological, and cultural preservation
- Natural resources
- Open space and protection of environmentally sensitive lands
- Siting of public capital facilities of a countywide or statewide nature
- Transportation facilities and strategies
- Urban growth areas

- Amendments and transition

The updated CPPs include a new emphasis on social equity and inclusion, healthy communities, climate change, interjurisdictional coordination, and displacement of residents and businesses. The Sumner-Pacific Manufacturing Industrial Center (MIC) is considered a Regional Manufacturing Industrial Center in the CPPs, which aligns with Puget Sound Regional Council's designation. Sumner Town Center is designated as a Countywide Growth Center.

The Countywide Planning Policies Appendix A allocates population, housing, and employment growth targets for the 2020-2044 period. The County adopted revised housing targets by income band in June 2023. See Exhibit 3-1 and Exhibit 3-2 for the final Pierce County adopted targets allocated to Sumner.

Exhibit 3-1: 2044 Growth Targets - Sumner

	2020	2020-2044 Growth	2044 Total
Housing	4,492	1,985	6,477
Population	10,621	4,904	15,525
Employment	18,106	5,313	23,419

Source: Pierce County Countywide Planning Policies Appendix A, 2022, Pierce County Ordinance 2023-22s, 2023.

Exhibit 3-2: Pierce County Adopted Housing Affordability Targets - Sumner

	Total	0-30% AMI Non- PSH*	0-30% AMI PSH*	30-50% AMI	50-80% AMI	80-100% AMI	100- 120% AMI	>120 % AMI	Emergency housing needs (beds)
Allocation (2020-2044)	1,985	256	347	368	291	125	114	484	121

Source: Pierce County Ordinance No. 2023-22s, 2023.

*PSH refers to Permanent Supportive Housing, which is defined in RCW 36.70A.030(16) as "non-time-limited housing for persons with disabling conditions who have experienced homelessness or risk of homelessness and are offered voluntary supportive services aimed at assisting the client in maintaining the terms of their lease agreement."

Pierce County has yet to adopt targets for each unincorporated urban growth area for 2044. However, if the County were to adopt targets allocating the same percentage of growth as was previously adopted for 2030 (1.5% of the unincorporated county housing unit growth and 0.4% of the unincorporated county job growth), 484 new housing units and 82 new jobs from 2020-2044 could be expected in the Sumner UGA.

Sumner Comprehensive Plan

The adopted Sumner Comprehensive Plan includes a multi-page Vision Statement for Sumner in 2035. The statement is excerpted below:

In 2035 Sumner shows strongly its unique "small town" characteristics and appeal even in the face of a changing world. Through ongoing cooperation and communication between citizens, business, industry, schools, and local government, an environment exists which reflects the community's pride in itself. This environment embodies our agricultural heritage, our desire for open space, our promotion of quality education, our community interaction, and our readiness for the future.

In order to maintain this environment our community upholds responsible commitments in planning for sustainability with our physical layout, the character of our residential districts, our growth patterns, the maintenance of our parks and recreational commitments, our continued economic development, and responsible governance.

Residential uses are intended to fit a range of needs:

City plans support a diversity of lot sizes and variety of housing types to meet the varied needs and lifestyles found in Sumner.

Economic development consists of small businesses and industrial enterprises:

In 2035, small businesses are supported and nurtured throughout the community. Essential business services are found within walking distance of most neighborhoods.... Planned industrial and commercial areas are encouraged and should utilize landscaping and other forms of buffering to ensure compatibility with surrounding neighborhoods and limit noise, lighting, and traffic. Employment in manufacturing is promoted and encouraged over warehouse distribution for quality jobs and reduced truck traffic. The north end has become a burgeoning manufacturing and industrial center of regional significance.

The City desires to create a multimodal network connecting jobs and housing:

Through adequate planning for both jobs and housing, we strive to have a large portion of the work force living in the City and using something other than automobiles for transportation.

The Town Center emphasizes mixed uses:

... there are areas of "mixed-use", predominately around the train station, where a mix of housing and businesses creates a vibrant and diverse living environment. Sumner has found a balance between parking for riders in and outside the City to gain access to a regional transit system while maintaining the City's small town atmosphere and character.

Other areas of the city also include mixed uses and pedestrian amenities:

Downtown and the main commercial core of the City are enhanced with pedestrian amenities, landscape, streetscape, and other improvements which complement the efforts of Downtown businesses to create a coherent theme. These improvements play a major role in linking

Downtown with West Sumner and East Main Street and help create a unified and seamless whole.

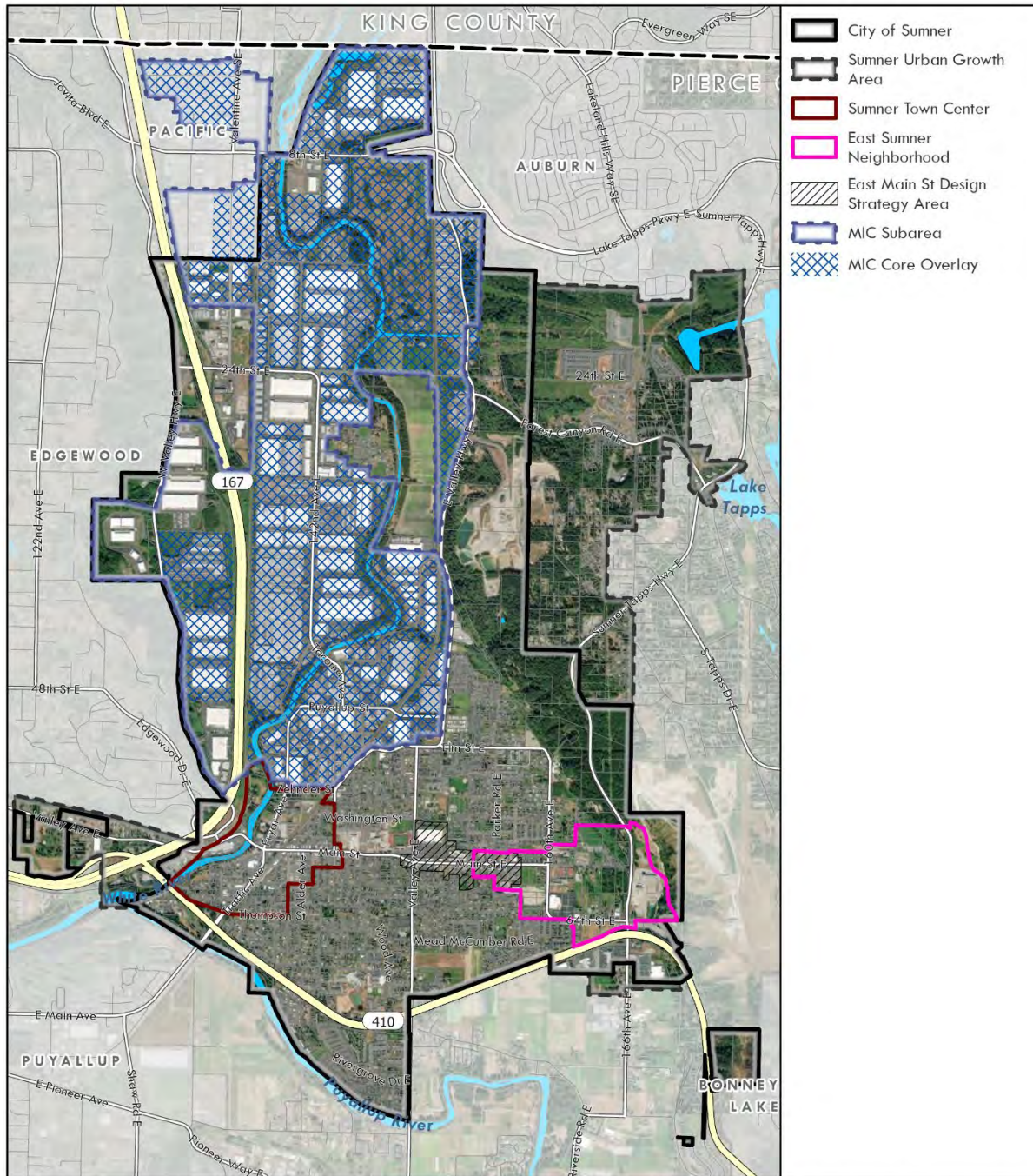
Revisions to the Vision Statement are proposed in the Draft 2024 Comprehensive Plan. These revisions emphasize embracing Sumner's heritage while looking forward to the future; the role of the downtown transit station; access to home ownership and high quality housing; safe connections to schools, services, and amenities; environmental justice; support of incubator businesses; and public participation,

The adopted plan includes the following elements:

- Land Use
 - Land Use Sub-Element
 - Historic and Cultural Resource Sub-Element
 - Essential Public Capital Facilities Sub-Element
 - Commuter Rail/ Regional Transit Sub-Element
 - Permit Process Sub-Element
 - Plan Monitoring and Amendment Sub-Element
 - Governance Sub-Element
 - Land Use Designations
- Economic Development
- Community Character
- Parks and Open Space
- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline Master Program

The Comprehensive Plan was last amended in 2020, with a minor update to land use descriptions in 2022.

Exhibit 3-3: Vicinity Map



CITY OF SUMNER Vicinity Map

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner, 2023, BERK, 2023.

Subarea and Neighborhood Plans

Town Center Plan

The Sumner Town Center Plan was adopted in 2018 and presents a vision, strategies, goals, and policies for Sumner's 197-acre Town Center. The Town Center Plan is a transit oriented subarea plan that supports the Sumner Comprehensive Plan.

The Town Center vision is described as:

Sumner, a city of excellence reinforcing its role as classic, small town Americana that goes beyond nostalgia.

Sumner, a community that retains/strengthens a fully functional, full life cycle, "everyday" downtown.

Sumner, a community that provides housing for all life stages and recognizes the value of a transit station for convenience of residents.

In addition to the vision, strategies, goals, and policies, the Town Center Plan established a form-based code for Town Center, which has been adopted into the Zoning code.

Sumner-Pacific Manufacturing Industrial Center Plan

The Sumner-Pacific Manufacturing Industrial Center (MIC) Plan was adopted in 2018 and articulates a vision for the Sumner-Pacific MIC's future and goals and policies to guide investments. The plan supports business retention and growth, strengthens existing neighborhood assets, expands transportation choices, and improves environmental conditions. The Subarea Plan is aligned with the regional plans and policies in effect at the time of adoption. This includes the Pierce County Countywide Planning Policies and Puget Sound Regional Council's VISION 2040 (the precursor to VISION 2050).

The Sumner-Pacific MIC is an important regional warehousing, transportation, distribution, and logistics hub that spans portions of Sumner and Pacific. Sumner-Pacific MIC is designated a Regional Manufacturing/Industrial Center by PSRC and is therefore an area expected to see a greater proportion of future employment growth than other areas of Sumner.

Three overarching goals and their supporting policies are included in the MIC Subarea Plan:

SPMIC-1: Land within the SPMIC is preserved for industrial use and remains available to support a broad range of industrial job opportunities.

SPMIC-2: New growth in the SPMIC complements the existing character and development pattern.

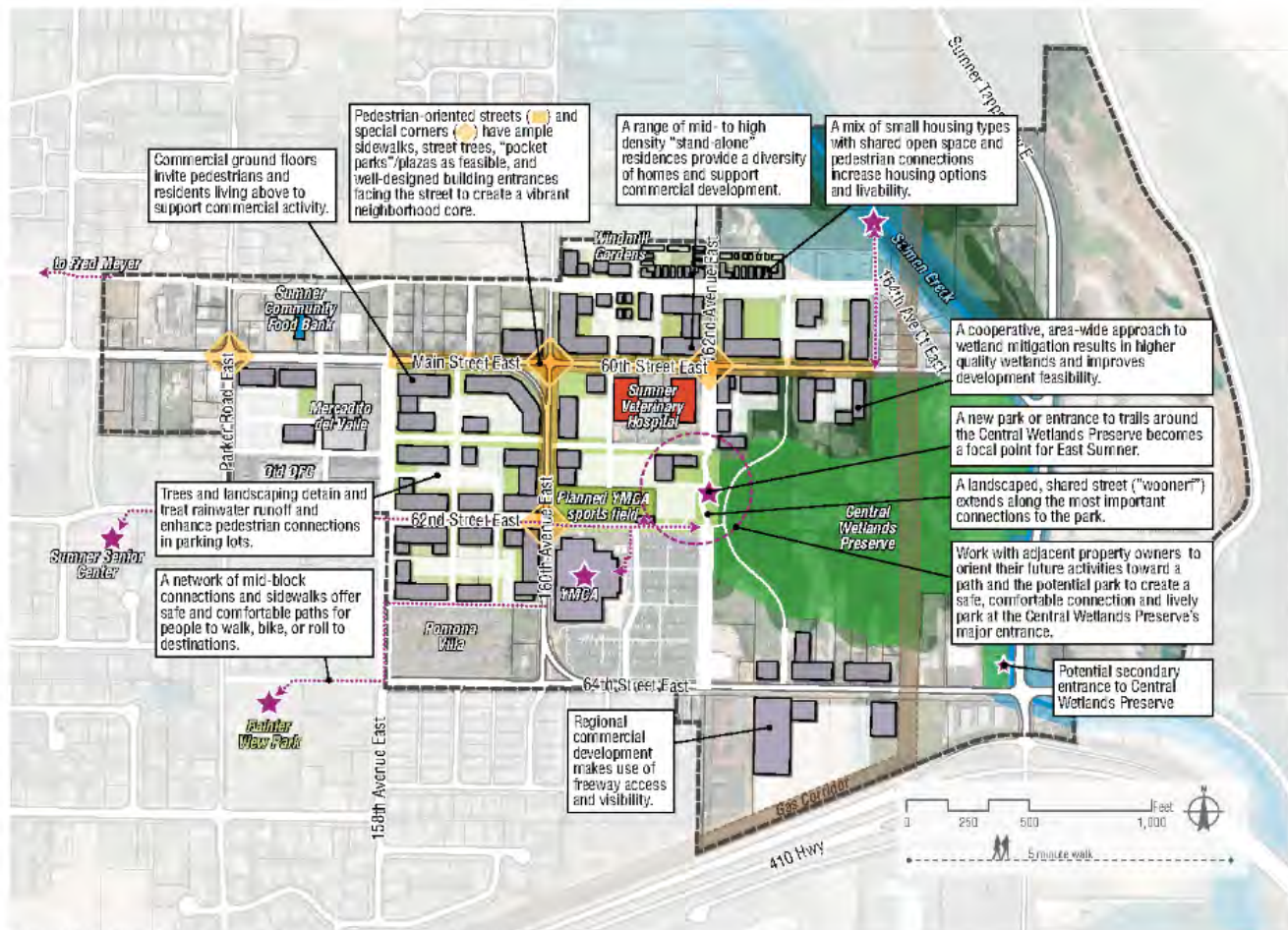
SPMIC-3: Industrial activity in the SPMIC does not adversely impact adjacent uses and neighborhoods.

East Sumner Neighborhood Plan

Updated from prior plans created over two decades, the 2020 East Sumner Neighborhood Plan area comprises approximately 174 acres in the eastern portion of Sumner. The area is bordered by 160th Avenue East, 64th Street East, Main/60th Street East, Sumner-Tapps Highway East, and State Route 410. Salmon Creek cuts through the eastern portion.

The Plan includes goals and objectives under four categories: Mobility and Circulation, Ecological Viability, Economic Growth, and Community Livability. A concept for the development of East Sumner is also included, which focuses on encouraging:

- A range of commercial development
- Minimizing and mitigating wetland impacts
- Retaining open space and incorporating the central wetlands area as a major open space amenity
- Medium-to-high density multifamily housing
- Pedestrian-oriented development along 160th Avenue East and 60th Street East
- Improved multimodal circulation
- “Small town feel” through retaining open space and natural areas and applying design guidelines to high-density development

Exhibit 3-4: East Sumner Neighborhood Plan: Potential Future Development Scenario**Potential Future Development Scenario for the East Sumner Village**

East Sumner Neighborhood Plan Update

page
17

Source: East Sumner Neighborhood Plan 2020

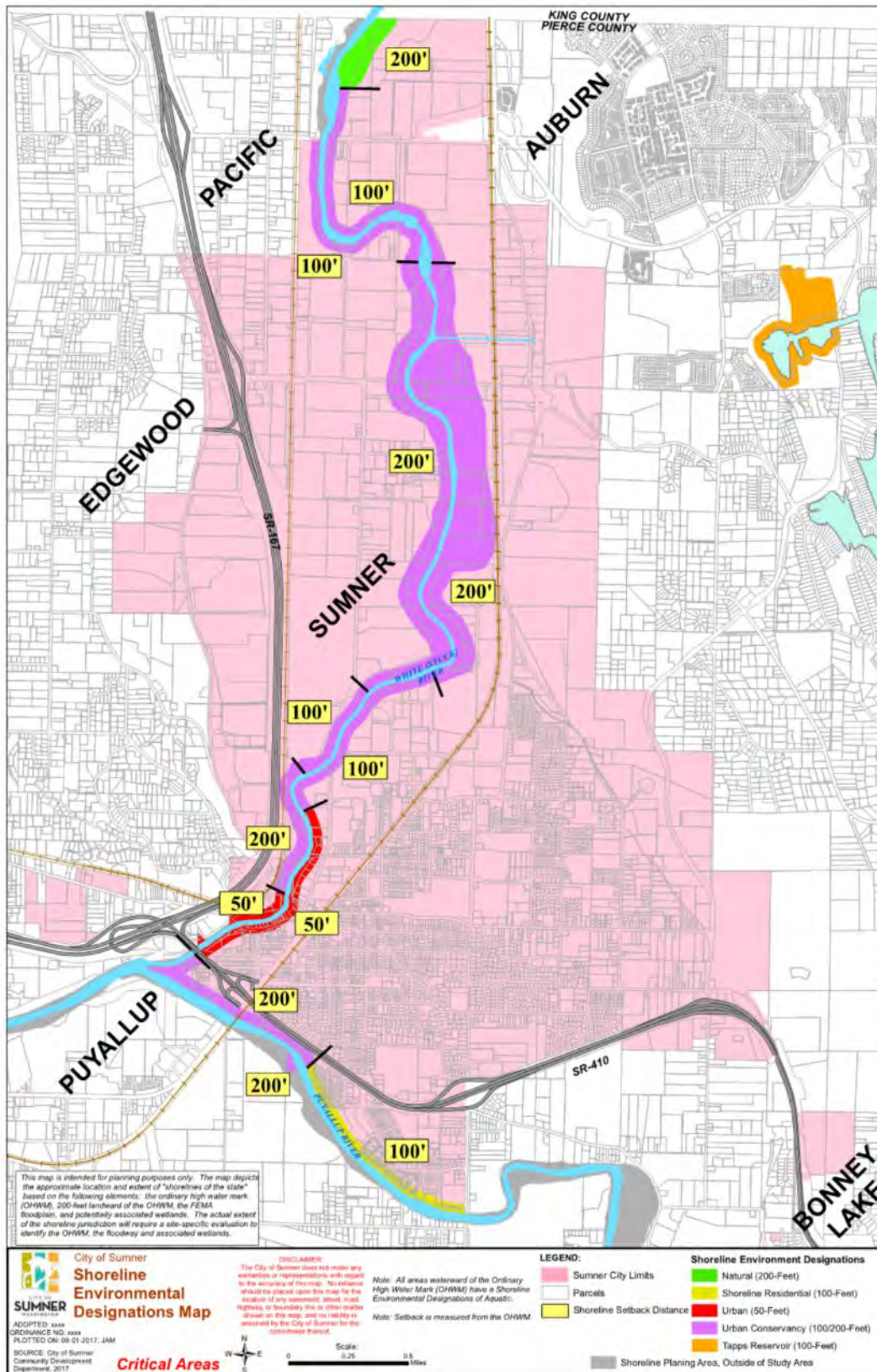
Sumner Shoreline Master Program

The Sumner Shoreline Master Program (SMP) was updated in 2019 and became effective in 2020. The SMP is a requirement of the Shoreline Management Act (SMA) that establishes goals, policies, and regulations to guide future development along Sumner's shorelines. The SMP establishes six shoreline environment designations, including:

- Natural
- Urban Conservancy
- Shoreline Residential
- Urban
- Tapps Reservoir
- Aquatic

Designations along the White (Stuck) River are predominantly Urban Conservancy (100/200-foot buffer), but also include an area of Urban (50-foot buffer) near the Town Center and an area of Natural (200-foot buffer) at the north end of the city (Exhibit 3-5). Along the Puyallup River, designations include Shoreline Residential (100-foot buffer), and Urban Conservancy (100/200-foot buffer).

Exhibit 3-5: Sumner Shoreline Designations



Source: City of Sumner, 2020.

Sumner Zoning Code

The Sumner Zoning Code (SMC Title 1) establishes various residential, commercial, industrial, and mixed use districts (Town Center) with different intents and densities (Exhibit 3-6).

Exhibit 3-6: Zoning Districts and Densities

Abbreviation	District	Minimum Lot Size (sq. feet)	Maximum Density (du/ac)
RES	Resource Protection	871,200	-
RP	Residential-Protection	871,200	1 du / 20 ac
LDR-4	Low Density Residential	4,000	10.9
LDR-6	Low Density Residential	6,000	7.3
LDR-7.2	Low Density Residential	7,200	6.1
LDR-8.5	Low Density Residential	8,500	5.1
LDR-12	Low Density Residential	12,000	3.6
MDR	Medium-density Multifamily Residential	5,000	15
HDR	High-density Multifamily Residential	5,000	25
NC	Neighborhood Commercial	4,500	25
GC	General Commercial	5,000	25
IC	Interchange Commercial	5,000	N/A
M-1	Light Manufacturing	10,000	N/A
M-2	Heavy Manufacturing	6,000	N/A
Town Center	Station District, River District, West Sumner District, Historic Central Business District	Form-based code: see Town Center Code	Form-based code: see Town Center Code

Source: Sumner Municipal Code Title 18, 2023.

The Sumner Zoning Code also includes several overlay districts, which apply unique land use, density or design standards. Overlay districts include:

- **Cluster Overlay.** The purpose is “to manage and preserve valuable resources and environmentally sensitive lands...yet allow for development where appropriate. Structures are to be concentrated on a portion of the site with the remaining reserved as a conservation easement.” (SMC 18.28.010)
- **East Sumner Urban Village Overlay.** The intent is for this district “to be a neighborhood oriented area with a mix of residential, commercial, and civic uses that serve the neighborhood and the larger region with goods and services.” (SMC 18.30.010)
- **Manufacturing/Industrial Core Overlay.** The intent is “to apply additional restrictions on uses that may be incompatible with current manufacturing and industrial uses and the intensification of these uses in the future” (SMC 18.18.010)

- **Interchange Commercial Truck Parking Overlay Area.** Truck-related parking is permitted in this area. (SMC 18.42.046)
- **Innovation District and Enterprise Area (IDEA).** This overlay may be applied in any commercial or industrial zone. The intent is to encourage innovative, small incubator, and research and development startup businesses; encourage infill and live-work uses; and provide affordable housing and workspaces, while minimizing impacts on residential neighborhoods. (SMC 18.22.010)

Pierce County Comprehensive Plan and Shoreline Master Program

The Pierce County Comprehensive Plan and SMP apply to the unincorporated Sumner Urban Growth Area (UGA) which is adjacent to city limits. The last periodic update of the Pierce County Comprehensive Plan was in 2015. There have been several amendments since the latest update of the plan became effective July 1, 2023. Future land use in the UGA is detailed below under Future Land Use.

The County's SMP was adopted in 2015 with updates in 2018. Two areas within Sumner's UGA include shoreline designations. This includes a portion of the UGA east of the southeast end of Sumner, at the SR 410 and SR 167 interchange, which is designated High Intensity (0- or 50-foot buffer) and Shoreline Residential (75-foot buffer). A portion of the UGA to the east of the city along Lake Tapps is designated as Conservancy (100-foot buffer), Shoreline Residential (50-foot buffer), and High Intensity (0- or 50-foot buffer).

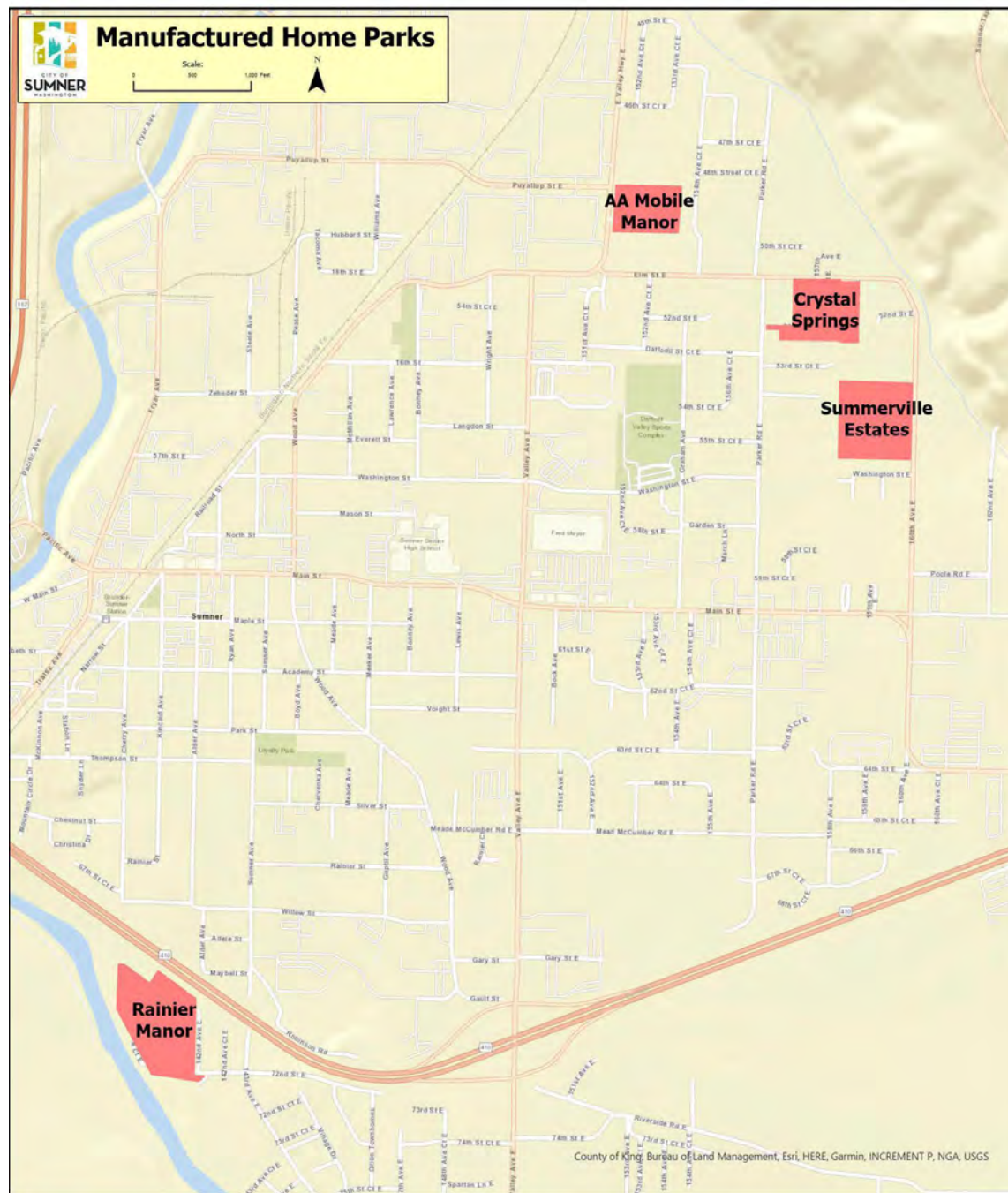
3.2.2 Land Use Patterns

Existing Land Use

Citywide

There are a range of existing land uses in Sumner. The residential core is centered around Main Street and Valley Avenue. There are also four manufactured home parks in Sumner that serve a total of approximately 260 households (Exhibit 3-7). Commercial areas are concentrated in the Town Center and around East Main Street. Industrial uses are primarily located in the north portion of the city in the Sumner-Pacific MIC and on larger parcels between West Valley Highway and East Valley Highway along the White River, SR 167 and 142nd Avenue East. Open space resources include the Sumner watershed along Sumner-Tapps Highway East, wetlands along streams, and city parks and school properties. There are also active gravel mine sites in Sumner, including the Corliss gravel mine on the southeast side of the city extending out of city limits and the Cava gravel mine off East Valley Highway East and 29th Street East.

Exhibit 3-7: Manufactured Home Parks in Sumner



Source: City of Sumner, 2024.

Per Pierce County Assessor records, industrial uses make up the greatest acreage of any use category at 1,156 acres (Exhibit 3-8). Single-family residential is the second largest use at 747 acres. Resource production and extraction uses, primarily due to active mines in the city, make up approximately 354 acres. There are no large-scale commercial agricultural lands within city limits. Commercial uses currently make up approximately 440 acres.

Exhibit 3-8: Current Uses

Current Use	Acres
Single Family Residential	747
Multifamily Residential	196
Public	169
Transportation, Communication, and Utilities	283
Resource Production and Extraction*	354
Commercial	440
Industrial	1,156

Source: Pierce County Assessor, 2023; BERK, 2023.

Notes: Approximately 255 acres are gravel mining operations.

Per the 2022 Pierce County Buildable Lands Report and updates using city permit data through 2023, there are an estimated 320 acres of vacant land and 603 acres of underutilized land in Sumner (Exhibit 3-9). Zones with large amounts of vacant land include LDR-12 and M1. These are also the zones with the largest amount of underutilized acreage.

As detailed in Pierce County's 2022 Buildable Lands Report methodology, parcels are considered underutilized where:

Residential

- The parcel's current use is single-family or mobile home and the improvement value is less than \$500,000; or
- The parcel's current use is multifamily or mobile home park and the improvement value is less than \$1,500,000; or
- In a mixed-use/residential zone, the ratio of assumed housing build-out to existing housing units is greater than or equal to 2.5.

Commercial or Industrial

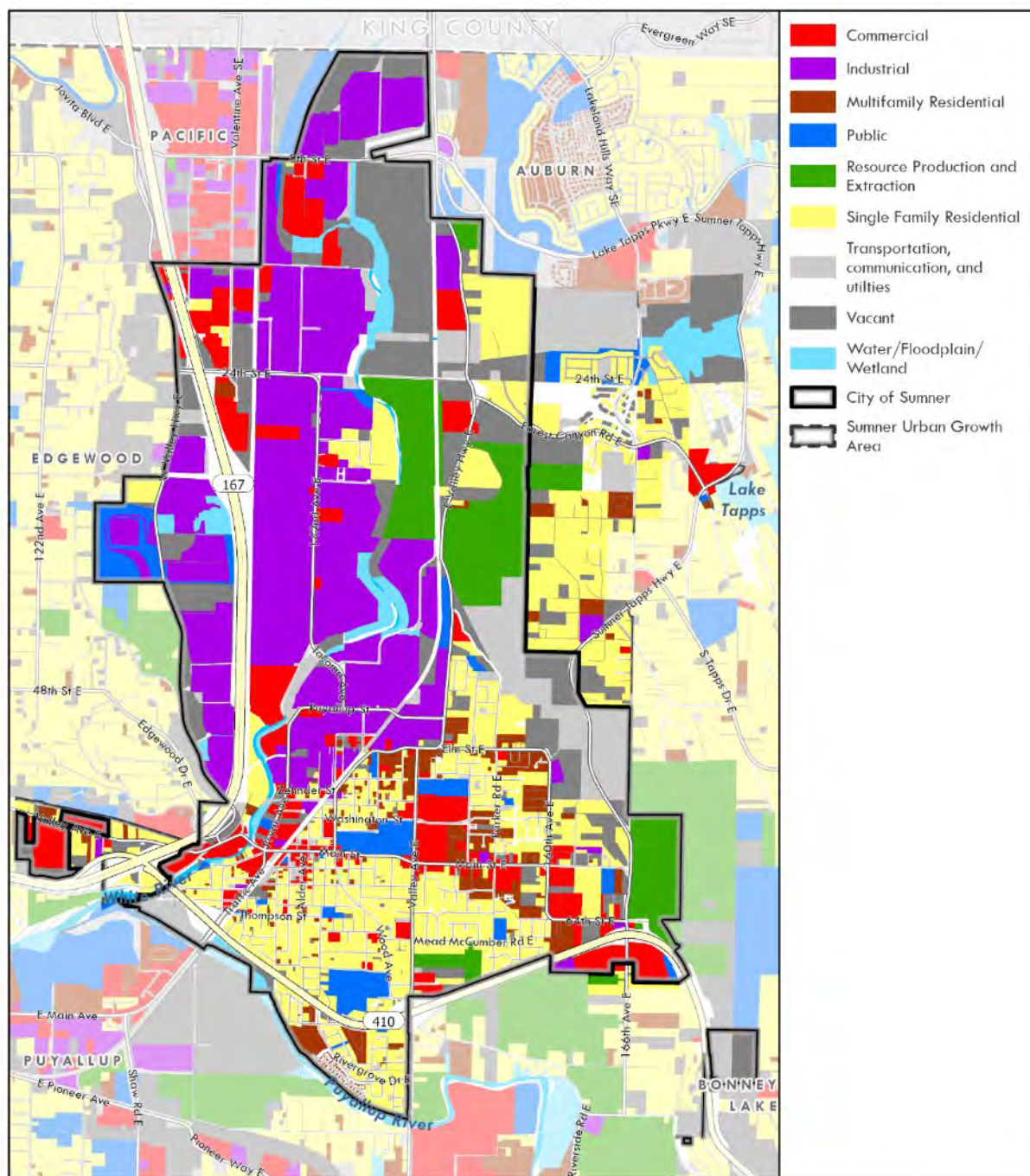
- In a commercial/industrial zone that prohibits residential units, there is an existing single-family housing unit (excluding parcels that are within platted subdivisions); or
- In a commercial/industrial/mixed-use zone with a non-residential current use, the parcel has an improvement value of less than \$1,500,000; or
- The ratio of assumed future job build-out to estimated existing jobs is greater than or equal to 5.

Exhibit 3-9: Estimated Vacant and Underutilized Acreage (2020 Pierce County Data, Updated for 2023 with City Permit Data)

Zone	Vacant	Underutilized
LDR-4	0	0
LDR-6	4	24
LDR-12	91	108
LDR-72	1	12
LDR-85	15	81
MDR	10	18
HDR	2	8
NC	18	7
GC	11	50
CBD	0	1
TC-3	0	1
TC-4	1	13
TC-5	1	7
TC-6	6	44
M1	129	199
M2	5	16
IC	25	15
RES	0	0
Total	320	603

Source: Pierce County Buildable Lands Report, 2020; City of Sumner Permit Data, 2020-2023; BERK, 2023

Exhibit 3-10: Current Land Use Map



CITY OF SUMNER

Current Land Use



Map Date: October 2023

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: Pierce County, 2023; BERK, 2023.

For purposes of the EIS analysis only, the city has been organized into sections with characteristics discussed below (as detailed in Chapter 2: Alternatives). The quadrants generally are:

- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.

See Chapter 2: Alternatives for a map of the areas for analysis.

North Portion

The North Portion of the city includes the Sumner-Pacific MIC, which is primarily comprised of industrial uses, with some commercial uses as well. A small area of single-family housing is present on the eastern edge of the North Portion. Along the White River, an area of approximately 200 acres in the MIC (including most of the former golf course) has been set aside by the City of Sumner for the White River habitat restoration project, which will preclude development of those acres.

East Portion

The East Portion of the city includes the East Sumner neighborhood, which is located along Main Street East and 60th Street East. East Sumner has a variety of businesses and higher density residential uses along major roads. Three of the four manufactured home parks in Sumner are located in the East Portion.

The northern “leg” of the East Portion, along East Valley Highway, has primarily small-scale commercial/industrial uses, and undeveloped steep slopes along the hillside. There are two gravel mines in the East Portion: one (aka Corliss site) is immediately east of the East Sumner neighborhood and the other is the Cava gravel mine to the north off of East Valley Highway East. Both are shown in Exhibit 3-10 as resource production and extraction. Other areas of the East Portion primarily include single-family, multifamily, and commercial uses.

South Portion

The South Portion, south of SR 410, contains single-family and multifamily uses, as well as some vacant land and communications/utilities/transportation uses. One of the four manufactured home parks in Sumner is located in the South Portion.

West Portion

The West Portion contains the Sumner Town Center, which includes commercial and some small areas of industrial uses and multifamily. Outside of the Town Center, the small area along SR 167 is mostly comprised of a few single-family dwellings and some industrial uses.

Sumner UGA

The Sumner unincorporated Urban Growth Area (UGA) includes three main areas (see Exhibit 3-3):

- An area to the west of Sumner surrounding the interchange of SR 410 and SR 167
- An area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps
- An area to the south at the east end of the city encompassing approximately fourteen parcels.

According to Pierce County 2023 Assessor data, the area to the west includes single-family residential, vacant, industrial, commercial, and multifamily residential land. The area to the northeast includes a mix of single family residential, multifamily residential, vacant, resource production and extraction (part of the Cava mine site), and industrial uses. The area to the south contains single-family residential, commercial, and resource production and extraction (agriculture).

Vicinity

In the areas immediately surrounding Sumner, the following current uses are found (per Pierce County Assessor data):

- Pacific and Auburn areas: heavy commercial, industrial, single family and multifamily residential, and vacant
- Lake Tapps vicinity: single-family residential, some commercial and vacant land
- South along SR 162 (Orting Highway): primarily agriculture and scattered housing
- Southwest near Puyallup (Traffic Avenue vicinity): vacant land, commercial, industrial, single family and multifamily residential, and agriculture
- West in Edgewood: primarily large-lot, single-family residential, with some vacant land and agriculture.

Permitted and Pipeline Projects

Permitted projects and projects in the preapplication stage between 2020 and 2023 are shown in Exhibit 3-11, Exhibit 3-12, and Exhibit 3-13.

These are projects that were proposed, approved, or under construction between 2020 and 2023. Projects include a mix of commercial, industrial, mixed use, and residential projects. There may be other projects in the pipeline in the UGA.

Exhibit 3-11: Commercial/Industrial Projects

Name / Address	Description	Square Footage
2003 136th Ave E	Commercial building with mezzanine and office	25,050
3490 West Valley Hwy E	Industrial building	24,721
3123 142nd Ave E	Industrial building	79,679
14495 Stewart Rd	Warehouse	268,070
14585 Stewart Rd	Industrial building	441,316
14545 Stewart Rd	Warehouse	292,072
1510 Puyallup St	Warehouse	193,948
2518 East Valley Hwy E	Solid waste processing facility	10,134
2800 136th Ave Ct E	Truck sales/service/parts/office	61,090
13607 24th St E	Heavy timber machinery repair shop	24,916
Former Sumner Golf Course / Steward Rd SE and Sumner Link Trail	Industrial facility	1,000,000
5019 East Valley Hwy E	Adult family care	15,000

Source: City of Sumner, 2023.

Exhibit 3-12: Mixed Use Projects

Name / Address	Description	Housing Units / Jobs
Kincaid Ave Mixed Use / 809 Kincaid Ave	Mixed Use	180 / ~23 jobs
Riverfront Mixed Use / 1228 Fryar Ave	Mixed Use	127 / 0 jobs
Nemeth / 15802 Main St E	Mixed Use	105 / ~7 jobs

Source: City of Sumner, 2023.

Exhibit 3-13: Residential Projects

Name / Address	Description	Housing Units
Tarragon / 6216 160th Ave E	Mixed Use	216
East Sumner Apartments / 16009 60th St E	Multifamily	162
6211 Parker Rd E	Multifamily	49
157 th Ave Ct E	Single-family units	46
1644 Gault St	Single-family units	9

Name / Address	Description	Housing Units
1525 45th St E	Single-family units	5
14814 74 th Ct E	Single-family units	3
16521 60 th St E	Single-family units	2
1313 Academy St	Single-family units	2
5619 160 th Ave E	Single-family units	2
404 Wood Ave	Single-family unit	1

Source: City of Sumner, 2023.

Current Zoning

Citywide

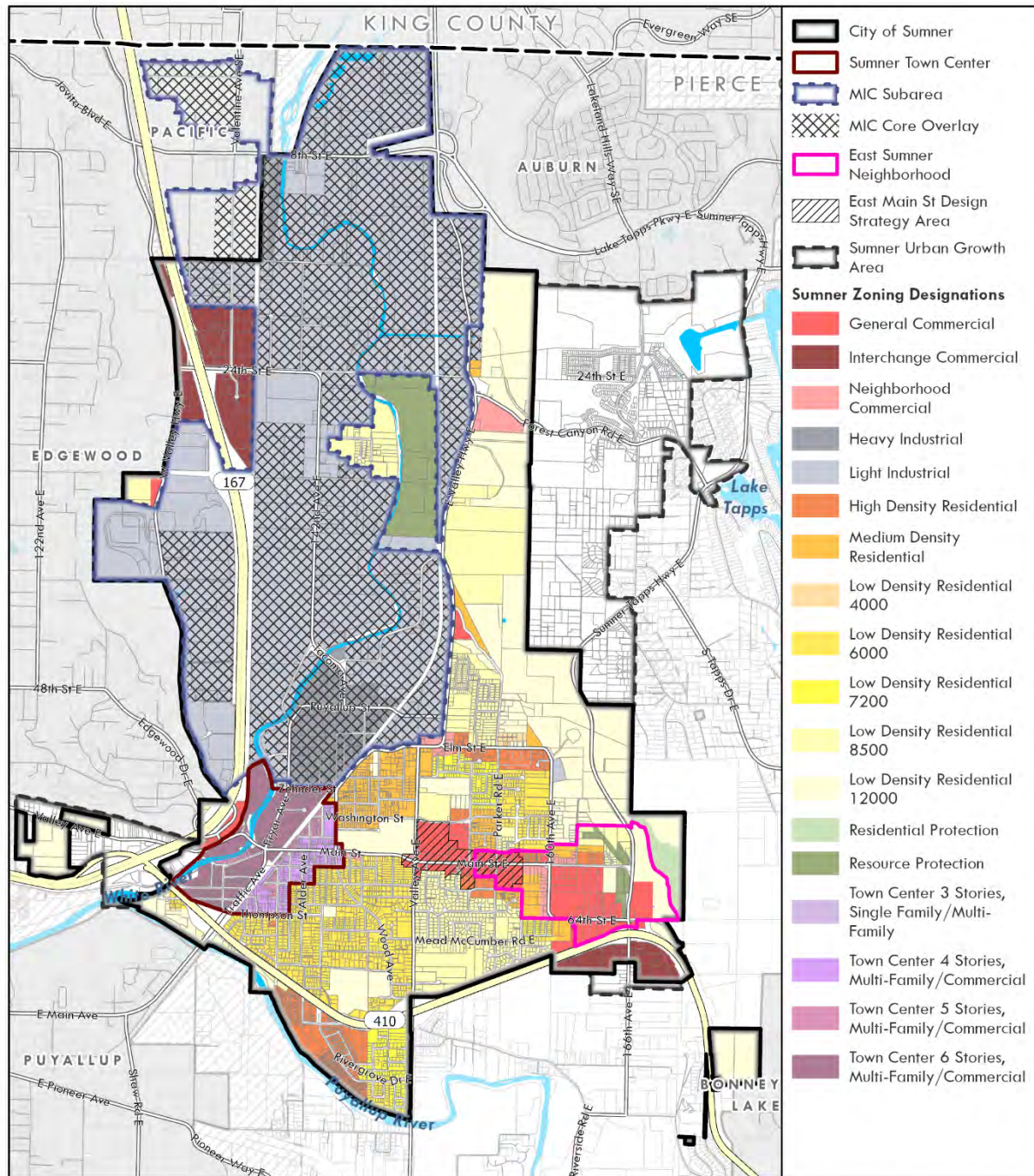
Almost half of the city is zoned for industrial uses (47.7 percent) and 10.6 % is zoned for commercial uses. Low density residential also makes up a large proportion of the zoning at 34.0 percent. Medium and high density residential zones are a much smaller proportion at 2.8% and 2.6% respectively. Resource protection zoning makes up 2.3% of the total, a district that is generally intended for mining activities but currently is used only for publicly-owned natural habitat areas. See Exhibit 3-14 and Exhibit 3-15.

Exhibit 3-14: Acreage by Zone Type

Zone Type	Acres	Percent
Low Density Residential	1418	34.0%
Medium Density Residential	117	2.8%
High Density Residential	109	2.6%
Commercial/Mixed Use	440	10.6%
Industrial	1985	47.7%
Resource Protection	97	2.3%
Total	4165	

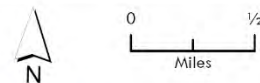
Source: Pierce County Buildable Lands Report, 2020; BERK, 2023.

Exhibit 3-15: Zoning Map



CITY OF SUMNER

Zoning



Map Date: January 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2023; BERK, 2023.

North Portion

The North Portion of the city is mostly comprised of the Sumner-Pacific MIC, which is zoned predominantly Light Industrial with some areas of Heavy Industrial. Areas of the North Portion outside of the MIC are zoned Light Industrial, Interchange Commercial, Low Density Residential, and Resource Protection.

East Portion

In the East Sumner neighborhood, zoning is predominantly General Commercial and Medium Density Residential. Outside of the East Sumner neighborhood in the East Portion are mostly Low Density Residential, with some areas of Medium and High Density Residential, Neighborhood Commercial, and General Commercial. In the area immediately south of East Sumner and south of 410, there is also Interchange Commercial zoning.

South Portion

The South Portion is zoned entirely residential. Approximately half of the area is zoned Low Density Residential, and the remainder is High Density Residential.

West Portion

The West Portion includes the Town Center, which is zoned for mixed residential and commercial zoning from up to three to six stories. Outside of Town Center, the West Portion includes mostly Low Density Residential zoning with some areas of Medium Density Residential and General Commercial.

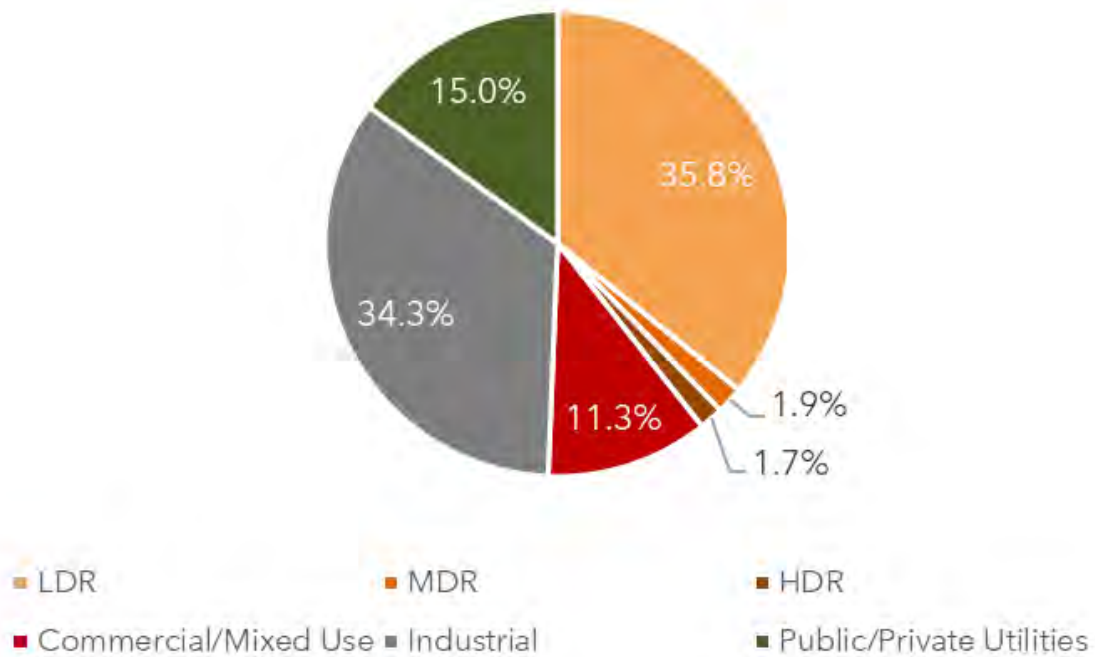
Sumner UGA

Unincorporated UGA zoning is determined by Pierce County. The portion of the UGA to the east of the City (towards Lake Tapps) is zoned Moderate Density Single Family, with a small area of Public Institutional zoning where there is Puget Sound Energy utilities infrastructure. The portion of the UGA to the south off of 166th Avenue East is zoned Community Center. The portion of the UGA to the west is zoned Employment Center and Moderate Density Single Family.

Future Land Use

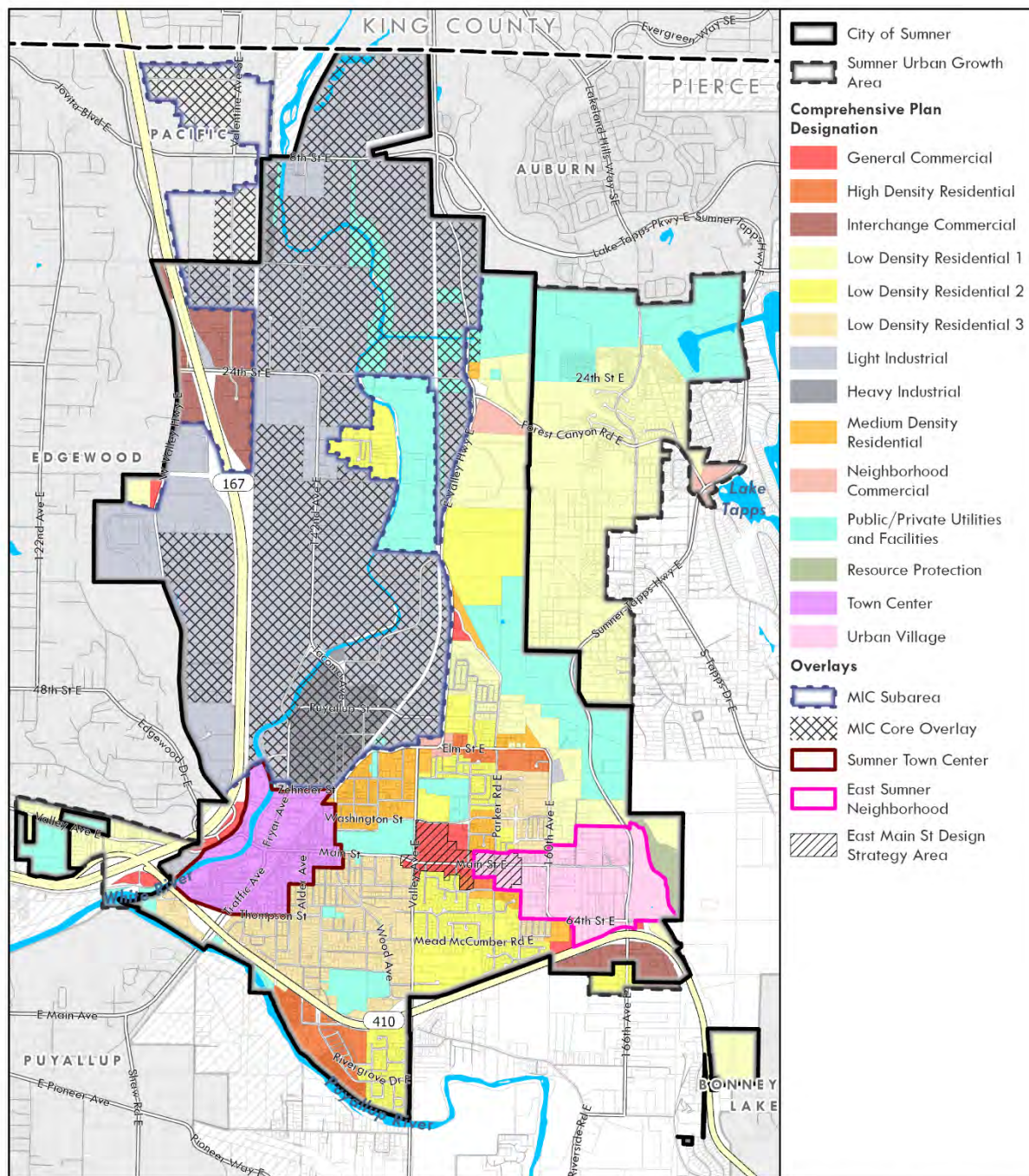
Citywide

Future land use, as adopted in the Comprehensive Plan, designates 34.3% of the city to industrial uses, 11.3% to commercial and mixed uses, 35.8% to low density residential, and a combined 3.6% to medium and high density residential (Exhibit 3-16). See Exhibit 3-17 for the Future Land Use Map.

Exhibit 3-16: Future Land Use - Acres

Source: City of Sumner, 2023; BERK, 2023.

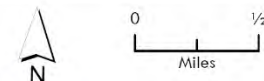
Exhibit 3-17: Future Land Use as Adopted in Comprehensive Plan



CITY OF SUMNER

Comprehensive Plan Map

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner, 2023; BERK, 2023.

North Portion

The North Portion of the city is mostly comprised of the Sumner-Pacific MIC. Future land use for the MIC is mostly Light Industrial, with some areas of Heavy Industrial and Public/Private Utilities and Facilities. Other areas of the North Portion outside of the MIC include Interchange Commercial, Low Density Residential, and Public/Private Utilities future land uses (e.g. schools, City facilities, parks). There is also a small area to the west of SR 167 and north of 24th Street that is designated General Commercial.

East Portion

In the East Sumner neighborhood, the future land use designation is Urban Village. Other areas within the East Portion include designations for Low Density Residential predominantly, with some areas of Medium and High Density Residential, General Commercial, and Neighborhood Commercial. There are also areas designated for Public/Private Utilities and Facilities. The area immediately south of East Sumner, south of SR 410, is designated Interchange Commercial.

South Portion

The South Portion is designated for Low Density Residential and High Density Residential, with a small area designated for Public/Private Utilities and Facilities.

West Portion

The West Portion includes the Town Center, which has a Town Center future land use designation. The Town Center Plan anticipates high density multifamily, commercial, and mixed use development. It prohibits new single family development. Outside of the Town Center, the West Portion includes mostly Low Density Residential designations, with an area of Medium Density Residential to the northeast of Town Center and several areas designated as Public/Private Utilities and Facilities. There are also small areas of General Commercial and Light Industrial near SR 167.

Sumner UGA

Sumner's Comprehensive Plan Map includes designations for the Sumner UGA. The portion of the UGA to the east includes Low Density Residential and Public/Private Utilities and Facilities designations, with a small area of Neighborhood Commercial near Lake Tapps. The UGA portion south of the city along 166th Avenue East is designated Low Density Residential. The portion to the west includes Low Density Residential and General Commercial designations.

3.3 Impacts

3.3.1 Thresholds of Significance

Impacts of the alternatives on land use are considered significant if they would:

- Fail to include enough housing and job capacity to accommodate assigned growth targets
- Change land use patterns or development intensities in a way that reduces land use compatibility

- Be inconsistent with regional plans and policies, including the Growth Management Act, Pierce County Countywide Planning Policies, and/or VISION 2050

3.3.2 Impacts Common to All Alternatives

Under all alternatives, growth is expected to result in new development and redevelopment in Sumner. The distribution of future growth and the rate at which it occurs would be influenced by the City's implementation of its Comprehensive Plan policies and regulations and by the decisions of individual property owners. Impacts associated with housing and employment growth could include the conversion of vacant land for new residential, industrial, or commercial uses and infill development or redevelopment on existing sites.

All alternatives assume the same amount and distribution of job growth. However, the amount and distribution of housing growth varies, with Alternatives 2 and 3 having the most housing growth (see Exhibit 3-18. See Chapter 6: Housing and Chapter 4: Population and Employment for growth distribution maps. All alternatives assume the same amount of job and housing growth in the unincorporated UGA (Exhibit 3-19).

Exhibit 3-18: Alternatives Job and Housing Growth: City

	2020-2044 Growth Target	2020-2023 Growth and Pipeline	2023-2044 Growth			
			Alt 1	Alt 2	Alt 3	Preferred Alt
Jobs	5,313	3,656	1,657	1,657	1,657	1,657
Housing	1,985	900	1,085	2,100	2,100	1,085

Source: Pierce County CPPs 2022; Pierce County Ord. 2023-22s, 2023; BERK, 2023.

Exhibit 3-19: Estimated Job and Housing Growth (All Alternatives): UGA

	Estimated Growth and Target 2020- 2044
Jobs	82
Housing	484

Source: Pierce County CPPs, 2022; Pierce County Ord. 2023-22s, 2023; BERK, 2023.

Notes: This estimate is based on the share of unincorporated county growth allocated to the Sumner unincorporated UGA for 2030. Pierce County has yet to release UGA-specific targets for 2044.

Land Capacity

All alternatives have enough land capacity under current zoning and regulations to accommodate the City's 2020-2044 job growth target of 5,313 jobs. Approximately 3,656 jobs have been created since 2020 or will be created through permitted and pipeline projects, leaving a remaining target of 1,657.

All alternatives also have enough capacity to accommodate the overall 2020-2044 housing target of 1,985 units. Approximately 900 units have already been permitted since 2020 or are in the pipeline, leaving a remaining target of 1,085. However, as discussed in Chapter 6: Housing, housing capacity in Alternative 1 does not meet housing targets by income band. Much of the city's housing capacity under Alternative 1 is in the Low Density Residential zones and Town Center zones, areas which are not expected to produce housing affordable to incomes less than 100% Area Median Income without significant policy support and changes to allowed housing types. Alternatives 2 and 3 do meet the housing targets by income band through proposed changes to allowed housing types and densities, and affordability strategies. The Preferred Alternative, which includes a blend of policies from Alternatives 2 and 3, also creates enough capacity for the housing targets by income band. See Chapter 6: Housing for more detail on housing affordability and the income band housing targets.

Exhibit 3-20: Alternatives and Growth Targets

	2020-2044 Growth Target	2020-2023 Estimated Growth + Pipeline	2023-2044 Target Remaining	Alt 1 Capacity	Alt 2 Capacity	Alt 3 Capacity	Preferred Alt Capacity
Jobs	5,313	3,656	1,657	4,884	4,884	4,884	4,884
Housing	1,985	900	1,085	2,557*	5,325*	4,025*	4,035*

Source: Pierce County CPPs, 2022; Pierce County Buildable Lands Report, 2020; City of Sumner Permit Data, 2020-2023; BERK, 2023.

* While all alternatives have enough capacity to meet the overall housing target, Alternative 1 does not meet housing targets by income band. See Chapter 6: Housing for more details.

Note: Population targets are discussed in Chapter 4: Population and Employment.

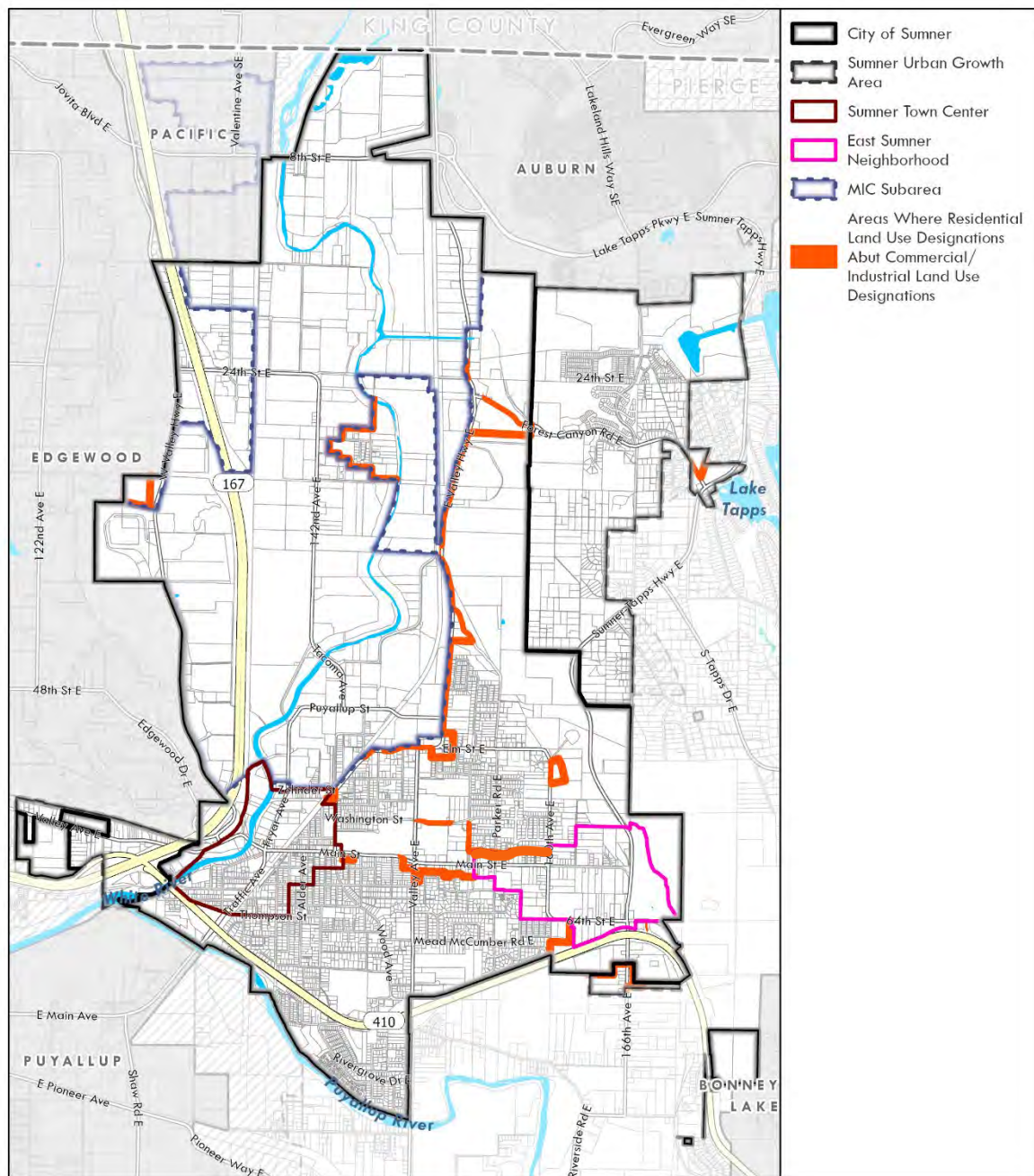
Land Use Compatibility

Areas where residential uses abut commercial or industrial uses are the same under all alternatives. The only variation in land use designations from the adopted Comprehensive Plan Map is in Alternative 2 where part of the Cava mine site (located at the intersection of East Valley Highway East and Forest Canyon Road East) is proposed in Alternative 2 to change from Low Density Residential 8.5 to Medium Density Residential. This changes the intensity of the residential use but not its residential nature, therefore the areas impacted are the same as shown for the other alternatives in Exhibit 3-21.

Many of the potential land use incompatibility areas are those where the Sumner-Pacific MIC abuts residential designations, including a large area across East Valley Highway East from residential designations. Other locations include an area immediately west of East Sumner, where General Commercial designations are located next to residential designations. A few small pockets, including one on West Valley Highway East near Edgewood and two areas east of Town Center, are also highlighted.

Outside of city limits in the UGA, an area near Lake Tapps is highlighted where Neighborhood Commercial abuts Low Density Residential, and an area along 166th Avenue East is highlighted where Interchange Commercial is located next to Low Density Residential.

Exhibit 3-21: Future Land Use Compatibility (All Alternatives)



CITY OF SUMNER

Future Land Use Compatibility

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner, 2023; BERK, 2023.

Plans and Policies

Growth Management Act

Sumner's adopted Comprehensive Plan contains the chapters required by the GMA, except for the requirement for a Climate Change and Resiliency element, introduced in 2023. The City has also adopted zoning and other regulations consistent with the Comprehensive Plan.

All four alternatives are generally consistent with the intent of the GMA planning goals and all alternatives have sufficient capacity for the citywide 20-year job and housing growth targets. However, Alternative 1 does not have the capacity to meet the housing targets by income band, while Alternatives 2 and 3 and the Preferred Alternative do have adequate capacity and additional policy support for housing affordability and availability. Alternative 1 also assumes no changes to the adopted Comprehensive Plan or development regulations to meet new State requirements and therefore would be out of compliance (see Exhibit 3-22).

Exhibit 3-22: Consistency with GMA Planning Goals

Planning Goal	Alt 1	Alt 2	Alt 3	Preferred Alt	Discussion
(1) Concentrate growth in urban areas	+	+	+	+	All three alternatives focus on growth within Sumner, all of which is an urban area.
(2) Reduce sprawl	+	+	+	+	All alternatives are focused on urban growth, not on rural areas where sprawl can occur.
(3) Encourage a multimodal transportation system	x	+	+	+	All alternatives include policies and planning for multimodal transportation. Alternatives 2 and 3 and the Preferred Alternative include additional updates to comply with changes to state law that emphasize active transportation.
(4) Plan for and accommodate a variety of housing types affordable to all economic segments	-	+	+	+	Alternative 1 has enough capacity for the citywide housing target but does not have capacity for all income bands. Alternatives 2 and 3 and the Preferred Alternative have the capacity to meet targets for all income bands and include policy changes to reduce barriers to housing affordability and availability.
(5) Promote economic development	x	+	+	+	All Alternatives include an Economic Development element. Alternatives 2 and 3 and the Preferred Alternative include updates to the element that strengthen the city's economic development policies and improve climate resilience.
(6) Recognize property rights	+	+	+	+	All alternatives recognize private property rights.

Planning Goal	Alt 1	Alt 2	Alt 3	Preferred Alt	Discussion
(7) Ensure timely and fair permit procedures	+	+	+	+	All alternatives include provisions for timely and fair permit procedures.
(8) Protect agricultural, forest, and mineral lands	+	+	+	+	All alternatives include land use designations and codes to protect resource lands.
(9) Retain open space, conserve habitat, increase access to natural resource lands and water	x	+	+	+	All alternatives carry forward the existing Parks and Trails Plan and are subject to the city's Critical Areas Ordinance and Shoreline Master Program. Alternatives 2 and 3 and the Preferred Alternative include updates to the Critical Areas Ordinance to meet best available science. Alternative 1 does not include these updates.
(9) Enhance and develop parks and recreation facilities	+	+	+	+	All alternatives carry forward the existing Parks and Trails Plan.
(10) Protect the environment	x	+	+	+	All alternatives are subject to the City's Critical Areas Ordinance, but Alternatives 2 and 3 and the Preferred Alternative update this for best available science while Alternative 1 does not. Alternatives 2 and 3 and the Preferred Alternative also include policy changes in support of climate resiliency and greenhouse gas emissions reductions.
(11) Foster citizen participation	+	+	+	+	All alternatives include policies that encourage citizen participation.
(12) Ensure adequate public facilities and services	x	+	+	+	All alternatives include a Capital Facilities and Public Services Element and Capital Facilities Plan. Alternatives 2 and 3 and the Preferred Alternative update the element and plan to reflect changes to facility needs and levels of service.
(13) Encourage historic preservation	+	+	+	+	All alternatives include a Historic and Cultural Resources Element, which encourages historic preservation.
(14) Climate change and resiliency	x	+	+	+	Alternative 1 includes some policies that support climate change resiliency. Alternatives 2 and 3 and the Preferred Alternative are more robust and include updates to meet new state climate change planning requirements.
(15) Management of Shorelines of	+	+	+	+	All alternatives are subject to Sumner's Shoreline Master Program.

Planning Goal	Alt 1	Alt 2	Alt 3	Preferred Alt	Discussion
Statewide Significance					

Source: RCW 36.70A.020 and RCW 36.70A.480 (1), 2023; BERK, 2023.

LEGEND: + = meets; x = partially meets, - = does not meet.

Pierce County Countywide Planning Policies

Sumner's current Comprehensive Plan generally aligns with the Pierce County Countywide Planning Policies but does not thoroughly address new areas of emphasis (see Exhibit 3-23). Alternatives 2 and 3 and the Preferred Alternative include updates to the Comprehensive Plan that better address social equity and inclusion, climate change, displacement, and other required County and State requirements, while Alternative 1 carries forward the adopted plan.

Exhibit 3-23: Consistency with Pierce County CPPs

New Area of Emphasis in CPPs	Alt 1	Alt 2	Alt 3	Preferred Alternative	Discussion
Social Equity and Inclusion —Policies and strategies ensuring equity are incorporated throughout the CPPs in keeping with VISION 2050's integrated approach to addressing land use and transportation, along with the environment, economic development, and equity. Equity means that all people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.	x	+	+	+	While Alternative 1 includes some policies that indirectly support social equity and inclusion, Alternatives 2 and 3 and the Preferred Alternative include an equity policy review and updated policies to address equity and displacement impacts.
Climate Change —Includes new policies to support climate change resilience and mitigation strategies that address the new GMA climate change and resiliency goal and VISION 2050 priorities related to climate change planning.	x	+	+	+	Alternative 1 includes some policy support for climate resilience and mitigation, however, Alternatives 2 and 3 and the Preferred Alternative include a greater emphasis on this topic and meet the state's new climate change planning requirements.
Interjurisdictional Coordination —Policies added to improved	+	+	+	+	All alternatives support interjurisdictional coordination.

New Area of Emphasis in CPPs	Alt 1	Alt 2	Alt 3	Preferred Alternative	Discussion
coordination with other jurisdictions, agencies, tribes, ports, military installations, special purpose districts, and adjacent regions in accordance with VISION 2050 MPPs contained in the new regional collaboration chapter.					
Displacement of Residents and Businesses —New policies seek to reduce the risks of displacement of lower-income people and businesses through elevating social and racial equity in regional planning and encouraging integration of equity in local plans consistent with VISION 2050.	x	+	+	+	Alternatives 2 and 3 and the Preferred Alternative include an equity policy review and updated policies that address displacement impacts. Alternative 1 does not.
Reasonable Measures Process —If the buildable lands report identifies a lack of capacity, jurisdictions may be required to take “reasonable measures” to assure they can accommodate allocated growth so that that land is used efficiently prior to expanding UGAs. The County’s reasonable measures were updated to include innovative approaches to address housing affordability and supply consistent with state law.	-	+	+	+	Alternatives 2 and 3 and the Preferred Alternative include a new policy that addresses reasonable measures, while Alternative 1 does not specify the actions to take when a lack of capacity is identified.

Source: Pierce County Countywide Planning Policies 2022; BERK, 2023.

LEGEND: + = meets; x = partially meets, - = does not meet.

VISION 2050

While all alternatives generally address the VISION 2050 goals, Alternatives 2 and 3 and the Preferred Alternative include plan updates that better reflect these regional objectives (see Exhibit 3-24).

Exhibit 3-24: Consistency with VISION 2050

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Preferred Alternative	Discussion
Regional Collaboration (15 MPPs) The region plans collaboratively for a healthy environment, thriving communities and opportunities for all.	+	+	+	+	All alternatives support regional collaboration.
Regional Growth Strategy (16 MPPs) The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.	+	+	+	+	All alternatives are focused on urban growth near transit and growth in the Sumner-Pacific MIC (a regional growth center).
Environment (22 MPPs) The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.	x	+	+	+	All alternatives include policy support for environmental protection and implementation of the Critical Areas Ordinance and Shoreline Master Program. However, Alternatives 2 and 3 and the Preferred Alternative include updates to the Critical Areas Ordinance for best available science and add additional policy support for climate change mitigation and adaptation.
Climate Change (12 MPPs)	x	+	+	+	Alternative 1 includes some policies related to climate

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Preferred Alternative	Discussion
The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.					change mitigation and adaptation, but Alternatives 2 and 3 and the Preferred Alternative emphasize this topic through new and updated policies. Alternatives 2 and 3 and the Preferred Alternative meet the state's new climate planning requirements while Alternative 1 does not.
Development Patterns (54 MPPs) The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.	x	+	+	+	All alternatives include policy support for walkability, infill development, and transit-oriented development in the Town Center. However, Alternatives 2 and 3 and the Preferred Alternative include support for greater densities and multimodal transportation, which would better support walkability and compact development.
Housing (12 MPPs) The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.	x	+	+	+	All alternatives include policies that support housing availability and affordability. Alternatives 2 and 3 and the Preferred Alternative also include changes that address new state housing requirements and provide capacity for housing for all income bands. Alternatives 2 and 3 and the Preferred Alternative also include policy changes that reduce barriers to housing affordability.
Economy (23 MPPs) The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental	x	+	+	+	All alternatives include an Economic Development element in the Comprehensive Plan. Alternatives 2 and 3 and the Preferred Alternative strengthen this element and add policies that support climate resilience in the local economy.

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Preferred Alternative	Discussion
quality, and creating great central places, diverse communities, and high quality of life.					
Transportation (32 MPPs) The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.	x	+	+	+	All alternatives address multimodal transportation. Alternatives 2 and 3 and the Preferred Alternative include updates to meet new state requirements that emphasize active (non-motorized) transportation, and Transportation Plan updates to reflect future needs to 2044.
Public Services (30 MPPs) The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.	x	+	+	+	All alternatives include a Capital Facilities and Public Services element, but Alternatives 2 and 3 and the Preferred Alternative update the element and Capital Facilities Plan to reflect current conditions and future needs, whereas Alternative 1 carries forward existing plans.

Source: PSRC VISION 2050; BERK, 2023.

3.3.3 Alternative 1 (No Action)

Land Capacity

Alternative 1 has enough land capacity to accommodate the citywide job and housing growth targets, as shown in Exhibit 3-20. However, it does not have adequate land capacity to meet housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

Land use compatibility under Alternative 1 is similar to the description under Impacts Common to All Alternatives.

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 1 does not adequately address regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 1 does not include updates to reflect changes to these regional frameworks, whereas Alternatives 2 and 3 and the Preferred Alternative do. This is especially true for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-22, Exhibit 3-23, and Exhibit 3-24 for comparisons across the alternatives.

3.3.4 Alternative 2

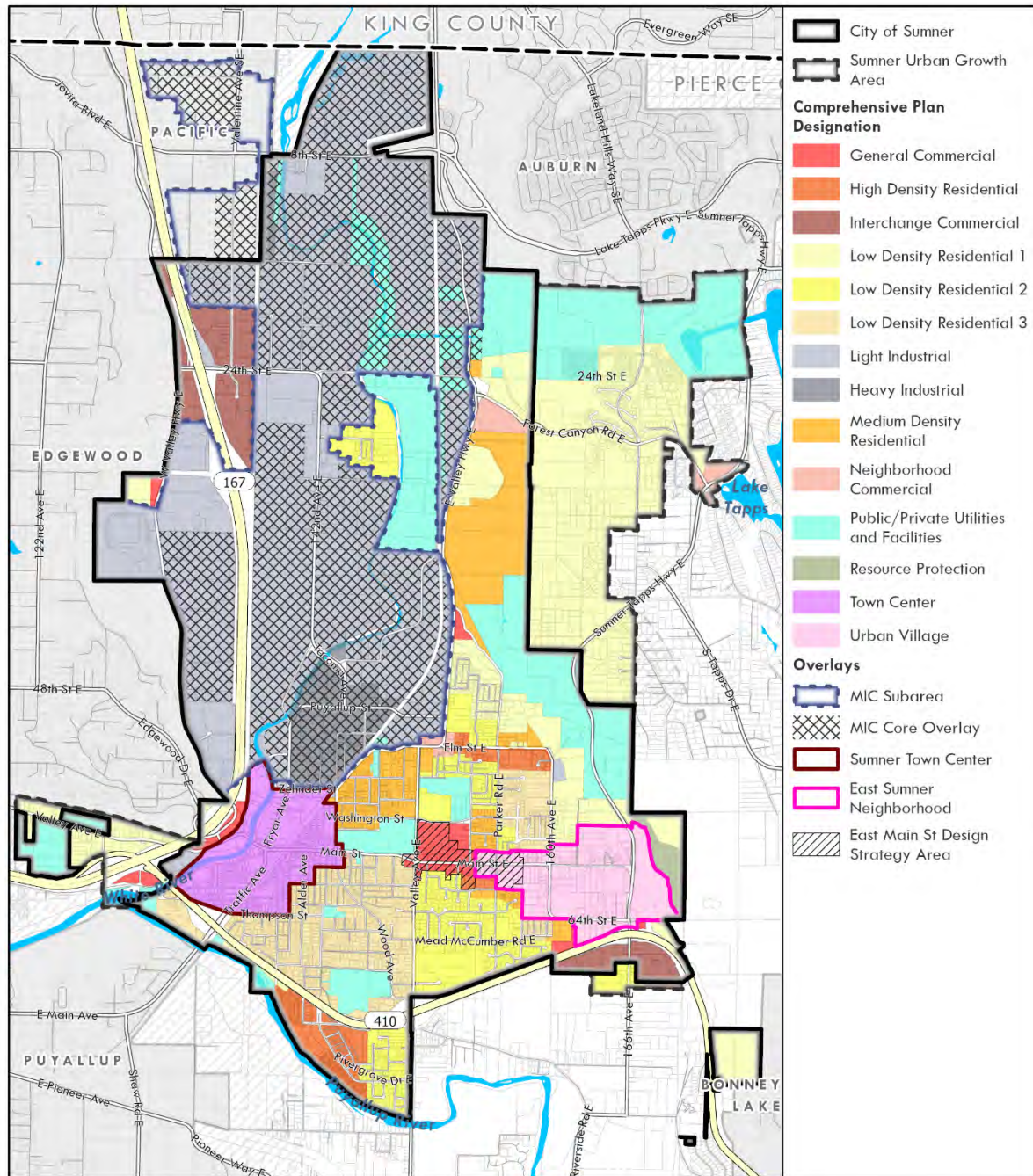
Land Capacity

Alternative 2 has adequate land capacity to accommodate the 2044 job growth and housing growth targets (see Exhibit 3-20), including housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

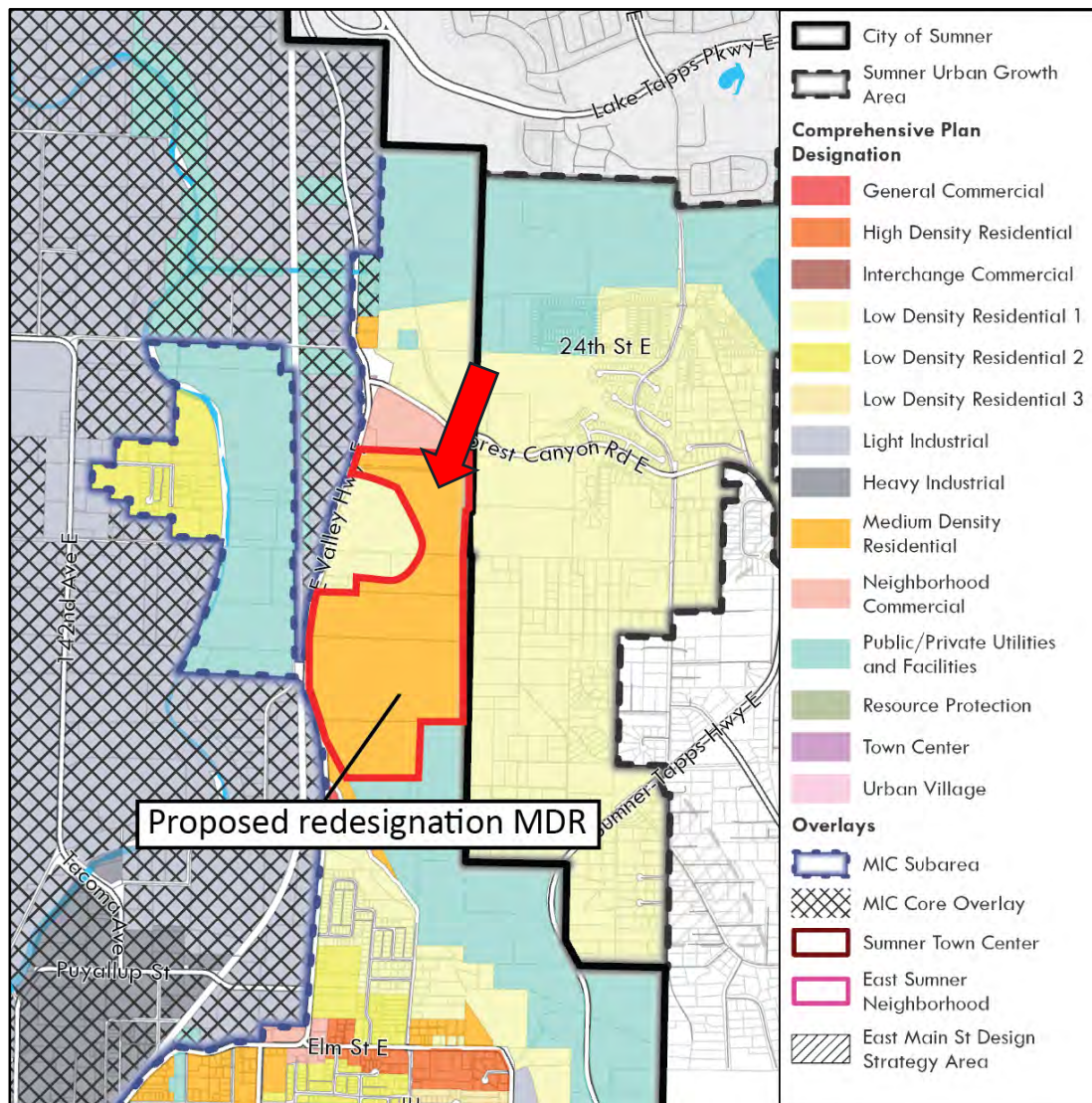
Land Use Compatibility

The only land use redesignation from the existing Comprehensive Plan Map (Exhibit 3-17) proposed under any alternative is for the Cava Mine site located at the intersection of East Valley Highway East and Forest Canyon Road East, which is proposed to be redesignated from Low Density Residential to Medium Density Residential under Alternative 2 (see Exhibit 3-25 and Exhibit 3-26). While this would change the density of the use, it would not change the residential designation of the site. If the Cava site is reclaimed in stages, with phased housing development, there is the potential for conflicts between new residential and any ongoing mining activities.

Exhibit 3-25: Alternative 2 Future Land Use



Source: City of Sumner, 2023; BERK, 2023.

Exhibit 3-26: Cava Mine Site - Alternative 2 MDR Redesignation

Source: City of Sumner, 2023; BERK, 2023.

The proposed area to be changed to Medium Density Residential abuts a small area of Medium Density Residential to the south. Other areas immediately to the south are designated Public/Private Utilities and Facilities and to the west are areas of Light Industrial designation. To the north and east, the area is surrounded by the Low Density Residential 1 designation. The closest commercial designations that would serve the area are a Neighborhood Commercial area approximately 1,400 feet to the north and a small General Commercial pocket approximately 300 feet to the south.

This change, along with additional housing growth around the Sumner-Pacific MIC in Alternative 2, could result in more residents living near industrial uses in potential land use incompatibility areas (see Exhibit 3-21).

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 2, like Alternative 3 and the Preferred Alternative, addresses regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 2, like Alternative 3 and the Preferred Alternative, includes policy updates to reflect changes to these regional frameworks. This alignment is particularly strong under Alternatives 2 and 3 and the Preferred Alternative for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-22, Exhibit 3-23, and Exhibit 3-24 for comparisons across the alternatives.

3.3.5 Alternative 3

Land Capacity

Alternative 3 has adequate land capacity to accommodate the 2044 job growth and housing growth targets (see Exhibit 3-20), including housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

Land use compatibility under Alternative 3 is similar to the description under Impacts Common to All Alternatives. Like Alternative 2, Alternative 3 has more housing growth than Alternative 1 and the Preferred Alternative, which could result in a greater number of residents in potential land use incompatibility areas (Exhibit 3-21). This is particularly true for residential areas bordering the Sumner-Pacific MIC: these areas are expected to see more housing growth under Alternatives 2 and 3 than under Alternative 1 and the Preferred Alternative. Some areas in the East Portion of the city near East Sumner are also expected to see more housing growth near commercial uses.

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 3, like Alternative 2 and the Preferred Alternative, addresses regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 3, like Alternative 2, includes policy updates to reflect changes to these regional frameworks. This alignment is particularly strong under Alternatives 2 and 3 and the Preferred Alternative for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-22, Exhibit 3-23, and Exhibit 3-24 for comparisons across the alternatives.

3.3.6 Preferred Alternative

Land Capacity

The Preferred Alternative, similar to Alternatives 2 and 3, has adequate land capacity to accommodate the 2044 job growth and housing growth targets (see Exhibit 3-20), including housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

Land use compatibility under the Preferred Alternative is similar to the description under Impacts Common to All Alternatives. Like Alternative 1, the Preferred Alternative has less housing growth than Alternatives 2 and 3, which could result in a fewer number of residents in potential land use incompatibility areas than under those alternatives (Exhibit 3-21).

Plans and Policies as discussed under Impacts Common to All Alternatives, the Preferred Alternative, like Alternatives 2 and 3, addresses regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. The Preferred Alternative, like Alternatives 2 and 3, includes policy updates to reflect changes to these regional frameworks. This alignment is particularly strong under the Preferred Alternative and Alternatives 2 and 3 for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-22, Exhibit 3-23, and Exhibit 3-24 for comparisons across the alternatives.

3.4 Mitigation Measures

3.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 and the Preferred Alternative would mitigate adverse impacts to land capacity, land use compatibility, and plans and policies:

Land Capacity

- No adverse impacts expected under Alternatives 2 and 3 or the Preferred Alternative

Land Use Compatibility

- Alternatives 2 and 3 and the Preferred Alternative include a revised policy to encourage industries and industrial processes that are sustainable, environmentally and socially responsible, and contribute to the local community. This could help mitigate impacts where residential areas are located near industrial areas.

Plans and Policies

- No adverse impacts expected under Alternatives 2 and 3 and the Preferred Alternative

3.4.2 Regulations and Commitments

The following regulations and commitments apply to all alternatives.

Land Capacity

- Pierce County's Buildable Lands Program ensures ongoing review and monitoring of vacant and underutilized land capacity in Sumner and other Pierce County jurisdictions. The latest Buildable Lands Report was completed in 2022.

Land Use Compatibility

- Sumner’s design review process requires new subdivisions, infill single-family development, multi-family, commercial, and industrial developments to be reviewed per the City’s Design and Development Guidelines. The guidelines include landscaping and screening requirements for some uses, which can help address compatibility by minimizing noise, lighting, and visual impacts. New laws, including HB 1110 and HB 1337, do now limit the city’s ability to require design review for ADUs and middle housing types. Amendments to the code will be needed in order to comply.
- Conditional use review of some uses in certain zoning districts can provide the city an opportunity to require site-specific mitigation if compatibility is a concern.
- Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues by placing buildings further apart and improving privacy.
- The Sumner-Pacific MIC Subarea Plan includes a goal (SPMIC-3) that states “industrial activity in the SPMIC does not adversely impact adjacent uses and neighborhoods.” Subpolicies for this goal emphasize building design, site design, and screening to minimize impacts.

Plans and Policies

- The adopted Comprehensive Plan aligns with the previous Pierce County CPPs, VISION 2040, and the GMA as written at the time of Sumner’s plan adoption. Many of the same and similar regional policies and requirements remain in effect in the present iterations.

3.4.3 Other Potential Mitigation Measures

Land Capacity

- No additional potential mitigation measures.

Land Use Compatibility

- No additional potential mitigation measures.

Plans and Policies

- No additional potential mitigation measures.

3.5 Significant Unavoidable Adverse Impacts

All alternatives anticipate job and housing growth and will have associated impacts related to land use compatibility. Alternative 1 is expected to have impacts related to land capacity and plans and policies, as it is not updated to meet recent changes to the regional planning framework. The only mitigation that could fully address these impacts would be to adopt features of Alternatives 2 and 3 and the Preferred Alternative.

4 Population and Employment

4.1 Introduction

The population and employment analysis identifies current population and employment conditions in the City of Sumner and evaluates potential impacts of the alternatives on population exposure to air and noise pollution, the adopted jobs targets, and involuntary economic displacement.

Under HB 1181, which was enacted in 2023, cities and counties must give special consideration to achieving environmental justice, including efforts to avoid creating or worsening environmental health disparities. Accordingly, this Chapter analyzes environmental health indicators, such as proximity to heavy traffic roadways and facilities involved in the treatment, storage, or disposal of hazardous waste and evaluates impacts from the alternatives on population growth in areas with air and/or noise pollution. Sumner's Comprehensive Plan and development regulations must be consistent with the provisions in the Growth Management Act (GMA). Per the GMA, the City of Sumner's Comprehensive Plan includes goals and policies related to accommodating the city's share of growth.

In 2021, GMA goals and element requirements for housing were amended (see Chapter 6: Housing). These and other amendments between 1995-2022 are described in a summary from Washington State Department of Commerce. See Chapter 3: Land Use. In 2023, a new requirement was added for a climate change and resiliency element per HB 1181. See Chapter 3: Land Use for further discussion of the Growth Management Act and the state, regional, and local framework that Sumner's Comprehensive Plan must be consistent with.

4.2 Affected Environment

4.2.1 Population

Citywide

According to US Census Data, the 2020 population within Sumner city limits was 10,621. In recent years, there has been slow population growth, with a compound annual growth rate of 1% between 2000-2010 and between 2010-2020. This is in line with Pierce County's compound annual growth rates in the same period. See Exhibit 4-1.

Exhibit 4-1: Population Growth (1990 - 2020)

Jurisdiction	Population Estimates				Compound Annual Growth Rates*		
	1990	2000	2010	2020	1990-2000 CAGR	2000-2010 CAGR	2010-2020 CAGR
Sumner	6,459	8,504	9,451	10,621	3%	1%	1%
Pierce County	586,203	700,820	795,225	921,130	2%	1%	1%

* Compound Annual Growth Rate refers to the growth rate of the population smoothed across several time periods.

Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.

Source: US Census Bureau, 2020.

Per population estimates from the Washington State Office of Financial Management (OFM), Sumner has approximately 10,800 residents as of April 1, 2023.

Charged with regional planning programs, the Puget Sound Regional Council (PSRC) makes regular population, housing, and employment forecasts. Population forecasts to the year 2050 equal 16,744 for the city limits (PSRC, 2023). This represents a 55% increase over the 2023 population estimate, with a compound annual growth rate of 2% over the 27-year period.

Exhibit 4-2: PSRC Total Population Forecasts - Sumner

Year	2023	2025	2030	2035	2040	2044	2050
PSRC Population Forecasts	10,800*	11,648	12,675	13,692	14,713	15,519	16,744

Note: * 2023 population estimate is sourced from Washington State OFM.

Source: PSRC, 2023.

Pierce County has adopted a target of 15,525 total residents in Sumner in 2044, which assumes population growth of 4,904 residents above the 2020 Census population of 10,621.

Exhibit 4-3: Summary of Population Characteristics - Sumner and Pierce County

Characteristic	2000	2010	2020	2000	2010	2020
	Sumner	Sumner	Sumner	Pierce Co	Pierce Co	Pierce Co
Total Population	8,504	9,451	10,621	700,820	795,225	921,130
Median Age	35.4	38.2	37.8	34.1	35.9	36.9
Percent under 18 years	26.5%	24.4%	22.8%	27.2%	24.2%	23%
Percent 65+ years	13.4%	14.9%	16.6%	10.2%	12.3%	14.6%

Characteristic	2000 Sumner	2010 Sumner	2020 Sumner	2000 Pierce Co	2010 Pierce Co	2020 Pierce Co
Percent Female	51.6%	51.8%	52%	50.3%	50.3%	50.4%
One Race						
Caucasian	90.3%	87.3%	74.1%	78.4%	76.5%	64.6%
African American	0.9%	1.2%	1.6%	7%	7.3%	7.2%
American Indian/Alaskan Native	1.4%	1%	1.2%	1.4%	1.7%	1.4%
Asian	1.7%	2.4%	3.1%	5.1%	6.4%	6.9%
Native Hawaiian/Pacific Islander	0.2%	0.4%	1.1%	0.8%	1.5%	2%
Other	2.4%	3.4%	7.1%	2.2%	4.3%	5.3%
Two or More Races	3%	4.3%	11.9%	5.1%	6.7%	12.6%
Hispanic/Latino of Any Race	6%	10.1%	13.8%	5.5%	9.9%	12.1%
Household Size	2.4	2.37	2.46	2.6	2.59	2.71
Education: High School Diploma or Greater	85.8%	91.3%*	91.3%**	86.9%	90.5%*	92.4%**
Education: Bachelor's Degree or Higher	19.6%	18.8%*	24.2%**	20.6%	24%*	29.3%**
Median Household Income	\$38,598	\$50,206*	\$83,285**	\$45,204	\$59,478*	\$91,486**

Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.

*Data from 2013 (ACS 2009-2013 5-Year Estimates).

**Data from 2022 (ACS 5-Year Estimates).

Source: US Census Bureau, 2020.

The population of Sumner has grown over the past two decades, as noted above. Key areas of change between 2000 and 2020 include:

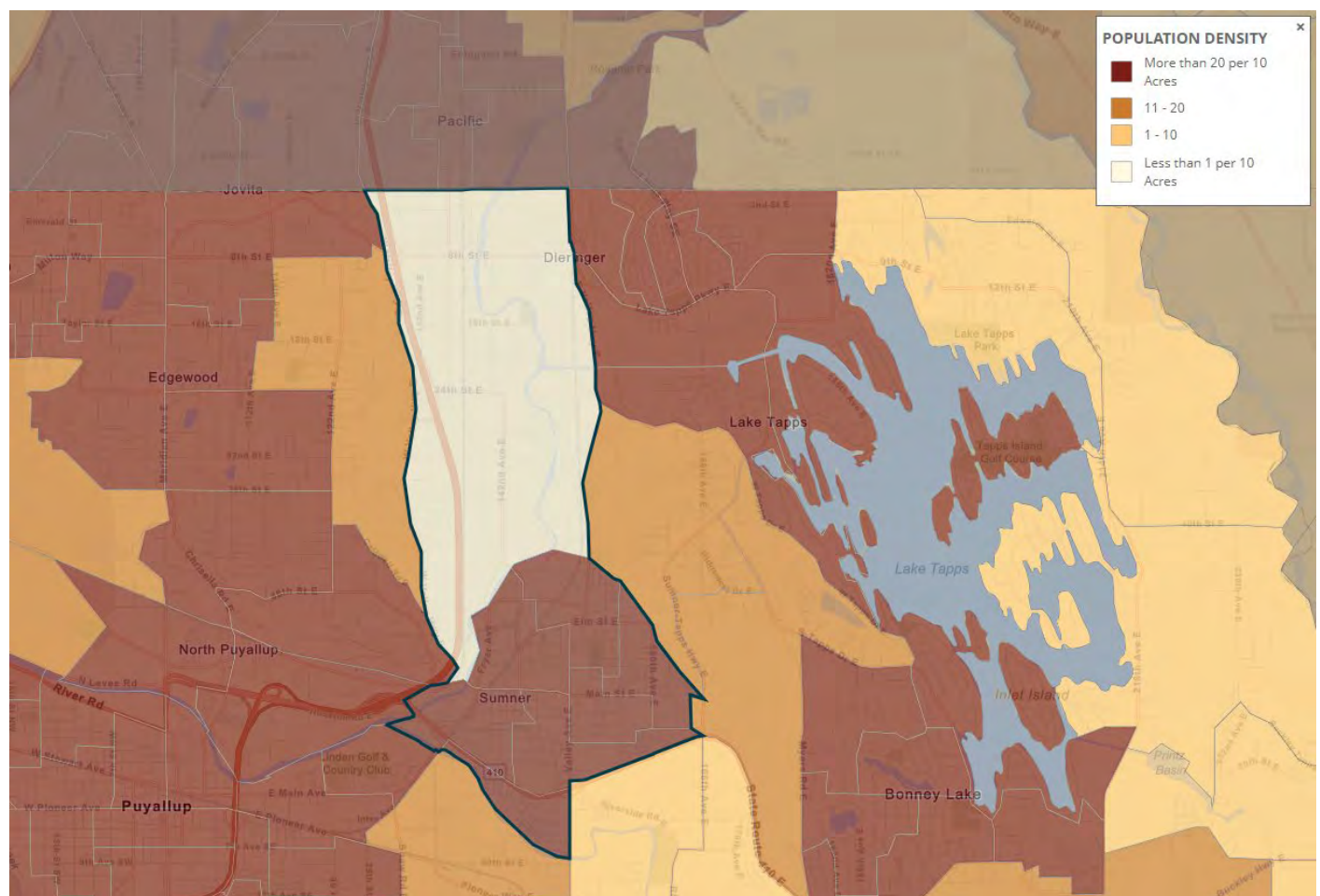
- A decline in the percentage of the Sumner population that is Caucasian (one race) and an increase in the percentage of the population that is two or more races, for both Sumner and Pierce County.
- An increase in the percentage of the population that identifies as Hispanic or Latino (any race), in both Sumner and Pierce County

- An increase in the percentage of the population with a bachelor's degree in and the median household income for both Sumner and Pierce County.
- An increase in the percentage of the population over age 65 and a decrease in the percentage of the population under age 18, both in Sumner and Pierce County.

Population Density

Mapping from Pierce County shows population density for Sumner. The northern portion of the city, the MIC area, has a population density of less than 1 person per 10 acres, which is consistent with the area's status as primarily an employment center, rather than a residential area. The rest of the city has a population of more than 20 people per 10 acres. See Exhibit 4-4.

Exhibit 4-4: Population Density - Sumner

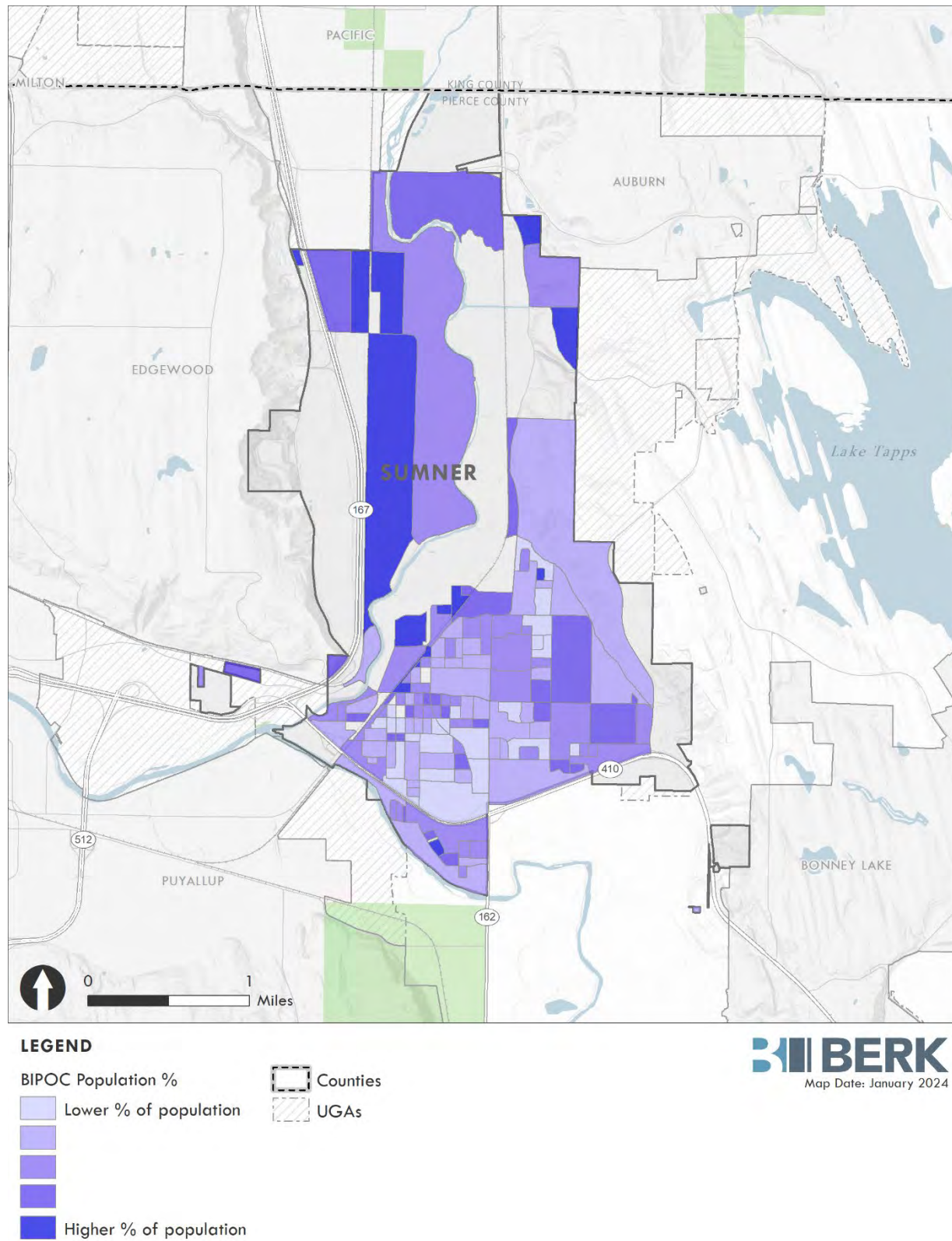


Source: Pierce County, 2023.

BIPOC Distribution

According to mapping performed using 2020 Census data, some census blocks have a greater proportion of the population that is BIPOC (Black, Indigenous, and People of Color) than others. There is minimal housing located in the North Portion, however a larger percentage of those residents are BIPOC

than in other parts of the city. This area has the most proximity to industrial uses due to the MIC. Other pockets with greater percentages of BIPOC residents are distributed throughout the city, including a few blocks in the East Portion near Auburn and small areas in the West and South portions. See Exhibit 4-5.

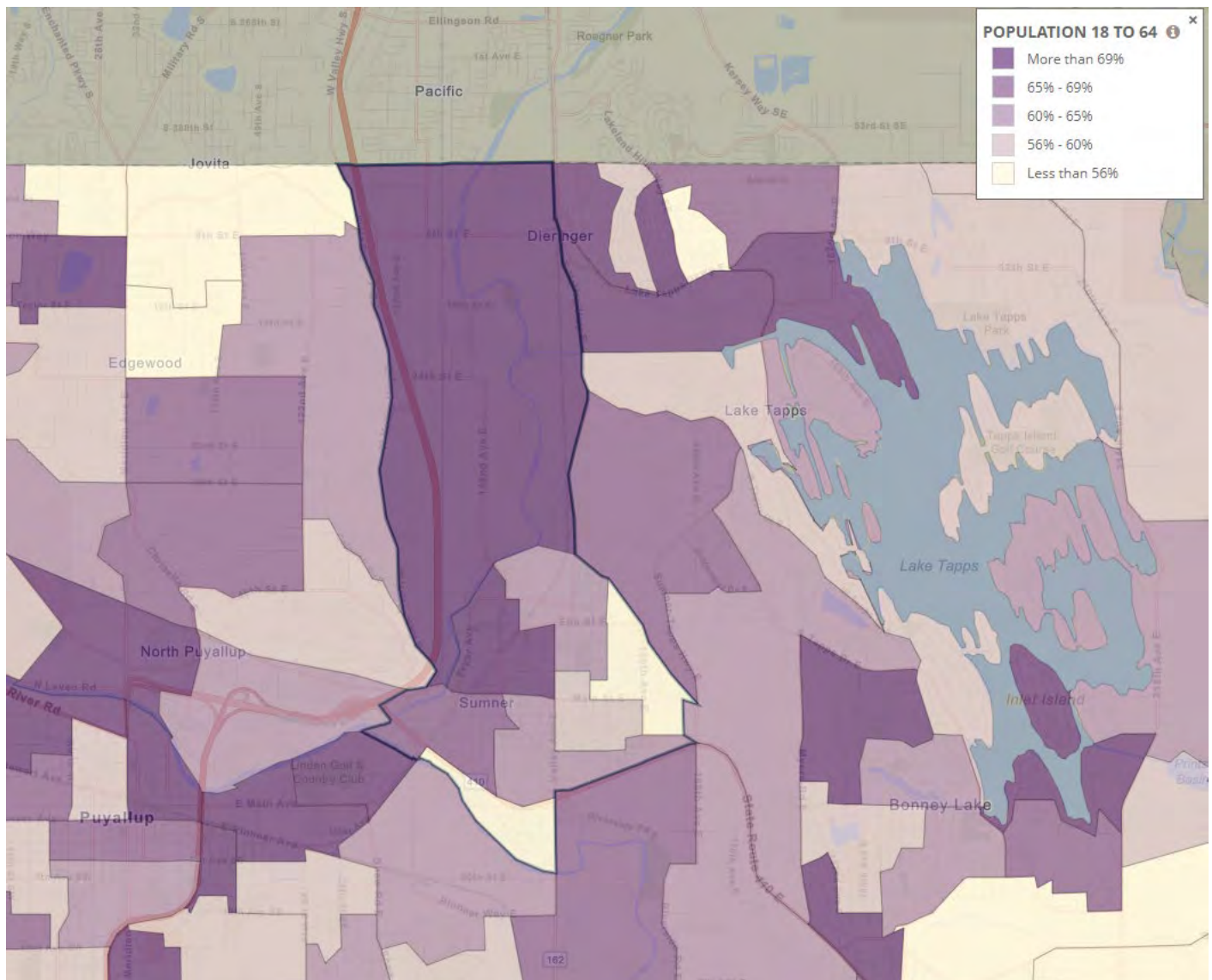
Exhibit 4-5: BIPOC Population - Sumner (Census Blocks)

Source: US Census Bureau, 2020, BERK, 2023.

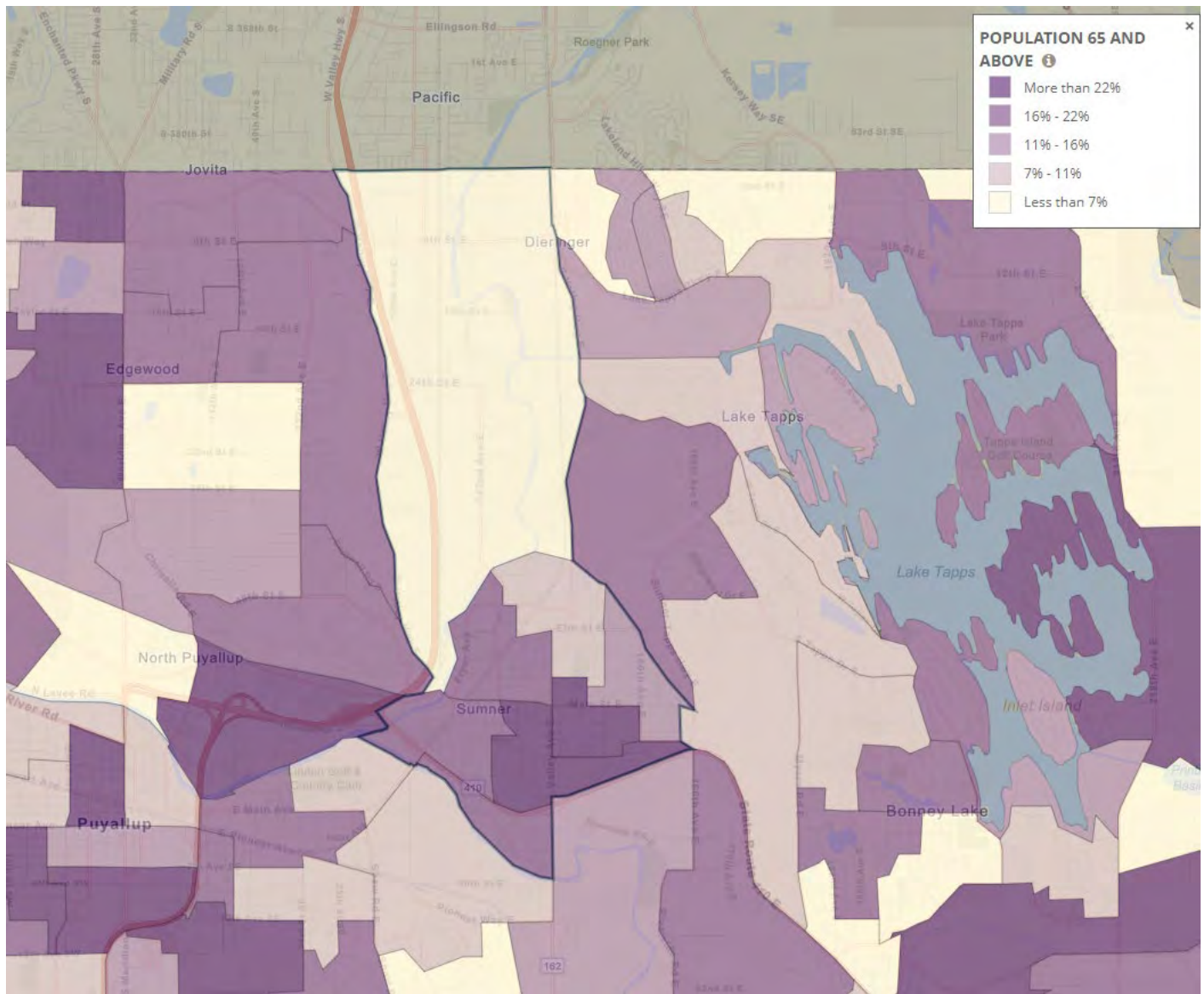
Age

Age distribution from Pierce County mapping shows the northern portion of Sumner, as well as parts of the western portion of the City have highest concentrations of adults between the ages of 18-64. Adults aged 65 and over are primarily concentrated in east Sumner, with some in portions of West Sumner. Youths under the age of 18 are starkly concentrated in east Sumner. See Exhibit 4-6, Exhibit 4-7, and Exhibit 4-8.

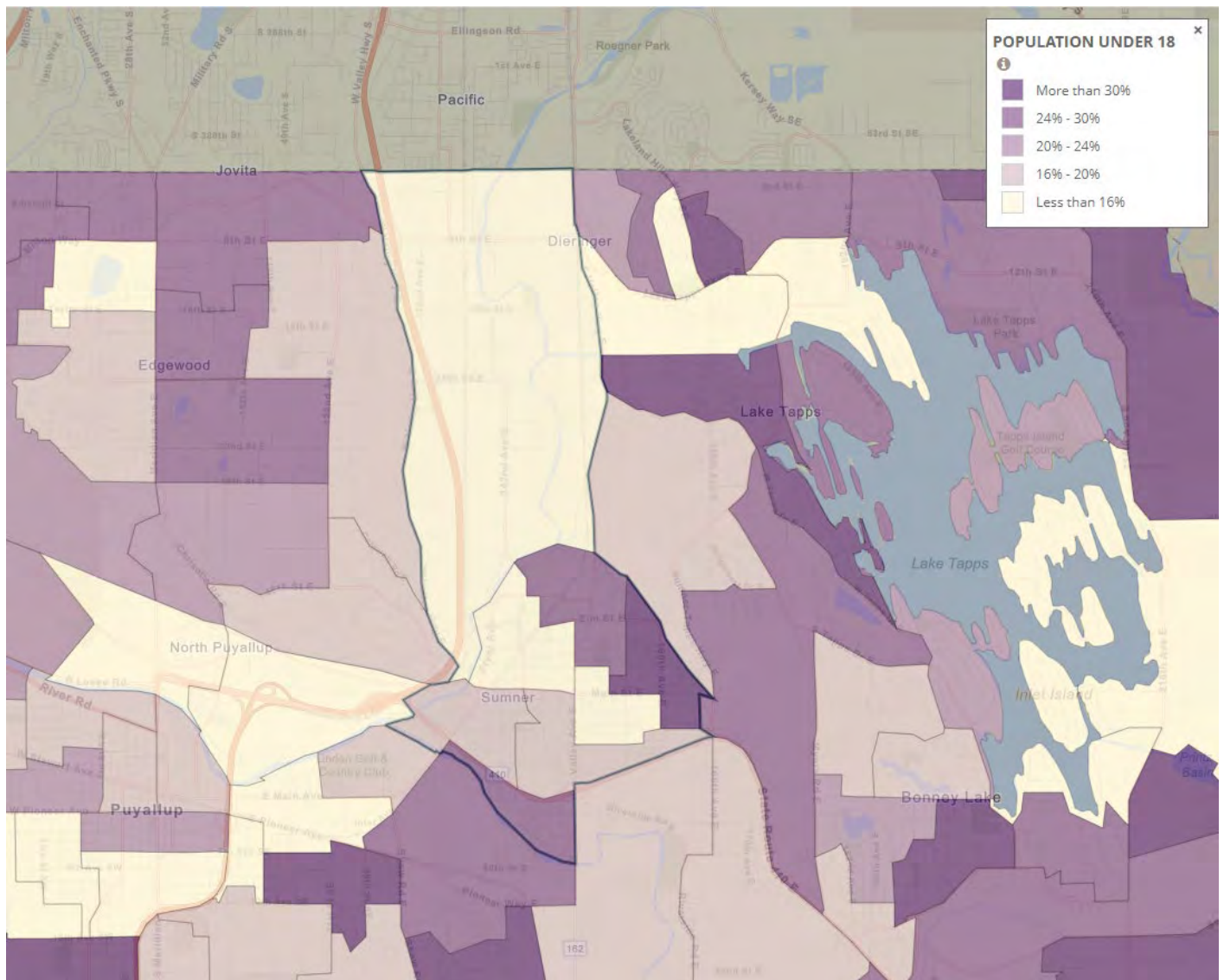
Exhibit 4-6: Population 18-64 Years - Sumner



Source: Pierce County, 2023.

Exhibit 4-7: Population 65 & Over

Source: Pierce County, 2023.

Exhibit 4-8: Population Under 18

Source: Pierce County, 2023.

Education & Income

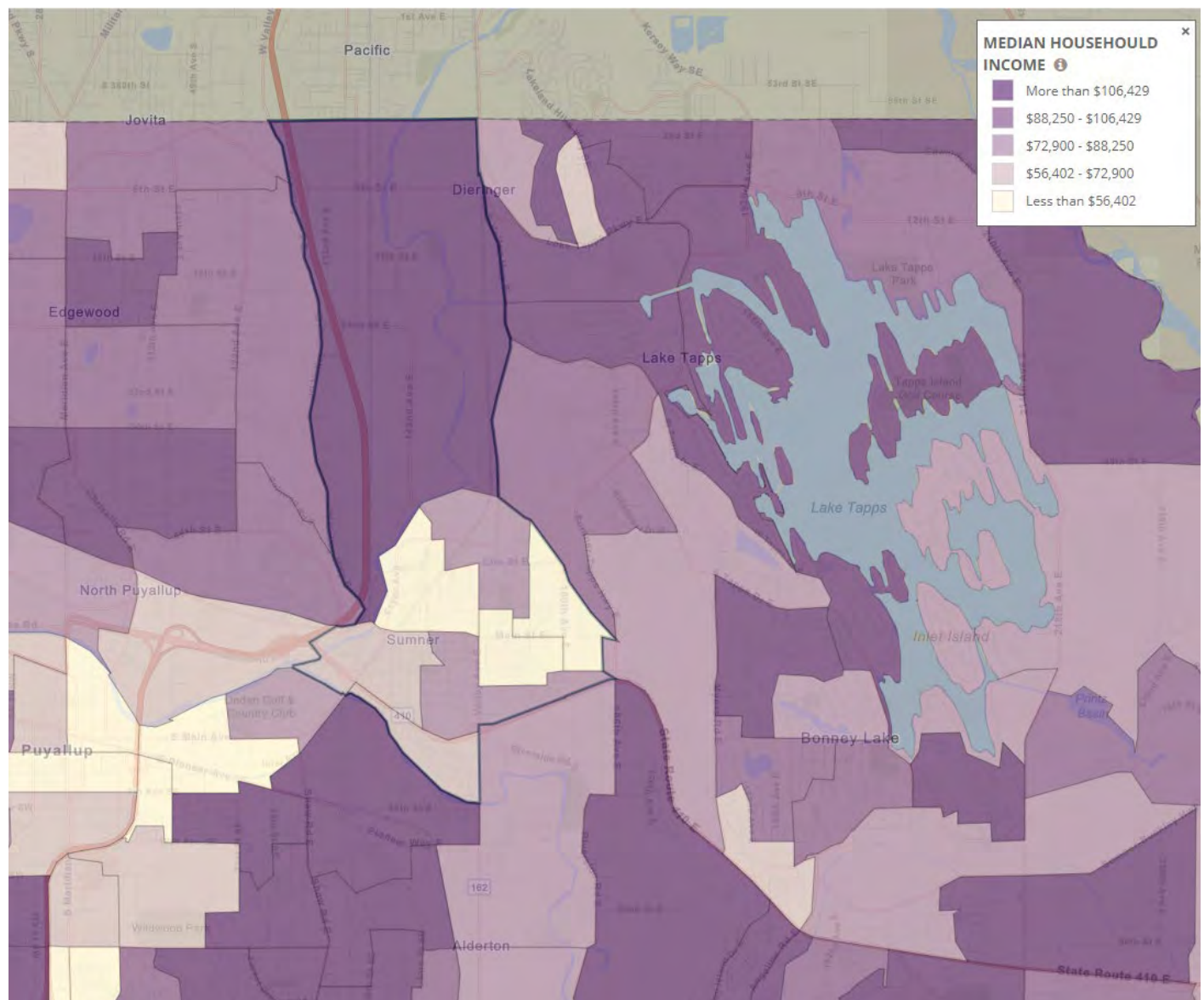
The proportion of the population with a high school diploma and bachelor's degree (or higher) and median household income increased in Sumner between 2000-2021. See Exhibit 4-9.

Pierce County mapping shows geographic distribution of median household income across the City of Sumner. Highest median household incomes (greater than \$106,429) are found in the North Portion, and lowest median household incomes (less than \$56,402) are found in parts of the East Portion. See Exhibit 4-10.

Exhibit 4-9: Summary of Education and Income Characteristics - Sumner and Pierce County

Characteristic	2000 Sumner	2010 Sumner	2021 Sumner	2000 Pierce Co	2010 Pierce Co	2021 Pierce Co
Education: High School Diploma or Greater	85.8%	91.3%	90.7%	86.9%	90.5%	92.1%
Education: Bachelor's Degree or Higher	19.6%	18.8%	25.8%	20.6%	24%	28.4%
Median Household Income	\$38,598	\$50,206	\$77,601	\$45,204	\$59,478	\$82,574

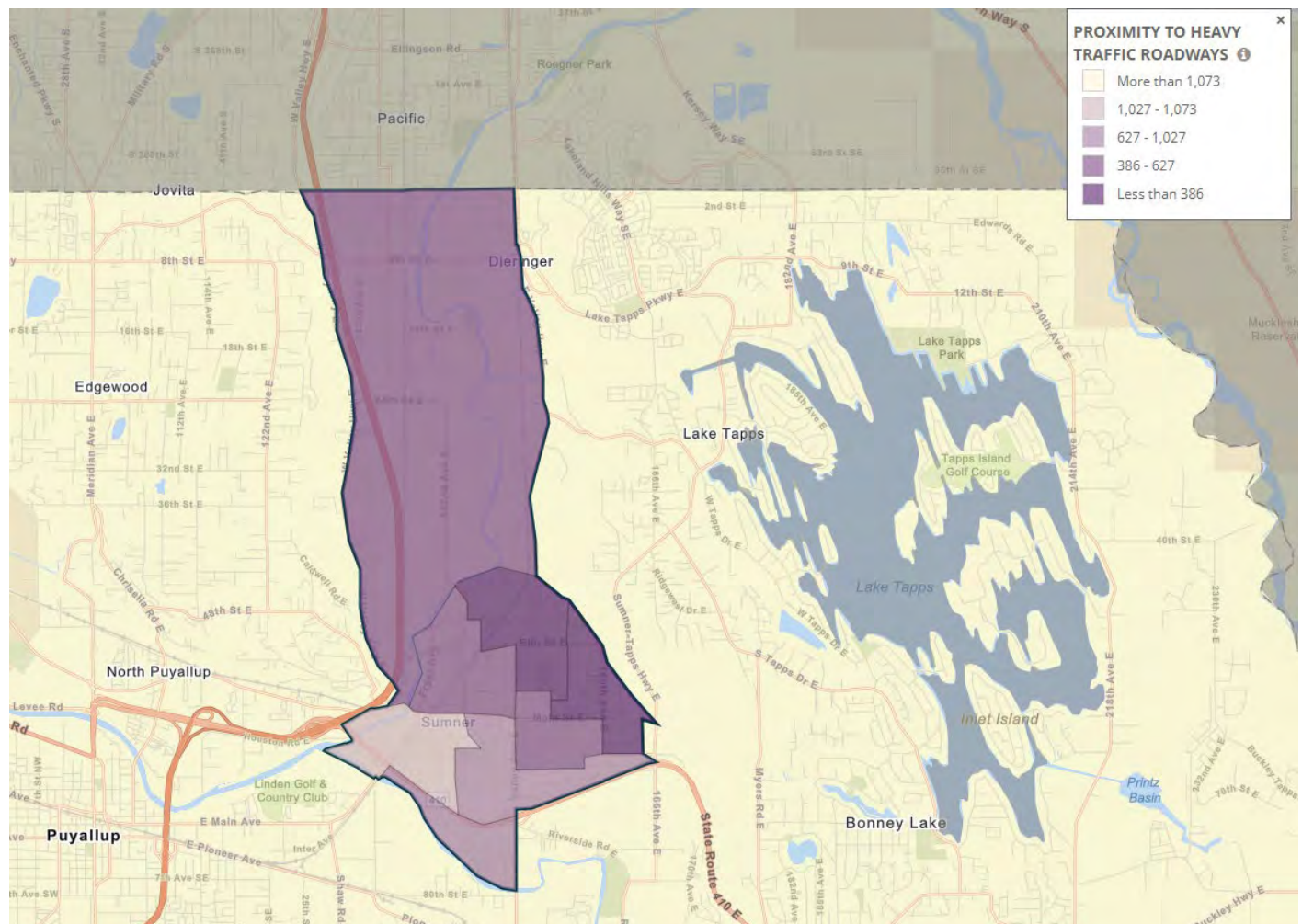
Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.
Source: US Census Bureau, 2021.

Exhibit 4-10: Median Household Income - Sumner

Source: Pierce County, 2023.

Environmental Health

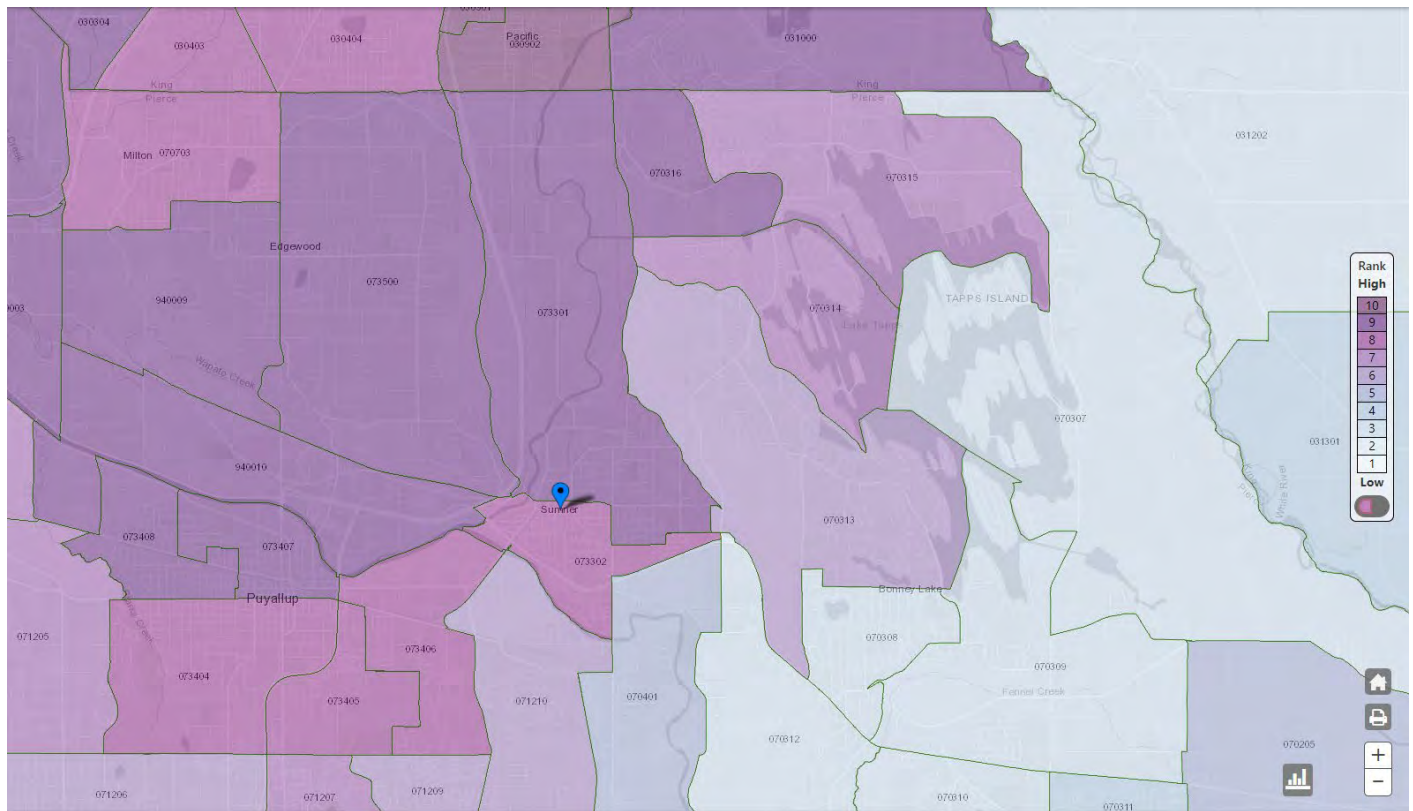
Pierce County mapping also shows environmental health indicators, such as proximity to heavy traffic roadways. The major heavy traffic roadways near Sumner are State Route 167 and State Route 410. The highest concentration of Sumner's population in proximity to heavy traffic roadways is in the western portion of the city near the convergence of State Route 167 and State Route 410. Population is also exposed to heavy traffic roadways in the South and West Portions of Sumner along State Route 167. State Route 410 runs north south through the MIC, though that portion is mainly an employment center, which is why the map shows a smaller portion of population exposed in that area. See Exhibit 4-11.

Exhibit 4-11: Population in Proximity to Heavy Traffic Roadways

Source: Pierce County, 2023.

In addition to heavy traffic roadways, the BNSF rail line runs north-south in Sumner with several at-grade crossings. Horns and bells are used at at-grade crossings to warn drivers of an on-coming train. The at-grade crossing noise impacts the population proximate to the at-grade crossings especially residents. Three at-grade crossings are within the west portion of the city including Maple and Main Streets east of Traffic Avenue and Zehnder Street at Wood Avenue. The number of trains using the tracks within Sumner is anticipated to increase over the next 20-years, which means crossing will be more frequent.

Washington State Department of Health mapping shows proximity to hazardous waste treatment, storage, and disposal facilities. Western and southern portions of Sumner have lower proximity to these facilities than the North and East Portions of Sumner, though all have high rankings when compared to areas to the south and east of the city. See Exhibit 4-12.

Exhibit 4-12: Proximity to Hazardous Waste Treatment Storage and Disposal Facilities - Sumner

Source: Washington State Department of Health, 2023.

North Portion

The North Portion has the smallest residential population and lowest population density in the city as it is primarily an employment center. Similarly, the North Portion has a lower density of BIPOC residents than the rest of the city. The North Portion has a larger concentration of adults between the ages of 18-64. Though there is limited housing in the North Portion, the North Portion does have the highest median incomes in the city. The North Portion has higher proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

East Portion

The East Portion has large concentrations of the city's population of residents over the age of 65 and under the age of 18 years, as well as large concentrations of the city's BIPOC population. Portions of the East Portion have the lowest median incomes in the city. The East Portion contains the lowest concentration of Sumner residents living in close proximity to heavy traffic roadways, though it does have higher proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

West Portion

The West Portion has high concentrations of adults between the ages of 18-64. The highest concentration of Sumner's population in proximity to heavy traffic roadways is in the West Portion near

the convergence of State Route 167 and State Route 410. While relatively high in proximity to heavy traffic roadways, the West Portion has lower proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

South Portion

The South Portion has a large share of the city's BIPOC population and has more residents that are over 65 or under 18 years old than between 18-64 years. The South Portion has lower median income than other parts of the city. The South Portion has a lower concentration of residents in proximity to heavy traffic roadways and proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

Sumner UGA

The Sumner unincorporated UGA includes three main areas. The western area near to interchange of State Route 410 and State Route 167 is located near the West Portion. Similar to the West Portion, this area has a large concentration of residents in proximity to heavy traffic roadways. The area to the south has a moderate number of residents in proximity to heavy traffic roadways, likely due to its location near State Route 410. The area to the northeast of the city has a small share of residents living near heavy traffic roadways. The area to the west has a higher proximity to hazardous waste treatment, storage, and disposal facilities compared to the areas northeast and south of the city. The area to the northeast has the highest median household income out of the three areas and the area to the west has the highest proportion of adults over the age of 65 years.

4.2.2 Employment

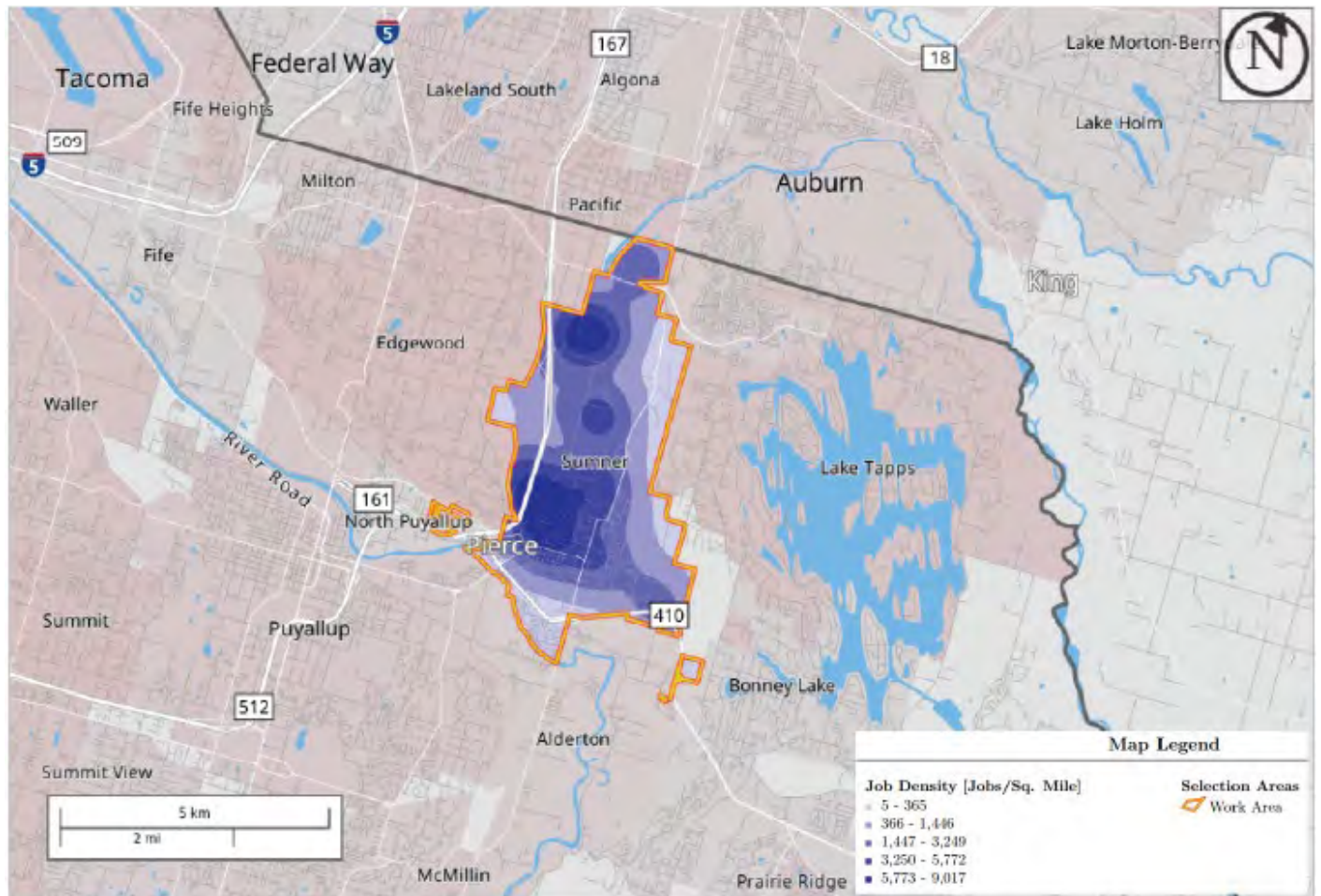
Citywide

The Sumner-Pacific Manufacturing Industrial Center (MIC) is the largest MIC in Pierce County and is a major employer and important warehousing, transportation, distribution, and logistics hub for the region. The MIC is home to an estimated 17,515 jobs as of 2021 (according to PSRC data). Headquartered businesses and major industrial operations include (per the Puyallup Sumner Chamber of Commerce):

- **Headquarters:** Bellmont Cabinet Company, Parsons Construction Company, Shining Ocean, Dillanos Coffee Roasters, Investco
- **Major Industrial Centers:** REI Distribution Center, Amazon Distribution Center, Costco Distribution Center, Martin Brower, Maersk, Keurig Dr. Pepper

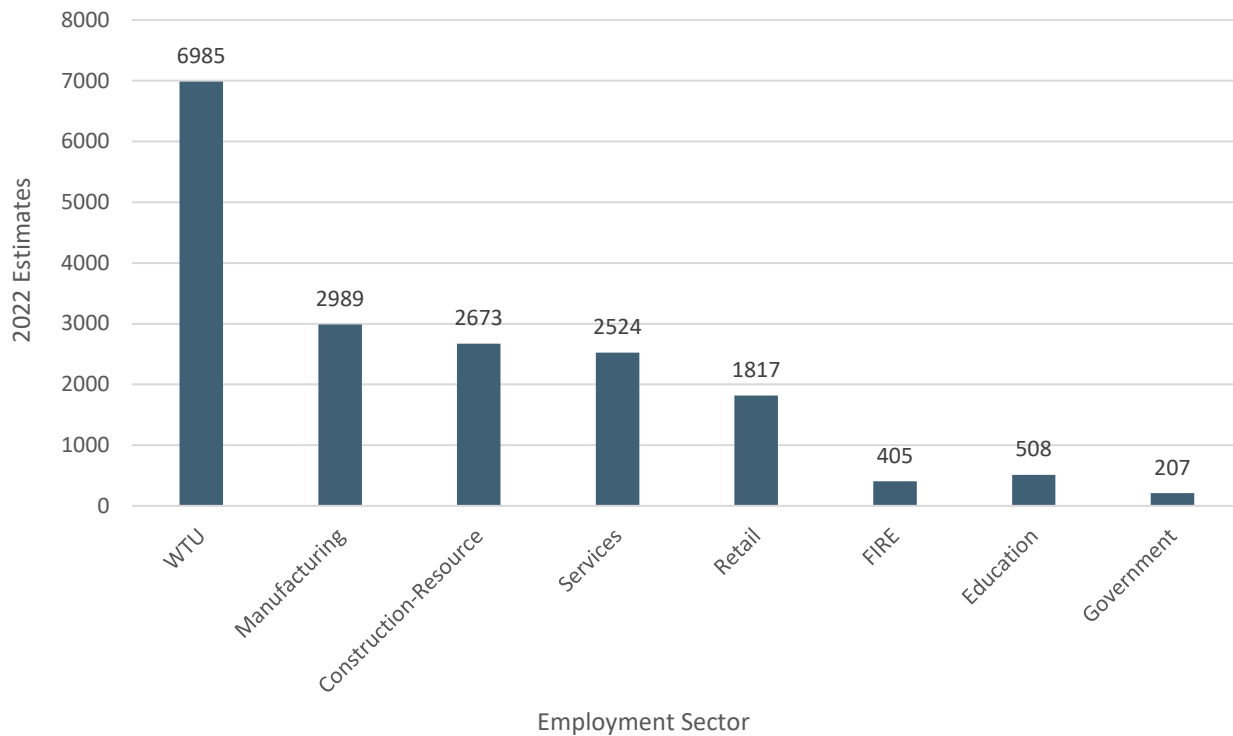
To meet the criteria for an MIC a jurisdiction must be planning for at least a total of 20,000 jobs.

Census OnTheMap, a US Census Bureau tool, provides a geographic representation of where jobs are located throughout the City of Sumner. There is a high concentration of jobs in the in the MIC, as well as in the Town Center area. The map also shows some job density in and around the East Sumner neighborhood. See Exhibit 4-13.

Exhibit 4-13: 2020 Job Densities – Sumner

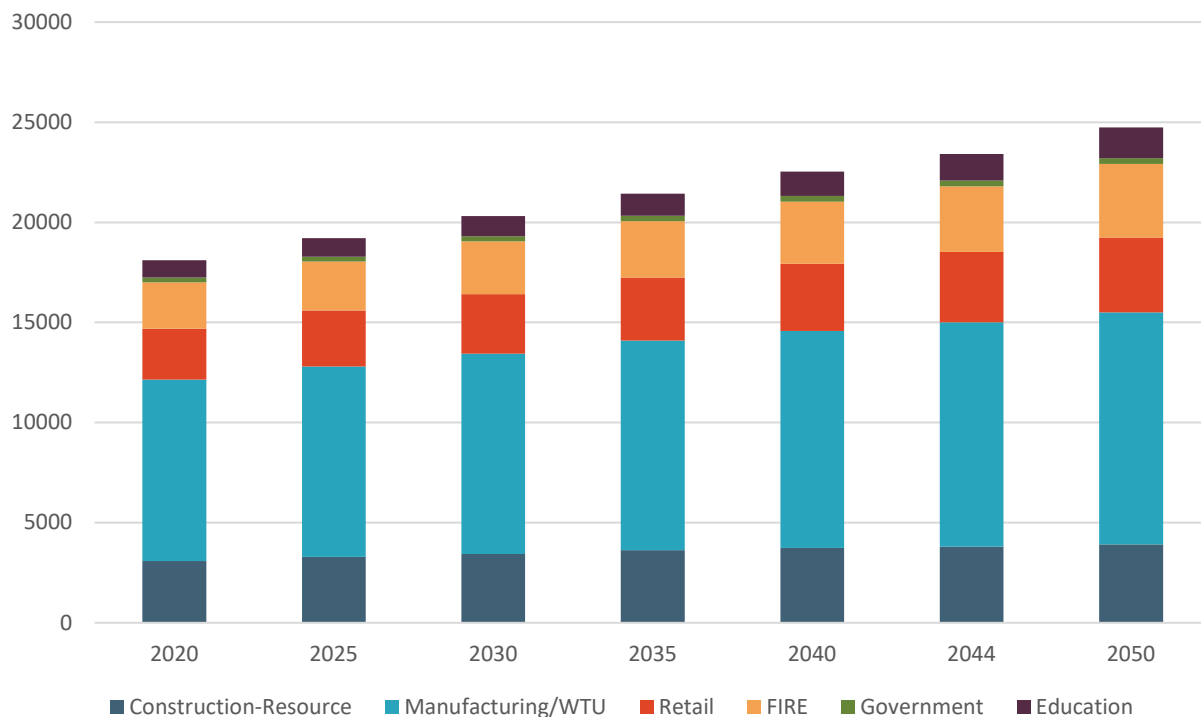
Source: Census OnTheMap, 2023.

Current employment estimates provided by PSRC indicate that wholesale trade/transportation/utilities (WTU), manufacturing, construction resource, and services are the largest employment sectors in Sumner, which comprise 84% of all current employment. See Exhibit 4-14 for estimates of the number of workers in each employment sector.

Exhibit 4-14: 2022 Employment - Sumner

Source: PSRC, 2023.

PSRC provides a forecast for employment in Sumner through 2050. 2050 forecasts expect the largest sectors of employment to be manufacturing and WTU, accounting for roughly 47% of the jobs. Forecasts also expect the number of jobs to increase by 6,641 between 2020 and 2050. See Exhibit 4-15.

Exhibit 4-15: Employment Forecasts - Sumner

Source: PSRC, 2023.

Pierce County has adopted a total jobs target for Sumner of 23,419 in 2044, or an increase of 5,313 jobs over 2020 estimates (18,106).

The majority of Sumner residents aged 16 and over are in the labor force (64.3%), slightly lower than in Pierce County (66.1%). Sumner is in line with Pierce County on employment and unemployment rates. See Exhibit 4-16.

Exhibit 4-16: Current Labor Force, 2021 5-Year Estimates

	Population 16+ Years Old	% in Civilian Work Force	% Employed	% Unemployed
Sumner	8,467	64.3%	60%	5%
Pierce County	718,566	66.1%	60.2%	5%

Source: ACS, 2021.

Commuting Mode

Most workers commute to work, with the primary form being single-occupant vehicles (77.7%). Approximately 14.6% of Sumner residents drove in a carpool, took public transit, or walked to work, compared to approximately 15.3% in Pierce County. See Exhibit 4-17.

Exhibit 4-17: Means of Transportation to Work

	Sumner	Pierce County
Total Workers 16 & Over	5,003	439,523
Car, truck, or van – drove alone	77.7%	74.5%
Car, truck, or van – carpooled	7%	9.9%
Public transportation (excluding	3.6%	3.4%
Walked	4%	2%
Bicycle	0%	0.3%
Taxicab, motorcycle, or other means	1.3%	1.1%
Worked at home	6.4%	8.8%

Source: ACS, 2021.

North Portion

The North Portion contains the largest concentration of jobs within the city, due to the MIC. These jobs are largely in the manufacturing and wholesale trade/transportation/utilities sectors.

East Portion

While primarily a residential area, the East Portion does have a moderate distribution of jobs in and around the neighborhood.

West Portion

The West Portion contains a large concentration of jobs, largely in the Town Center, which is Sumner's mixed-use downtown area.

South Portion

Primarily a residential area, the South Portion has a small number of jobs compared to other parts of the city.

Sumner UGA

All three areas have some jobs, but in lower concentrations than the City of Sumner.

4.3 Impacts

4.3.1 Thresholds of Significance

Impacts on population and employment are considered significant if they would:

- Add population growth in areas with considerable air/noise pollution
- Fail to meet the citywide population or jobs target
- Fail to meet MIC criteria for planning for jobs
- Result in involuntary economic displacement by business

4.3.2 Impacts Common to All Alternatives

Population and employment would increase under all of the alternatives, though the extent and location of residential growth differs slightly across the alternatives. Employment growth and distribution is the same across all alternatives.

Growth in Air or Noise Pollution Areas

Citywide

All alternatives add population growth to areas of high air or noise pollution. This includes growth near the BNSF rail line, therefore more people will be impacted by the noise of the train crossings.

North Portion

Residential uses in the North Portion are limited, as most of the area consists of the MIC, which is designated for industrial uses. Under all the alternatives, there is minor population growth in the North Portion and the number of residents living near high noise and air pollution levels in the North Portion is not expected to increase substantially.

East Portion

As shown in Exhibit 4-11, the East Portion has the smallest concentration of population living in proximity to heavy roadways as the area is not as close to State Route 167 and State Route 410 as other areas in Sumner. The East Portion receives a considerable amount of the population growth under all alternatives, so the number of residents living near high noise or air pollution levels in the East Portion is expected to increase to some extent.

South Portion

Under all the alternatives, there is minor population growth distributed to the South Portion. As shown in Exhibit 4-11, there is a moderate concentration of Sumner's population living along State Route 410 in the South Portion. The number of Sumner residents in the South Portion living near high noise and air pollution levels will increase slightly under all the alternatives.

West Portion

Under all alternatives, much of the population growth is focused in Town Center in the West Portion. As shown in Exhibit 4-11, the West Portion is the area in Sumner with the largest concentration of population in proximity to heavy traffic roadways due to its proximity to State Route 410 and State Route 167. Seeing as population growth is focused in the West Portion, the number of Sumner residents in the West Portion living near high noise and air pollution areas will increase under all the alternatives.

Sumner UGA

Under all alternatives, there is some population growth in the Sumner unincorporated UGA. All alternatives direct the most housing growth to the area to the northeast of the city, which has the lowest concentration of residents living near heavy traffic roadways. However, there is housing growth directed to the areas west and south of the city, which have higher numbers of residents living near heavy traffic roadways, so the number of Sumner residents in the South Portion living near high noise and air pollution levels will increase slightly under all the alternatives.

Growth Targets

All the alternatives are expected to meet citywide population and jobs targets. See Chapter 6: Housing for discussion on housing targets under each of the alternatives.

Exhibit 4-18: Population and Employment Growth Allocations by Alternative

	2020-2044 Target	2020-2023 Growth (and Pipeline, for Employment only)	Alternative 1 (2023-2044)	Alternative 2 (2023-2044)	Alternative 3 (2023-2044)	Preferred Alternative (2023- 2044)
Population	4,904	179	4,725	6,521	6,521	4,725
Employment	5,313	3,656	1,657	1,657	1,657	1,657

Source: BERK, 2023.

MIC Criteria

All the alternatives are expected to meet the MIC criteria to plan for at least 20,000 jobs in the area. PSRC estimates that 17,515 jobs were present in the MIC in 2021. Sumner has added since 2021, or is expecting, 2,951 new and future pipeline jobs. All alternatives plan for approximately 950 new jobs, in addition to those already in the pipeline, in the Sumner portion of the MIC. Based on the existing, pipeline, and future jobs, the MIC is expected to reach over 21,000 jobs by 2044. This is not including growth between 2020 and 2044 in the Pacific portion. Pacific's jobs target, citywide, is 638 new jobs by 2044.

Economic Displacement

Citywide

All alternatives expect job, population, and housing growth. As development occurs, some businesses may be displaced through redevelopment or increased land prices and rents. Because all alternatives include growth, potential displacement could occur, and adverse commercial displacement impacts are expected under each alternative.

It is estimated that over 40% of job capacity in Sumner is on underutilized properties (opposed to vacant properties).¹ This is a potential indicator that existing jobs and businesses on these underutilized properties may be displaced if these properties redevelop.

North Portion

The majority of job growth is focused in the MIC area. Some commercial displacement could occur as a result of redevelopment. However, the MIC Subarea Plan has policies aimed at business retention and encouraging a variety of business sizes in the MIC.

East Portion

The East Portion is expected to receive housing and job growth under each alternative. Commercial displacement could occur as a result of redevelopment and/or increased land prices and rents.

South Portion

Primarily a residential area, the South Portion has a small number of jobs compared to other parts of the city. The South Portion is not expected to receive job growth under any of the alternatives, though it is expected to receive some housing growth. Commercial displacement impacts are expected to be minor.

West Portion

While not receiving the majority of job growth, the West Portion is expected to add some jobs in the Town Center. The Town Center has a concentration of older and historic buildings, which, due to their age, could be vulnerable to commercial displacement if the buildings are redeveloped.

The Town Center in the West Portion is expected to receive housing growth under all the alternatives. Town Center is a mixed-use center and housing growth and development could cause commercial displacement.

¹ Based on data from Pierce County Buildable Lands and City of Sumner permit data, accounting for development since 2020 and projects in the timeline. BERK, 2023.

Sumner UGA

The Sumner unincorporated UGA has a small number of jobs compared to other parts of the city, though its three areas are expected to receive some job and housing growth under all alternatives. Commercial displacement impacts are expected to be minor.

4.3.3 Alternative 1 (No Action)

Growth in Air or Noise Pollution Areas

Similar to Alternatives 2 and 3 and the Preferred Alternative, Alternative 1 primarily adds population growth to West Portion and East Portion. While the West Portion currently has a high concentration of residents living near air or noise pollution areas, Alternative 1 and the Preferred Alternative add less population growth than Alternatives 2 and 3, meaning they are expected to add less people living near air or noise pollution areas in Sumner than the action alternatives.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 1, like Alternatives 2 and 3 and the Preferred Alternative, meets the population and job targets allocated to Sumner. Under Alternative 1, like the Preferred Alternative, 4,900 additional residents are added to Sumner between 2020-2044. Alternative 1 and the Preferred Alternative provide less population growth than Alternatives 2 and 3. All alternatives provide the same amount of job growth.

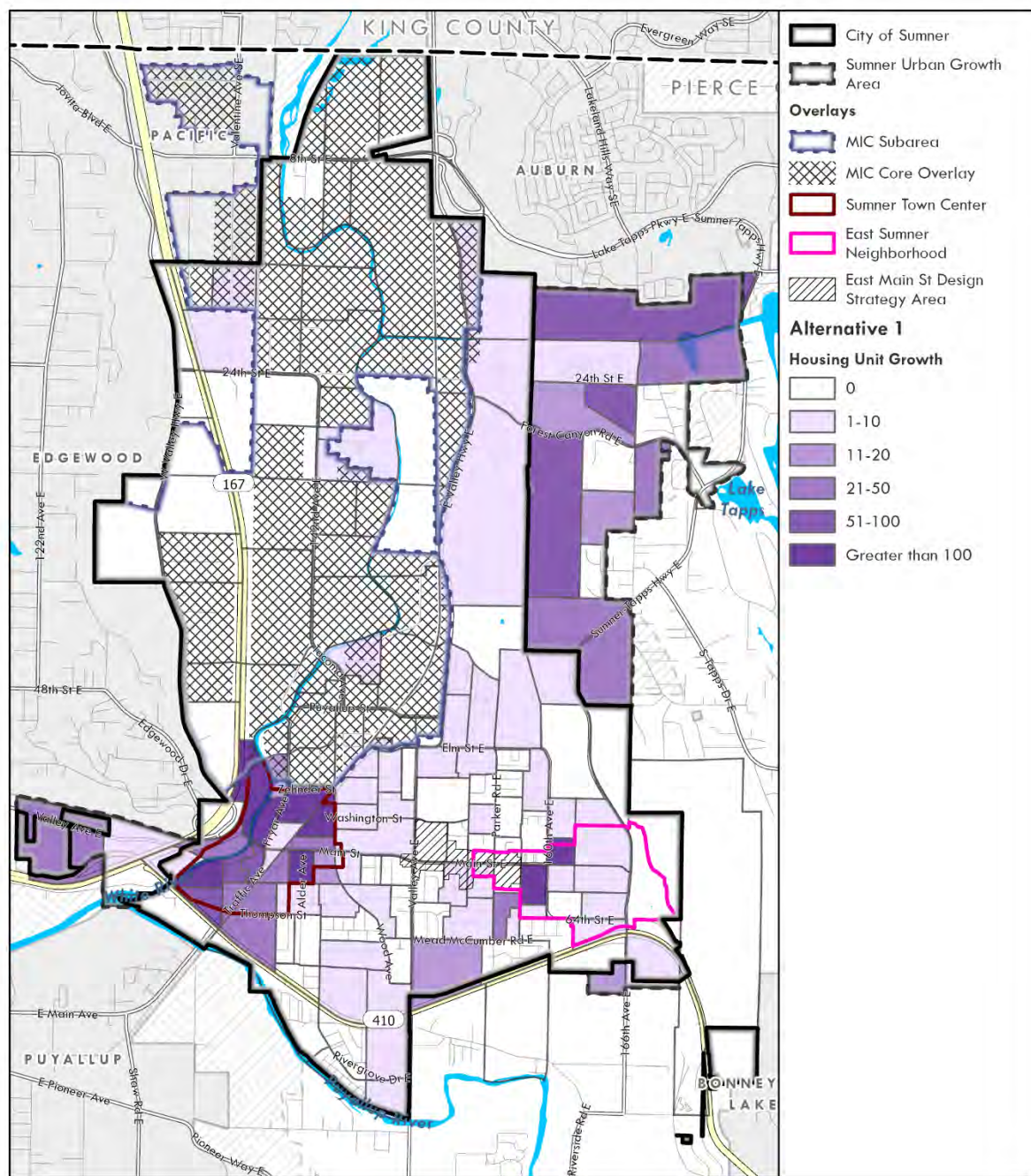
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 1, like Alternatives 2 and 3 and the Preferred Alternative, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

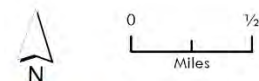
All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1 and the Preferred Alternative. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

Exhibit 4-19: Future Housing Growth - Alternative 1



CITY OF SUMNER

Future Housing Growth



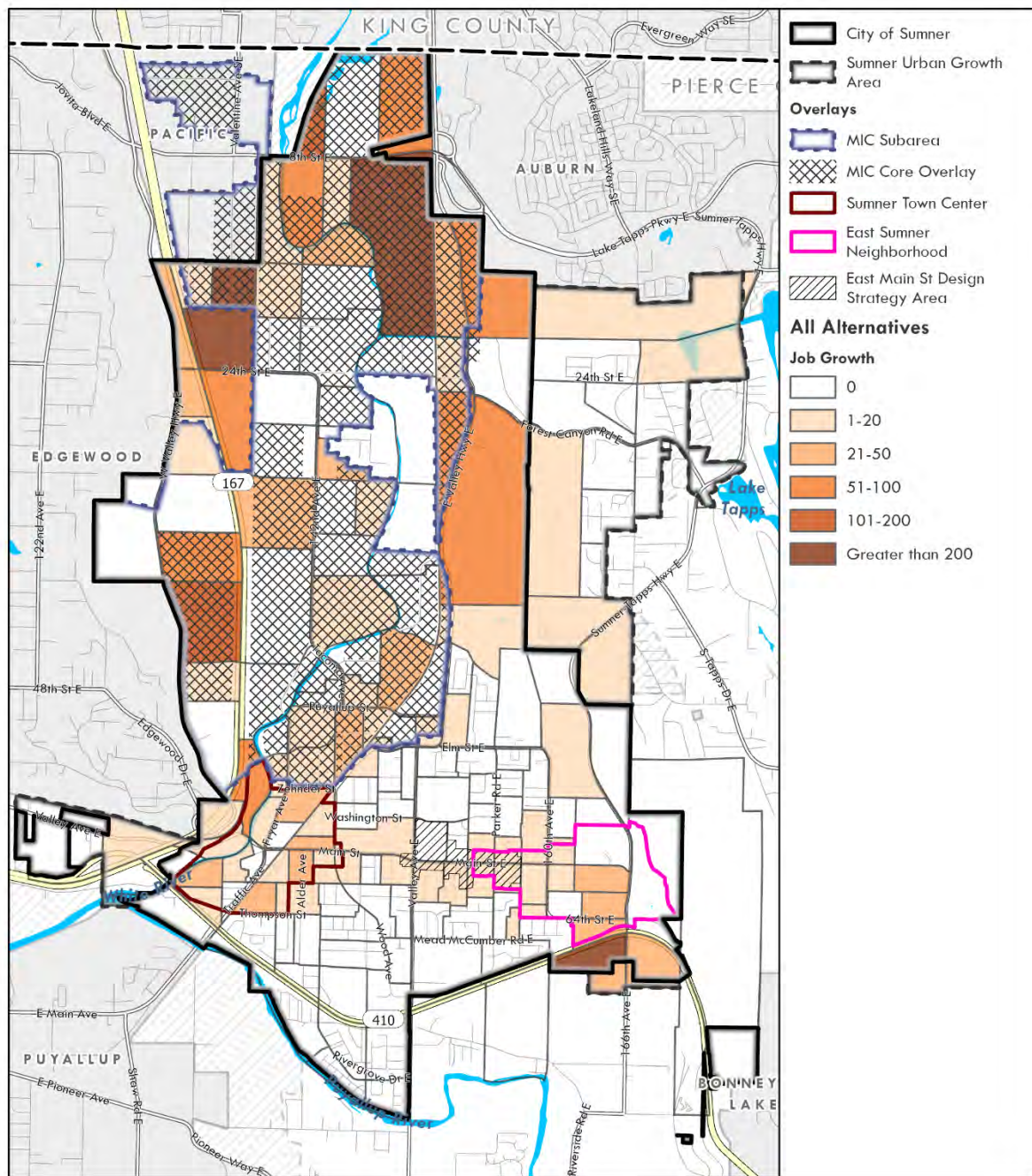
Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 4-20: Future Job Growth - All Alternatives



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.3.4 Alternative 2

Growth in Air or Noise Pollution Areas

Similar to Alternatives 1 and 3 and the Preferred Alternative, Alternative 2 primarily adds population growth to West Portion and East Portion. The West Portion currently has a high concentration of residents living near air or noise pollution areas, and since Alternative 2 adds more population growth than Alternative 1 and the Preferred Alternative and the same as Alternative 3, it is expected to add more residents living near air or noise pollution areas.

Alternative 2, unlike Alternatives 1 and 3 and the Preferred Alternative, rezones the Cava gravel mine site in the East Portion to Medium Density Residential (MDR). Given the mine site's proximity to the MIC area and hazardous waste treatment, storage, and disposal facilities (see Exhibit 4-12), Alternative 2 is expected to add more residents living in proximity to these facilities than Alternatives 1 and 3 and the Preferred Alternative.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 2, like Alternatives 1 and 3 and the Preferred Alternative, meets the population and job targets allocated to Sumner. Under Alternative 2, 6,700 additional residents are added to Sumner between 2020-2044. Alternative 2 provides more population growth than Alternative 1 and the Preferred Alternative and the same as Alternative 3. All alternatives provide the same amount of job growth.

Alternative 2 focuses population growth in Town Center (West Portion) and the East Portion (primarily to the Cava gravel mine site), but also distributes growth citywide.

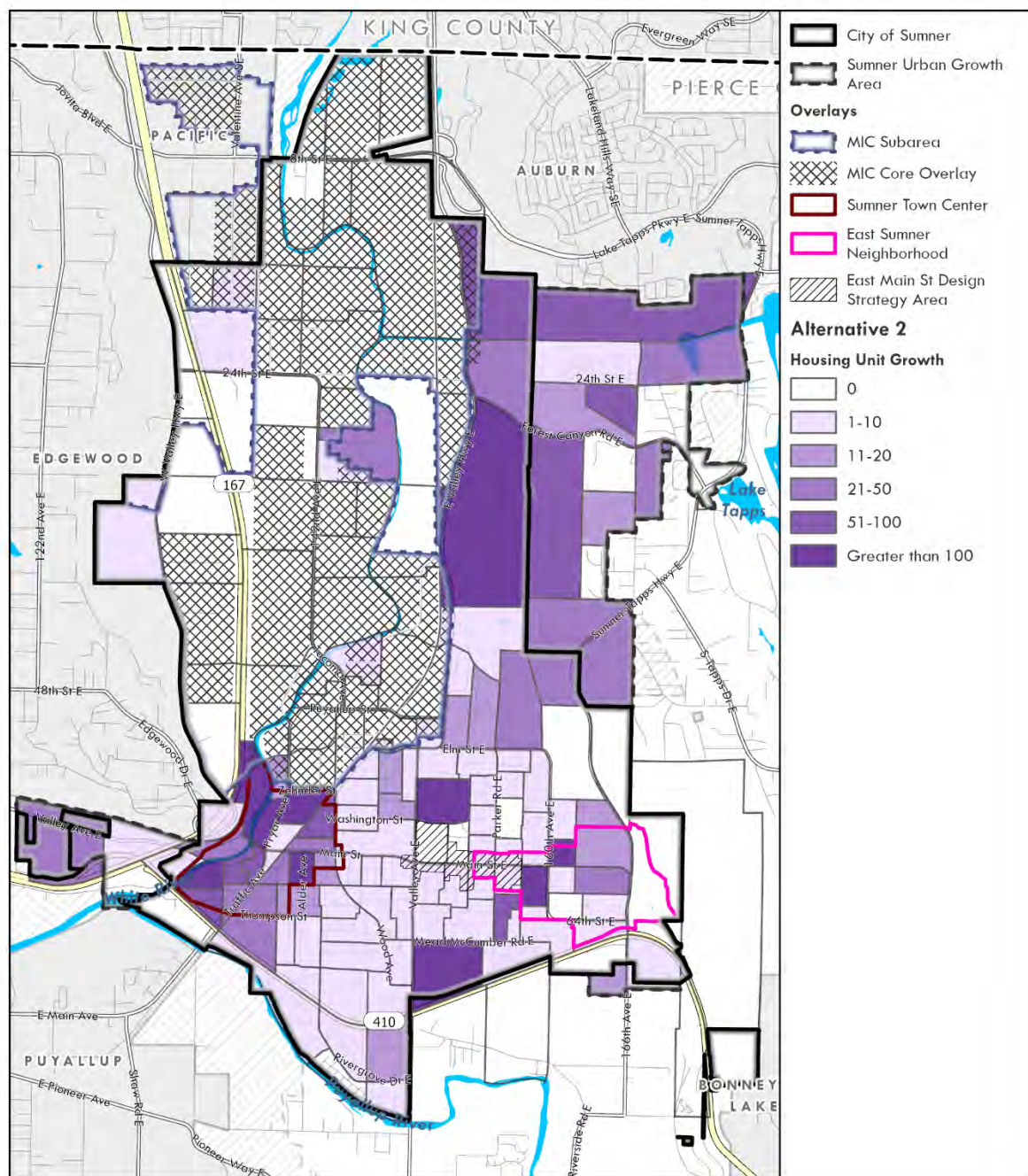
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 2, like the other alternatives, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1 and the Preferred Alternative. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

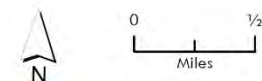
Exhibit 4-21: Future Housing Growth - Alternative 2



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.3.5 Alternative 3

Growth in Air or Noise Pollution Areas

Similar to Alternatives 1 and 2 and the Preferred Alternative, Alternative 3 primarily adds population growth to West Portion and East Portion. The West Portion currently has a high concentration of residents living near air or noise pollution areas, and since Alternative 3 adds more population growth than Alternative 1 and the Preferred Alternative, and the same as Alternative 2, it is expected to add more residents living near air or noise pollution areas. However, unlike Alternative 2, Alternative 3 does not propose rezoning the Cava gravel mine site, and therefore is expected to add less population in proximity to hazardous waste treatment, storage, and disposal facilities.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 3, like Alternatives 1 and 2 and the Preferred Alternative, meets the population and job targets allocated to Sumner. Under Alternative 3, 6,700 additional residents are added to Sumner between 2020-2044. Alternative 3 provides more population growth than Alternative 1 and the Preferred Alternative and the same amount as Alternative 2. All alternatives provide the same amount of job growth.

Under Alternative 3, population growth is focused in Town Center (West Portion) and the East Portion, with small-scale moderate-density housing spread throughout the city.

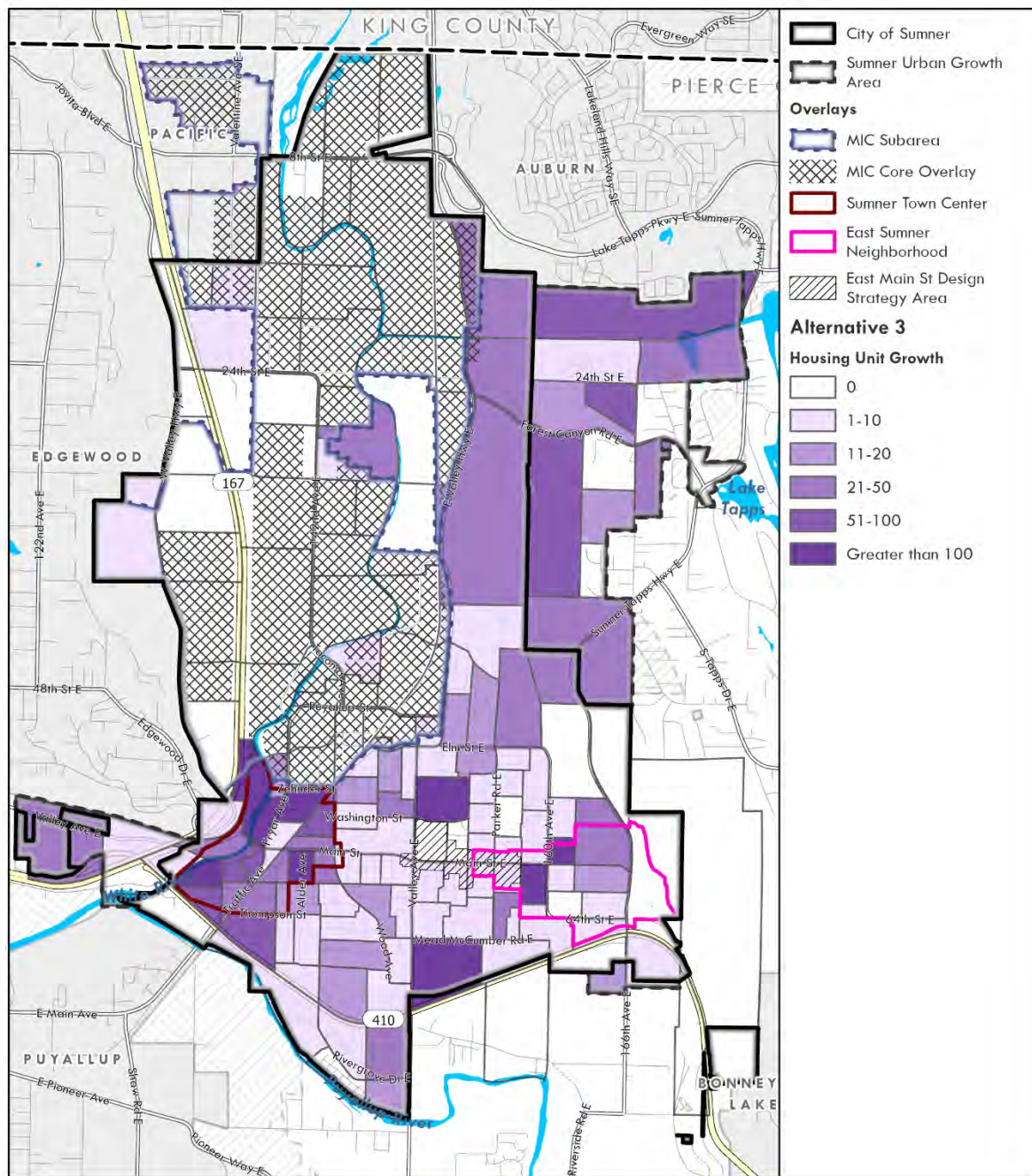
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 3, like the other alternatives, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1 and the Preferred Alternative. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

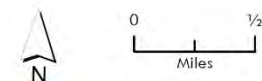
Exhibit 4-22: Future Housing Growth - Alternative 3



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.3.6 Preferred Alternative

Growth in Air or Noise Pollution Areas

Similar to Alternatives 1, 2, and 3, the Preferred Alternative primarily adds population growth to West Portion and East Portion. The West Portion currently has a high concentration of residents living near air or noise pollution areas. However, the Preferred Alternative, like Alternative 1, plans for less growth than Alternatives 2 and 3 and therefore is expected to add fewer residents living near air or noise pollution areas.

Growth Targets

As discussed under Impacts Common to All Alternatives, the Preferred Alternative, like Alternatives 1, 2, and 3, meets the population and job targets allocated to Sumner. Under the Preferred Alternative, like the Alternative 1, 4,900 additional residents are added to Sumner between 2020-2044. Alternative 1 and the Preferred Alternative provide less population growth than Alternatives 2 and 3. All alternatives provide the same amount of job growth.

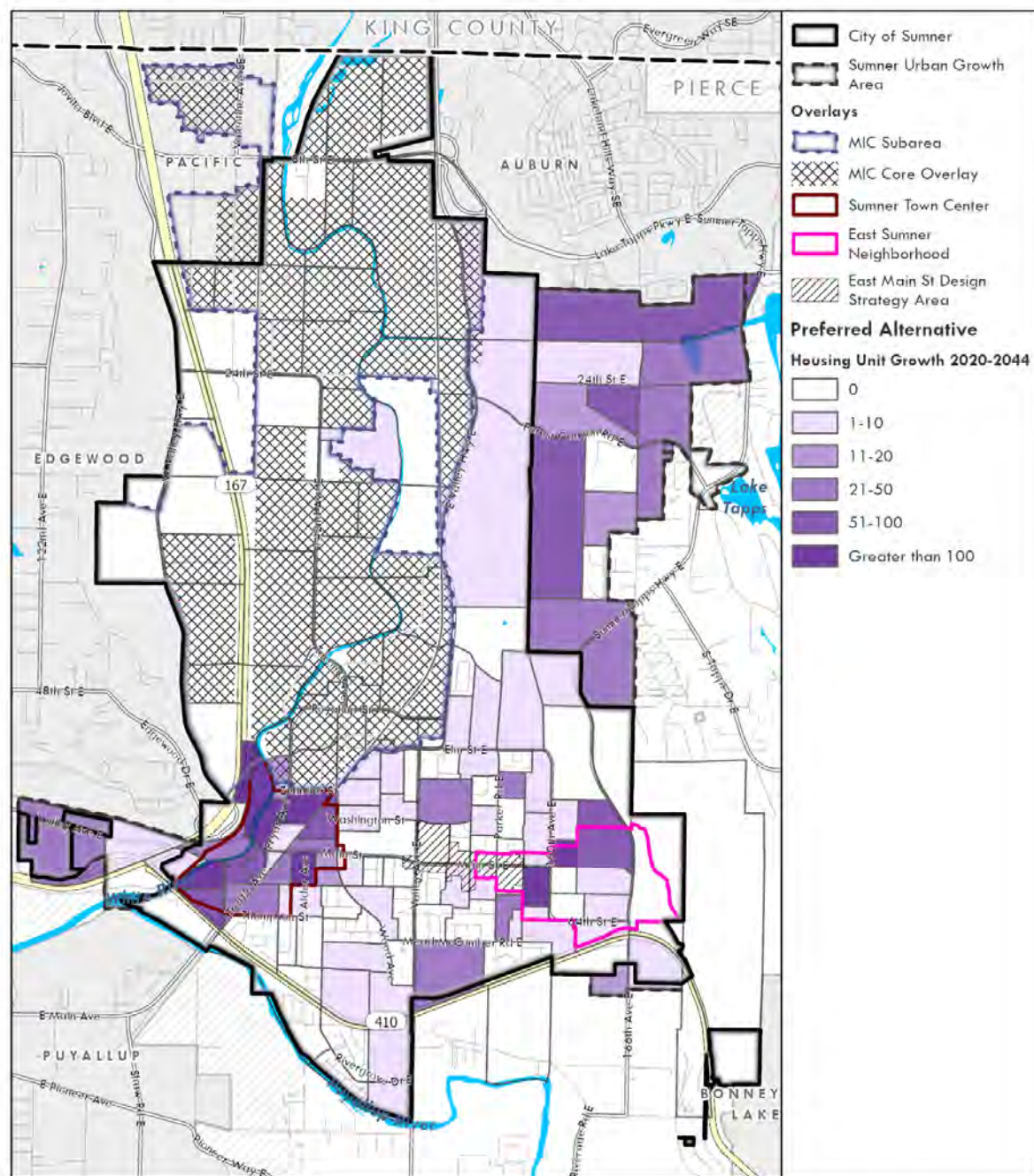
MIC Criteria

As discussed under Impacts Common to All Alternatives, the Preferred Alternative, like the other alternatives, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1 and the Preferred Alternative. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

Exhibit 4-23: Future Housing Growth - Preferred Alternative



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: July 2024

Source: City of Sumner, 2024; BERK, 2024.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.4 Mitigation Measures

4.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 and the Preferred Alternative would mitigate adverse impacts to growth in air or noise pollution areas, growth targets, MIC criteria, and economic displacement.

Growth in Air or Noise Pollution Areas

- Alternatives 2 and 3 and the Preferred Alternative include a revised policy to require new developments that generate noise impacts sufficient to cause environmental health problems to submit an analysis of potential noise impacts and propose mitigation.
- Alternatives 2 and 3 and the Preferred Alternative include a new Climate element and revised Transportation policies that aim to reduce vehicle miles traveled (VMT).
- Alternatives 2 and 3 and the Preferred Alternative include a revised goal to plan for a variety of land uses and prevent adverse impacts between neighboring uses.

Growth Targets

- No adverse impacts expected under Alternatives 2 and 3 and the Preferred Alternative.

MIC Criteria

- No adverse impacts expected under Alternatives 2 and 3 and the Preferred Alternative.

Economic Displacement

- Alternatives 2 and 3 and the Preferred Alternative include a revised goal around supporting locally and women- and minority- owned businesses and incorporate goals and policies from the MIC Subarea Plan, which promote business retention and a mix of businesses of all sizes.

4.4.2 Regulations and Commitments

The following regulations and commitments would be mitigation measures common to all alternatives.

Growth in Air or Noise Pollution Areas

- The Sumner Comprehensive Plan Environment Element contains multiple goals and policies aimed at protecting air quality and reducing noise impacts. This is achieved through air quality impact analysis of new developments, requirements for buffers between busy roadways and schools or residential areas, and conducting noise impact analysis for new developments that could generate substantial levels of noise.
- The Sumner Municipal Code Title 18 (Zoning) establishes zoning and development regulations that govern allowed uses and site development standards, including tree planting and landscaping.
- The Sumner Municipal Code Title 16 (SEPA Procedures and Policies) establishes a framework, consistent with Washington State law, for identifying, analyzing, and if necessary, mitigating

environmental impacts associated with non-exempt development projects and adopting regulations and plans.

- The City enforces the noise ordinance in the Sumner Municipal Code (SMC 18.14).

Growth Targets

- The City of Sumner must meet its designated growth targets per Pierce County Countywide Planning Policies.

MIC Criteria

- With the designation of the Sumner-Pacific Manufacturing/Industrial Center, the Cities of Sumner and Pacific have committed to accommodating significant shares of regional employment growth (planning for at least 20,000 jobs in the area), promoting efficient use of land and provision of infrastructure, and supporting the manufacturing and industrial sectors.
- Puget Sound Regional Council's Centers Criteria guides planning and growth for Manufacturing/Industrial Centers.

Economic Displacement

- Economic Development Element includes goals and policies to promote a strong and diverse economy, home to businesses and industries of all sizes and types and encourages business retention. The policies and implementing regulations encourage a vibrant activity center in downtown and ensure that adequate public services and facilities are available to businesses in Sumner.

4.4.3 Other Potential Mitigation Measures

Growth in Air or Noise Pollution Areas

- All alternatives add population growth to areas in proximity to heavy traffic roadways. The City could pursue a variety of mitigation strategies, such as transit-oriented development, land use buffers, enhanced vegetated screening, or roadside barriers for sound.
- The noise from the train horns could be mitigated with implementation of quiet zones within the West portion of the city. Establishing "quiet zones" needs to meet the Federal Rail Administration (FRA) requirements. The "quiet zone" provides improvements that allow the train to proceed through the at-grade crossing within using the horn, except in emergencies. The minimum requirements for quiet zones are the crossing must have gates, flashing lights, constant warning time devices and power out indicators and the zone must be ½-mile in length as well as have no non-quiet zone crossings within ¼-mile. Multiple crossings can be included in one quiet zone. In addition to the minimum requirements, typically additional safety measures must be installed at the crossings such adding gates in all quadrants of the crossing.

Growth Targets

- No additional potential mitigation measures.

MIC Criteria

- No additional potential mitigation measures.

Economic Displacement

- All alternatives have the possibility for economic displacement. The City could study creating a program to identify and preserve commercial spaces that are suitable for small businesses to ensure that adequate and affordable space is available in Sumner for small, local, and women-and minority-owned businesses.

4.5 Significant Unavoidable Adverse Impacts

Population and employment growth would increase under all alternatives, although the location of residential growth and the extent of that growth varies by alternative. Employment growth and distribution is the same under all alternatives.

Significant unavoidable adverse impacts on population and employment are not expected under any alternative due to the above opportunities for mitigation.

5 Aesthetics

5.1 Introduction

The aesthetics analysis reviews possible impacts of the alternatives on the physical character of Sumner and possible mitigation measures. This chapter includes a range of topics, including urban form, viewsheds, and shadows.

5.2 Affected Environment

5.2.1 Aesthetics-Related Policies, Design Guidelines, and Other Considerations

The adopted Sumner Comprehensive Plan includes a Community Character element.

Several Community Character policies are relevant to analysis of citywide aesthetics:

- **CC 1.1:** Encourage development which enhances the human/pedestrian scale, creating a sense of community and place.
- **CC 1.2:** Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, work places, schools, parks, civic facilities, and community services essential to the daily life of residents.
- **CC 1.3:** Maintain design guidelines that address streetscape, landscape, and building design. Materials and methods of construction should be specific to the region, exhibit continuity of history and culture, be compatible with the climate, protect historic and archaeological resources, and promote the community's character and identity.
- **CC 4.1:** Through street standards, design guidelines and land use regulations, promote all entrances to the City, including Traffic Avenue and Valley Avenue, 166th Street as gateways to the community. The character of the Avenues shall be a boulevard with median or other treatments. Gateway design standards for community entrances shall be applied.
- **CC 5.1:** In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complements the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.
- **CC 6.1:** Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other.

- **CC 7.1:** Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets, pedestrian paths, and bike paths should contribute to a system of fully-connected and interesting routes to all destinations. Street design should encourage pedestrian and bicycle use and discourage high speed traffic.

The City of Sumner has adopted Design and Development Review Guidelines, which implement these aesthetic-related goals and policies, and through the Sumner Municipal Code (SMC) Chapter 18.40 Design and Development Review the guidelines apply to most new development. These are intended to encourage development which enhances the human and pedestrian scale and creates a sense of community and place.

As proposed in the Draft 2024 Comprehensive Plan, several of the City's Community Character policies may change. For example, changes to CC 1.3 are proposed to be more specific about terms such as "community character" and "identity".

Sumner-Pacific MIC

The Sumner-Pacific Manufacturing/Industrial Center (SPMIC) is an important regional warehousing, transportation, distribution, and logistics hub.

Aesthetics-related Comprehensive Plan goals and policies that are specifically relevant to the Sumner-Pacific MIC include:

- **CC 8:** Promote the development of the Manufacturing/Industrial Center (MIC) and ensure integration and compatibility of this area with adjacent neighborhoods and encourage pedestrian and transit connectivity and access.

The cities of Sumner and Pacific also adopted the Sumner-Pacific MIC Subarea Plan (updated 2018) which articulates a vision for the area and provides goals and policies to guide investments. Aesthetic related goals and policies from the Sumner-Pacific MIC Subarea Plan include:

- **SPMIC-2:** New growth in the SPMIC complements the existing character and development pattern.
- **SPMIC-2.1:** Encourage high quality industrial development through the establishment of appropriate performance standards and design guidelines for industrial areas.
- **SPMIC-3.1:** All industrial development should incorporate aesthetically pleasing building and site design. The City shall ensure its codes and performance standards which govern industrial development this policy.
 - Procedures shall be established to ensure aesthetically pleasing building and site design in areas designated for light industrial areas.
 - Appropriate landscaping and site development standards shall regulate site development in heavy industrial areas.
 - Heavy machinery, service entrances, storage areas, rooftop equipment, loading docks, and parking areas shall be screened from view of adjacent retail, commercial, light industrial and residential areas and from public streets.

- Require industrial businesses and development to minimize exterior odor levels to avoid impacts to adjacent residential and commercial land uses. Work with Puget Sound Clean Air Agency to investigate and respond to odor complaints.
- **SPMIC-3.2:** Allow outdoor storage only as accessory to principal use.
- **SPMIC-3.3:** Require landscape buffers between SPMIC and adjacent neighborhoods to reduce noise, light and glare, and visual impacts from industrial activity.

East Sumner Neighborhood

The 2020 East Sumner Neighborhood Plan Update includes a variety of goals and objectives for the 174-acre planning area located in the eastern portion of the City. Aesthetics-related East Sumner Neighborhood Plan goals and objectives include:

- Provide a graceful transition between higher and lower intensity uses.
- Increase tree canopy throughout the neighborhood.
- Provide opportunities to strengthen the sense of community.
- Increase opportunities for community interaction, such as creating gathering places and places for community events.

Town Center

The City's Town Center is a 197-acre planning area that is intended to be a fully functional everyday downtown, while maintaining its small town character.

Aesthetic related Comprehensive Plan policies specific the Town Center include:

- **CC 3.1:** Plan for the downtown as town center and the community core encouraging a combination of commercial, civic, cultural, recreational, and residential uses.
- **CC 3.3:** Continue design review process for new and expanded uses. Any future amendments to the Sumner design guidelines shall include consultation with Sumner Downtown Association, Sumner Historical Society, other civic groups, and residents.

Policies from the 2018 Town Center Plan include:

- **TC 1.3:** The City, should, in partnership with the Sumner Downtown Promotion Association, actively recruit promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in Downtown Center, away from Main Street and Alder Avenue and designated Activity Centers.
- **TC 1.8:** Through the Comprehensive Plan and Zoning Code and form based code, ensure a central role of the historic central business district, and limit competitive uses as appropriate.
- **TC 5.8:** Maintain a high quality and attractive appearance. Work with Sumner Downtown Promotion Association and others to seasonally decorate Downtown with decorations, hanging baskets, light, etc.
- **TC 6.6:** Subject to a form-based code and design review, encourage infill residential development in the Downtown Center, such as "mixed use buildings" (multifamily units above ground-floor

commercial), and “mixed use developments” (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core.

- **TC: 6.9:** Adopt a “form-based code” in the Town Center to ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.
- **TC 6.11:** Development along Traffic Avenue should be in a range of 4-6 stories and be of a mid-rise urban style and provided for underbuilding parking.
- **TC 6.12:** The height in the Historic Subdistrict should be 3-4 stories to protect and preserve the small town character and scale of Main Street and reduce conflicts with adjacent residential uses.

Minor revisions to the Town Center policies for clarity are included in the Draft 2024 Comprehensive Plan.

5.2.2 Urban Form

Citywide

The City of Sumner covers approximately 7.6 square miles of valley lands and is traversed by the White and Puyallup Rivers, as well as State Route 167 and State Route 410 and the Burlington-Northern Santa Fe and Union Pacific rail lines.

The physical character of Sumner varies, including low-density residential areas, strip mall commercial development, mixed-use centers, and an industrial and manufacturing hub (Exhibit 5-1). The city is characterized by large lot industrial development in the north with smaller lot residential and commercial development occurring largely southeast of Traffic Avenue.

As of 2017, the City of Sumner had a total of seven parks, totaling 28.3 acres of parks and open space and more 9.28 miles of multi-use trails.

Exhibit 5-1: Urban Form Across Sumner

Upper left: Large, low rise building with surface parking that is typical of the MIC area; upper right: small businesses typical of the Town Center area; lower left: single family residence; and lower right: Rainier View Park
Source: Google Street View, 2023.

North Portion

The North Portion is characterized by industrial development and is a vehicle-oriented environment. Industrial buildings are generally large, low-rise buildings with large surface parking lots. Streets generally have grassy strips separating the road from the parking lots and contain street trees.

The North Portion is located in the floodplain of the White River, leaving the northeast portion as undeveloped open space.

East Portion

The East Sumner Neighborhood is characterized by low-density residential development in its central neighborhood, though planning in the area anticipates that over time many of these uses will convert to a more diverse mix of uses and intensities. Several multifamily, townhome, and mixed-use development

projects have recently been developed (or are in permitting/construction process) in the East Sumner Neighborhood, indicating increased interest in and viability of multifamily development in the neighborhood.

Commercial development is varied. A pedestrian-oriented commercial center is located near 160th Avenue East and 60th Street East, allowing residents to walk to commercial services. Beyond this center, commercial uses are not required to be pedestrian-oriented. The southeast portion of the neighborhood is automobile-oriented environment, ideal for “big box” retail to take advantage of easy access to State Route 410.

The East Portion is also characterized by extensive wetlands. The “central wetlands,” an extensive wetland and wetland buffer network, are located in the central neighborhood. Salmon Creek runs along the neighborhood’s eastern edge. Because of this, much of this eastern area contains land that is undevelopable or that would present many challenges to develop and therefore is likely to remain as open space.

South Portion

The South Portion is characterized by low-density residential development in a vehicle-oriented environment. There are pockets of multifamily residential, in the form of townhomes and apartments. Street trees are plentiful. The southern border of the south portion is the Puyallup River.

West Portion

The West Portion is characterized by denser development east of the BNSF railroad and a more suburban development pattern along Traffic/Fryar Avenue. The Town Center Plan area largely features sidewalks on both sides of the street, and a tighter pattern of commercial development that fronts directly off of the sidewalk. Buildings are predominantly one to two stories in height. Many buildings in Sumner’s downtown are historic and have brick facades and contain other traditional architectural elements.

Sumner UGA

The Sumner unincorporated UGA includes three main areas with varied urban form. The area to the west is characterized by largely low-density residential development, with pockets of commercial development. State Routes 410 and 167 bound this area. The area to the northeast of the city is characterized by low density residential development, steep hillsides, and land in resource production and extraction as part of the Cava mine site. The UGA area to the south similarly contains low-density residential development, mineral extraction uses, and some agricultural use.

5.2.3 Viewsheds

Sumner has views of Mount Rainier and the shorelines of the Puyallup River and White River. Views of forested hillsides are also present from most areas of the city.

The adopted Comprehensive Plan includes the following goals and policies in relation to viewsheds:

- **CC 1.5:** Encourage in the community a continuous commitment to maintaining Sumner's character and quality of place, including land conservation and stewardship, wise management of streetscapes and public viewsheds, property maintenance, and historic preservation.
- **SMP 2:** Increase public access to the shoreline and preserve and enhance views of the shoreline.

However, changes are proposed to CC 1.5 with the 2024 Comprehensive Plan update to remove the emphasis on viewsheds, as there are no specific public viewsheds in Sumner that are explicitly protected.

5.2.4 Shadows

Shadows play a role in aesthetics because their presence can change the function, look, and feel of public and private spaces. Areas of Sumner with higher densities, taller buildings, and smaller setbacks cast more shadows than lower density areas and low-rise buildings.

The primary building style in the MIC is large, low-rise industrial buildings with large surface parking lots, and therefore there are few shaded areas. Low-density residential development in the East and South Portions of the City also cast few shadows. Denser commercial development with small setbacks in the Town Center (within the West Portion) can cast shadows into the public realm at different points in the day. Elevated portions of State Route 410 and State Route 167 also cast shadows on the streets and space below. Loyalty Park, located in the West Portion, is home to the tallest and the greatest number of trees out of all Sumner's parks, and these large trees can cast shadows into the open space of the park. However, these shaded areas can also provide a refuge from heat.

5.3 Impacts

5.3.1 Thresholds of Significance

Impacts of the alternatives on aesthetics are considered significant if they would:

- Result in disruptions to important city views, such as Mount Rainier.
- Result in additional shadows on public open space.
- Would result in changes to existing scale/bulk transitions.

5.3.2 Impacts Common to All Alternatives

There is population, housing, and employment growth under all alternatives, though amounts and locations of housing growth differ across the alternatives. Employment growth and distribution is the same across all alternatives.

All alternatives direct much of the population and housing growth to the Town Center and East Sumner, with some additional growth targeted in other areas of the city. Additionally, under all alternatives, most of the employment growth (more than 70%) is directed to the Manufacturing Industrial Center (MIC). All alternatives have the potential for an increase in overall building sizes where existing buildings are not currently maximizing the buildable envelope, based on minimum setbacks and maximum lot coverage. Additionally, given recent changes in state law regarding housing, Alternatives 2 and 3 and the Preferred

Alternative may see additional development on residential lots (such as two housing units on a lot or two ADUs per lot).

Views

Citywide

All alternatives would have some impacts on views in Sumner because all alternatives plan for population, housing, and employment growth, which will be reflected by an increase in building area in the city. Alternatives 2 and 3 and the Preferred Alternative have the greater potential to impact views as they result in greater building densities and housing unit allowances than Alternative 1.

North Portion

Under all alternatives, the North Portion is expected to receive a large share of the job growth. Impacts to views could occur as buildings, particularly in the MIC, redevelop or get developed to accommodate increased jobs.

East Portion

Under all alternatives, the East Portion is expected to receive a large share of the housing and some job growth. Impacts to views are expected as a result of redevelopment or development of new buildings and/or housing units.

South Portion

Under all alternatives, there is some housing growth in the South Portion. As a result, some minor impacts to views are expected due to redevelopment or development of new buildings and/or housing units.

West Portion

Under all alternatives, the West Portion is expected to receive a large share of the housing and job growth. Impacts to views are expected as a result of redevelopment or development of new buildings and/or housing units.

Sumner UGA

Under all alternatives, the Sumner unincorporated UGA is expected to receive some housing and job growth. As a result, some minor impacts to views are expected due to redevelopment or development of new buildings and/or housing units.

Shadows

Citywide

All alternatives would have some impacts on shadows in public spaces in Sumner because all alternatives plan for population, housing, and employment growth, which will be reflected as increased building space. Alternatives 2 and 3 and the Preferred Alternative have the greatest potential to cause impacts to shadows as they plan for the greatest building densities, and larger/taller building envelopes.

North Portion

Under all alternatives, the North Portion is expected to receive the majority of employment growth. While no changes to zoning or land use policies to the MIC are proposed, new buildings are likely on some vacant properties and it is possible that buildings in the North Portion redevelop and use their allowable buildable area more fully to accommodate increased employees, which could result in minor shadow impacts. The buildings in the North Portion tend to be lower in height and do not cast large shadows.

East Portion

Under all alternatives, the East Portion is expected to receive a large share of the housing and some of the job growth. As a result, shadow impacts are expected to occur from building development or redevelopment.

South Portion

Under all alternatives, the South Portion is expected to receive a small portion of the housing growth because this area is mostly built out with established single-family residential uses. Some redevelopment could occur on underutilized parcels and some ADU development could occur on lots with existing residences, particularly under Alternatives 2 and 3 and the Preferred Alternative. Minor shadow impacts are expected to occur from building development or redevelopment.

West Portion

Under all alternatives, the West Portion is expected to receive a large share of the housing growth and some of the job growth. Shadow impacts are expected to occur from building development or redevelopment. Existing buildings in the Town Center front directly onto the sidewalk, which casts shadows into the public realm.

Sumner UGA

Under all alternatives, the Sumner unincorporated UGA is expected to receive some housing and job growth. As a result, shadow impacts are expected to occur from building development or redevelopment.

Scale/Bulk Transitions

Citywide

All alternatives are expected to have some impacts on scale/bulk transitions because all alternatives plan for some housing and job growth within the city. Alternatives 2 and 3 have the greatest potential to cause impacts to shadows as they plan for the most housing and job growth, Alternatives 2 and 3 and the Preferred Alternative also plan for the greatest building densities.

North Portion

Under all alternatives, the North Portion is expected to receive the majority of employment growth. While no changes to zoning or land use policies to the MIC are proposed, it is possible that new buildings are built on vacant properties, and some buildings in the North Portion could redevelop to maximize the buildable envelope, which could result in minor bulk and scale impacts.

East Portion

Under all alternatives, the East Portion is expected to receive a large share of the housing growth. As a result, impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

South Portion

Under all alternatives, the South Portion is expected to receive some housing growth. As a result, minor impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

West Portion

Under all alternatives, the West Portion is expected to receive a large share of the housing growth. As a result, impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

Sumner UGA

Under all alternatives, the Sumner unincorporated UGA is expected to receive some housing growth. As a result, minor impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

5.3.3 Alternative 1

Views

Under Alternative 1, Sumner is planning for 1,985 additional housing units and 5,313 additional jobs between 2020-2044. There are no changes to zoning designations or land use policies proposed, meaning that the land uses, densities, and building heights that are currently allowed in Sumner will

continue to be allowed. However, Alternative 1 does assume that some properties may redevelop to utilize the allowable building space more fully. Additionally, a small number of single-family parcels (5%) have capacity for an accessory dwelling unit (ADU), meaning some of these lots may develop out and have a larger lot coverage, which could potentially impact neighbor's views. Generally, Alternative 1 is expected to have the least impact on views out of the alternatives.

Shadows

Under Alternative 1, minimal shadow impacts are expected as there are no proposed code changes that would increase building densities and building heights. However, it is to be expected that some new buildings could be developed on vacant properties, and existing buildings may redevelop to more fully utilize their allowable building space, which could increase shadows in neighborhoods if buildings are closer together than they were previously. Generally, Alternative 1 is expected to have the least impact on shadows out of the alternatives.

Scale/Bulk Transitions

Under Alternative 1, there are no proposed changes to zoning and land use policies, meaning that the land uses, densities, and building heights that are currently allowed in Sumner will continue to be allowed. Minor impacts to bulk could occur from properties redeveloping to utilize their building area more fully or developing an ADU on the property. Some impacts to scale, as growth occurs, are expected under Alternative 1.

5.3.4 Alternative 2

Views

Under Alternative 2, Sumner is planning for 3,000 additional housing units and 5,313 additional jobs between 2020-2044, consistent with Alternative 3. This growth is mainly distributed in East Sumner and Town Center, though some growth is also directed to other areas as middle housing and the Cava gravel mine site. Alternative 2 proposes code and zoning changes to meet updated state housing requirements, which could impact views across the City as these proposed changes would allow increased building densities and increases in the number of housing units allowed per lot in some zones. Alternatives 2 and 3 and the Preferred Alternative would also allow low rise apartments in all MDR and HDR zones, however, height limits will remain consistent.

Additionally, Alternative 2, like Alternative 3 and the Preferred Alternative, updates city regulations to allow two ADUs per lot and to make ADUs more feasible. This means more ADUs may be developed. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to views.

Shadows

Under Alternative 2, there are proposed zoning and code changes that would increase allowable building density and the number of housing units allowed per lot. Some shadow impacts are expected

as a result of these proposed changes as denser buildings cast greater shadows. Additionally, Alternative 2, like Alternative 3 and the Preferred Alternative, allows housing to be developed on vacant land owned by churches in the city, which could cause shadow impacts.

Scale/Bulk Transitions

Under Alternative 2, there would be increases to maximum density allowed in the Medium Density Residential zone and the number of ADUs allowed per lot. These proposed changes have the potential to change the form of existing neighborhoods in Sumner by increasing the number of housing units allowed to develop on a single lot. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to neighborhood form.

Alternative 2, like Alternative 3 and the Preferred Alternative, modifies the Medium Density Residential (MDR) and High Density Residential (HDR) zones to allow low-rise apartments, such as 3 story buildings, in other areas of the city besides just East Sumner. This has the potential for impacts to bulk/scale transitions as it is a change to what is currently allowed and typically being built in those areas of Sumner.

Alternative 2, like Alternative 3 and the Preferred Alternative, allows housing to be developed on vacant land owned by churches in the city. This has the potential to create scale and bulk impacts as it would be new development on vacant land. However, this housing would be required to meet Sumner Municipal Code requirements that address potential aesthetic impacts and to go through the same permit process as senior housing.

5.3.5 Alternative 3

Views

Under Alternative 3, Sumner is planning for 3,000 additional housing units and 5,313 additional jobs between 2020-2044. This is consistent with Alternative 2. Housing growth is mainly distributed in East Sumner and Town Center, with small-scale, moderate density housing distributed throughout the city. Alternative 3 proposes code and zoning changes to meet state housing requirements. Similarly with Alternative 2 and the Preferred Alternative, these code and zoning changes could cause impacts to views across the city as they would allow increased building densities and increases in the number of units allowed per lot. Unlike Alternative 2, Alternative 3 does not propose zoning changes to the Cava gravel mine site, and, resulting impacts to views in the mine site are expected to be lesser under Alternative 3.

Additionally, more ADUs would be expected to be developed under Alternative 3 than the other alternatives, due to changes in city regulations to meet new state requirements, plus additional support for ADU development through pre-approved plan sets and incentives. However, ADUs would still be required to be the same or lower height than the principal unit, minimizing impacts on views.

Shadows

Under Alternative 3, there are proposed zoning and code changes that would increase allowable building density and the number of units allowed per lot. Shadow impacts are expected as a result of these proposed changes as denser buildings cast greater shadows. Additionally, Alternative 3, like

Alternative 2 and the Preferred Alternative, allows housing to be developed on vacant land owned by churches in the city, which could cause shadow impacts.

Scale/Bulk Transitions

Under Alternative 3, like Alternative 2 and the Preferred Alternative, there are increases to the number of ADUs allowed per lot. These proposed changes have the potential to change the form of existing neighborhoods in Sumner by increasing the number of buildings allowed to develop on a single lot. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to neighborhood form.

Alternative 3, like Alternative 2 and the Preferred Alternative, modifies the Medium Density Residential (MDR) and High Density Residential (HDR) zones to allow low-rise apartments in areas of the city outside of East Sumner. This has the potential for impacts to bulk/scale transitions as it is a change to what is currently allowed and typically built in those areas of Sumner.

Alternative 3, like Alternative 2 and the Preferred Alternative, allows housing to be developed on vacant land owned by churches in the city. This has the potential to create scale and bulk impacts as it would be new development on vacant land. However, this housing would be required to meet Sumner Municipal Code requirements that address potential aesthetic impacts and to go through the same permit process as senior housing.

5.3.6 Preferred Alternative

Views

Under the Preferred Alternative, Sumner is planning for 1,985 additional housing units and 5,313 additional jobs between 2020-2044. This is consistent with Alternative 1. Housing growth is mainly distributed in East Sumner and Town Center subareas, with small-scale, moderate density housing distributed throughout the city. The Preferred Alternative proposes code and zoning changes to meet state housing requirements. Similarly to Alternatives 2 and 3, these code and zoning changes could cause impacts to views across the city as they would allow increased building densities and increases in the number of units allowed per lot. Unlike Alternative 2, the Preferred Alternative does not propose zoning changes to the Cava gravel mine site, and, resulting impacts to views in the mine site are expected to be lesser under the Preferred Alternative.

Additionally, the Preferred Alternative, like Alternatives 2 and 3, updates city regulations to allow two ADUs per lot and to make ADUs more feasible. This means more ADUs may be developed. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to views.

Shadows

Under the Preferred Alternative, there are proposed zoning and code changes that would increase allowable building density and the number of units allowed per lot. Shadow impacts are expected as a result of these proposed changes as denser buildings cast greater shadows. Additionally, the Preferred

Alternative, like Alternatives 2 and 3, allows housing to be developed on vacant land owned by churches in the city, which could cause shadow impacts.

Scale/Bulk Transitions

Under the Preferred Alternative, like Alternatives 2 and 3, there are increases to the number of ADUs allowed per lot. These proposed changes have the potential to change the form of existing neighborhoods in Sumner by increasing the number of buildings allowed to develop on a single lot. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to neighborhood form.

The Preferred Alternative, like Alternatives 2 and 3, modifies the Medium Density Residential (MDR) and High Density Residential (HDR) zones to allow low-rise apartments in areas of the city outside of East Sumner. This has the potential for impacts to bulk/scale transitions as it is a change to what is currently allowed and typically built in those areas of Sumner.

The Preferred Alternative, like Alternatives 2 and 3, allows housing to be developed on vacant land owned by churches in the city. This has the potential to create scale and bulk impacts as it would be new development on vacant land. However, this housing would be required to meet Sumner Municipal Code requirements that address potential aesthetic impacts and to go through the same permit process as senior housing.

5.4 Mitigation Measures

5.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 and the Preferred Alternative would mitigate adverse impacts to views, shadows, and scale/bulk transitions.

Views

- Alternatives 2 and 3 and the Preferred Alternative propose changes to ADU regulations only to the extent of new Washington State law requirements. ADUs would still be required to be the same or lower height than the principal unit.
- Alternatives 2 and 3 and the Preferred Alternative do not propose height increases in any zones, except for those required by Washington State law for ADUs.

Shadows

- Alternatives 2 and 3 and the Preferred Alternative require new housing units developed on church property to meet the same Sumner Municipal Code requirements and the same permitting process as senior apartments.
- Alternatives 2 and 3 and the Preferred Alternative do not propose height increases in any zones, except for those required by Washington State law for ADUs.

Scale/Bulk Transitions

- Alternatives 2 and 3 and the Preferred Alternative propose changes to ADU regulations only to the extent of new Washington State law requirements. ADUs would still be required to be the same or lower height than the principal unit.
- Alternatives 2 and 3 and the Preferred Alternative require new housing units developed on church property to meet the same Sumner Municipal Code requirements and the same permitting process as senior apartments.
- Alternatives 2 and 3 and the Preferred Alternative do not propose height increases in any zones, except for those required by Washington State law for ADUs. These alternatives would allow low-rise apartments in MDR/HDR-zoned areas outside of East Sumner, but at the same height as in current code (35 feet).

5.4.2 Regulations and Commitments

The following regulations and commitments apply to all alternatives.

Views

- Sumner's Comprehensive Plan has policies that aim to preserve views in the city.
- The Sumner Municipal Code Title 16 (SEPA Procedures and Policies) establishes a framework, consistent with Washington State law, for identifying, analyzing, and if necessary, mitigating, environmental impacts associated with non-exempt development projects and adopting regulations and plans. Views are a consideration in this review process.

Shadows

- Conditional use review of some uses in certain zoning districts can provide the City an opportunity to require site-specific mitigation if compatibility between land uses is a concern.
- Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues by placing buildings further apart and improving privacy.

Scale/Bulk Transitions

- Sumner Comprehensive Plan Community Character Element and Sumner Municipal Code have existing policies and regulations that mitigate impacts on urban form, community character, and lighting. See 5.2 Affected Environment for the specific policies.
- Sumner Municipal Code (Title 18) establishes zoning and development regulations that govern uses, building and site design, and land use compatibility. Title 18 also includes Design and Development Guidelines (SMC 18.40) and Required Landscaping and Open Space (SMC 18.41) requirements for different types of new development.
- Conditional use review of some uses in certain zoning districts can provide the City an opportunity to require site-specific mitigation if compatibility between land uses is a concern.

5.4.3 Other Potential Mitigation Measures

- All alternatives are expected to cause some adverse impacts to views, shadows, and scale/bulk. Sumner could require areas with higher building heights to have upper-story setbacks, which could help to minimize shading, impacts to views, height, and bulk.
- Sumner could require additional landscaping on major streets, beyond citywide requirements, to screen development and improve the pedestrian experience.

5.5 Significant Unavoidable Adverse Impacts

Under all alternatives, additional growth would result in impacts on the built form across Sumner. Development associated with growth has the potential to cause impacts to views, shadows, and scale/bulk transitions. This is especially true for Alternatives 2 and 3 and the Preferred Alternative due to increases in the number of housing units allowed on LDR lots, increased density in the MDR zone, and changes to allowed building types in MDR and HDR zones. These impacts are to be expected as Sumner continues to grow. With the application of mitigation measures, there are no significant unavoidable adverse impacts on views, from shadows, or on scale/bulk transitions expected.

6 Housing

6.1 Introduction

The purpose of this section is to describe current and forecast housing conditions and analyze the alternatives for consistency with state housing requirements and potential residential displacement impacts.

6.2 Affected Environment

6.2.1 Current Policy and Regulatory Framework

Housing in Sumner is influenced by the current policy and regulatory framework, which stems from the Washington State Growth Management Act (GMA), Puget Sound Regional Council (PSRC) Multicounty Planning Policies (MPPs), the Pierce County Countywide Planning Policies (CPPs), and the city's adopted Comprehensive Plan, Shoreline Master Program, and Development Regulations. The City also completed a Housing Action Plan in 2021 to assess and address housing affordability and community needs. See Chapter 3: Land Use for more detail on the overall planning framework.

Washington State Growth Management Act

The GMA includes a goal promoting housing variety and affordability:

(4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

The GMA also requires a housing element of the comprehensive plan. House Bill (HB) 1220 added new requirements for the housing element in 2021 regarding racially disparate impacts, special housing needs, and planning for housing for all income levels.

Sumner and other jurisdictions planning under the GMA are now required to:

- Include a statement of goals, policies, objectives, and provisions for “middle housing” or moderate-density housing (for example, duplexes, triplexes, and townhomes)
- Identify policies that result in racially disparate impacts, displacement, and exclusion in housing, and implement policies that address and begin to undo these impacts. See *Displacement Risk* below and

Appendix B for additional analysis on racially disparate impacts, displacement, and exclusion in housing.

- Allow permanent supportive housing, transitional housing, emergency housing, and emergency shelters with limited restrictions.
- “Plan for and accommodate” housing affordable to all income bands. The City must determine whether zoning and available land can accommodate 2044 housing growth targets for all income levels, adjust accordingly, and reduce barriers to housing production and affordability. Pierce County adopted housing targets in 2023, including the target for the City of Sumner (Exhibit 6-1).

Exhibit 6-1: Pierce County Adopted Housing Targets - Sumner

	Total	0-30% AMI Non- PSH*	0-30% AMI PSH*	30-50% AMI	50-80% AMI	80-100% AMI	100- 120% AMI	>120 % AMI	Emergency housing needs (beds)
<i>Estimated Supply (2020)</i>	4,492	73	0	445	1,334	1,049	518	1,073	0
<i>Allocation (2020-2044)</i>	1,985	256	347	368	291	125	114	484	121

Source: Pierce County Ordinance No. 2023-22s, 2023.

*PSH refers to Permanent Supportive Housing, which is defined in RCW 36.70A.030(16) as “non-time-limited housing for persons with disabling conditions who have experienced homelessness or risk of homelessness and are offered voluntary supportive services aimed at assisting the client in maintaining the terms of their lease agreement.”

Other State Housing Requirements

Other recent changes to state housing requirements include House Bill 1110, House Bill 1337, E2SHB 1998, and ESSSB 5258.

HB 1110 passed in 2023 with the intent to increase middle housing in areas traditionally dedicated to single-family detached housing and address regional housing challenges. See Exhibit 6-2 for examples of middle housing types. Based on Sumner’s size and location, HB 1110 requires the City to allow at least two units per lot on all lots zoned predominantly for residential use. To comply with HB 1110, Sumner would need to adjust maximum densities and allow unit types with two units in these zones, such as duplexes. HB 1110 also dictates that standards for middle housing, such as permit processes and development regulations, may not be more restrictive than those for single-family homes.

Exhibit 6-2: Middle Housing Types

Source: Washington State Department of Commerce 2023; MAKERS 2023.

HB 1337 also passed in 2023 with the intent to expand housing units through accessory dwelling units (ADUs). In Sumner, HB 1337 requires the City to allow at least two ADUs per lot. HB 1337 also places limitations on how the City can regulate ADUs, regarding size, owner-occupancy, parking, design, conversion of existing structures, and allowing ADUs to be sold as condominiums.

Other bills of note include E2SHB 1998 on co-living and ESSSB 5258 on unit lot subdivisions. The City must allow co-living as a permitted use on any lot that allows at least six residential units. The co-living requirements take effect December 31, 2025 and are not included with Sumner's comprehensive plan periodic update. The unit lot subdivision requirements are due with the periodic update and Sumner already meets the requirements through its fee-simple zero lot line subdivision code, previously implemented based on recommendations from the 2021 Sumner Housing Action Plan.

Puget Sound Regional Council VISION 2050

VISION 2050 provides a regional growth strategy for King, Pierce, Snohomish, and Kitsap Counties that allocates growth to geographies including metropolitan cities, high-capacity transit communities, and others. Sumner is identified as a high capacity transit (HCT) community in VISION 2050. VISION 2050 emphasizes locating growth near high-capacity transit, both existing and planned, and includes a goal for 65% of the region's population growth to be in regional growth centers and within walking distance of high-capacity transit.

VISION 2050 also includes a housing goal and 12 supporting MPPs:

Housing Goal: *The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.*

Pierce County Countywide Planning Policies

Pierce County adopted updated CPPs in 2022, with revisions to the housing targets in June 2023. Pierce County's updated CPPs are consistent with the MPPs and PSRC's Regional Growth Strategy. The CPPs include policy emphasis on supporting homeownership opportunities, addressing displacement, reducing land costs for affordable housing, and identifying opportunities for infill housing. Pierce County consulted with the cities and towns in adopting the targets (including housing, population, and job growth). The adopted targets are found in Appendix A of the Pierce County Countywide Planning Policies (CPPs), with revised housing targets in Ordinance 2023-22s. 2044 targets represent new growth above a 2020 baseline (Exhibit 6-1).

Sumner Comprehensive Plan

The adopted Comprehensive Plan includes a Housing Element with four goals and 44 supporting policies. Goals include:

1. *Encourage the maintenance and preservation of existing housing stock and residential neighborhoods*
2. *Provide a range of housing types for all life stages and economic segments of the Sumner community.*
3. *Encourage energy efficiency in housing developments.*
4. *Provide for a variety of housing types and densities in the town center in close proximity to the train station.*

Proposed changes to these goals in the 2024 Comprehensive Plan update include rewording of goal 1 to focus on public and private reinvestment in older residential neighborhoods and private rehabilitation of housing, and two new goals:

5. *Support high density multifamily development and apartments in key locations in East Sumner Neighborhood Plan area.*
6. *Prevent and mitigate residential displacement through tenant protections and existing programs.*

Sumner Housing Action Plan

Sumner and Bonney Lake collaborated on a Housing Action Plan (HAP), adopted in 2021, to better understand and address community needs relating to housing. House Bill (HB) 1923 introduced the framework and funding for cities to opt-in to develop a HAP. The HAP focused on topics including preserving rental housing, incentivizing new rental housing, reducing the cost of development, improving permit processing, providing a wider variety of housing types and preventing and mitigating displacement. Sumner especially focused on workforce and senior housing.

Sumner identified an overall goal for the HAP:

The City of Sumner's goal is to provide a realistic picture of affordable housing in Sumner, including an understanding of demographics and economics. It should engage the community and provide a clear picture to the Council and the community of affordable housing issues and provide solutions.

6.2.2 Current Conditions

Households

According to the United States Census, there were approximately 4,317 households in Sumner in 2020, an 8.5% increase since 2010 (Exhibit 6-3). 30.4% of households include at least one child and 31.1% of households include at least one person 65 years old or older. 30.1% of households are single-person households, 46.9% two to three persons, and 23.0% have four or more persons.

Exhibit 6-3: Household Characteristics and Trends

	2010	Share of Households	2020	Share of Households	Percent Change 2010-2020
Number of households	3,980	100.0%	4,317	100.0%	8.5%
Average household size	2.37	-	2.46	-	2.8%
Households with one or more people 18 years and younger	1,266	31.8%	1,314	30.4%	3.8%
Households with one or more people 65 years and over	1,072	26.9%	1,342	31.1%	25.2%
Single-person households	1,260	31.7%	1,301	30.1%	3.3%
Householder over age 65	531	13.3%	552	12.8%	4.0%
Households with 2-3 persons	1,907	47.9%	2,025	46.9%	6.2%
Households with 4+ persons	813	20.4%	991	23.0%	21.9%

Source: US Census Bureau, 2010 and 2020.

Household Size

The average household size has stayed relatively consistent over the past 10 years, at 2.46 in 2020 compared to 2.37 in 2010. Sumner's average household size is smaller than Pierce County's at 2.71 in 2020. According to PSRC, the average household size is expected to decrease to 2.33 in Sumner by 2044.

Single-person households make up an estimated 30.1% of households in Sumner as of 2020. This share has decreased from 31.7% in 2010. These households may be best served by smaller units, studios, or one-bedroom housing units. Households with two to three persons make up a larger proportion of households (46.9%) in Sumner based on 2020 estimates (Exhibit 6-3). This share has decreased from 47.9% in 2010.

Larger households (four or more persons) make up an estimated 23.0% of households as of 2020. This share has increased from 20.4% in 2010. Larger households can be more difficult to accommodate due to the affordability and availability of larger units. According to 2022 estimates from the American Community Survey, approximately 12.8% of occupied housing units in Sumner have four or more bedrooms.

Older Adults

The proportion of households with residents over age 65 has increased over time, from 26.9% in 2010 to 31.1% in 2020. The proportion of older adults living alone has decreased from 13.3% of households to 12.8%.

An estimated 15.3% of the 2022 Sumner population is over the age of 65. This is slightly higher than the share of over 65 residents in Pierce County overall (14.2 percent). The Washington Office of Financial Management projects that the percentage of the Pierce County population over age 65 will grow to 21.5% by 2045.

Local assisted living and adult family homes in Sumner include the following:

- Franklin House, 5713 Parker Road
- Mountain View Adult Family Home, 15922 66th St East
- Stafford Suites, 15519 62nd St East
- Sumner Cottage, 209 Mountain Circle Drive
- Sumner Meadows, 7417 166th Ave East
- Memory Haven Sumner, 5107 Parker Rd East

Homelessness

The Pierce County Homeless Point-in-Time Count 2023 found that seven individuals had last reported zip codes in Sumner. The total count for Pierce County was 2,148 people experiencing homelessness, including sheltered and unsheltered individuals. However, the Point-in-Time Count has limitations: the County estimated that 6,500 individuals were connected to their homeless crisis response system during the same time period.

Pierce County Countywide Planning Policies include estimates of existing emergency shelter and permanent supportive housing units, as well as future targets. County estimates suggest that Sumner has no existing emergency shelter beds or permanent supportive housing units. Between 2020 and 2044, Sumner's assigned target is 121 emergency shelter beds and 347 permanent supportive housing units.

There are several agencies in the Sumner area that provide housing for households with low incomes or experiencing homelessness. This includes:

- Helping Hand House, based in Puyallup, serves families in Pierce County experiencing or at risk of homelessness with housing relocation and stabilization, emergency housing, transitional housing, and permanent supportive housing.
- Catholic Community Services Family Housing Network serves families with low incomes experiencing homelessness in Pierce County with a shelter program, day center, rental assistance, transitional housing, and other support services.
- Mi Casa, based in Edgewood, provides affordable housing for people with low incomes.

Disability

The American Community survey estimates that 13.0% of Sumner residents have one or more disabilities. This is slightly lower than the countywide estimate of 13.3%. Disabilities can be sensory, physical, or mental, and may or may not affect one's ability to care for oneself, go outside of the home, or work. People of all ages can have disabilities, but older adults (over 65) may be more likely to have disabilities due to the health impacts of aging. Sumner's proportion of older adults is also higher than that of the county (see *Older Adults* above).

Group Quarters

The group quarters population includes all Sumner residents not living in a housing unit and instead living in a group living arrangement managed by an organization. Group quarters include correctional facilities, juvenile facilities, nursing facilities, military quarters, and student housing. 2020 Census data shows 37 Sumner residents in nursing or skilled nursing facilities and 66 residents in "other" noninstitutional facilities, for a total group quarters population of 103. This number does not include assisted living. Franklin Place and Stafford Suites assisted living are estimated to have about 132 units total.

Household Income

Sumner's median household income in 2022 was estimated at \$83,285, about 9% lower than the median income for Pierce County overall (\$91,486).

Exhibit 6-4: Median Household Income (2022)

	Sumner	Pierce County
Median household income	\$83,285	\$91,486

Source: ACS 5-year Estimates, 2022.

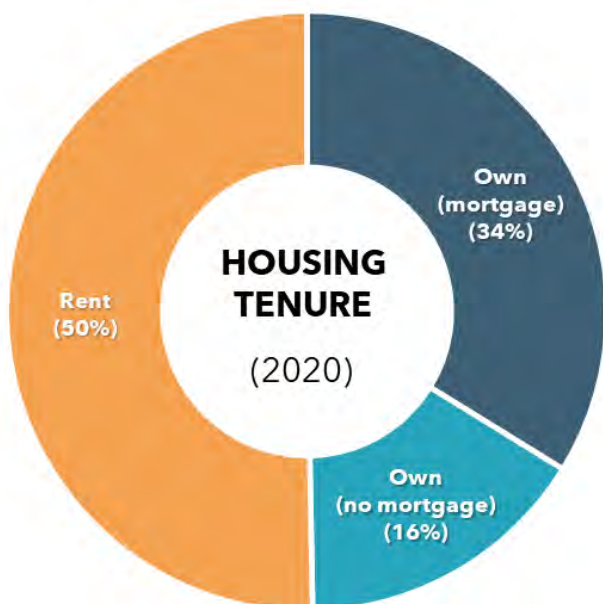
Housing Tenure

About half of Sumner residents rent their homes and about half own their homes (Exhibit 6-5). This split is consistent with 2015 conditions (Exhibit 6-6).

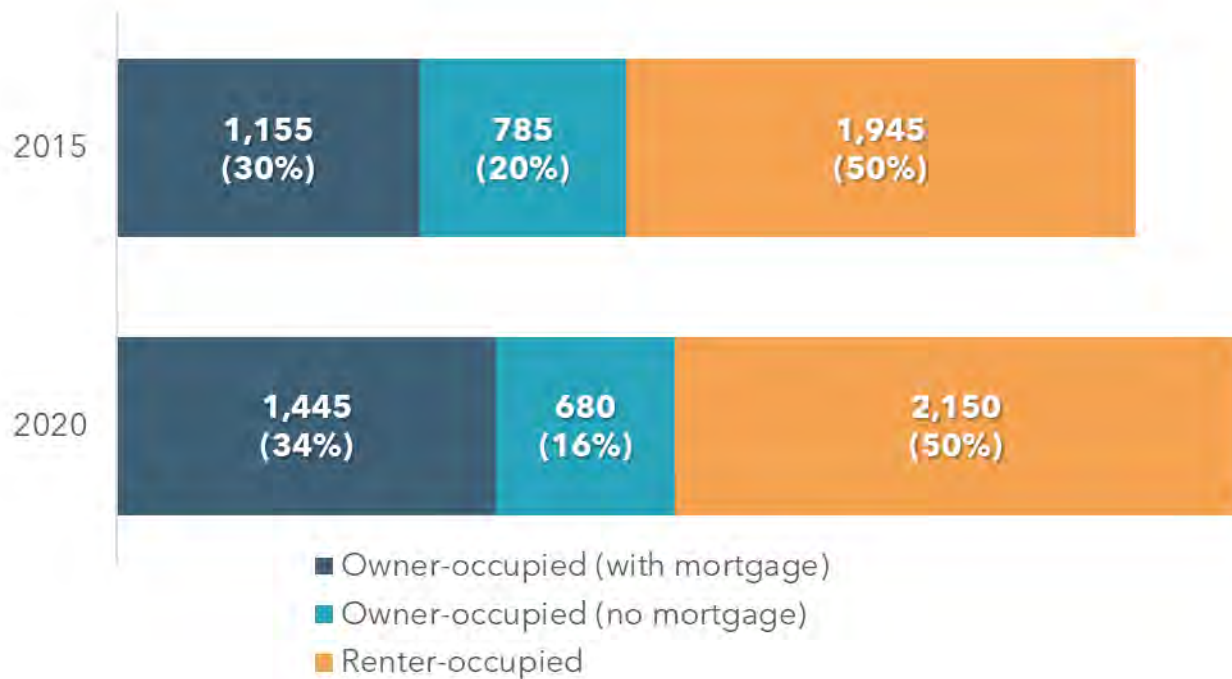
In 2020, an estimated 34% of households own their home with a mortgage and 16% own their home with no mortgage. The percentage of households with a mortgage has increased from 30% in 2015.

Approximately 54% of renter households and 28% of owners have incomes below 80% of the area median (Exhibit 6-7). 16% of renter households and five percent of owners have incomes below 30% of the area median income.

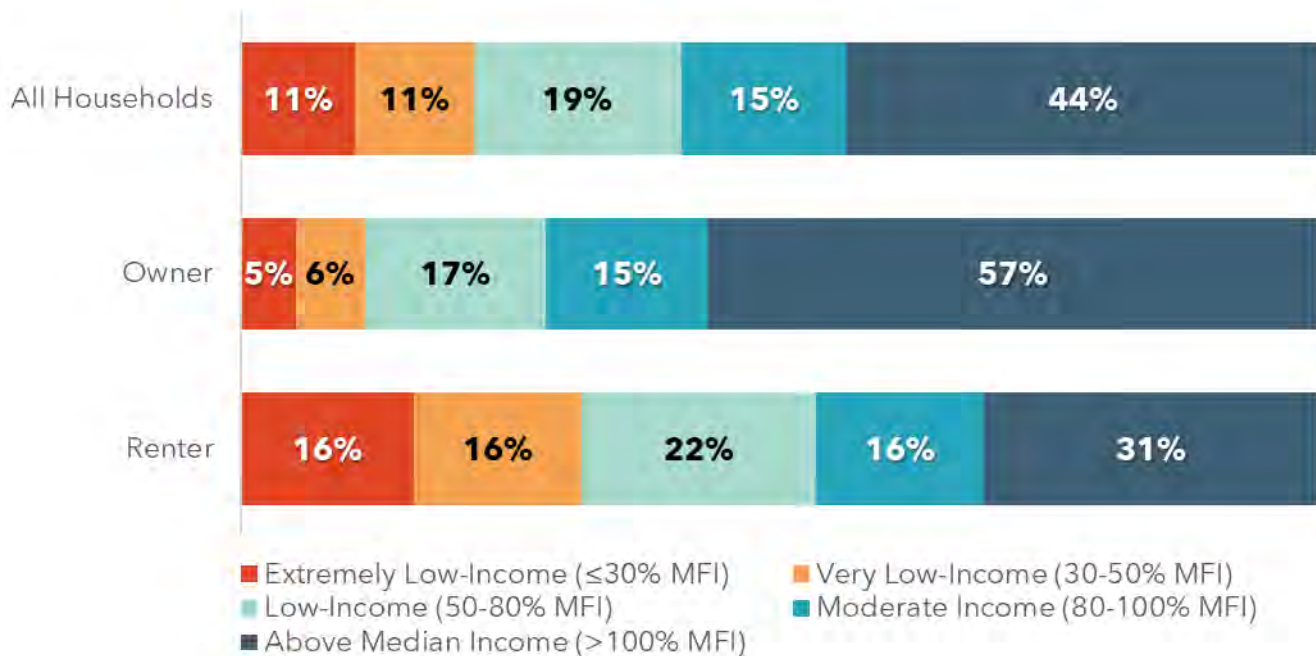
Exhibit 6-5: Housing Tenure (2020)



Source: CHAS Table 15A/B/C, 2020.

Exhibit 6-6: Housing Tenure 2015-2020

Source: CHAS Table 15A/B/C, 2020.

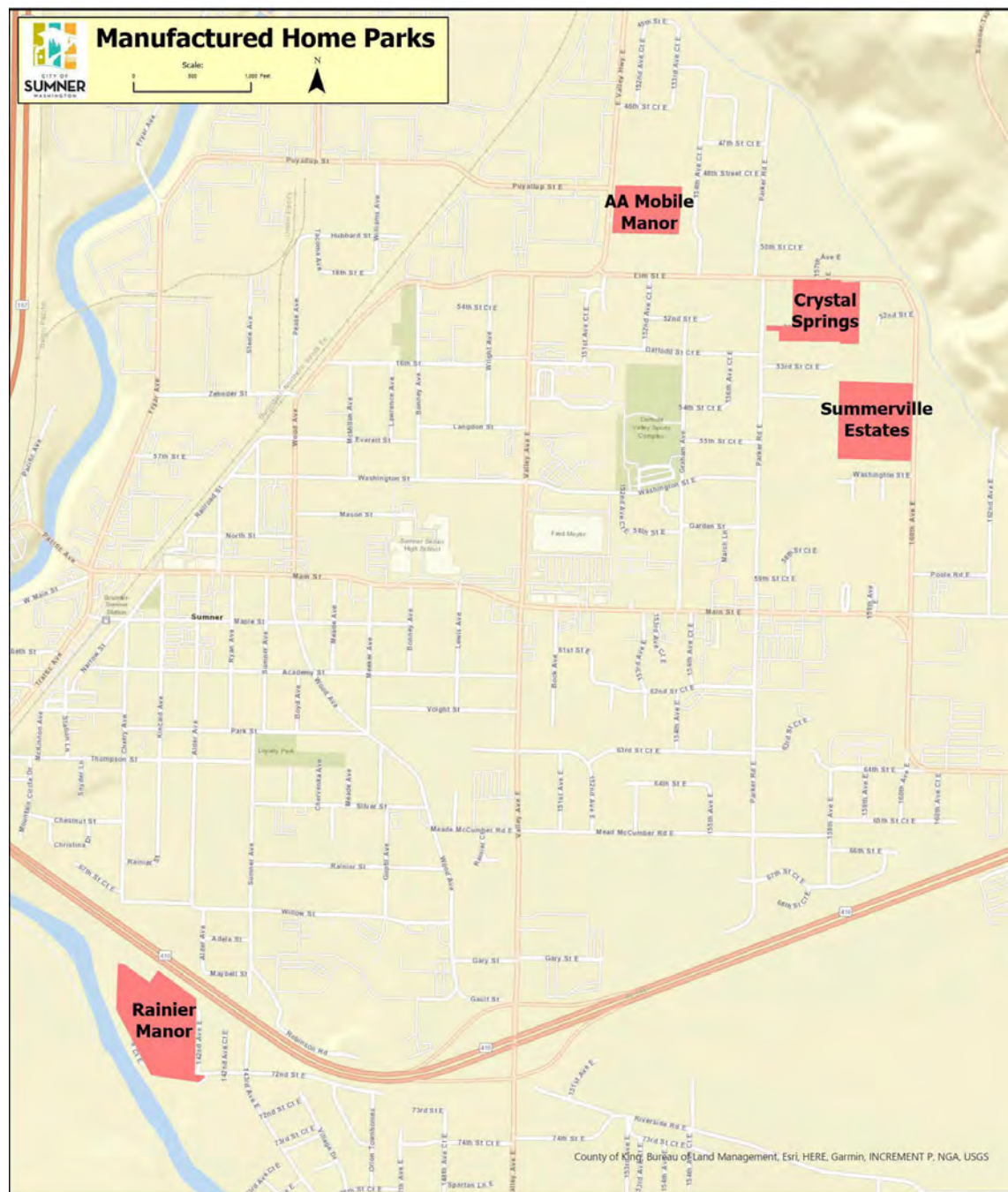
Exhibit 6-7: Housing Tenure by Income

Source: CHAS Table 8, 2020.

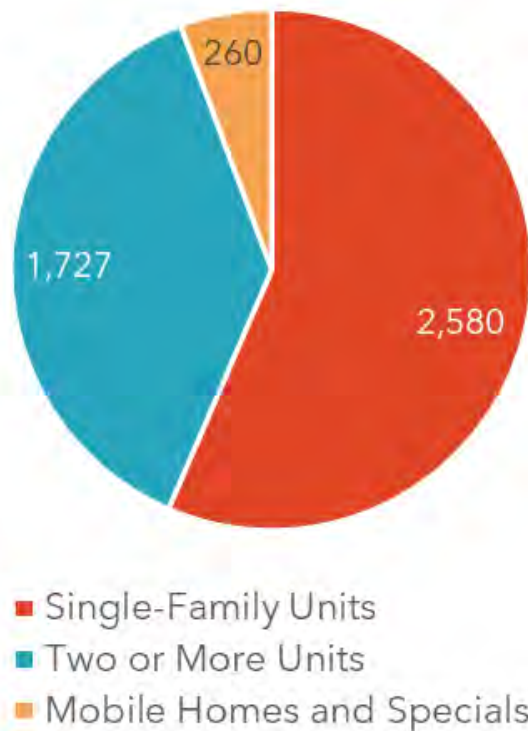
Housing Stock

According to the Washington Office of Financial Management, there are an estimated 4,567 housing units in Sumner. This includes 2,580 single family units (56.5 percent), 1,727 multifamily units (37.8 percent), and 260 mobile home and specials (5.7 percent) (see Exhibit 6-9). There are four manufactured home parks in Sumner (Exhibit 6-8).

Exhibit 6-8: Manufactured Home Parks in Sumner



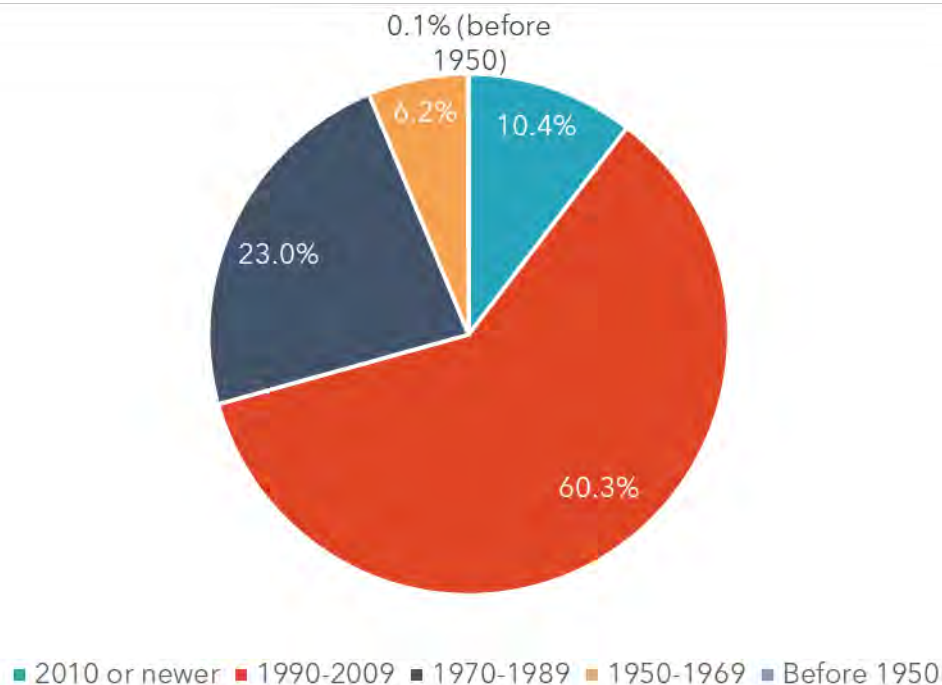
Source: City of Sumner, 2024.

Exhibit 6-9: Housing Stock by Unit Type (2023)

Source: Washington State Office of Financial Management, April 1 estimates, 2023.

Age of Housing

Per Pierce County Assessor data (2023), approximately 60.3% of units in Sumner were built between 1990 and 2009. Only 10.4% were built since 2010 and 29.3% were built before 1990 (Exhibit 6-10).

Exhibit 6-10: Age of Housing

Source: Pierce County Assessor, 2023.

Existing Housing Conditions

According to American Community Survey estimates (5-year, 2021), there are no units in Sumner without complete plumbing facilities, but there are 116 units (2.7 percent) lacking complete kitchen facilities and 25 units (0.6 percent) with no telephone service available. 1.9% of units are considered to be overcrowded, with more than one occupant per room. 96.4% of units are heated with utility gas or electricity, with 3.6% heated with other sources such as fuel oil, kerosene, bottled gas, or wood.

Vacancy Rates

The 2020 Census estimates the homeowner vacancy rate in Sumner is 0.7% and the rental vacancy rate is 3.4%. Countywide, the homeowner vacancy rate is 1.0%, and the rental vacancy rate is 5.5%.

The national vacancy rate for metropolitan areas was around 5.7% for rentals and 0.8% for homeownership in 2022 (according to the US Census Bureau). Vacancy rates below four percent are considered low and tend to indicate economic distress in the market, a recession, or a lack of available housing units to serve the population.

Housing Costs

Per recent sales information (Zillow Home Value Index), the estimated average home value in Sumner is \$544,455 as of August 31, 2023, a decrease of 2.9% over the past year. However, values have risen

overall over the past five years: compared to August 2023, the average home value in August 2019 was \$382,391.

According to 2021 American Community Survey estimates, approximately 47.8% of Sumner's housing units are renter-occupied and 52.2% are owner-occupied. Approximately 70.0% of owner-occupied units have a mortgage. The median gross rent was \$1,627 per month for renters, with 41.2% of units having a gross rent under \$1,500 per month, and 24.2% of rental units with a gross rent over \$2,000.

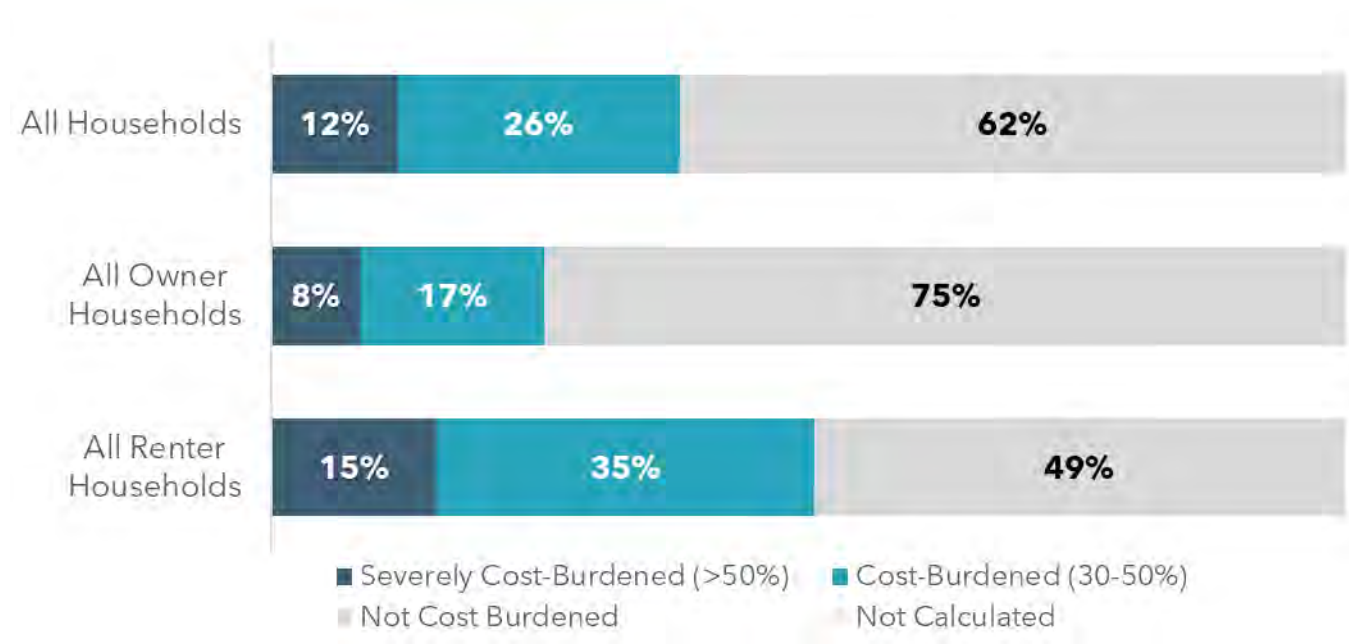
Housing Cost Burden

A household is considered housing cost-burdened if they pay more than 30% of their annual income on housing costs. They are considered severely housing cost-burdened if more than 60% of their income goes to housing. These households may have difficulty affording necessities such as food, clothing, transportation, and medical care. The U.S. Census provides data on gross rent and monthly owner housing costs as a percentage of household income. HUD also provides housing affordability data to describe housing cost burden.

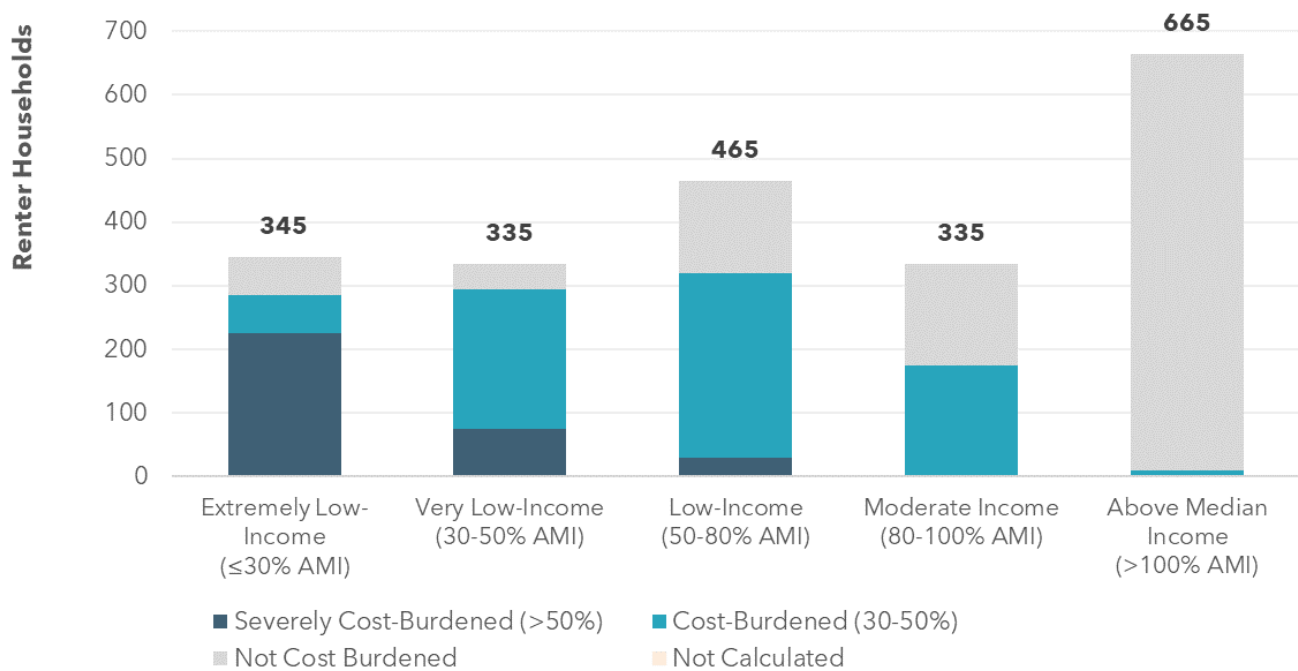
In 2020, approximately 26% of households in Sumner were housing cost-burdened and 12% were severely cost-burdened (CHAS 2020). These rates were higher for renter households than owner households, with 35% of renters cost-burdened and 15% severely cost-burdened (Exhibit 6-11).

Sumner has higher cost-burden rates than Pierce County. In Pierce County, approximately 33% of households were cost-burdened or severely cost-burdened in 2020.

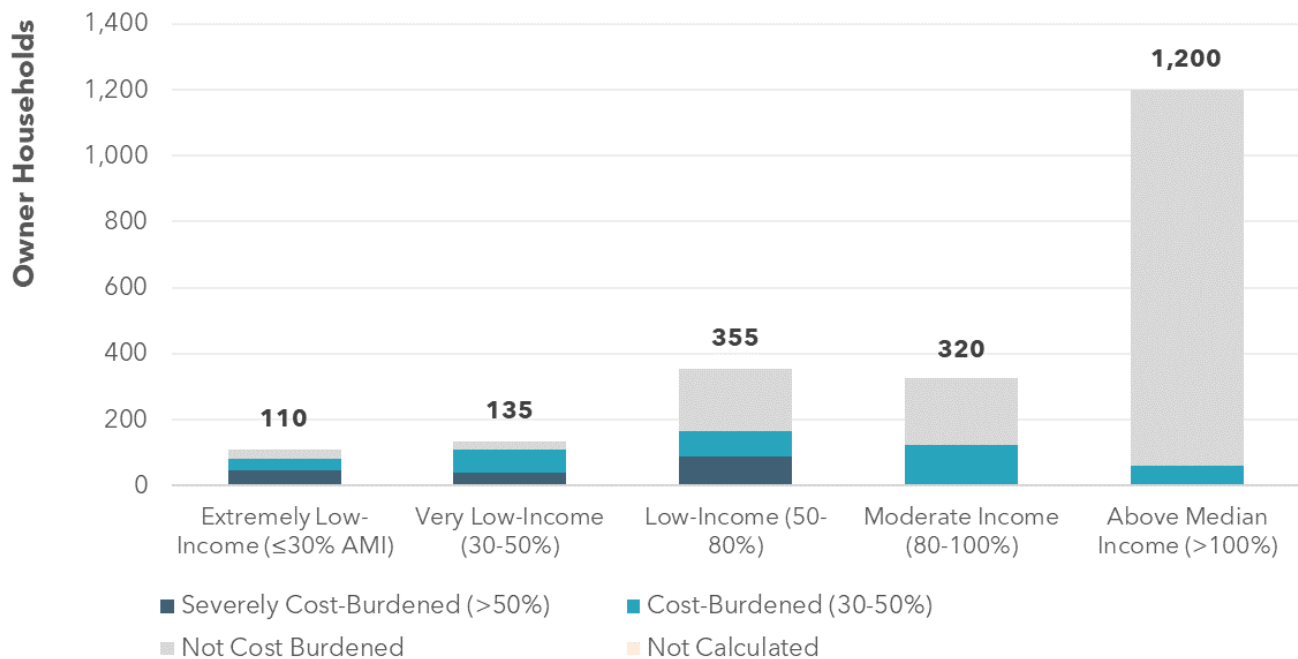
When considering income level, the majority of renter households making less than 100% AMI are cost-burdened or severely cost-burdened (Exhibit 6-12). Severe cost burden is especially prevalent in renters making less than 30% AMI. The majority of homeowner households making less than 50% AMI are also cost-burdened or severely cost-burdened (Exhibit 6-13)

Exhibit 6-11: Housing Cost Burden by Tenure (2020)

Source: CHAS Table 8, 2020.

Exhibit 6-12: Housing Cost Burden by Income: Rental Households (2020)

Source: CHAS Table 8, 2020.

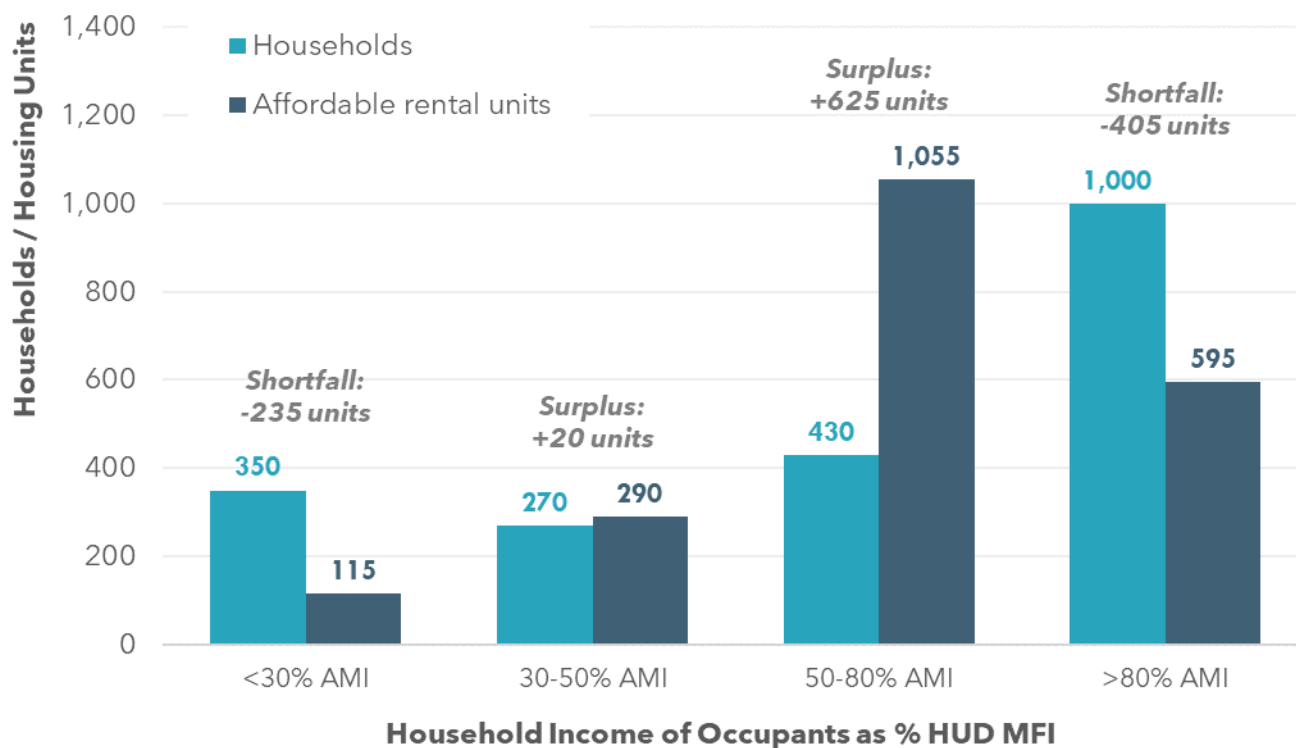
Exhibit 6-13: Housing Cost Burden by Income - Owner Households (2020)

Source: CHAS Table 8, 2020.

Affordability Gap

Based on housing affordability data from HUD, Sumner has a gap in housing for renters making less than 30% median family income (MFI) (Exhibit 6-14). This shortfall is estimated at 235 housing units.

A gap is also shown for renters making more than 80% MFI, however, the surplus for units affordable to 50-80% MFI may be able to fill that gap as higher income renters “down-rent” those more affordable units. As the city grows, these gaps are likely to change depending on the affordability of new housing.

Exhibit 6-14: Rental Affordability Gap (2020)

Source: CHAS Tables 8/14B/15C, 2020.

The National Association of Home Builders / Wells Fargo Housing Opportunity Index (HOI) identifies “the share of homes sold in that area that would have been affordable to a family earning the local median income, based on standard mortgage underwriting criteria” (NAHB 2023). For the Tacoma-Lakewood area in Q2 2023, the HOI estimates that the median home price was \$415,000 and 36.9% of homes were affordable to those earning median family income, estimated by the index to be \$108,900. The HOI has decreased substantially over the past ten years: in Q4 2013, 79.8% of homes were estimated to be affordable to a family earning the median income.

As described above in Exhibit 6-1, Pierce County has adopted housing targets by income band to meet projected housing needs in 2044. Approximately 49% of the unit target is for incomes under 50% AMI, suggesting an existing undersupply of units at this affordability level.

Displacement Risk

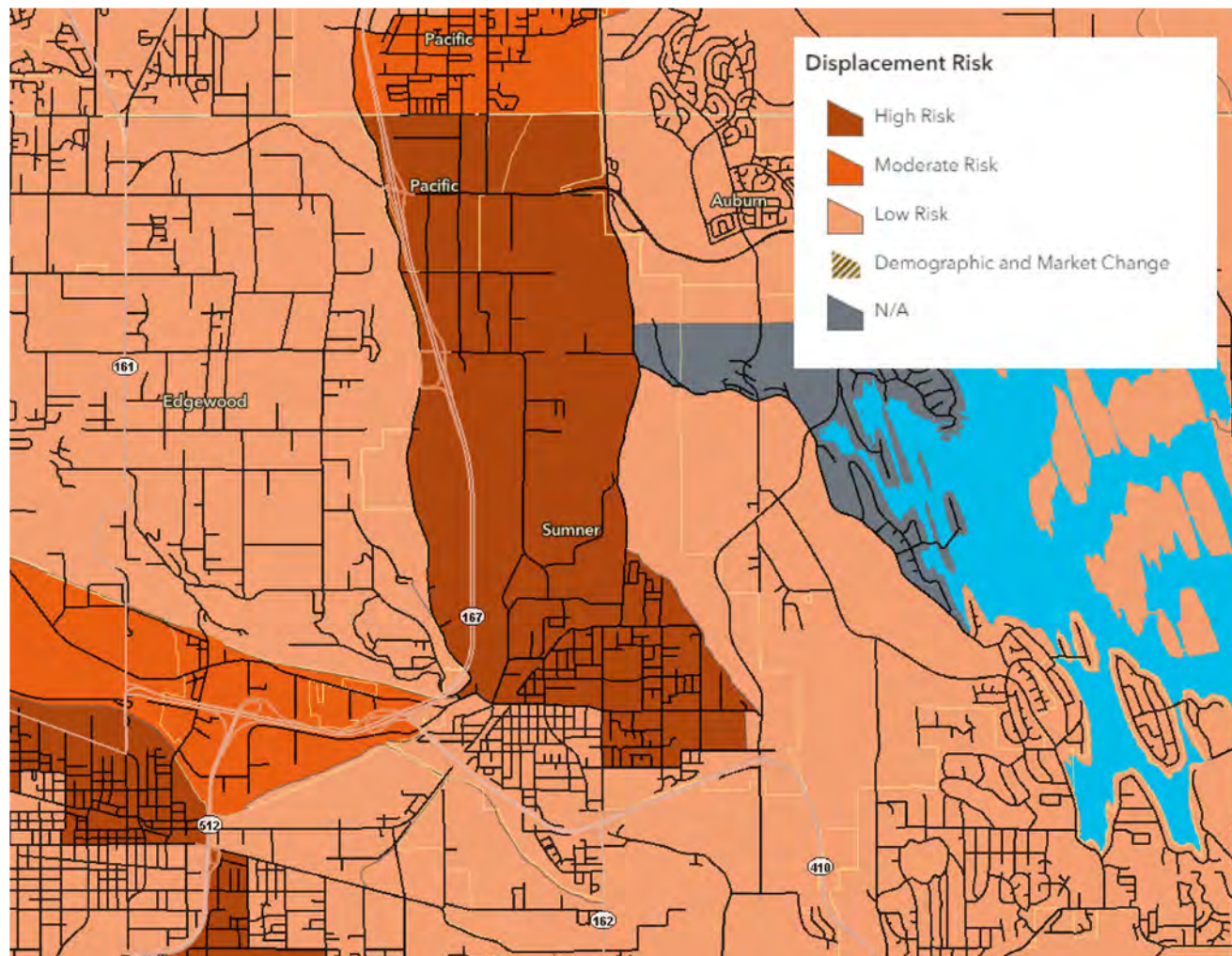
Displacement is defined by the Washington State Department of Commerce as, “The process by which a household is forced to move from its community because of conditions beyond their control”. This can include physical displacement, which could include eviction, foreclosure, natural disaster, or deterioration in housing quality; economic displacement, when households are compelled to move by rising housing costs; or cultural displacement, where residents “are compelled to move because the people and institutions that make up their cultural community have left the area.”

Commerce has developed a draft displacement map for all Census tracts in Washington State (Exhibit 6-15). Most of Sumner is shown as high risk (Census Tract 733.01), generally north of Main Street and west of East Valley Highway East, and north of Meade McCumber Road east of Valley Avenue. All other areas of Sumner are described as low risk.

The draft map also includes indicators that suggest that the north tract's demographic distribution could make it more vulnerable to displacement risk, that gentrification is actively occurring, that the housing market is accelerating, and that costs are rising in this area.

While the Sumner Town Center is shown as low risk for displacement, the southeast part of the area is likely to see development of some single-family dwellings due to new Town Center zoning that allows for higher densities. For this reason, despite the area not being shown on the Commerce map, the city considers this a high risk area for displacement.

Exhibit 6-15: Washington Department of Commerce Draft Displacement Risk Map 2023



Source: Washington State Department of Commerce 2023; BERK, 2023.

6.3 Impacts

6.3.1 Thresholds of Significance

Impacts of the alternatives on housing are considered significant if they would:

- Fail to meet state requirements for middle housing (HB 1110), accessory dwelling units (HB 1337), or planning for and accommodating housing at all income levels (HB 1220), including permanent supportive housing (PSH) and emergency housing
- Increase risk for involuntary residential displacement

6.3.2 Impacts Common to All Alternatives

All alternatives assume an increase in housing over the 20-year planning period. Alternative 1 and the Preferred Alternative plan for 1,985 housing units above 2020 conditions while Alternatives 2 and 3 plan for 3,000 units above 2020 conditions. All alternatives distribute housing growth differently throughout the city, though all place a similar number of units in the Town Center (938 to 1,002 units, in addition to units already permitted or in the pipeline since 2020). Alternative 1 continues forward the city's existing plans and policies while Alternatives 2 and 3 and the Preferred Alternative modify policies to meet new state requirements and provide land capacity for housing at all income levels.

State Requirements

HB 1220

Alternative 1 does not meet HB 1220 requirements for planning for and accommodating housing at all income levels, and to address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Alternatives 2 and 3 and the Preferred Alternative include new policies and regulations to comply with the new requirements. Alternative 1 does carry forward adopted regulations for permanent supportive housing, transitional housing, emergency housing, and emergency shelters, which respond to requirements in HB 1220. However, Alternatives 2 and 3 and the Preferred Alternative better align with the state guidance on spacing and occupancy restrictions.

Analysis of capacity under the three alternatives followed the methods recommended by Washington State Department of Commerce Guidance. Pierce County Buildable Lands Report data (2020) was used as the basis for the capacity analysis and was updated to reflect recent development data. Zones were categorized based on their most likely income level served, based on densities and housing types allowed. Generally, higher density zones were presumed to be more likely to serve lower incomes than lower density zones. Based on the actual affordability of recent housing development in Town Center and East Sumner, capacity in those areas, though it allows for multifamily housing, was assumed to be affordable to 100% Area Median Income and higher. Other areas of the city assumed the following affordability of different housing types (Exhibit 6-16):

Exhibit 6-16: Housing Types and Zones by Income Band

Zone Category	Housing Types Allowed	Lowest Income Level Served
Low Density	Detached single-family homes	Higher Income (>120% AMI)
Moderate Density	Duplexes and other middle housing types	Moderate Income (>80-120% AMI)
Low-Rise	Apartments up to three stories	Low-Income (0-80% AMI) and PSH
Mid-Rise	Apartments greater than three stories	Low-Income (0-80% AMI and PSH)
ADUs (All Zones)	Accessory dwelling units on developed residential lots	Low-Income (>50-80% AMI)

Source: Washington State Department of Commerce, 2023.

Note: These assumptions are based on Commerce guidance for “moderate-cost communities.”

Capacity analysis findings are shown in Exhibit 6-17. Highlighted in red is the capacity for 0-80% AMI housing in Alternative 1, which falls significantly short of the need (estimated capacity for 165 units compared to the estimated need of 1,262 units). Alternatives 2 and 3 and the Preferred Alternative, in contrast, show sufficient capacity to meet the need for this aggregated income category. There is sufficient capacity under all alternatives for the housing needs for households with incomes above 80% AMI.

Exhibit 6-17: Housing Needs and Capacity by Income Band

	Projected Housing Need (2020- 2044)	Estimated units permitted / in pipeline since 2020	Remaining housing need (2023- 2044)	Aggregated need	Alternative 1 Capacity	Alternative 2 Capacity	Alternative 3 Capacity	Preferred Alt Capacity
0-30% AMI PSH	256	0	256	1,262	165	2,195	1,618	1,385
0-30% AMI Other	347	0	347					
30-50% AMI	368	0	368					
50-80% AMI	291	0	291					
80-100% AMI	125	33	92	-596	1,149	2,337	1,613	1,858
100-120% AMI	114	802	-688					
120%+ AMI	484	65	419	419	1,263	793	793	792
TOTAL	1,985	900	1,085	1,085	2,577	5,325	4,025	4,035

Source: Pierce County Buildable Lands Report 2020; City of Sumner, 2023; BERK, 2024.

Notes: As advised in guidance from the Washington State Department of Commerce, income band needs are aggregated into 0-80% AMI, 80-120% AMI, and 120%+ AMI for the purposes of comparing capacity to need.

See the discussion under each of the alternatives for more detail on policies and regulations that affect capacity and affordability.

The City's emergency housing beds target for 2020-2044, as adopted by Pierce County, is 121 beds (see Exhibit 6-1). Existing code limits emergency housing facilities to 20 occupants and the facilities cannot be located within ½ mile of other emergency shelters, emergency housing, permanent supportive housing, or transitional housing. Alternative 1 continues these regulations forward while Alternatives 2 and 3 and the Preferred Alternative amend the regulations to meet the latest state guidance on occupancy limits and spacing requirements.

Under all alternatives, there is adequate capacity to meet the need. Based on underutilized and vacant parcels eligible in zones that allow emergency housing, up to approximately eight facilities could be created within the current spacing requirements. With a maximum of 20 occupants under the current code, these could accommodate up to 160 beds, which is above the need of 121 beds. Under Alternatives 2 and 3, where regulations are updated to match state guidance, capacity for more than 160 beds would be possible.

HB 1110

Alternative 1 does not meet HB 1110 middle housing requirements (to allow at least two units per lot on all lots zoned predominantly for residential use) because the Low Density Residential zones only allow for single-family units. Alternatives 2 and 3 and the Preferred Alternative update policies and regulations to allow for duplexes in Low Density Residential Zones and to ensure the standards for middle housing are not more restrictive than those for single-family residences.

HB 1337

While all alternatives allow for ADUs to some extent, Alternative 1 does not meet HB 1337 requirements. The existing code does not allow two ADUs per residential lot and includes restrictions for size, owner-occupancy, and other factors that are not allowed under the updated law. Alternatives 2 and 3 and the Preferred Alternative include policy and regulation changes to meet HB 1337 through allowing two ADUs per lot and removing noncompliant restrictions.

Residential Displacement

Citywide

All alternatives include job and housing growth, which could put pressure on the limited vacant and underutilized land in Sumner and increase land values. This could result in increased home values and rents and the pricing out of some households. Redevelopment of underutilized residential properties could also result in displacement of existing residents. As the city grows, demographics in some neighborhoods could also shift and result in cultural displacement, which is when residents “are compelled to move because the people and institutions that make up their cultural community have left the area” (Commerce 2023).

While all four alternatives anticipate the same amount of job growth, Alternatives 2 and 3 include more housing growth (3,000 units above 2020 conditions) than Alternative 1 and the Preferred Alternative (1,985 units above 2020 conditions) and therefore could result in more redevelopment impacts, impacts to land values, and demographic shifts. Alternatives 2 and 3 and the Preferred Alternative provide enough capacity for housing targets at all income levels and include housing affordability policies that could reduce displacement risk. Alternatives 2 and 3 and the Preferred Alternative also include policy support for homeownership opportunities by connecting residents to county, state, and other programs. Alternative 1 does not provide enough housing capacity for all income bands or any new anti-displacement or affordability policies.

North Portion

Draft displacement risk mapping from the Washington State Department of Commerce shows the North Portion is at high risk of displacement. However, residential uses in the northernmost North Portion are limited, as most of the area consists of the Sumner-Pacific MIC, which is designated for industrial uses and new housing is prohibited. The North Portion, therefore, is expected to see limited housing unit growth under all alternatives, and only in the small designated residential areas located outside of the MIC. Two pockets of existing residential uses around SR 167, near 24th Street East, could also see

commercial redevelopment aligned with the current zoning and future land use designation for that area, both Interchange Commercial. Redevelopment of small areas of existing residential uses to accommodate residential growth or to align with commercial zoning could result in some displacement in the North Portion.

East Portion

The East Portion is mostly shown as high displacement risk in the Commerce mapping. Much of the East Portion contains older single family dwellings and older multifamily, and this area is expected to see housing unit growth under all alternatives. This part of the city also contains three of the four manufactured home parks in Sumner, which is a housing type that typically serves lower income households and may be particularly at risk of displacement. Growth in the East Portion could lead to redevelopment of some residential parcels to accommodate growth. Residential uses currently located in commercial designations could also be affected as redevelopment occurs to accommodate new jobs. Some amount of residential displacement is therefore expected to occur in the East Portion under all alternatives.

South Portion

The South Portion is expected to see some housing growth under all alternatives, with more housing growth under Alternatives 2 and 3, however, displacement risk is considered low in Commerce mapping. There is one manufactured home park in the South Portion that could be at risk of redevelopment. No job growth is anticipated under any alternative in this area. Overall displacement impacts are expected to be minimal under all alternatives.

West Portion

Most of the West Portion is shown as low displacement risk in the Commerce mapping. However, due to recent zoning changes and existing single-family land uses, the city considers the southeast area of the Town Center area to be high risk. There is a mapped area of high risk east of the SR 167 and SR 410 interchange, which is within the Town Center. The Town Center is expected to see substantial housing growth and some job growth under all alternatives. Areas of the West Portion outside of the Town Center are also expected to see housing growth. A small area bordering the Sumner-Pacific MIC includes a small amount of residential development and is also within a high displacement risk area, and this overlaps in part with the Town Center.

Redevelopment in the West Portion to accommodate new jobs and housing could have displacement impacts, particularly in the areas shown as high displacement risk towards the MIC and in the southeast part of the Town Center.

Sumner UGA

Some housing and job growth is expected in the Sumner unincorporated UGA under all alternatives. Residential displacement risk in these areas is shown as low in Commerce mapping. Displacement impacts are expected to be low and may also be addressed by any Pierce County policies related to anti-displacement and housing affordability.

6.3.3 Alternative 1 (No Action)

State Requirements

Alternative 1 does not meet new state requirements as it carries forward the adopted plan and regulations.

HB 1220

While Alternative 1 has capacity for and meets the citywide housing target of 1,985, it does not have adequate capacity for housing units at all income bands as required by HB 1220 (see Exhibit 6-17). It also does not include revisions to address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Existing regulations for emergency housing, emergency shelter, transitional housing, and permanent supportive housing address the law, but do not adhere to updated guidance from the state on spacing and occupancy requirements.

HB 1110

As discussed under Impacts Common to All Alternatives, Alternative 1 does not meet the middle housing requirements in HB 1110, as it does not revise codes and policies to address the changes.

HB 1337

As discussed under Impacts Common to All Alternatives, Alternative 1 does not meet ADU requirements in HB 1337, as it does not revise codes and policies to address the changes.

Residential Displacement

Most housing growth under Alternative 1 is focused in the Town Center, of which part is in a high displacement risk area and part is in a low displacement risk area. Alternative 1 also anticipates housing growth in other areas of the city where there is existing underutilized and vacant land in residential zones. This includes some areas shown as high displacement risk in the East Portion of the city. Redevelopment of underutilized residential parcels to accommodate housing growth, particularly in Town Center and the East Portion of the city, could result in residential displacement. Job growth in Alternative 1 is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

While Alternative 1 anticipates less housing growth than Alternatives 2 and 3, it also does not include new policies or regulations to address housing affordability and displacement. Alternative 1 does not include capacity for housing affordable to all income bands. Less housing growth overall could also put more pressure on the local housing market leading to increased rents and housing prices. These factors may make Alternative 1 particularly susceptible to displacement impacts.

6.3.4 Alternative 2

State Requirements

Alternative 2, like Alternative 3 and the Preferred Alternative, meets new state requirements for housing.

HB 1220

Alternative 2 includes adequate capacity to meet housing needs by income band (see Exhibit 6-17). This is accomplished through a mix of land use and affordability strategies, which varies somewhat from the mix in Alternative 3 and the Preferred Alternative. These strategies include:

- Incentives such as MFTE to support affordable units in Town Center and East Sumner
- Permitting duplexes in LDR zones (per HB 1110 requirements)
- Permitting larger lots (1.5 times the minimum parcel size) in LDR 8.5 and 12 to construct four units per lot
- Permitting two ADUs per lot and adding flexibility to ADU regulations (per HB 1337 requirements)
- Allowing multiplexes / small apartments throughout MDR and HDR
- Raising the maximum density in MDR from 15 to 22
- Support for Cava mine reclamation and rezoning of the site to MDR
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Policy support and density bonus for religious organizations building affordable apartment housing

In addition, Alternative 2, like Alternative 3 and the Preferred Alternative, includes policy revisions that address racially disparate impacts, displacement, displacement risk, and exclusion in housing.

Alternative 2, like Alternative 3 and the Preferred Alternative, also updates city regulations to better align with state guidance on emergency shelter, emergency housing, transitional housing, and permanent supportive housing spacing and occupancy requirements.

HB 1110

Alternative 2, like Alternative 3 and the Preferred Alternative, complies with HB 1110 by allowing for duplexes in Low Density Residential zones and updating policies so as not to treat middle housing differently from single-family housing in terms of permitting and development regulations.

HB 1337

Alternative 2, like Alternative 3 and the Preferred Alternative, allows for two ADUs per residential lot and removes restrictions on owner occupancy, size, and other factors in order to comply with HB 1337.

Residential Displacement

Housing growth under Alternative 2 is spread throughout the city based on land capacity, with an emphasis on the Town Center. Development in parts of Town Center and the East Portion of the city is most likely to have displacement impacts where underutilized residential properties are redeveloped

with higher density housing or commercial uses. These areas have high risk of displacement according to Commerce mapping. Job growth in Alternative 2 is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

Alternative 2 plans for more growth on the existing Cava gravel mine site than the other alternatives, as it includes policies supportive of mine reclamation, assumes the mine will be reclaimed within the planning period, and increases density from Low Density Residential to Medium Density Residential. By creating more capacity on this unimproved property, less redevelopment of underutilized residential parcels would need to occur to achieve the planned growth. This could lead to less displacement impacts than Alternative 3 and the Preferred Alternative.

Alternative 2, like Alternative 3 and the Preferred Alternative, also assumes that Low Density Residential designations, which cover much of the city, will have more development potential by allowing two units per lot. Accessory dwelling units are also expected to increase as regulations are made more flexible and allow two ADUs per lot. This increased flexibility could lead to more infill-like development in the form of renovations and ADUs, which could absorb some of the city's growth in a way that is less likely to displace residents than redevelopment of entire parcels.

Alternative 2, like Alternative 3, plans for more housing growth than Alternative 1 and the Preferred Alternative (3,000 units compared to 1,985 units from 2020-2044). This could increase displacement impacts due to redevelopment on underutilized residential parcels. However, unlike Alternative 1, Alternatives 2 and 3, and the Preferred Alternative, include new policies and regulations to address housing affordability and displacement. Alternative 2's capacity for housing units for all income bands is also likely to help manage residential displacement and make it possible for residents to stay in Sumner where housing becomes more expensive or is redeveloped to accommodate growth. A greater number of planned units could also relieve pressure on housing costs.

6.3.5 Alternative 3

State Requirements

HB 1220

Alternative 3 includes adequate capacity to meet housing needs by income band (see Exhibit 6-17). This is accomplished through a mix of land use and affordability strategies, including:

- Mandatory affordability in Town Center and East Sumner (20% of units)
- Permitting duplexes in LDR zones (per HB 1110 requirements)
- Permitting larger lots (1.5 times the minimum parcel size) in LDR 8.5 and 12 to construct four units per lot if at least one is designated affordable
- Permitting two ADUs per lot, adding flexibility to ADU regulations (per HB 1337 requirements), including incentives such as fee waivers
- Allowing multiplexes / small apartments throughout MDR and HDR
- Raising the maximum density in MDR from 15 to 17

- Policy support and density bonus for religious organizations building affordable apartment housing, with a greater emphasis on policy support than Alternative 2, including incentives such as fee waivers

Alternative 3, like Alternative 2 and the Preferred Alternative, also includes policy revisions that address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Additionally, Alternative 3 and the Preferred Alternative, updates city regulations to better align with state guidance on emergency shelter, emergency housing, transitional housing, and permanent supportive housing spacing and occupancy requirements.

HB 1110

Alternative 3, like Alternative 2 and the Preferred Alternative, complies with HB 1110 by allowing for duplexes in Low Density Residential zones and updating policies so as not to treat middle housing differently from single-family housing in terms of permitting and development regulations.

HB 1337

Alternative 3, like Alternative 2 and the Preferred Alternative, allows for two ADUs per residential lot and removes restrictions on owner occupancy, size, and other factors in order to comply with HB 1337.

Residential Displacement

Housing growth under Alternative 3 is similar to the distribution in Alternative 2. Growth is distributed throughout the city based on land capacity, with an emphasis on the Town Center. Development in parts of Town Center and the East Portion of the city is most likely to have displacement impacts where underutilized residential properties are redeveloped with higher density housing. These areas have high risk of displacement according to Commerce mapping. Job growth in Alternative 3 is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

Unlike Alternative 2, Alternative 3 does not assume reclamation of the Cava gravel mine site and upzone to Medium Density Residential. Alternative 3 assumes the same overall housing growth as Alternative 2 but does not allocate growth to that site. Therefore, under Alternative 3, more units would be developed elsewhere in the city, including on some underutilized residential parcels, which could result in displacement impacts.

Alternative 3, like Alternative 2 and the Preferred Alternative, also assumes that Low Density Residential designations, which cover much of the city, will have more development potential by allowing two units per lot. Accessory dwelling units are also expected to increase as regulations are made more flexible and allow two ADUs per lot. This increased flexibility could lead to more infill-like development in the form of renovations and ADUs, which could absorb some of the city's growth in a way that is less likely to displace residents than redevelopment of entire parcels.

Alternative 3, like Alternative 2, plans for more housing growth than Alternative 1 (3,000 units compared to 1,985 units from 2020-2044). This could increase displacement impacts due to redevelopment on

underutilized residential parcels. However, unlike Alternative 1, Alternatives 2 and 3, and the Preferred Alternative, include new policies and regulations to address housing affordability and displacement. Alternative 3's capacity for housing units for all income bands is also likely to help manage residential displacement and make it possible for residents to stay in Sumner where housing becomes more expensive or is redeveloped to accommodate growth. A greater number of planned units could also relieve pressure on housing costs.

6.3.6 Preferred Alternative

State Requirements

HB 1220

The Preferred Alternative includes adequate capacity to meet housing needs by income band (see Exhibit 6-17). This is accomplished through a mix of land use and affordability strategies, including:

- MFTE incentives to support affordable units in Town Center and East Sumner, including restricting the existing MFTE program in Town Center to affordable projects only, and expanding the existing East Sumner MFTE-eligible area
- Permitting duplexes in LDR zones (per HB 1110 requirements)
- Permitting larger lots (1.5 times the minimum parcel size) in LDR 8.5 and 12 to construct four units
- Permitting two ADUs per lot, adding flexibility to ADU regulations (per HB 1337 requirements), including incentives such as fee waivers
- Allowing multiplexes / small apartments throughout MDR and HDR
- Raising the maximum density in MDR from 15 to 22
- Policy support and density bonus for religious organizations building affordable apartment housing

The Preferred Alternative, like Alternatives 2 and 3, also includes policy revisions that address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Under the Preferred Alternative, anti-displacement provisions include a new policy in support of a manufactured home park overlay designation, to be considered for implementation in the zoning code at a future date. Additionally, the Preferred Alternative, like Alternatives 2 and 3, updates city regulations to better align with state guidance on emergency shelter, emergency housing, transitional housing, and permanent supportive housing spacing and occupancy requirements.

HB 1110

The Preferred Alternative, like Alternatives 2 and 3, complies with HB 1110 by allowing for duplexes in Low Density Residential zones and updating policies so as not to treat middle housing differently from single-family housing in terms of permitting and development regulations.

HB 1337

The Preferred Alternative, like Alternatives 2 and 3, allows for two ADUs per residential lot and removes restrictions on owner occupancy, size, and other factors in order to comply with HB 1337.

Residential Displacement

The distribution of housing growth under the Preferred Alternative is similar to the distribution in Alternative 3, however the overall housing unit growth is lower (1,985 additional units compared to 3,000 units from 2020-2044). Growth is distributed throughout the city based on land capacity, with an emphasis on the Town Center. Development in parts of Town Center and the East Portion of the city is most likely to have displacement impacts where underutilized residential properties are redeveloped with higher density housing. These areas have high risk of displacement according to Commerce mapping. Job growth in the Preferred Alternative is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

The Preferred Alternative, like Alternatives 2 and 3, also assumes that Low Density Residential designations, which cover much of the city, will have more development potential by allowing two units per lot. Accessory dwelling units are also expected to increase as regulations are made more flexible and allow two ADUs per lot. This increased flexibility could lead to more infill-like development in the form of renovations and ADUs, which could absorb some of the city's growth in a way that is less likely to displace residents than redevelopment of entire parcels.

Unlike Alternative 1, but similar to Alternatives 2 and 3, the Preferred Alternative includes new policies and regulations to address housing affordability and displacement. In the Preferred Alternative, this includes a new policy to support the preservation of manufactured home parks, which typically serve households with lower incomes, with an overlay designation. The Preferred Alternative's capacity for housing units for all income bands is also likely to help manage residential displacement and make it possible for residents to stay in Sumner where housing becomes more expensive or is redeveloped to accommodate growth. Mitigation Measures

6.3.7 Incorporated Plan Features

The following features of Alternatives 2 and 3 and the Preferred Alternative would mitigate adverse impacts to consistency with state housing requirements and displacement impacts.

State Requirements

- No adverse impacts expected under Alternatives 2 and 3 and the Preferred Alternative

Displacement Impacts

- Alternatives 2 and 3 and the Preferred Alternative include antidisplacement and housing affordability policies. They also include adequate capacity to meet housing needs by income band, meaning affordable units are more likely to be available for residents displaced due to increased costs or redevelopment. Planning for a greater number of housing units overall may also mean less pressure on housing prices and rents than Alternative 1.

6.3.8 Regulations and Commitments

State Requirements

- The City's existing comprehensive plan includes some policies related to housing affordability and availability. The Housing Action Plan also identifies strategies to address housing needs.

Displacement Impacts

- Pierce County has some existing programs to assist lower income residents with energy and housing costs. Some Sumner residents may be eligible for these programs.

6.3.9 Other Potential Mitigation Measures

State Requirements

- No additional potential mitigation measures.

Displacement Impacts

- The City could consider additional anti-displacement strategies, such as connecting residents with information on existing tenant protections and programs; adopting preference policies that give previously displaced households priority in applications for subsidized housing; or facilitating a range of ownership opportunities through supporting condominiums, cooperatives, community land trusts, and other structures. Adoption of manufactured home park zoning, as supported by policy language in the Preferred Alternative, could also minimize displacement of park residents.

6.4 Significant Unavoidable Adverse Impacts

Housing growth will occur under all alternatives, resulting in impacts related to residential displacement. Alternative 1, specifically, will have impacts related to meeting state requirements, as it does not provide enough capacity to accommodate housing targets at all income bands, as is now required under GMA. The only mitigation to fully address these impacts would be to adopt features of Alternatives 2 and 3 and the Preferred Alternative.

7 Public Services and Utilities

7.1 Introduction

This section examines existing public services and utilities in Sumner, the potential impacts of the growth alternatives, and possible mitigation.

7.2 Affected Environment

7.2.1 City Facilities and Police

General Facilities

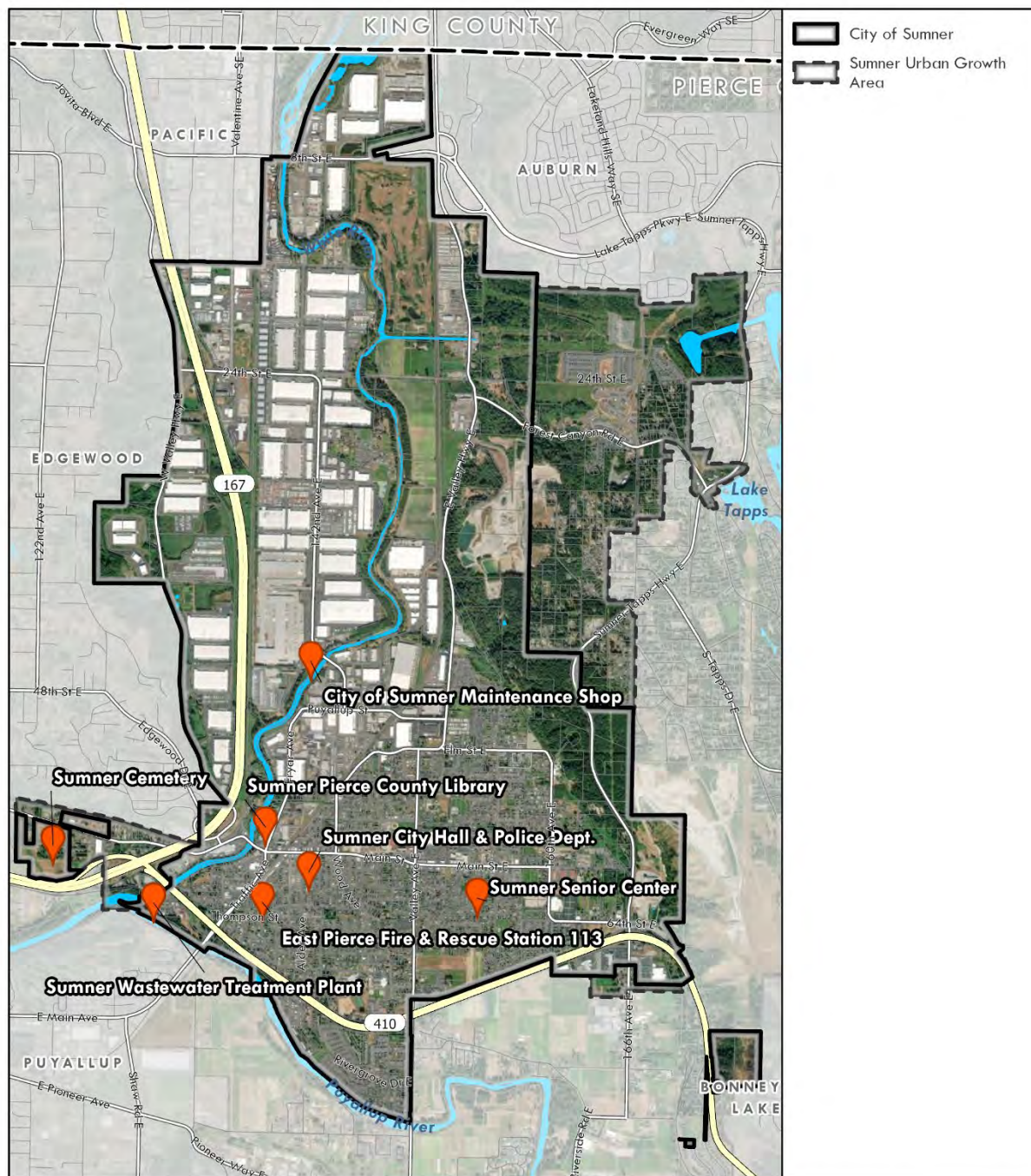
The major city facilities in Sumner, excluding parks, fire, and emergency medical facilities, include the Sumner Cemetery, City Hall, City Public Works Facilities, Sumner Library, and Sumner Senior Center. Most general government facilities are mainly located at City Hall at 1104 Maple Street, including offices for the Administration, Finance, Community & Economic Development, City Attorney, Human Resources, Public Works, and Police Departments (Exhibit 7-2). See Exhibit 7-1 for the existing space allocation for general government facilities.

Exhibit 7-1: City General Government Buildings

City Facility		Building Area (sf)
City Hall	General Government Services	14,577
	Police	7,654
Public Works Shops		17,136
Total		39,367

Source: City of Sumner Capital Facilities Plan, 2015.

Exhibit 7-2: Sumner General Government Facilities Map



CITY OF SUMNER

General Government Facilities

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



Map Date: January 2024

Source: BERK, 2023.

Sumner's Comprehensive Plan includes adopted levels of service (LOS) for city facilities in order to meet the needs of city operations. There are adopted LOS from the 2015 Capital Facilities Plan (CFP) and proposed changes to the LOS as part of the 2024 update to the CFP (Exhibit 7-3).

Exhibit 7-3. City Facilities Levels of Service

City Facility	Adopted LOS	Proposed LOS (s.f. per capita)
General Government	1.13 s.f. per capita	1.36 s.f. per capita
Police	0.44 s.f. per capita	294 s.f. per employee
Public Works Shops	1.80 s.f. per capita	(no change)

Source: City of Sumner Capital Facilities Plan, 2015; City of Sumner Comprehensive Plan, 2021.

Police

The Sumner Police Department (SPD) provides law enforcement services within the city limits. The SPD headquarters are located at Sumner City Hall, occupying a building area of 7,654 sf. The SPD currently employs 21 commissioned officers, 4 special commissioned employees, and 6 non-commissioned employees. In 2021, SPD responded to 15,800 calls for police service and 14,530 calls in 2023 (slightly fewer due to reduced number of officers, who initiate many of the calls).

Officers circulate throughout the City on patrol and respond to calls from a dispatch center in Tacoma through South Sound 911. The police facility in City Hall currently houses the communications center, holding cells, conference room, locker facilities, and sundry offices. Jail facilities are provided through an inter-local agreement with the City of Puyallup. Sumner's court services operate through Bonney Lake Municipal Court with Sumner judge presiding.

The Sumner Comprehensive Plan sets the following Level of Service standards for Law Enforcement:

- Maintain a ratio of two (2) commissioned officers per 1,000 population.
- Establish and maintain a ratio of not less than 1 commissioned patrol officer for every 1,000 calls for service per year.
- Provide one sergeant for every 6-7 commissioned patrol officers.
- Provide and maintain one detective position at a ratio of 1/400 Part A offenses.
- Police Government Buildings: 0.44 square feet per capita

Library

The Pierce County Library System (PCLS) provides library services to the City of Sumner. PCLS operates 19 branch libraries, serving residents in unincorporated Pierce County as well as the cities and towns of Bonney Lake, Buckley, Dupont, Eatonville, Edgewood, Fife, Gig Harbor, Lakewood, Milton, Orting, South Prairie, Steilacoom, Sumner, University Place, and Wilkeson.

The Sumner Pierce County Library branch is located at 1116 Fryar Avenue occupying a 10,600 square foot building. This branch library is open seven days a week and includes several amenities/services,

including a book drop, library curbside service, community bulletin board, book donations/sale, ballot drop box, computers (with printing/scanning/copying capabilities), a law library, fax machine, meeting room, study room, and Wi-Fi.

As of 2023, the Pierce County Library System is in the process of updating its Facility Master Plan. There is no City-adopted level of service for library services in Sumner. In August 2023 a bond was passed to support the Sumner library relocation and expansion to an East Main Street location, through the creation of an independent taxing district. The goal is to expand the library from approximately 10,000 s.f. to 20,000 s.f.

7.2.2 Fire and Emergency Medical Services

The City of Sumner formally joined East Pierce Fire & Rescue (EPFR) through a resident vote 2008. EPFR provides fire, rescue, and emergency medical services to approximately 105,000 residents living in and around Bonney Lake, Edgewood, Milton, Lake Tapps, the Ridge communities, South Prairie, Tehaleh, and surrounding communities. The total service area covers 153 square miles. As of 2022, EPFR employs 82 career firefighter-EMT's, 59 career firefighter-paramedics, and five volunteer firefighters.

EPFR operates from nine fire stations. Station 113 is located in Sumner at 800 Harrison Street, see Exhibit 7-4. In 2022, EPFR received a total of 12,653 calls for service, the majority (about 74%) were emergency medical calls. The average response time in 2022 was 7 minutes, 33 seconds.

The Sumner Comprehensive Plan includes the following levels of service for fire and emergency medical services in the Capital Facilities and Public Services Element:

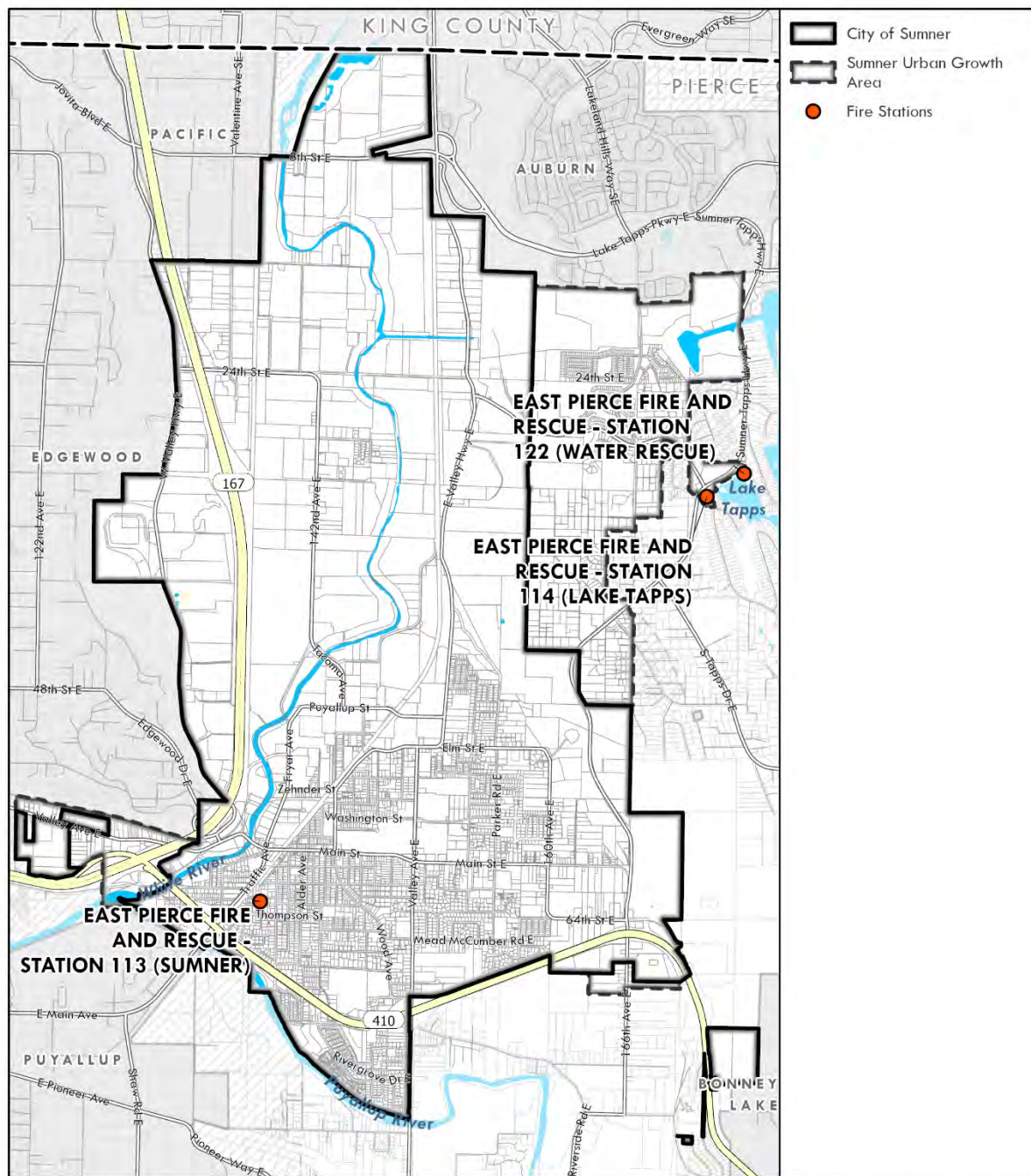
- Policy 1.3.1 East Pierce Fire & Rescue shall strive to maintain sufficient personnel and equipment, strategically located such that the first-due response units arrive at fire and emergency medical incidents in urban areas served by staff fire stations (as characterized by the City of Sumner) within 5 minutes to the 90th percentile.
- Policy 1.3.2 East Pierce Fire & Rescue shall strive to maintain sufficient personnel and equipment, strategically located to provide a minimum acceptable (effective) response force capable of arriving at emergency incidents within 10 minutes to the 90th percentile.

EPFR has adopted the following benchmarks for standards of coverage for urban areas:

- First Apparatus to arrive at a fire scene (90th percentile): 8 minutes, 30 seconds.
- Minimum acceptable response for full effective response force arriving at a fire scene (90th percentile): 13 minutes, 30 seconds.

In 2022, EPFR achieved this benchmark of the first unit arriving at a fire scene approximately 81% of the time and the minimum acceptable response approximately 77% of the time.

Exhibit 7-4: Fire Stations



CITY OF SUMNER

Fire Stations

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



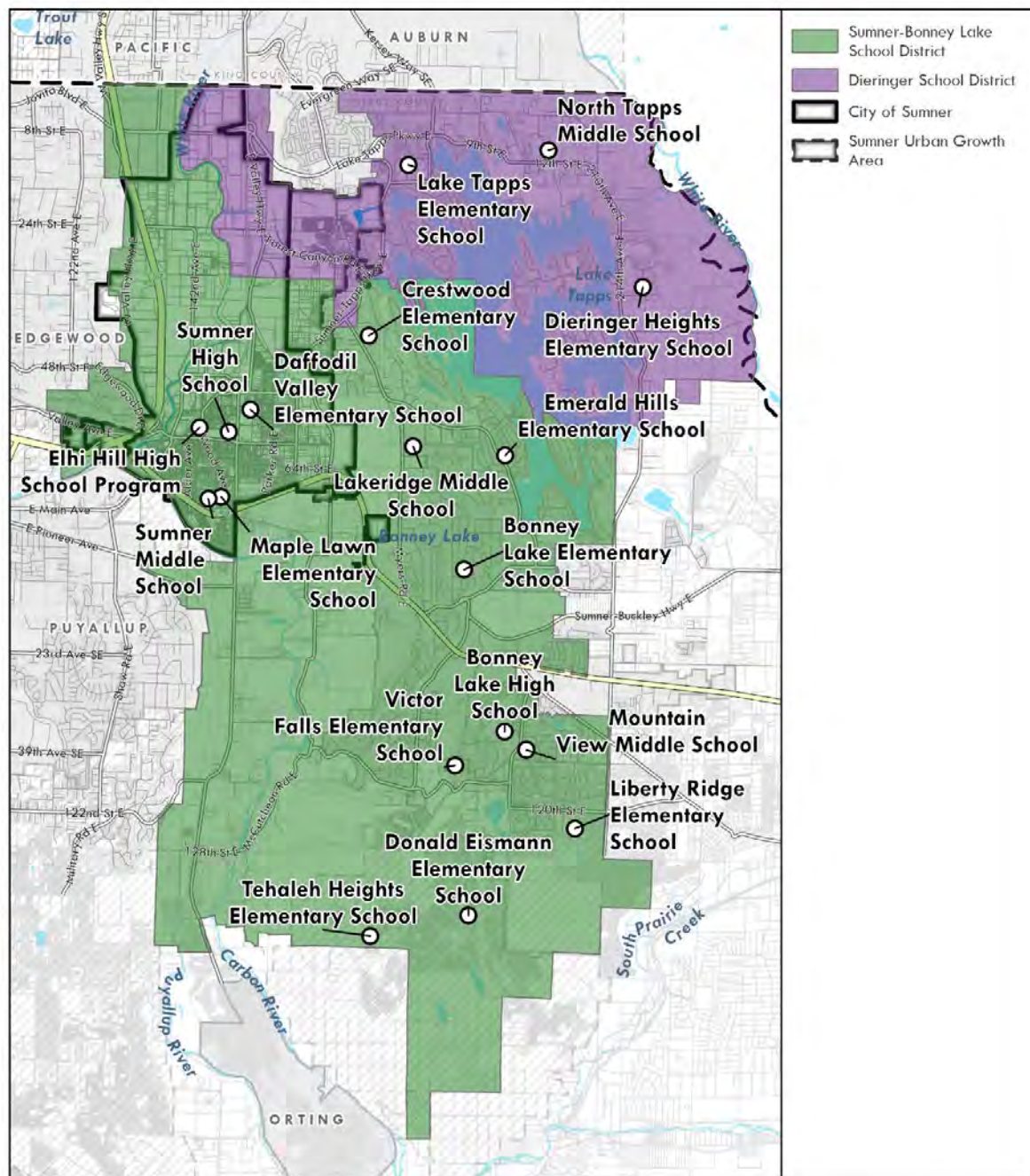
Map Date: January 2024

Source: Pierce County, 2023; BERK, 2024.

7.2.3 Schools

The City of Sumner is served by the Sumner-Bonney Lake and Dieringer School Districts, which also serve surrounding cities and unincorporated areas. School district boundaries and school locations are shown in Exhibit 7-5.

Exhibit 7-5: School District Boundaries and Facilities



CITY OF SUMNER

Public Schools

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Note: Sumner Early Learning Center was not constructed at the time of this map and is located on the Sumner Middle School campus.

Source: BERK, 2023; Pierce County, 2023.

Sumner-Bonney Lake School District

The Sumner-Bonney Lake School District serves the communities of Sumner, Bonney Lake, parts of Edgewood, Pacific, and Lake Tapps, and unincorporated areas of Pierce County and operates a total of 16 schools. The following K-12 schools are located within and serve the City of Sumner:

- Sumner High School
- Sumner Middle School
- Daffodil Valley Elementary
- Maple Lawn Elementary
- Sumner Early Learning Center
- Elhi Hill Program

The Sumner Early Learning Center serves kindergarten students in the Daffodil Valley and Maple Lawn Elementary service areas and offers classrooms and playgrounds areas that are different from traditional educational facilities and encourage self-direction and exploration in students. Elhi Hill, located in downtown Sumner, provides an alternative learning experience for high school students. An inventory of the existing Sumner school facilities is shown in Exhibit 7-6.

Exhibit 7-6: Sumner School Facilities

School	Site Size (Acres)	Facility Size (SF)	Capacity (Students)	Year Built
Sumner High School	26.83	186,888	1,260	1954
Sumner Middle School	23	107,194	722	1962
Daffodil Valley Elementary	12.7	48,035	481	2000
Maple Lawn Elementary	8.5	51,291	454	1952
Sumner Early Learning Center	3.65	35,290	168	2019
Elhi Hill Program*	0.10	4,743	N/A	1958

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

According to the Washington State Office of the Superintendent of Public Instruction (OSPI), the Sumner-Bonney Lake School District had a districtwide enrollment of 10,622 students for the 2022-23 school year, with the four Sumner schools accounting for 3,651 students. Enrollment and capacity figures are shown in Exhibit 7-7, Exhibit 7-8, and Exhibit 7-9. Sumner Middle School is the only school under its enrollment capacity. The Sumner-Bonney Lake School District Capital Facilities Plan includes enrollment projections based on a Demographic Study prepared for the District.

Exhibit 7-7: Sumner Schools Enrollment and Capacity

School	Capacity (Students)	2022-23 Enrollment (Students)	Percent Over/Under Capacity
Sumner High School	1,260	1,844	46%
Sumner Middle School	722	681	-6%
Daffodil Valley Elementary	481	492	0.2%
Maple Lawn Elementary	454	634	40%
Sumner Early Learning Center	168	<i>Unknown</i>	<i>Unknown</i>
Elhi Hill Program	N/A	<i>Unknown</i>	<i>N/A</i>

Source: Enrollment: OPSI Report Card, 2023.

Capacity: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

Notes: Sumner Early Learning Center capacity does not include pre-K students (82 students).

Daffodil Valley and Maple Lawn Elementary capacity includes capacity at the kindergarten level housed at Sumner Early Learning Center.

Exhibit 7-8: Projected Student Enrollment, Sumner-Bonney Lake School District

	2021	2022	2023	2024	2025	2026	Change
Total Students	9,823	10,085	10,322	10,507	10,599	10,739	1,105

Note: Projections were calculated by Educational Data Solutions for a Demographic Study for Sumner-Bonney Lake School District

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

The Sumner-Bonney Lake School District maintains student generation numbers to determine the number of students that can be expected from new residential construction. These numbers are shown in Exhibit 7-9. Within the boundaries of the Sumner-Bonney Lake School District there are three large, master planned developments: Tehaleh, Falling Water, and Plateau 465. Housing construction in these developments has the potential to substantially increase enrollment in the District in both the short and long term, depending on how quickly the housing is developed. However, it is not expected that students from these new developments would be served by schools located within or primarily serving the City of Sumner.

Exhibit 7-9: Student Generation Rates, Sumner-Bonney Lake School District

School Type	Single Family	Multifamily
Elementary School	0.403	0.095
Middle School	0.140	0.043
High School	0.099	0.033

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

The Sumner-Bonney Lake School District Board of Directors, in association with local jurisdictions, establishes impact fees for new residential construction. Impact fees are a means of collecting funds to meet the “unhoused student need” and provide funds to accommodate growth and demand for school facilities. Impact fees ensure that new development pays for fair share proportional amount of the costs incurred by the school district for expanding new facilities and new construction. The impact fee charged is based on the costs for providing the additional space and the projected number of students in each new residential unit. The current impact fee is \$3,575.61 for a single-family residence and \$1,818.07 for a multifamily residential unit.

The Sumner-Bonney Lake School District’s strategy to meet future demand includes system upgrades to replace aging infrastructure, improvements to existing facilities to better meet District needs, creation of new classroom space, acquisition of land for a future elementary and middle school, full buildout of the Sumner High School Master Plan, and additional capacity and upgrades at Bonney Lake High School.

In recent years, the Sumner-Bonney Lake School District has completed or begun construction on many of the 2016 capital bond projects, including:

- The new Tehaleh heights Elementary School opened in 2018.
- The Emerald Hills Elementary Replacement project was completed in 2020.
- The Sumner Early Learning Center opened in 2019.
- Upgrades to Bonney Lake High School were completed in 2019 and include a new Performing Arts Center, interior improvements, safety/security improvements, and improvements to the athletic field.
- The athletic fields at Sumner, Lakeridge, and Mountain Middle Schools were upgraded with new synthetic turf.
- Security upgrades were installed at Crestwood, Liberty Ridge, and Daffodil Valley Elementary Schools.
- Improvements to Mountain View Middle School, including new classrooms and support facilities, upgraded security measures, new floors, and reconfigured parking and drop off areas are expected to be completed in the 2022-2023 school year, and
- The District is undertaking a project for a complete replacement of Sumner High School, which broke ground in 2021.

Dieringer School District

The Dieringer School District includes three schools: Lake Tapps Elementary School, Dieringer Heights Elementary School, and North Tapps Middle School and provides a K-8th grade education. The majority of Dieringer School District #343 is located in unincorporated Pierce County. The District is bounded by the White River to the east, the Stuck River on to the west, the City of Auburn to the north, and the cities of Bonney Lake and Sumner to the south. The District covers approximately 5.5 square miles. During the 2022-23 school year, the Dieringer School District had a total enrollment of 1,444 students. Lake Tapps Elementary School is over capacity and Dieringer Heights Elementary School and North Tapps Middle School are near capacity (Exhibit 7-10). The Dieringer School District serves the northeast Sumner city limits along East Valley Highway.

The Dieringer School District establishes student generation rates for the purposes of facility planning, see Exhibit 7-11.

Exhibit 7-10: Dieringer School District - Enrollment

School	Capacity	2022-23 Enrollment	Percent Over/Under Capacity
Lake Tapps Elementary School	357	451	26%
Dieringer Heights Elementary School	508	472	-7%
North Tapps Middle School	536	521	-3%

Source: Enrollment: OPSI Report Card, 2023.

Exhibit 7-11: Student Generation Rates, Dieringer School District

School Type	Single Family	Multifamily
Elementary School	0.322	0.172
Middle School	0.13	0.07

Source: Dieringer School District Capital Facilities Plan, 2021-2026, 2020.

7.2.4 Parks

Sumner currently manages 38.8 acres of parks and several trails (see

Exhibit 7-12 and Exhibit 7-14). The City is updating levels of service for amenity types, investment per capita, and park distribution as part of the Capital Facilities Plan update in 2024. Related benchmarks are also included in the 2024 Parks and Trails Plan. Draft levels of service include:

Minimum levels of service for parks:

- Investment: Maintain a level of investment per capita (resident equivalent) that is consistent with the current value of the system per person. The 2024 value is \$1,652 per resident equivalent, as may be adjusted periodically for system value, inflation, or annexation.
- Recreation Facilities: Provide for a mix of parks and recreation facilities at a level consistent with the community's current level of facilities:
 - Active Recreation Facilities (fields, courts, skate parks, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 0.4 facilities per 1,000.
 - Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 3.4 facilities per 1,000.
- Parks: Sumner park acres per 1,000 resident equivalents consistent with the 2024 ratio of 3.2 acres per 1,000.

Target levels of service for parks:

- Investment: Achieve a level of investment per capita (resident equivalent) that is consistent with a 30% increase in the current value of the system per person. The 2024 value is \$2,148 per resident equivalent, as may be adjusted periodically for system value, inflation, or annexation.
- Recreation Facilities:
 - Active Recreation Facilities (fields, courts, skate parks, and similar): 0.5 facilities per 1,000 resident equivalents.
 - Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): 4.4 facilities per 1,000 resident equivalents.
- Parks: 5.4 acres per 1,000 resident equivalents.
- Open Space (including increases to tree canopy cover): 3.8 acres per 1,000 resident equivalents.
- Access: 10-minute maximum walk to a park for all Sumner residents.

Resident equivalent population is a calculation based on the number of residents and number of jobs in Sumner, considering an individual's estimated time available to use parks in a given week. Details on the calculation method are included in the Park Impact Fee Rate Study under consideration by City Council in January 2025.

The City currently collects a Park and Trails Mitigation Fee to address level of investment per capita. Adoption of the fee by the City Council is done under a separate action from the Capital Facilities Plan.

There are also four school district recreation facilities in Sumner. The Senior Center is owned by the City of Sumner who contracts with an independent vendor to provide a range of programs and activities for adults 55 and older. The Sumner Library, managed by Pierce County Library District, provides activities and meeting rooms to the public. The Gordon Family YMCA is a fitness center and also a community/arts center; the City has a service agreement with the YMCA to provide some fitness/recreation services.

The Parks and Trails Plan includes an inventory, vision and needs, a system plan, and a capital facility plan.

Exhibit 7-12: Parks and Trails in Sumner

Park Areas and Facilities	Acres
<i>Developed Local Parks</i>	9.8
Rainier View Park	3.9
Loyalty Park	3.3
Seibenthaler Park	2.3
<i>Undeveloped Local Parks</i>	4.5
Bennett Property	4.2
Qunell Family Park	0.3
<i>Special Facilities</i>	1.1
Reuben A. Knoblauch Heritage Park	0.8
Lucy V. Ryan Park*	0.4
<i>Regional Parks</i>	7.0
Bill Heath Sports Complex	7.0
<i>Linear Parks Along Sumner Link Trail</i>	16.7
Total City Parks Acreage	38.8
<i>Open Space Areas</i>	33.5
<i>Trails</i>	5.5 miles
Sumner Link Trail	5.5 miles

Source: City of Sumner Parks and Trails Plan, 2024.

Notes: *The Ryan House is expected to be demolished, with the site remaining as a park.

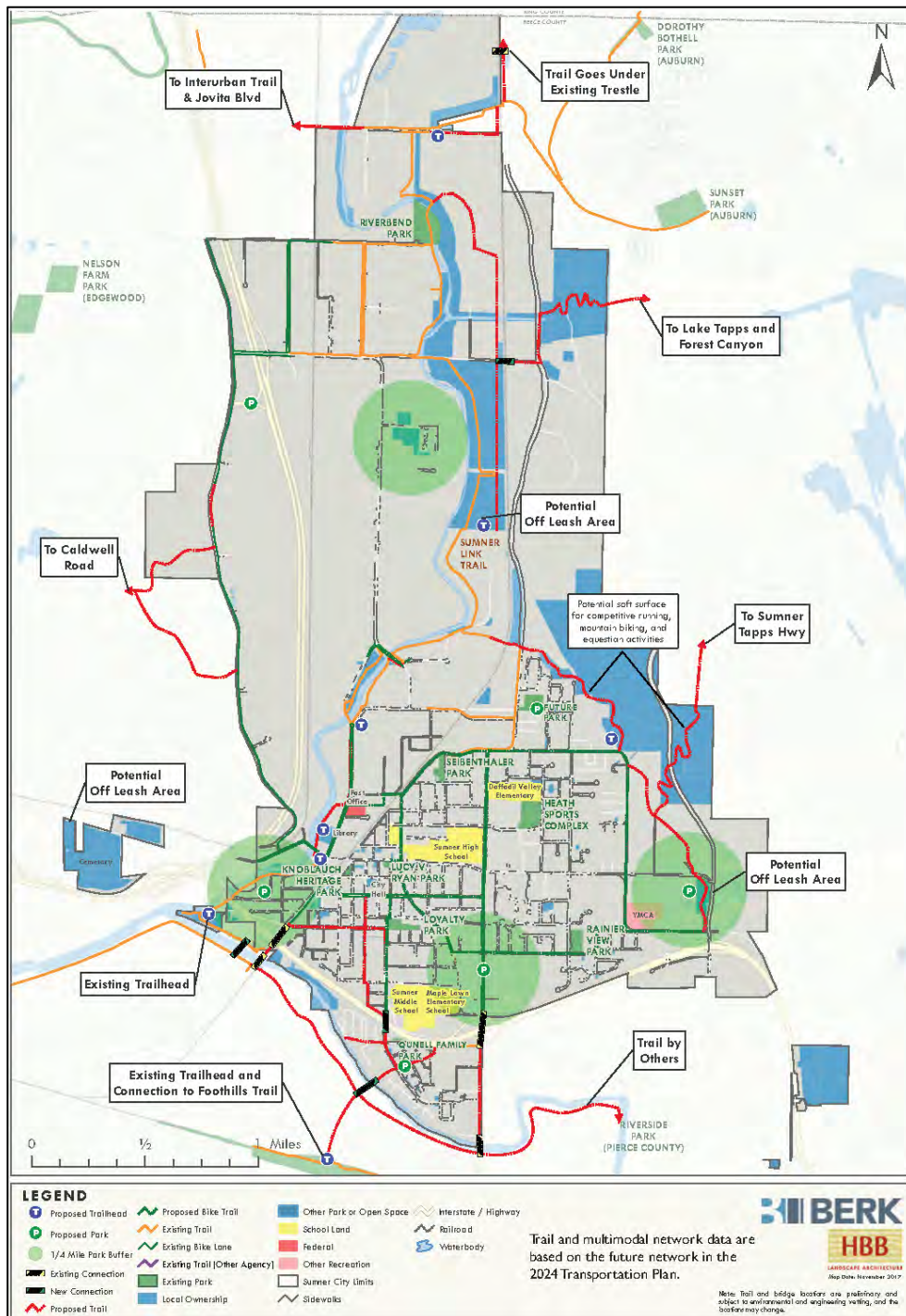
Exhibit 7-13: Existing Parks and Recreation Facilities and LOS

Activity	Req'd LOS (2024 conditions)	Exist. #	2044 Demand
Active Recreation Facilities	0.4 per 1,000 resident equiv.	5	7
Informal Recreation Facilities	3.4 per 1,000 resident equiv.	41	56
Parks	3.2 acres per 1,000 resident equiv.	38.8 acres*	53

Source: Parks and Trails Plan, 2024; Sumner Public Works, 2024.

* Includes 16.7 acres along the Sumner Link Trail maintained by Parks staff that are commonly used for picnics and other recreation activities.

Exhibit 7-14: Sumner Parks and Trails (2024)

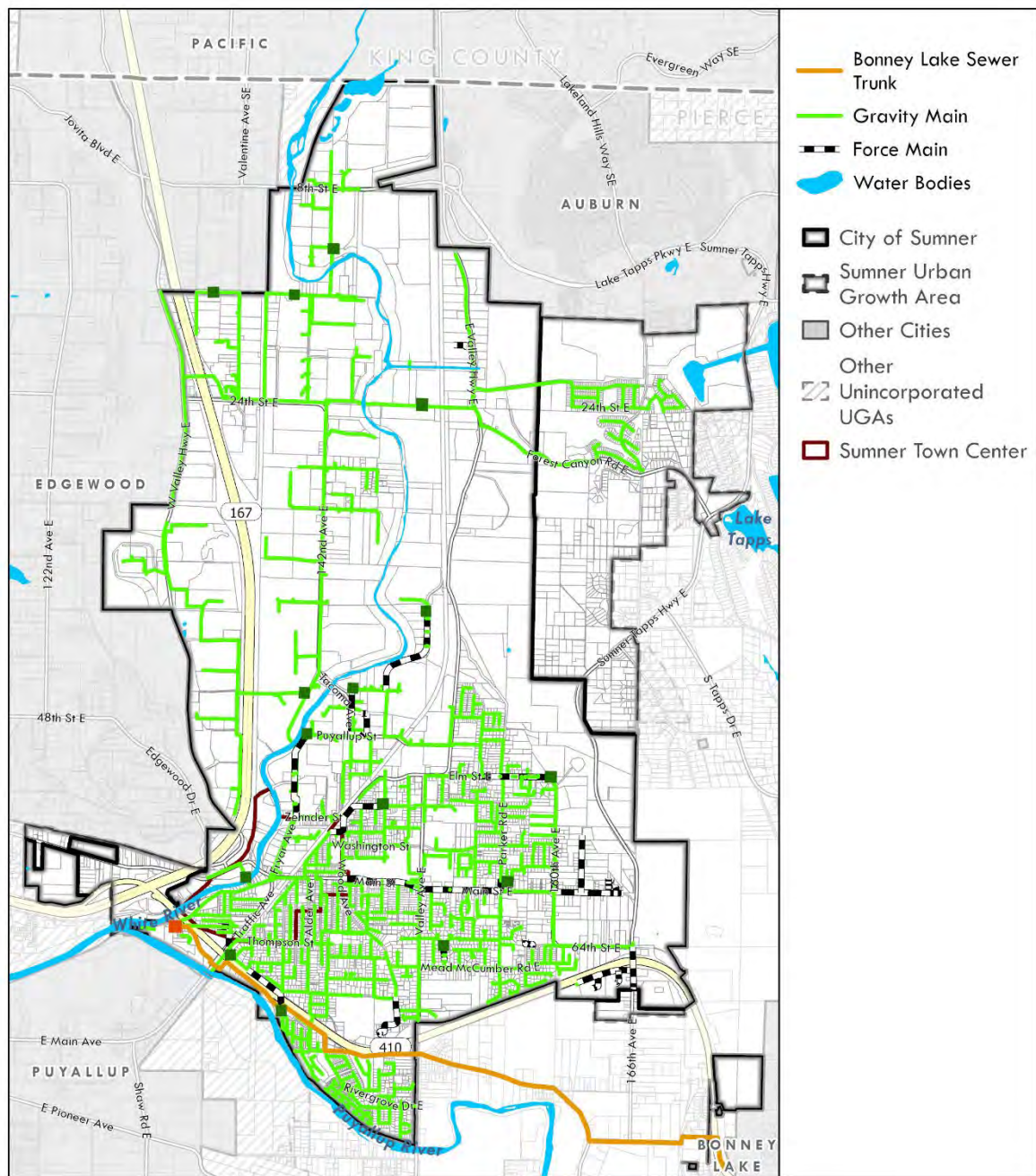


Source: Sumner Parks and Trails Plan, 2018; BERK, 2017.

7.2.5 Utilities

Sewer

The information in this section is based on the 2020 Sanitary Sewer Comprehensive Plan (Sanitary Sewer Plan), which is based on projections for a 20-year period to 2038, and the 2009 Wastewater Treatment Plant Capacity Increase Analysis. The Sanitary Sewer Plan analyzes the City's collection system, identifies any system deficiencies for existing and future flow conditions, and provides recommended improvements and cost estimates. In preparing the plan, the City's wastewater collection system was analyzed for existing and future capacity. The City has operated a sanitary sewer system since 1927 and a wastewater treatment plant since 1957. The City's sanitary sewer service area encompasses approximately 4,090 acres and includes the Sumner city limits, as well as portions of the Sumner UGA. As of 2020, the City owns and operates a collection system that includes 7.4 miles of force mains, 52.4 miles of gravity sewer, and 16 pump stations (Exhibit 7-15). The service area is divided into 18 basins to analyze capacity needs. Delineation of basins is based on existing sewer service and topography. The boundaries of the service area and its constituent basins are shown in Exhibit 7-16, along with the existing collection system for sanitary sewer.

Exhibit 7-15: Sewer System

CITY OF SUMNER

Sewer System

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Source: City of Sumner, 2023; Parametrix, 2023.

Wastewater Treatment Plant

The wastewater treatment plant (WWTP) is located at 13114 63rd Street E, at the confluence of the Puyallup and White (Stuck) rivers (Exhibit 7-15). The WWTP provides sanitary sewer treatment to all of the current plan area, as well as the City of Bonney Lake. The City of Sumner owns and operates the plant and has an Intergovernmental Agreement to accept waste from the City of Bonney Lake. Areawide, the WWTP collects waste from 15+ square miles, serves 28,700 residents, processes 860 million gallons of flow annually (391 million from Sumner and 469 million from Bonney Lake), treats 2.8 million pounds of solids, removes 98.2% of solids, and gives away 338 tons of biosolid to gardeners, as described in the 2018 Sumner Regional Wastewater Treatment Facility Annual Report. The WWTP is a secondary treatment facility and discharges treated effluent to the White (Stuck) River. The last major upgrade to the WWTP occurred in March 2016. Capacity measurements for treatment plants include wastewater flow (measured in gallons per day) and organic influent loadings (or solids). Per the City's Sanitary Sewer Plan, the most common measurements of organic loadings are 5-day biochemical oxygen demand (BOD5) and total suspended solids (TSS). As of 2020, the permitted capacity of the WWTP is :

- Maximum Month (Design Flow): 6.10 million gallons per day (mgd)
- Peak Day Flow: 11.66 mgd
- Peak Hour Flow: 19.87 mgd
- Influent 5-Day BOD5: 10,900 pounds/day
- Influent TSS: 12,660 pounds/day

As described in the Sanitary Sewer Plan, the City of Sumner maintains an agreement with the City of Bonney Lake which allows Bonney Lake to use up to 3.3 mgd of the plant's maximum month flow capacity, while the remaining 2.8 mgd of the plant's capacity is reserved for flows from the Sumner service area.

Wastewater Flow

The City's Sanitary Sewer Plan analyzed 2015-2017 wastewater flow data recorded at the WWTP to determine current wastewater flow characteristics. Average annual flow in Sumner from 2015-2017 was 1.06 mgd, of which about 66% was assumed from residential flows and 34% from commercial/industrial flows. The Sanitary Sewer Plan compares this to population and employment data from 2016 (a residential sewered population of 10,251 and 15,313 employees) to develop the following residential and employee based per capita flows used to project future flows:

- Residential per capita flow: 68 gpd/resident
- Commercial and industrial per employee flow: 23 gpd/employee

The Sanitary Sewer Plan uses the following peaking factors, determined by dividing the measured maximum month (1.71 mgd), peak day (3.67 mgd), and peak hour (3.60 mgd) flows by average annual flows:

- Maximum month to annual average: 1.61
- Peak day to annual average: 3.46
- Peak hour to peak day in 2017: 1.27
- Peak hour to annual average: 4.39

The maximum month, peak day, and peak hour factors are related to the served population and typically these peak factors decline as the population increases.

Infiltration and inflow were also considered in determining the peak day and peak hour flows throughout the system. Inflow is runoff entering the sewer directly, typically from storm sewer connections, basement sump pumps, roof drains, and submerged manholes. Infiltration occurs as groundwater leaks into the sewer system through cracked or broken pipes and manholes or through loose joints and connections. I/I rates ranged from 267 gpd/acre in 2016 to 641 gpd/acre in 2015.²¹ The Sanitary Sewer Plan uses the 2015 rate of 641 gpd/acre for planning purposes because it was the highest over the analyzed time period.

Assumed Population and Employment

The Sanitary Sewer Plan considers projected wastewater flows through the years 2024 and 2038. Throughout the sewer service area that includes the city limits and portions of the UGA, the residential population planned for is 11,658 for 2024 and 13,146 for 2038. The Sanitary Sewer Plan assumes that by 2038 all households within the service area will be sewered and that the sewered area (the area of all parcels and right-of-way adjacent to a sewer line) will include city limits and the entire UGA. Anticipated employment in the sewer service area is 18,917 for 2024 and 21,046 for 2038.

Major Recent and Planned Improvements

Funds were allocated in the City of Sumner's 2023-2024 Biennial Budget to upgrade equipment and add weather protection to increase longevity, as well as perform major long-term maintenance on aeration basins and digesters at the WWTP. The City's 2023-2024 Biennial Budget also includes funds to replace back-up generators that keep the WWTP working during power outages. In addition, funds are allotted

to receive full delegation of the Pretreatment Program currently under development to meet Washington State Department of Ecology requirements.

The Sanitary Sewer Plan identified the following improvement projects for 2018-2024:

- Many of the City's pump stations will exceed their typical 25-year life expectancy of electrical and mechanical equipment and will require rehabilitation or replacement improvements.
- The City is taking a proactive approach to keeping inflow and infiltration rates low and preserving the overall functionality of the collection system by funding a program to source to repair and replace problematic or deteriorated areas within the City's sanitary sewer system. This also allows the maintenance crews to monitor the condition of the collection system and make recommendations for repairs and replacement, as needed.
- A general budget was included for WWTP operation and maintenance improvements that may include roof replacements, painting, replacement of mechanical equipment, and replacement of electrical, instrumentation, and control equipment.
- A general budget was included to repair or replace broken pipes, as needed.

Level of Service (LOS)

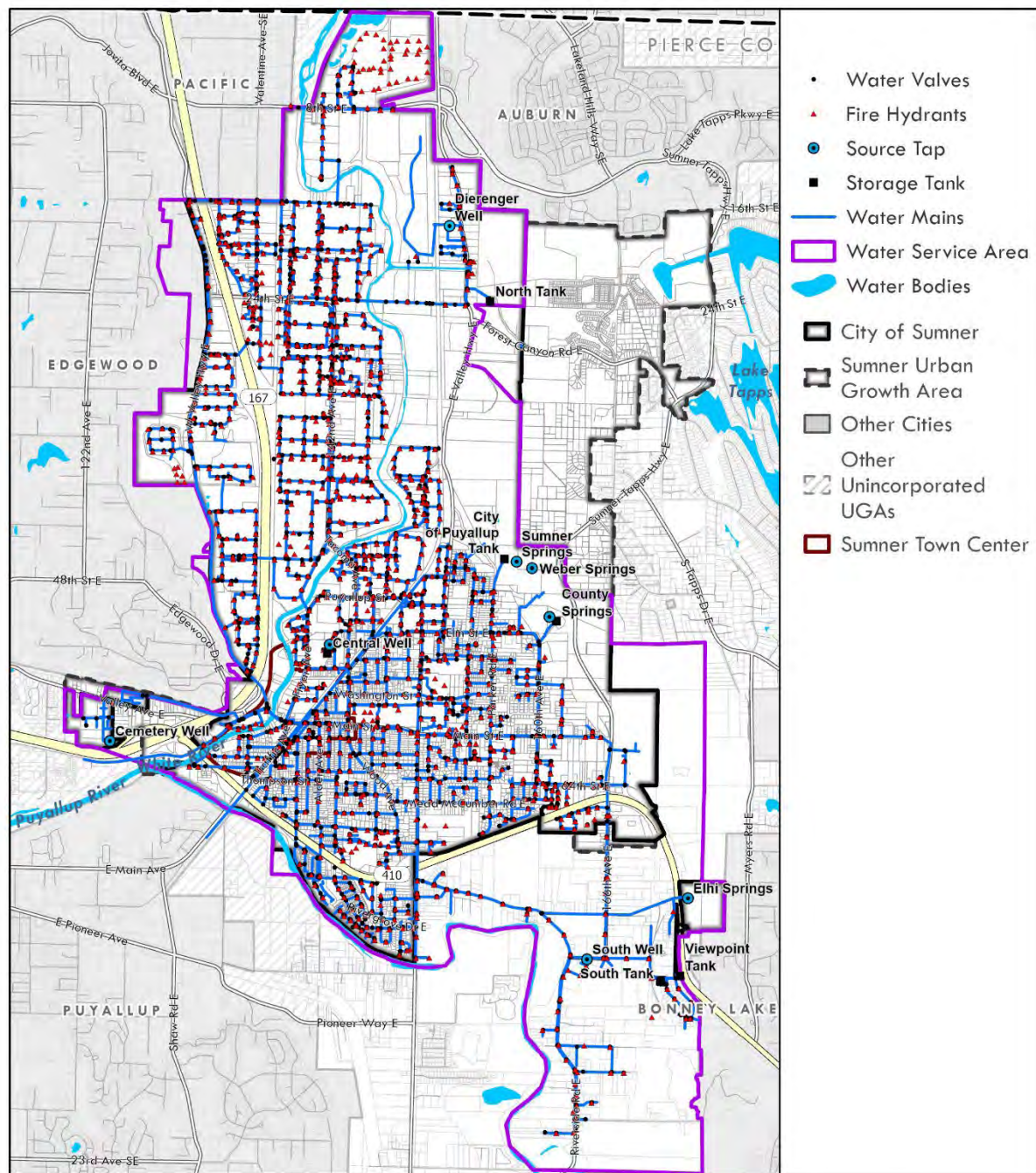
Policy 1.8. of the 2020 Comprehensive Plan's Capital Facilities and Public Services Element directs the City to establish and provide for the sanitary sewer system LOS defined in the Sanitary Sewer Plan (City of Sumner, 2020). The Sanitary Sewer Plan establishes the following per capita flows to project future flows:

- Residential per capita flow: 68 gpd/resident
- Commercial and industrial per employee flow: 23 gpd/employee

Water

Information in this section is primarily based upon the 2020 Water System Plan (Water System Plan), which is based on projections for a 20-year period to 2038. The City water system service area covers approximately 6,300 acres, 1,500 of which lie outside city limits. The service area is adjoined by the Bonney Lake, Valley (Alderton-McMillin), Puyallup, Pacific, Mountain View-Edgewood, and Tacoma water districts. The City of Sumner has assumed the spring supply, water rights, and customers of the Fowler Mutual Water Company, located in northwest Sumner, and portions of the Webstone Water District located outside the City of Pacific.

Exhibit 7-16: Water Utility & Infrastructure



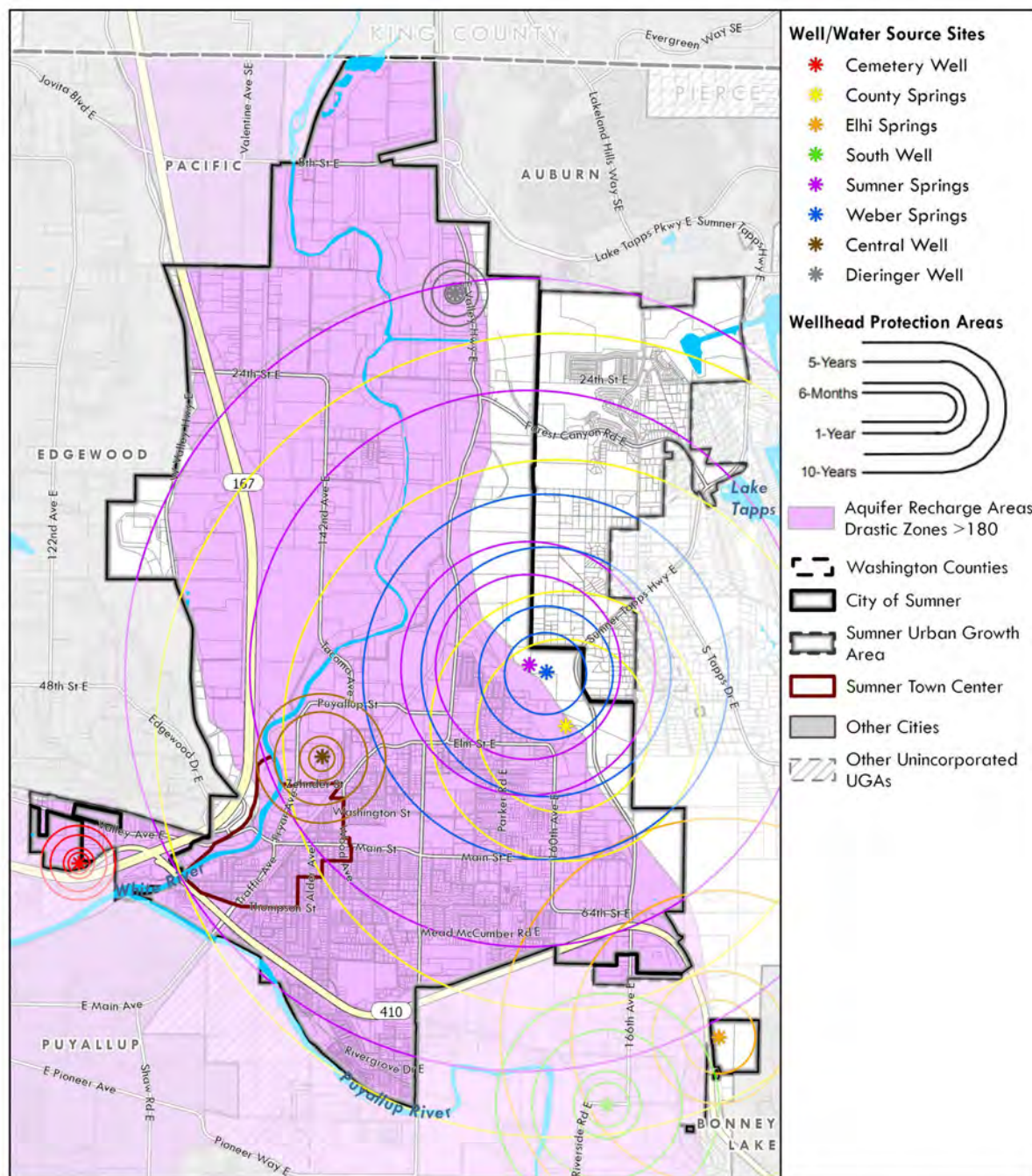
CITY OF SUMNER Water Utility & Infrastructure Area

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Source: City of Sumner, 2023; Parametrix, 2024.

Exhibit 7-17: Aquifer Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: August 2023

Source: City of Sumner, 2023; Parametrix, 2024.

Average Daily Demand

Based on actual usage for years 2015 through 2017, the average per capita residential water usage for the three years was 72.73 gpd/resident, and this was used for residential demand projections. Also for the 2015-2017 period, average per employee water usage for the three years was 25.28 gpd/employee.

Total annual use as of 2018 was estimated to be 1.75 million of gallons per day (mgd). The projected 2038 amount is 1.96 mgd. The plan also extends to 2068 and has a range of 2.38 to 2.85 mgd annual use.

Maximum Daily Demand

Comparing maximum daily production to average demand for the period, the Water System Plan uses 2.05 as the estimated peaking factor.

Water Facilities

Sumner's water system includes about 90 miles of transmission mains (2 inches to 18 inches). The City currently has the rights to utilize up to eight potable water sources, including four springs (Sumner Springs, County Springs, Weber Springs, and Elhi Springs) and four wells (South Well, Central Well, Dieringer Well, and West Well) (see Exhibit 7-16 and Exhibit 7-17). The City's water system currently has a physical source capacity of approximately 5.31 mgd and a storage capacity of approximately 5.40 million gallons.

Source Evaluation

The Sumner water system has a current operational source capacity of approximately 3.59 mgd. Based on water demand projections, the instantaneous capacity of the existing City sources may be insufficient to meet the projected maximum day demand by the year 2038 if the City does not receive approval of future additional water rights for the Central Well to allow for the increased source capacity of 1.05 mgd with provisions to expand to 2.1 mgd.

Assumed Population and Employment

The Water System Plan considers projected water demand through the years 2028, 2038, and 2068 for purposes of long-range planning necessarily associated with planning for water rights acquisitions (BHC Consultants, 2020). Throughout the water service area that includes the city limits and a rural area to the south, the residential population planned is 12,321 for 2028 and is 13,343 for 2038 according to the Plan's projections in 2020. The anticipated population for the year 2068 is also considered in the plan at 16,946. Anticipated employment in the water service area is 18,064 for 2028 and 19,096 for 2038. By 2068 this grows to 23,057.

Major Recent and Planned Improvements

The 2023-2024 City of Sumner Biennial Budget allocates funds to retrofit and recoat the South Tank and recoat the Sumner Spring Tank, as well as convert the City's telemetry system to cellular and retire the

outdated monitoring system. The 2023-2024 Biennial Budget also includes funders to replace the chlorine analyzer and generator, and to manage vegetation in the watershed. In addition, city staff have indicated that capital projects completed in 2021-2022 involved the start of the 24th Street East relocation Project and new infrastructure, as well as advanced design for the Town Center, including the Cherry and Maple Utilities Projects.

The following improvements were identified and recommended for implementation in 2018-2028 in the Water System Plan:

The City plans to continue to expand the water system to service areas not adequately served by the distribution system as currently constructed.

- Project D7 - Extend from 149th Avenue to East Valley Highway
- Project D8 - East Valley Highway from Salmon Creek to CTI

As significant City projects are constructed, the City will make improvements to realize efficiencies.

- Project C1 - Bridge Street Bridge Replacement
- Project C2 - Stewart Road Bridge Replacement
- Project C3 - Lower White River Restoration Project
- Project C4 - 64th & Sumner Tapps Highway
- Project C5 - Operations Facility

The proposed source and storage improvement projects address reliability.

- Project S1 - Additional Water Rights Acquisition
- Project S2 - Central Well Treatment Capacity Expansion
- Project S3 - South Well Improvements
- Project S4 - Dieringer Well Improvements
- Project S5 - West Well Improvements
- Project S6 - Sumner Springs Improvements
- Project S7 - County Springs Improvements
- Project ST1 - Earthquake Control Valves and Foundation Improvements
- Project ST2 - Viewpoint BPS Improvements
- Project ST3 - North Tank Improvements
- Project ST4 - Viewpoint Tank Detention Pond
- Project ST5 - Springs Tank Improvements

Additional projects have been identified to increase the operational effectiveness of the system:

- Project O&M1 - Hydrant and Isolation Valve Upgrades - 20 Years

The following improvements were identified and recommended for implementation in 2029-2038 in the Water System Plan:

- Many of the City's existing lines are made of asbestos concrete (AC) and have reached the end of their design life. These water lines are proposed to be replaced as significant repairs are made, leaks

are found on a segment, in coordination with street improvements, or as needed due to inadequate sizing. For example, the City has a plan to replace existing AC and small steel pipes through Project D5 Water Main Replacement Program.

- The City has filed application G2-30534 to increase the approved combined withdrawal rate from the West, South, and Central Wells in order to have sufficient production capacity to meet the projected maximum day demand beyond the year 2038. Although the City is currently in the application review and approval process, the City plans for Project S2 Central Well Treatment Capacity Expansion, which doubles the production capacity of the Central well and is pending acquisition of the additional water rights.

Level of Service

The City of Sumner adopted the following LOS standards for the water system in Policy 1.6.1 of the Comprehensive Plan's Capital Facilities and Public Services Element.

- Residential Demand: 60.3 gpd/capita
- Employee Demand: 58.3 gpd/employee plus 252,000 gpd

While included in the 2020 Comprehensive Plan, the policies have not been updated since the adoption of the 2020 Water System Plan. This DEIS includes analysis based on the Water System Plan: 72.73 gpd/resident and 25.28 gpd/employee.

Stormwater

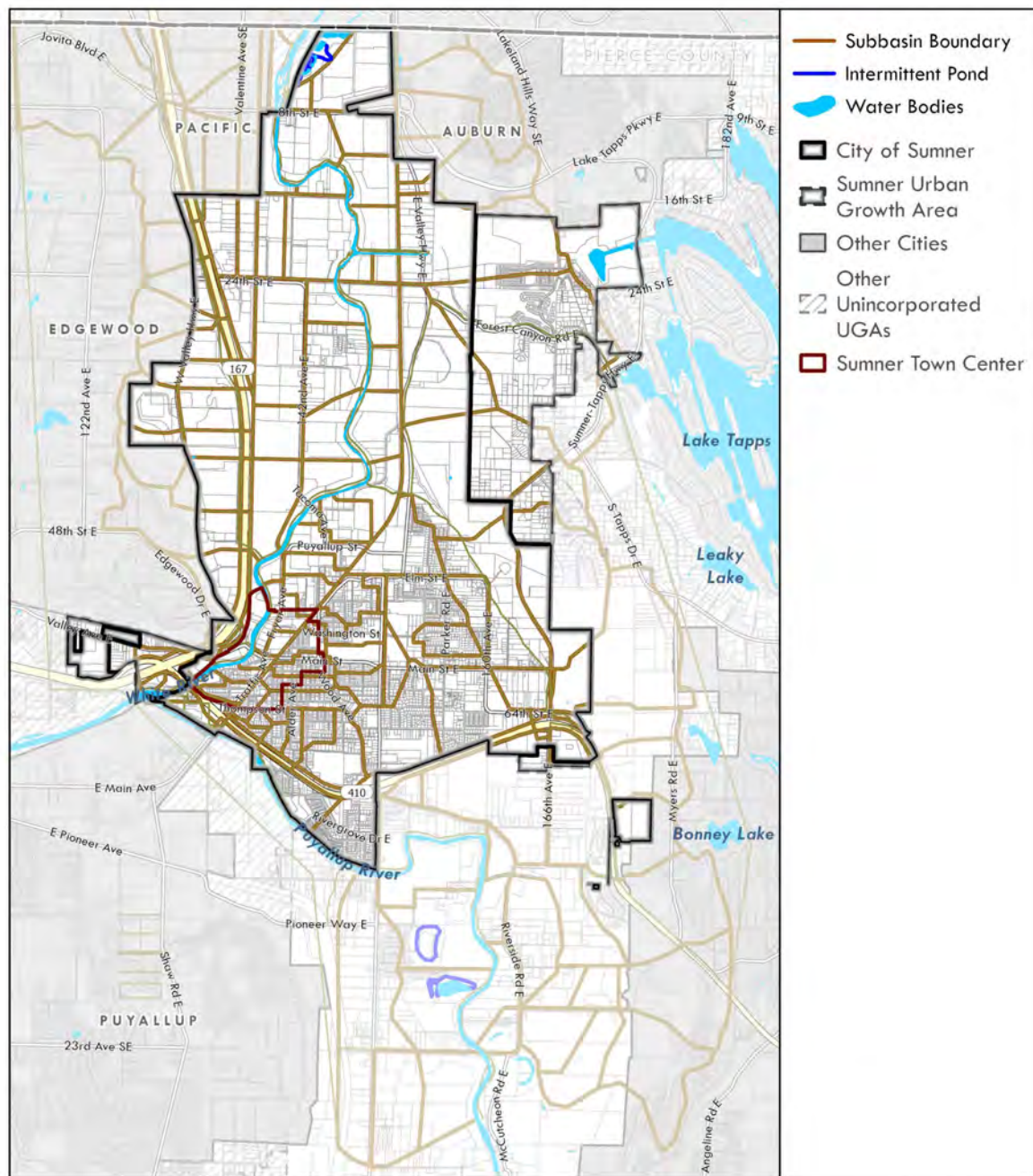
The information in this section is based on the City of Sumner 2011 Stormwater Comprehensive Plan Update (2011 SWCP) (Parametrix Inc. 2011), which is an update to the City of Sumner Stormwater Comprehensive Plan adopted in 1992 (1992 SWCP), the City of Sumner 2020 Stormwater Capital Improvement Plan (Parametrix Inc. 2020), and the Pierce County 2023 Comprehensive Flood Hazard Management Plan (Pierce County, 2023) and is incorporated in this analysis by reference.

Sumner is located in the valley where the White River flows into the Puyallup River and within the middle reach of the Puyallup River, which acts as a transitional zone between the more urbanized lower reach and rural upper reach (Pierce County, 2023). The valley has historically been drained to lower the natural water table, control flooding, and create land that was more conducive for agriculture. As more intensive commercial/industrial and residential development has occurred, expansion of the stormwater system has been necessary to collect and convey stormwater to the rivers and to prevent flooding.

The purpose of the Stormwater Plan has been to project the capacity infrastructure needs and address current problems with the stormwater system. Changes in state and federal water quality regulations, stormwater retention and detention standards, and other parameters have an effect on the overall system as well as accurately anticipating what type of growth will occur.

Stormwater Modeling

The 1992 SWCP identified 44 drainage basins that generate and affect stormwater flows within the city limits. These basins were further divided into 115 subbasins, as shown in Exhibit 7-18.

Exhibit 7-18: Stormwater Subbasin Boundaries

CITY OF SUMNER

Stormwater Subbasin Boundaries

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: October 2023

Source: City of Sumner, 2023; Parametrix, 2023.

The majority of these basins were modeled in 1992 for the 25-year, 24-hour event and the 100-year, 24-hour event using Type 1A precipitation distribution. Hydrologic modeling data was subsequently used to complete hydraulic modeling of the Sumner stormwater infrastructure to determine system deficiencies and identify potential capital improvement projects. The results of the modeling are contained in the 1992 Stormwater Comprehensive Plan.

The 2004 Stormwater Comprehensive Plan (2004 SWCP) update included remodeling up to four of the subbasins because of a significant change of land use designation (i.e., an increase in allowable development density) between 1992 and present. Remodeling based on the 2004 land use map and allowable densities showed there was no significant increase in allowable density for developable areas located within the city limits over what was modeled in 1992.

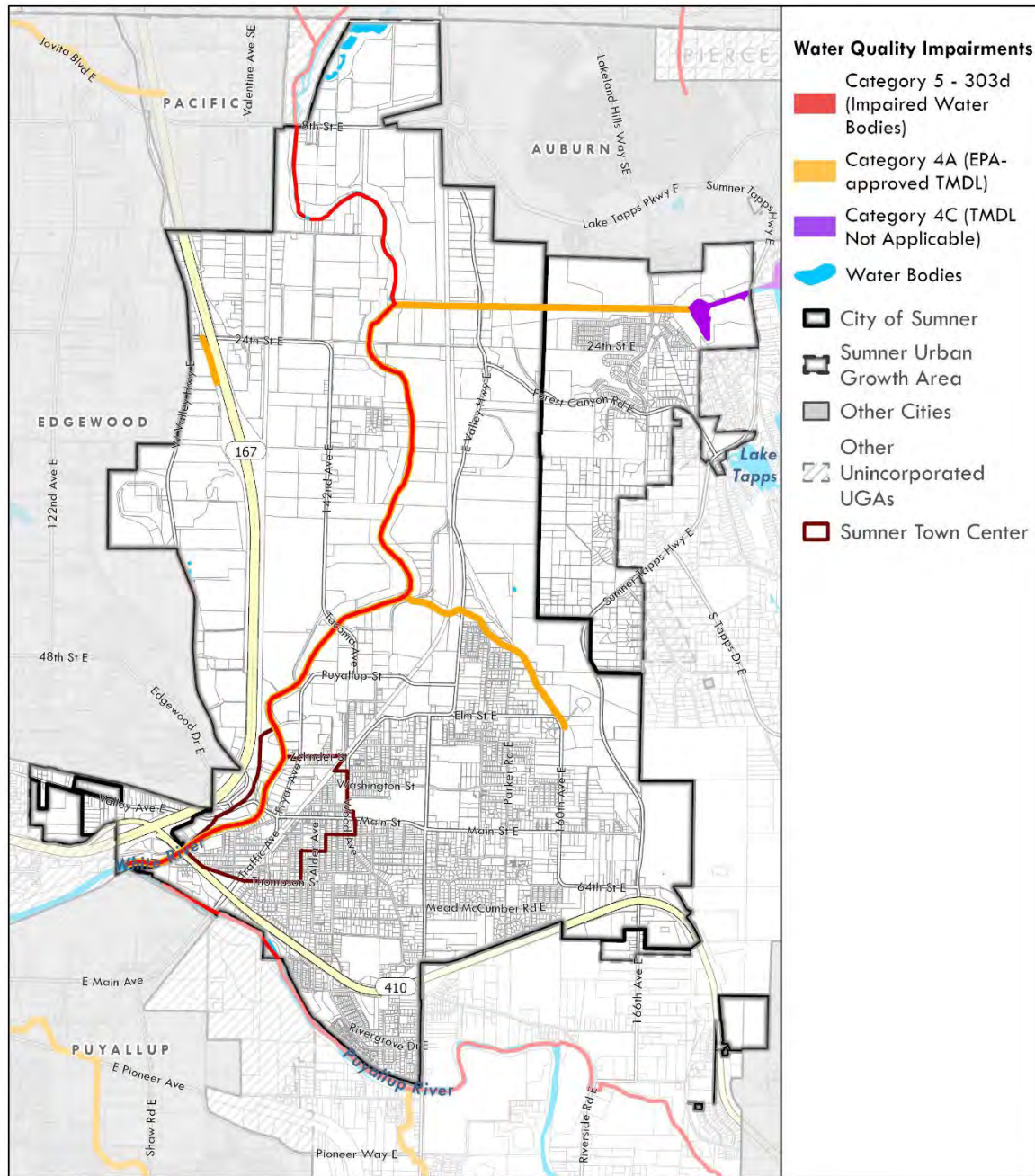
The modeling in 1992 assumed average densities for Low Density Residential (LDR) and Medium Density Residential (MDR) zones: one dwelling unit per acre (approximately 15% impervious surface area) and four dwelling units per acre (approximately 42% impervious), respectively. These density assumptions are too low for new development based on the minimum lot sizes currently allowed in LDR and MDR zones. Based on the current allowable lot sizes, density assumptions of 40% for LDR and 35% for MDR are more appropriate (City of Sumner, 2023). Although the densities assumed for inputs in the 1992 hydrologic modeling are not suitable for current development trends, they were appropriate for development occurring before and at the time the modeling was conducted. A majority of the capital improvement projects proposing upsizing existing conveyance as part of the 2004 planning is in the “Old Town” portion of Sumner, so previous modeling is still applicable.

Modeling conducted during preliminary regional facility sizing for the capital improvement section of the 2011 SWCP was completed using the Western Washington Hydrology Model and the basin characteristics and model inputs presented in the 1992 SWCP, with the exception that the LDR and MDR density assumptions were revised to more accurately represent current development trends. The modeling results for preliminary regional facility sizing are included in the 2011 SWCP.

Stormwater Requirements

Stormwater requirements for the City are included in Chapter 13.48 of the Sumner Municipal Code, Stormwater Management Regulations.

The 2011 SWCP presents an overview of federal, state, county, and local regulations and policies that impact stormwater and surface water. Federal regulations include Clean Water Act NPDES Stormwater Permits, Total Maximum Daily Loads (see Exhibit 7-19 for impaired waterbodies in the City of Sumner), Safe Drinking Water Act, Endangered Species Act, and Federal Emergency Management Agency. State regulations include Puget Sound Partnership Action Agenda, Hydraulic Project Approval, and Shoreline Management Act. County regulations include Stream Team, and Flood Control Hazard District. Local regulations include Surface Water Design, City of Sumner Comprehensive Plan, Critical Areas, and Development Regulations.

Exhibit 7-19: Impaired Water Bodies

CITY OF SUMNER

Impaired Water Bodies

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Source: City Sumner, 2023; Parametrix, 2023.

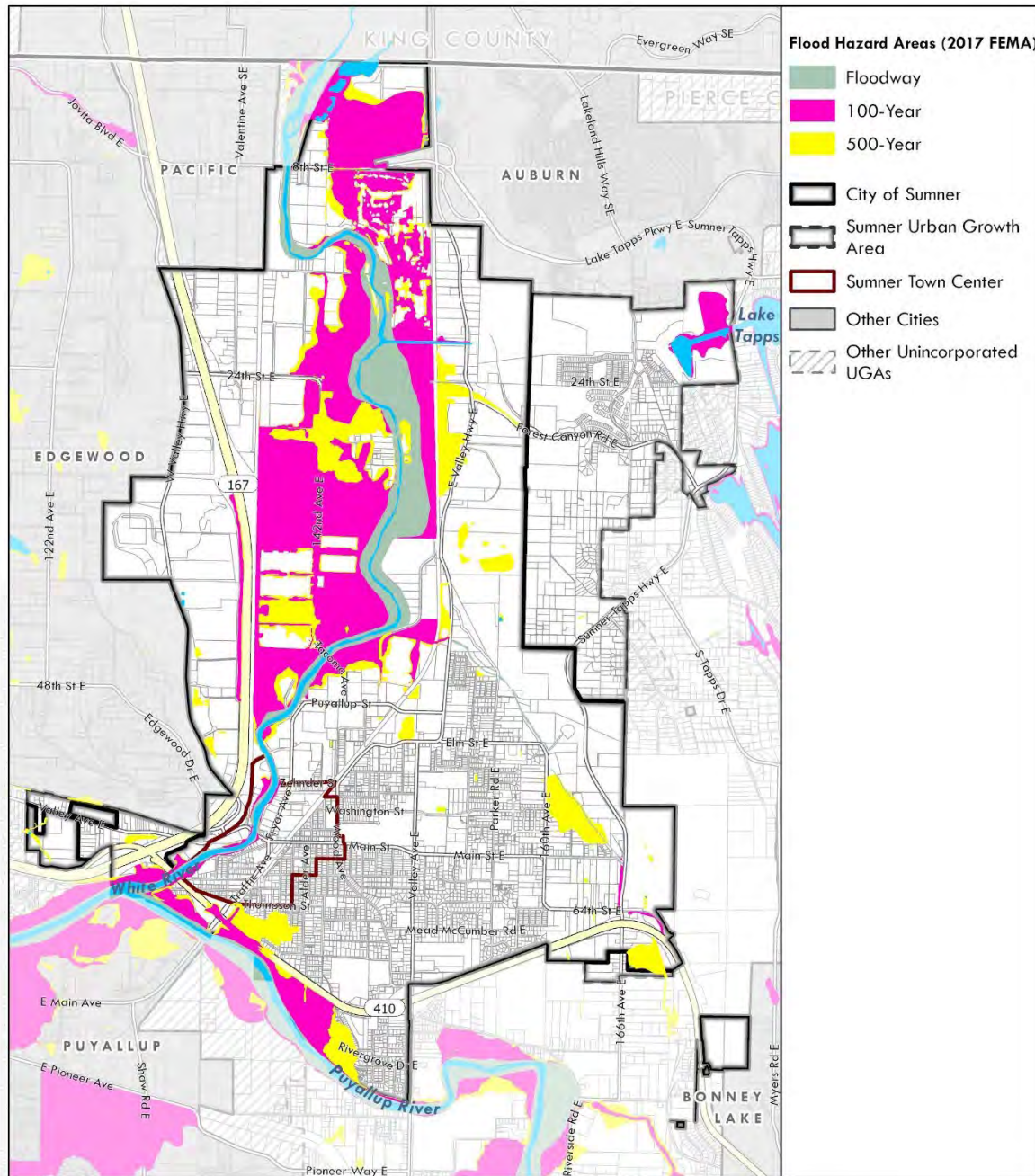
Flood Hazard Areas

Within the study area, there is a regulated 100-year floodplain for the White and Puyallup Rivers (Exhibit 7-20). Any development, such as adding fill, within the floodway and floodplain may increase surface water elevations during flood events. This, in turn, could expand the area affected by floodwaters, unless mitigation measures are implemented to compensate for the increased elevations. The City of Sumner currently implements the floodplain regulations required by the National Flood Insurance Program (NFIP) and through its Shoreline Master Program (SMP) and SMC Chapters 15.52 (Flood Hazard Protection).

Land along the White River is largely developed. Some of this area is in the 100-year flood hazard area (Zone AE), but most is outside the 100-year flood hazard area and in the 500-year flood area (Zone X).

Pierce County owns and maintains many levees along the lower White River within Sumner city limits. There is a history of flooding-related problems in the Middle Puyallup River and lower White River in Sumner. Identified recommendations include improvements to the levees and revetments to provide a 100-yr level of protection within the City of Sumner, per the County's 2023 Comprehensive Flood Hazard Management Plan.

Exhibit 7-20: Flood Hazard Areas



CITY OF SUMNER

Flood Hazard Areas

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: City of Sumner, 2023; Parametrix, 2023.

Low Impact Development

The objective of Low Impact Development (LID) methods is to mimic the predeveloped site hydrology by using site design techniques that store infiltrate, evaporate, and detain runoff. Since every aspect of site development affects hydrologic patterns on the site, LID control techniques focus mainly on site hydrology. If LID techniques can be used, the net result will be to more closely mimic the watershed's natural hydrologic functions. This can have a benefit to receiving waters by maintaining base flows, more closely approximating the natural conditions that are good for fish and wildlife using the streams and rivers.

The City's 2020 Comprehensive Plan promotes a sustainable growth pattern in support of VISION 2040 and Pierce County Countywide Planning Policies, including its environmental policies promoting low impact development. These goals and policies are contained in the City's 2020 Comprehensive Plan Environment Element, and include the following policies relevant to stormwater:

- Policy 1.4.6 - Continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development.
- Policy 1.4.7 - Low impact development techniques will be encouraged for both private and public developments including retention of native vegetation, soil amendment, rainwater harvesting, pervious pavement and bio-retention.
- Policy 1.4.8 - Incorporate low impact development principles and practices into the design, construction and operation of all city facilities and city-funded projects only when economically feasible.
- Policy 1.4.9 - Work with residential and commercial developers to incorporate low impact development that preserves a site's natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.
- Policy 1.4.10 - Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.
- Policy 1.7.3 - Seek broad funding for stormwater system improvements.
- Policy 1.7.4 - Coordinate with Pierce County on stormwater matters of common interest such as protection and preservation of water quality and resources in watersheds shared by both the City and County.
- Policy 1.7.5 - Continue to implement storm drainage, erosion control and critical area ordinances to help reduce off-site impacts of development and protect stream channels, aquatic resources, habitat and wetlands. The regulations shall reflect the requirements and manuals of state and federal agencies as appropriate.
- Policy 1.7.6 - Ensure that existing and future public and private stormwater and other water quality protection infrastructure is properly maintained and operated.
- Policy 1.7.7 - Identify locations for regional surface water facilities in areas of anticipated redevelopment in Downtown. Promote the establishment of regional surface water management facilities to support infill development and preclude the need for individual on-site ponds and

facilities, provide development incentives, encourage efficient use of land, and reduce overall facility maintenance costs.

- Policy 2.2.4. - Continue to implement wetland protection and stormwater management regulations to help mitigate flooding impacts to the community.
- Policy 6.5 - Provide incentives for the use of low impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems. Low impact development should be the preferred alternatives for new transportation projects.

Some updates to these policies are proposed in the draft Comprehensive Plan (2024 periodic update) but low impact development; stormwater system funding; wetland, water quality, and habitat protection; and surface water management continue to be emphasized.

The City of Sumner has adopted the following documents, per chapter 13.48.030 of the Sumner Municipal Code:

- 2019 Washington State Department of Ecology Stormwater Management Manual for Western Washington;
- Appendix 1, Minimum Technical Requirements for New Development and Redevelopment, of the 2019-2024 Western Washington Phase II municipal stormwater permit;
- 2012 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound together with any amendments or corrections;
- City of Sumner Development Specifications and Standard Details, together with any amendments or corrections.
- The City of Sumner requires that all applicants for residential, commercial, institutional and government agency projects implement LID strategies and practices in their stormwater site plan. LID standards and criteria are set forth in the manuals and the Sumner Development Specifications and Standard Details.

Capital Improvement Projects

The City's 2020 Stormwater Capital Improvement Plan Update (2020 Plan Update) presents a summary of capital improvement projects proposed to alleviate existing and future infrastructure deficiencies and increase the water quality of stormwater discharged to receiving waters. The 2020 Plan Update was prepared to summarize projects previously completed and updated the Capital Improvement Projects (CIPs) to be carried forward based on updated City needs. The 2020 Plan Update documents previously identified projects that were either completed, no longer needed, or needed to be carried forward. The 2020 Plan summarizes the status of the projects from the 2011 SWCP.

The 2020 Plan Update includes a table summarizing each proposed capital improvement project, including priority, scheduled completion date, and estimated construction cost in 2091 dollars and at the time of completion, and a site map showing the locations of proposed projects. There are a total of 32 capital improvement projects identified in the project list. The projects have been scheduled based on a high, medium, or low priority. Projects prioritized as high, medium, and low are scheduled for completion in 0 to 5 years, 5 to 10 years, and 10 to 20 years, respectively. The total estimated cost for

these projects at time of construction completion is \$82,728,000, in 2019 dollars. The projects have been prioritized based on urgency and to balance the annual cost. The cost per year ranges from \$833,000 to \$26,363,000.

Existing Conditions

North Portion

The North Portion of the city is currently heavily developed industrial area, some agricultural area, and some commercial area. There is also a resource protection area identified east of the White River. Stormwater is currently managed via stormwater infrastructure in the street system.

East Portion

The East Portion of the city is currently developed residential and commercial area and includes the East Sumner neighborhood and East Main St Design Strategy Area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

South Portion

The South Portion of the city is currently developed residential area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

West Portion

The West Portion of the city is currently heavily developed commercial and residential and includes the town center area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

Sumner UGA

The Sumner UGA includes the areas described above and is currently developed commercial and residential area with some industrial uses and areas of undeveloped forest slopes, including publicly-owned watersheds. Limited stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas. It is subject to the County's stormwater management rules and plans.

Power and Natural Gas

Puget Sound Energy (PSE) provides both electric and natural gas services in Sumner². PSE is the oldest local energy provider in Washington and maintains nearly 2,400 miles of electric distribution lines and nearly 2,500 miles of natural gas pipeline in Pierce County. While natural gas is considered a non-essential utility, the Washington Utilities and Transportation Commission (WUTC) requires providers of electricity to provide service on demand in support of growth that occurs in their service areas. As such

² Puget Sound Energy's contact address is 355 110th Ave NE, Bellevue, WA 98004

PSE conducts its own ongoing capacity planning process to ensure their power supply and infrastructure are adequate to meet anticipated future needs.

Telecommunications

Telephone service in Sumner is provided by CenturyLink (formerly Qwest Communications)³, who owns a main feeder line in Fryar Avenue in western Sumner and a primary feed line along the BNSF railroad that runs along the eastern boundary of the golf course property. CenturyLink commonly co-locates its facilities, including both underground and aerial lines, with the facilities of electric power providers, such as Puget Sound Energy. The BNSF right-of-way is also the location of a Sprint fiber optic line for high-speed data transfer. Cellular phone service from a variety of providers is ready available on-demand throughout Sumner. Sumner has adopted regulations and permit processes applicable to wireless facilities, particularly 5G services. Telecommunication providers, such as CenturyLink and Sprint, provide their services upon demand from consumers and engage in their own capacity planning processes to ensure that they have adequate facilities to accommodate future growth in their service areas. In addition, providers of essential utilities, such as landline telephone service, are required by the Washington Utilities and Transportation Commission (WUTC) to regularly evaluate the capacity of their facilities.

7.3 Impacts

7.3.1 Thresholds of Significance

Impacts of the alternatives are considered significant if they would:

- Fail to meet established levels of service under projected growth:
 - **City Facilities.** 1.13 s.f. per capita for general government (and proposed change to 1.36 s.f. per capita), 0.44 s.f. per capita for police (and proposed change to 294 s.f. per employee), and 1.8 s.f. per capita for public works shops.
 - **Police.** Two commissioned officers per 1,000 population.
 - **Parks.** Levels of service for each facility type, as detailed above in Affected Environment.
 - **Sewer.** The Sanitary Sewer Plan standards of 68 gpd/resident and 23 gpd/employee, as well as the U.S. Census Bureau statistic of 2.47 persons/household for the City, are applied to each alternative.
 - **Water.** Fail to meet established levels of service under projected growth. The Water System Plan standards of 72.73 gpd/resident and 25.28 gpd/employee, as well as the U.S. Census Bureau statistic of 2.47 persons/household for the City, are applied to each alternative.
 - **Stormwater.** The stormwater pipe system shall be designed to convey and contain the peak runoff rate for the 25-year design storm.

³ CenturyLink's contact address is 120 Lenora St, Suite 502, Seattle, WA 98121

- Affect the ability of East Pierce Fire and Rescue to meet their established benchmarks for standards of coverage.
- Exceed planned student capacity for Sumner-Bonney Lake School District and Dieringer School District.
- Increase demand for energy or telecommunications infrastructure beyond the planning and service capabilities of providers.
- Increase hard surfaces and fill, removal of vegetation, and flooding impacts.

7.3.2 Impacts Common to All Alternatives

City Facilities and Police

Citywide

Under all alternatives, the City of Sumner and its UGA will see population, job, and housing growth, which will impact city facilities and police.

The need for general government facilities in 2044, with the adopted LOS of 1.13 square feet per capita, will increase to between 18,000 and 20,000 square feet to serve the city population. To serve both the city and the UGA, this would increase to between 21,000 and 23,000 square feet. The current facility area is 14,577 square feet. Under all alternatives, the city will need to add more square footage to meet the adopted LOS. This need would be even higher with the proposed change to an LOS of 1.36 square feet per capita. With this higher LOS, the city would have to provide a total of 21,000 - 24,000 square feet by 2044 to meet city population needs, and 25,000 - 28,000 square feet if serving the city and UGA.

Public works shops would need between 28,000 and 31,200 square feet to meet the adopted LOS for the 2044 city population, compared to 17,136 square feet of existing area. If the City were to annex the UGA, this need would increase to 33,400-36,600, depending on the alternative.

To serve the city population in 2044 and maintain the adopted LOS (0.44 square feet per capita), police facility needs will be between 6,800 and 7,600 square feet. If the city were to annex the UGA in the planning period, the need would be between 8,200 and 9,000 square feet, exceeding the existing 7,700 square-foot facility. This need would be higher if the proposed LOS of 294 square feet per employee were adopted: a total of 12,000 - 13,000 s.f. to serve the city population or a total of 14,000 - 15,000 s.f. to serve the city and UGA in 2044.

There are currently 21 police officers in Sumner. Under all alternatives, the need for officers in 2044 will reach 31-35 officers to achieve the adopted LOS for the city population (two commissioned officers per 1,000 population). If Sumner were to annex the UGA in the planning period, the need would be 37-41 officers, depending on the alternative.

North Portion

Under all alternatives, most of the city's job growth is expected to occur in the MIC, which is located in the North Portion. This could increase demands on city facilities, such as general government facilities

and Public Works shops, and police services. A small amount of housing growth is also expected in the North Portion, outside of the MIC, in all alternatives.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion would likely lead to more demand for government facilities and police services.

South Portion

The South Portion, compared to other parts of the city, is expected to see minimal housing growth and no job growth under the alternatives. Impacts to city facilities, such as general government facilities and Public Works shops, and police services are expected to be minimal.

West Portion

The West Portion, which contains the Town Center, will see an increase in jobs and housing in all alternatives. This is likely to lead to more demand for city facilities, such as general government facilities and Public Works shops, and police services.

Sumner UGA

The Sumner UGA will see slight job and housing growth across the alternatives, leading to minimal increases in demand for city facilities, such as general government facilities and Public Works shops, and police services.

Fire and Emergency Medical Services

Citywide

Under all alternatives, housing growth and population growth are expected, which will increase fire and EMS dispatches. The total number of calls for East Pierce Fire and Rescue (EPFR) is expected to increase linearly with an increase in population. Data from 2021 shows that Station 113, which serves the majority of the City of Sumner and the UGA had 2,850 dispatched responses. Station 113 had 2,970 total incident responses and Medic 113 responded to 2,713 calls for service. These responses include dispatches to support other EPFR stations and service areas outside of Sumner. If call volume increases at the same rate that population increases, EPFR can expect 4,184 to 4,589 total dispatched responses, 4,360 to 4,782 Ladder 113 incidents, and 3,983 to 4,368 Medic 113 calls for service per year depending on the alternative (Exhibit 7-21).

Exhibit 7-21: Fire and EMS Projected Annual Calls

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)	Alternatives 2 and 3 (Pop. 20,351 City + UGA)
General	2,850	4,184	4,589
Ladder 113	2,970	4,360	4,782
Medic 113	2,713	3,983	4,368

Source: EPFR, 2021; BERK, 2023.

Other stations that partially support the service area include Station 114 (West Tapps Station) and Station 122 (Boat House Station). These stations support the East Hill UGA and apparatus inventory for each of these stations can be found in Exhibit 7-22.

Exhibit 7-22: Additional Fire and EMS Stations Serving Sumner UGA

Station	Apparatuses	Minimum Personnel	Notes
Station 114 (West Tapps)	1 Engine Unit 1 Medic Unit	3	Serves the North half of Lake Tapps and East Hill UGA
Station 122 (Boat House)	1 Pontoon Rescue Boat	0	This station is not staffed and is used as a storage and dispatch station for Marine 122-Rescue Boat.

Source: EPFR, 2021; BERK, 2023.

While Stations 122 and 114 support the East Hill UGA, Station 113 serves a vast majority of the service area based on EPFR service areas. Station 113 is therefore responsible for maintaining levels of service in Sumner and the possible future incorporated UGAs. Population and associated dispatch are anticipated to increase to 145%-160% of current level, additional personnel and equipment beyond the existing minimum will be required at Station 113 as determined by EPFR Unit and Response Benchmarks. The station currently has capacity for 4 additional personnel per shift (capacity for 9 staff per shift), which would support an additional apparatus to dispatch in the service area.

The 2022 Annual Report by EPFR also cites that the aging population in the City of Sumner and the UGA will result in a higher demand for EMS dispatch relative to fire dispatch as citizens aged 65 and older tend to call for advanced life support and basic life support at a rate 2-3 times higher than those younger than 65.

North Portion

Under all alternatives, most of the city's job growth is expected to occur in the MIC, which is located in the North Portion. This could increase demands on fire and EMS services. A small amount of housing growth is also expected in the North Portion, outside of the MIC, in all alternatives.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion would likely lead to more demand for fire and EMS services, particularly growth located on the forested slopes in the WUI area.

South Portion

The South Portion, compared to other parts of the city, is expected to see minimal housing growth and no job growth under the alternatives. Impacts to fire and EMS are expected to be minimal.

West Portion

The West Portion, which contains the Town Center, will see an increase in jobs and housing in all alternatives. This is likely to lead to more demand for fire and EMS services.

Sumner UGA

The Sumner UGA will see slight job and housing growth across the alternatives, leading to minimal increases in demand for fire and EMS services.

Schools

Under all alternatives, housing growth is expected to result in more students, impacting school capacity. Exhibit 7-23 shows estimated student growth based on the housing capacity in each school district and each school district's assumed student generation rates.

Exhibit 7-23: School Student Growth (from City of Sumner growth)

District	Alternative 1: Additional Students	Alternative 2 Additional Students	Alternative 3 Additional Students
Sumner-Bonney Lake School District	513	995	998
Elementary School	302	601	603
Middle School	121	228	228
High School	90	166	166
Dieringer School District	7	35	31
Elementary School	5	25	22
Middle School	2	10	9

Source: Sumner-Bonney Lake School District 2022; Dieringer School District 2021; Sumner 2023; BERK, 2023.

Sumner-Bonney Lake School District

All alternatives would result in a greater number of students in the district. With growth in the city and UGA, the Sumner-Bonney Lake School District could see a total of between 513 and 998 new students, depending on the alternative. This could include between 302 and 603 elementary school students, 121-228 middle school students, and 90-166 high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since all alternatives add new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Under all alternatives, the Dieringer School District would serve more students than it does currently. New students could be between 7 and 31, depending on the alternative. This could include between 5 and 22 elementary students and 2 to 9 middle school students.

Parks

Under all alternatives, Sumner parks and trails would serve more people than they do currently. Draft levels of service for each amenity can be found in Exhibit 7-24 as well as whether or not current inventory will be sufficient for each proposed alternative. While no current deficiencies are present, future deficits are expected for active recreation facilities, informal recreation facilities, and park acreage based on the 2044 city and UGA population under each alternative. In addition, as the population increases and older adults make up a larger percentage of the population (following the current trend), the City may find a need for expanded facilities/services at the Sumner Senior Center.

Exhibit 7-24: Existing Parks Facilities and Minimum Facilities (rounded)

Activity	Req'd LOS (2024 conditions)	Exist. #	2044 City Demand (Alternative 1 and Preferred Alternative)	2044 City Demand (Alternatives 2 and 3)
Active Recreation Facilities	0.4 per 1,000 resident equiv.	5	7	7
Informal Recreation Facilities	3.4 per 1,000 resident equiv.	41	56	60
Parks	3.2 acres per 1,000 resident equiv.	38.8 acres*	53	57

Source: Parks and Trails Plan, 2024; Sumner Public Works, 2024.

* Includes 16.7 acres along the Sumner Link Trail maintained by Parks staff that are commonly used for picnics and other recreation activities.

North Portion

Substantial job growth in the MIC could lead to more demand for parks and recreation services for workers, however, housing growth is expected to be minimal in the North Portion.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion could increase demand for parks and recreation services.

South Portion

The South Portion is expected to see some housing growth, but it is not a growth focus area. This area will have no job growth under the alternatives. Impacts to parks and recreation are expected to be minimal.

West Portion

The West Portion, including the Town Center, will see housing and job growth in all alternatives, leading to more demand for parks and recreation services in this area.

Sumner UGA

The Sumner UGA will see some job and housing growth, but this growth is minimal compared to City growth. The UGA is not currently within Sumner's parks official service area, however, UGA residents may

still use Sumner parks. Some increases to demand on nearby Sumner parks would be expected but would likely be minimal.

Sewer

Citywide

WWTP FLOWS

Increased population and employment under all alternatives would increase wastewater flows in the city and UGA, requiring conveyance and treatment, thus placing greater demand on the City's wastewater collection system. The Sanitary Sewer Plan assumes that by 2038 all households within the service area will be sewerred and that the sewerred area will include city limits and the entire UGA (BHC Consultants, 2020). The Sanitary Sewer Plan does not anticipate the WWTP will reach its average annual flow, maximum month flow, peak day flow, or peak hour flow capacity by 2038. There is also a possibility that by 2044, the WWTP might still not have reached its capacity for these flow parameters, as influent wastewater flows have grown more slowly than originally predicted (BHC Consultants, 2020, pp. 8-2, 8-3). Projected 2038 influent flows for the City of Sumner are compared to Sumner's portion of the WWTP's rated capacity in Exhibit 7-25.

Exhibit 7-25 Existing and Projected WWTP Sumner Influent Flows (mgd)

	Average Annual Flow	Maximum Month Flow	Peak Day Flow	Peak Hour Flow
WWTP Rated Capacity ¹	4.27	6.10	11.66	19.87
Sumner Allocated WWTP Capacity²	1.74	2.80	6.02	7.64
Existing 2016 Flows	1.06	1.71	6.67	4.66
Year 2024 Flows	1.23	1.86	3.93	5.00
Year 2038 Flows	1.53	2.32	4.38	5.56
2038 Surplus/(Deficit) Based on Sumner's Allocated Capacity	0.21	0.48	1.64	2.08

1 The rated WWTP capacity numbers are taken from the City of Sumner Wastewater Treatment Facility Final Comprehensive Facility Plan Addendum No. 2 approved by Ecology. They have not been incorporated in the Facility's NPDES permit yet but are anticipated to be adopted soon. 2 The maximum month flow of 2.8 mgd is the only specified capacity for Sumner stated within the WWTP Operating Agreement between the Cities of Sumner and Bonney Lake. Other values are interpolated using the peaking factors for flow established within Chapter 6 of the 2020 Sanitary Sewer Comprehensive Plan for purposes of illustrating hydraulic adequacy of the existing WWTP to meet future projections.

Source: Sumner Sanitary Sewer Plan, 2020; BERK, 2020.

Based on the per capita flow rates from the Sanitary Sewer Plan (68 gpd/resident and 23 gpd/employee), the total additional maximum month flow for residents and employees (using the peaking factor of 1.61 established in the 2020 Plan) is approx. 0.73 mgd from Alternative 1 and the Preferred Alternative and 0.93 mgd from Alternatives 2, 3 by 2044. It may be possible that the anticipated deficit can be

accommodated through regular monitoring and capital planning for all alternatives. The Capital Facility Plan Element of the Comprehensive Plan and associated Sanitary Sewer Plan is updated every 6 years, and the City's next Comprehensive Plan periodic review is due in 2030, and every eight years thereafter.

As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake. In anticipation of this need, the Wastewater Treatment Plant Phase III Feasibility Study was completed in 2016 and examines a service area that includes the city limits and the entire UGA. This study concluded that a maximum month WWTP capacity of 9.2 mgd was achievable on the current site. At such a time that influent flows necessitate the initiation of another expansion, the agreement would need to be updated to reallocate new capacity shares, per the Sanitary Sewer Plan.

WWTP BOD5 and TSS Loading

Per the Sanitary Sewer Plan, with the completion of the WWTP expansion in 2016, the WWTP has sufficient capacity to accommodate projected influent 5-day BOD₅ and TSS loads through 2038. The 2038 projected maximum month influent loadings to the WWTP are 8,620 pounds/day for 5-day BOD₅ and 9,400 pounds/day for TSS, approximately 2,280 and 3,260 pounds/day less than the respective permitted capacities

North Portion

Increased demand for sewer services will occur under all alternatives as housing and job growth occurs in the North Portion. Job growth, in particular, will add substantial demand in the MIC area. While projected wastewater flows and associated BOD₅/TSS loading generated from the North Portion would vary based on population and employment, overall flows are similar and would be processed at the WWTP regardless of where they are generated.

East Portion

All alternatives add housing and job growth in the East Portion, including the East Sumner neighborhood, which would require improvements to the collection and conveyance infrastructure, especially under Alternatives 2 and 3. Projected wastewater flows and associated BOD₅/TSS loading generated from the East Portion would be processed at the WWTP.

South Portion

While the South Portion is not a focus area for growth, some housing growth will occur under all alternatives and increase demand on the wastewater system. Overall demand on the City's wastewater system from the South Portion is anticipated to remain fairly consistent compared to the other portions of the city. While projected wastewater flows and associated BOD₅/TSS loading generated from the South Portion would vary slightly based on population and employment, overall flows would be processed at the WWTP.

West Portion

Housing and job growth in the West Portion will occur under all alternatives, with an emphasis on the Town Center, and require planned improvements to the collection and conveyance system. This is especially true for Alternatives 2 and 3, which add more growth than Alternative 1 and the Preferred Alternative. Projected wastewater flows and associated BOD₅/TSS loading generated from the West Portion would be processed at the WWTP.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, placing additional demand on the wastewater system.

Water

Citywide

The 2020 Water System Plan notes that existing City sources may be insufficient to meet the projected maximum day demand by the year 2028 if the City does not receive approval for the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd. Under all alternatives, increased population and employment would result in increased demand for water service, placing additional load on the current water supply system. Overall demand placed on the City's water system is similar regardless of where the growth occurs.

Average 2044 daily water demand for each alternative is estimated using factors in the Water System Plan (72.73 gpd/resident and 25.28 gpd/employee). Using the peaking factor of 2.05 established in the Water System Plan, the total additional maximum daily water demand for residents and employees is approx. 1.01 mgd from Alternative 1 and the Preferred Alternative and 1.27 mgd from Alternatives 2 and 3 by 2044. Since the Water System Plan anticipates growth to 2068 and associated strategies and investments, it is possible that the DEIS growth assumptions may be accommodated. Growth timing can be addressed through regular monitoring and capital planning, as the Water System Plan is updated every 6-10 years.

North Portion

Increased water demand will occur under all alternatives as housing and job growth occurs in the North Portion. Job growth in the MIC in particular will add substantial demand.

East Portion

All alternatives add housing and job growth in the East Portion, including the East Sumner neighborhood, which will require planned improvements to the water system. This is especially true for Alternatives 2 and 3, which add the most housing growth in the East Portion and may require improvements beyond what is already planned.

South Portion

While the South Portion is not a focus area for growth, some housing growth will occur under all alternatives, increasing demand on the City's water system. Overall demand on the City's water system from the South Portion is anticipated to remain fairly consistent compared to the other portions.

West Portion

Housing and job growth will occur in the West Portion under all alternatives, with an emphasis on the Town Center. Improvements to the water system will be needed to support development and growth. This is particularly true for Alternatives 2 and 3, which may require improvements beyond those already planned.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, resulting in increased demands on the water system.

Stormwater

Citywide

Additional growth and development will increase the amount of impervious surfaces and the level of stormwater runoff under all of the alternatives. In general, growth and development may require the expansion of stormwater infrastructure, and will require the maintenance, repair, or replacement of existing infrastructure facilities. The resulting higher stormwater peak flows can overwhelm roadways and stormwater infrastructure, leading to flooding, erosion, and potential property damage. New stormwater facilities will need to comply with current stormwater regulations and quality standards and the increased development can result in poorer stormwater quality, requiring additional treatment measures to protect local water bodies from pollution.

The Pierce County 2023 Comprehensive Flood Hazard Management Plan identified policies, programs, and projects to reduce the impacts on the community from major flooding events, reduce damage to critical infrastructure and private improvements, reduce ongoing maintenance costs, and improve habitat conditions while protecting and maintaining the regional economy. This includes projects identified along the White River and Puyallup River in the City of Sumner.

Since the relatively minor differences in growth capacity between the alternatives are attributable primarily to location, the increased growth capacity will not necessarily translate into greater amounts of impervious surfaces since most additional growth will likely be accommodated through greater building heights. Increases in impervious surfaces are also expected from the development and redevelopment of underutilized and vacant parcels and development that increases building footprints or parking on existing lots, such as through ADUs or larger buildings. Impacts will be especially pronounced in areas where the current land use is predominantly vacant or vegetated.

North Portion

The White River valley, which makes up most of the North Portion of the city, is at greatest risk of flood events. Large developments in the White River valley would reduce floodplain storage and would increase the number of people and property at risk of flooding impacts.

East Portion

The East Portion does not contain any major floodplains or risk of flooding; therefore, there is not expected to be any increase in flood risk under all alternatives.

South Portion

Much of the South Portion is part of the Puyallup River Valley, and therefore susceptible to flooding. The growth anticipated under the alternatives would be outside the mapped FEMA flood zones and unlikely to be at risk of flooding.

West Portion

The West Portion contains the confluence of the White and Puyallup Rivers, is in both valleys, and is therefore susceptible to flooding. However, due to previously implemented flood risk reduction measures (such as hardened riverbanks), most of the growth anticipated under all alternatives is primarily outside the mapped FEMA flood zones and unlikely to be at risk of flooding. Some growth and development are anticipated along the Western side of the White River, small pockets of which are at risk of flooding. Portions of these areas are within the buffers required in the Shoreline Master Program and are unlikely to be developed.

Sumner UGA

Impacts in the Sumner UGA would be similar to those in the city in all Alternatives.

Power and Natural Gas*Citywide*

Under all alternatives, development within the City will increase the consumption of electricity and natural gas, though the precise level of consumption will vary based on the specific uses developed. Additionally, electricity and natural gas consumption may vary based on current energy codes. Both electric power and natural gas are readily available in the study area and PSE conducts continuous resource planning to ensure adequate energy supply within its service area. No significant impacts associated with power and natural gas are anticipated under any of the alternatives.

North Portion

In all alternatives, the North Portion will see increased energy demands primarily due to job growth in the MIC. Some additional demand from housing growth outside of the MIC would also occur.

East Portion

All alternatives add housing and job growth in the East Portion, which would increase demands for energy in these areas. This is especially true for Alternatives 2 and 3 due to greater housing growth.

South Portion

The South Portion is not a focus area for growth under any alternative, but it will see a small amount of housing growth under all alternatives, leading to increased demand for energy.

West Portion

The West Portion will see housing and job growth under all alternatives, with an emphasis on Town Center. Energy demands are likely to increase due to this growth.

Sumner UGA

Some housing and job growth will occur in the Sumner UGA, which would likely increase power needs.

Telecommunications*Citywide*

A variety of telecommunications services are available within the City. While development in the City would likely require additional installation of telecommunication infrastructure, such as phone lines, fiber optic cables, cellular receivers, etc., these are private facilities owned and operated by private service providers. The cost for these system improvements would be borne by the individual service providers and no significant impacts associated with telecommunications are anticipated under any of the alternatives.

North Portion

Additional demand on telecommunications infrastructure would likely occur due to job and housing growth, particularly job growth in the MIC.

East Portion

Housing and job growth in the East Portion would likely place additional demand on telecommunications infrastructure, especially under Alternatives 2 and 3, which include more housing growth than Alternative 1 and the Preferred Alternative.

South Portion

The South Portion would see some housing growth under all alternatives, though growth is minimal, so impacts to telecommunications infrastructure are likely to be minimal.

West Portion

The West Portion will see housing and job growth under all alternatives, with an emphasis on the Town Center. This would likely increase demand on telecommunications infrastructure.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, which could increase demand on telecommunications infrastructure.

7.3.3 Alternative 1 (No Action)

City Facilities and Police

Alternative 1, along with the Preferred Alternative, will have the least impacts to city facilities and police services because it adds the least growth of the alternatives.

Under the adopted LOS, by 2044, based on city population growth, the city will need 18,000 square feet of city facilities, 7,000 square feet of police facilities, and 28,000 square feet of public works shops. If the City were to annex the UGA, this need would increase to 21,000 square feet of city facilities, 8,200 square feet of police facilities, and 33,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-26.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would be higher. 21,000 square feet of general government facilities would be needed and 11,000 square feet of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 25,000 square feet of general government facilities and 14,000 square feet of police facilities based on proposed LOS changes. See Exhibit 7-26.

The City would also need to add more police officers. Currently, there are 21 officers. With city population growth, the City will need 31 officers. If the City were to annex the UGA by the year 2044 (not proposed in the 2024 Comprehensive Plan Update), 37 officers would be needed. This means an increase of 10-16 officers, depending on whether the UGA were to be annexed.

Exhibit 7-26: Alternative 1 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	21,000	6,400	25,200	10,600
Police	7,700	8,200	500	13,500	5,800
Public Works Shops	17,100	33,400	16,300	33,400	16,300

Source: City of Sumner, 2023; BERK, 2023.

Fire and EMS

Under Alternative 1, East Pierce Fire and Rescue stations serving Sumner are anticipated to serve 5,916 more people than they do currently if the UGA is incorporated by 2044. The impacts for Alternative 1 are consistent with impacts common to all alternatives (Exhibit 7-27).

Exhibit 7-27 Current and Projected Calls for Service

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)
General	2,850	4,184
Ladder 113	2,970	4,360
Medic 113	2,713	3,983*

Source: EPFR, 2021, 2022; BERK, 2023

*Expected to be higher than this projection with aging population per 2022 EPFR Annual Report

Under Alternative 1, Station 113 of East Pierce Fire and Rescue will require 2 additional firefighter/EMS staff per shift to meet current response time, turnout time, and level of service standards. To effectively reduce strain on current staff and apparatuses, Station 113 will need to add or be reallocated an additional apparatus to serve this area.

Schools

Sumner-Bonney Lake School District

Alternative 1, along with the Preferred Alternative, will have the least impact to schools because it adds the least amount of growth. Under Alternative 1, Sumner-Bonney Lake School District is expected to serve approximately 513 more students than they do currently. Alternative 1 is expected to add an estimated 302 additional elementary school students, 121 additional middle school students, and 90 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 1, like Alternatives 2 and 3 and the Preferred Alternative, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Alternative 1, along with the Preferred Alternative, will have the least impact to schools because it adds the least amount of growth. Under Alternative 1, Dieringer School District is expected to serve approximately 7 more students than they do currently. Alternative 1 is expected to add an estimated 7 additional elementary school students and 2 additional middle school students.

Parks

Under Alternative 1, Sumner parks and trails are anticipated to serve 1,985 more residents and 5,313 more workers from 2020-2044 in the city than they do currently. To address the increase in demand, the City will need to add two more active recreation facilities, 15 informal recreation facilities, and 14 acres of parks, to meet the draft minimum levels of service (Exhibit 7-24).

Sewer

Impacts are consistent with those described under Impacts Common to All Alternatives. Under the No Action Alternative and the Preferred Alternative, the WWTP will likely have a maximum monthly flow capacity deficit without capacity upgrades. This deficit would likely be accommodated if the WWTP capacity were increased to 9.2 mgd per the Wastewater Treatment Plant Phase III Feasibility Study. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake (BHC Consultants, 2020). While projected wastewater flows generated from the city under the No Action Alternative and the Preferred Alternative would vary slightly from Alternatives 2 and 3, overall citywide flows are similar and would be processed at the WWTP regardless of where they are generated.

Water

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. If the City does not receive approval of the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd, the City's existing sources may be insufficient to meet the projected maximum day demand by the year 2028, as noted by the Water System Plan. The increased population and employment by the year 2044 would result in increased demand for water service, placing additional load on the current water supply system. Growth under Alternative 1 would be primarily in the MIC, East Sumner, and Town Center. Overall demand placed on the City's water system is similar regardless of where the growth occurs.

Stormwater

Under the No Action Alternative, it is likely impervious surfaces would increase due to continued development and growth throughout Sumner; however, these increases would be minimal and consistent with the current growth rate in Sumner as they would comply with the current zoning restrictions. No significant increase in new impervious surfaces or removal of vegetation is anticipated. The majority of the development under Alternative 1 is anticipated to occur in areas that already consist of mostly impervious surfaces, including the MIC, East Sumner, and Town Center, which have been previously developed.

Power and Natural Gas

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. By 2044, the increased population and employment would result in increased demand for power, placing additional demand on power and natural gas services. PSE would continue to provide

natural gas services on demand. Overall utility demand placed on the City is similar regardless of where the growth occurs.

Telecommunications

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. The increased population and employment by 2044 would result in increased demand for telecommunication, placing additional demand on telecommunication services. As development increases, the City may continue to facilitate the advancement of telecommunication supply throughout the City. Overall telecommunication demand placed on the City is similar regardless of where the growth occurs.

7.3.4 Alternative 2

City Facilities and Police

Alternative 2 will have greater impacts to city facilities and police services because it adds more growth than Alternative 1 and the Preferred Alternative and would be similar to Alternative 3.

Under the adopted LOS, by 2044, based on city population growth, the city will need 20,000 square feet of city facilities, 8,000 square feet of police facilities, and 31,000 square feet of public works shops. If the City were to annex the UGA, this need would increase to 23,000 square feet of city facilities, 9,000 square feet of police facilities, and 337,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-28.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would increase. 24,000 s.f. of general government facilities would be needed and 13,000 s.f. of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 28,000 s.f. of general government facilities and 15,000 s.f. of police facilities based on proposed LOS changes. See Exhibit 7-28. The City would also need to add more police officers. Currently, there are 21 officers. With city population growth under Alternative 2, like Alternative 3, the City will need 35 officers. If the City were to annex the UGA, 41 officers would be needed. This means an increase of 14-20 officers, depending on whether the UGA were to be annexed between now and 2044.

Exhibit 7-28: Alternative 2 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	23,000	8,400	27,700	13,000
Police	7,700	9,000	1,300	14,700	7,000
Public Works Shops	17,100	36,600	19,500	36,600	19,500

Source: City of Sumner, 2023; BERK, 2023.

Alternative 2 would still see growth in Town Center, the MIC, and East Sumner, but would include additional housing growth throughout the city compared to Alternative 1 and the Preferred Alternative. This is especially true in the East and West portions of the City. Alternative 2, unlike Alternative 3, also includes additional housing growth on the current Cava mine site.

Fire and EMS

Compared to Alternative 1 and the Preferred Alternative, more demand under Alternative 2 would come primarily from the East and West portions of the City, due to more housing growth. East Pierce Fire and Rescue stations serving Sumner are anticipated to serve 7,712 more people than they do currently assuming incorporation of the UGA (Exhibit 7-29).

Exhibit 7-29: Current and Projected Calls for Service

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)
General	2,850	4,589
Ladder 113	2,970	4,782
Medic 113	2,713	4,368*

Source: EPFR, 2021, 2022; BERK, 2023.

*Expected to be higher than this projection with aging population per 2022 EPFR Annual Report

Under Alternative 2, Station 113 of East Pierce Fire and Rescue will require 3 additional firefighter/EMS staff per shift to meet current response time, turnout time, and level of service standards. To effectively reduce strain on current staff and apparatuses, Station 113 will need to add or be reallocated an additional apparatus to serve this area.

Schools

Sumner-Bonney Lake School District

Alternative 2 would have greater impacts to schools because it adds more growth than Alternative 1 and the Preferred Alternative, similar to Alternative 3. Under Alternative 2, Sumner-Bonney Lake School District is expected to serve approximately 995 more students than they do currently. Alternative 2 is expected to add an estimated 601 additional elementary school students, 228 additional middle school students, and 166 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 2, like Alternatives 1 and 3 and the Preferred Alternative, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Alternative 2 like Alternative 3 will have the most impacts to schools because it adds more growth than Alternative 1 and the Preferred Alternative. Under Alternative 2, Dieringer School District is expected to serve approximately 35 more students. Alternative 2 is expected to add an estimated 25 additional elementary school students and 10 additional middle school students.

Parks

Under Alternative 2, like Alternative 3, Sumner parks and trails are anticipated to serve 3,000 more residents and 5,313 more workers from 2020-2044 in the city than they do currently. To address the increase in demand, the City will need to add two more active recreation facilities, 19 informal recreation facilities, and 18 acres of parks, to meet the draft minimum levels of service (Exhibit 7-24).

Compared to Alternative 1, demand for parks under Alternative 2 may be higher in the East and West portions of the City, due to more housing growth. The current Cava mine site would be designated Medium Density Residential, which could result in a need for more parks and recreation amenities in that area in particular.

Sewer

Under Alternative 2, like Alternative 3, it is projected that more growth and development will occur than under Alternative 1 and the Preferred Alternative and the WWTP is anticipated to have a maximum monthly flow capacity deficit without capacity upgrades. This deficit would likely be accommodated if the WWTP capacity were increased to 9.2 mgd per the Wastewater Treatment Plant Phase III Feasibility Study. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake per the City's Sanitary Sewer Plan. Much of the increased demand in Alternative 2, like Alternative 3, would come from the East and West portions of the City.

Water

Under Alternative 2, it is projected that more growth and development and the increase of additional housing and employment would result in an increased demand for water service, placing an additional load on the current water supply system. Overall demand placed on the City's water system is similar regardless of where the growth occurs. However, If the City does not receive approval of the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd, the City's existing sources may be insufficient to meet the projected maximum day demand by the year 2028, as noted by the Water System Plan. Much of the increased demand in Alternative 2, like Alternative 3, would come from the East and West portions of the City.

Stormwater

Under Alternative 2, it is projected that more growth and development would occur and more acres of new impervious surface will be created than in Alternative 1 and the Preferred Alternative. The majority of the development anticipated under Alternative 2, with the exception of the Cava gravel mine, is

anticipated to occur in already developed areas. A greater number and size of housing units are anticipated to be built under Alternative 2 and would, therefore, result in more impervious surfaces than under Alternative 1 and the Preferred Alternative. It can also be assumed that more vegetation would be removed, especially when building multiple units on a previously single-family home lot. Greater impervious surface could result in more flooding in flood-prone areas, particularly in the White River Valley.

On the Cava gravel mine site, additional development would occur and likely result in greater amounts of impervious surface compared to Alternatives 1 and 3 and the Preferred Alternative. The current site has very little impervious surfaces and any additional development would be a significant increase. Additionally, the Cava gravel mine site contains wetlands and forested land which would likely be removed during development, creating stormwater impacts such as those described under Impacts Common to All Alternatives. Any fill of wetlands in the Cava gravel mine site would reduce the area's ability to reduce runoff and remove pollutants from stormwater. Mitigation required from the impacts to wetlands will need to follow requirements set forth in chapter 16.46 of the Sumner Municipal Code, Wetlands Protection. Development in the Cava gravel mine site would be at a small risk of flooding from the current wetlands and ponds on the property.

Power and Natural Gas

More growth and development is projected under Alternative 2, like Alternative 3, than Alternative 1 and the Preferred Alternative. The increased population and employment would result in increased demand for power and natural gas. This additional demand on utility supply may require additional infrastructure to support the demand than Alternative 1 and the Preferred Alternative. PSE may continue to provide natural gas services on demand. Compared to Alternative 1, more demand would come from the East and West portions of the city. Overall utility demand placed on the City is similar regardless of where the growth occurs.

Alternative 2, like Alternative 3 and the Preferred Alternative, also includes new greenhouse gas emissions reduction policies, including policies around expanding access to electric vehicle charging infrastructure. This would likely shift some of the capacity between infrastructure types but would still place more demand on power utility infrastructure.

Telecommunications

Under Alternative 2, like Alternative 3, more housing growth will occur than under Alternative 1 and the Preferred Alternative, resulting in more demands on telecommunications infrastructure. Housing growth in the East and West Portions are the primary sources of this additional demand, above the demand in Alternative 1 and the Preferred Alternative.

7.3.5 Alternative 3

City Facilities and Police

As described under Alternative 2, Alternatives 2 and 3 will have the most impacts to city facilities and police services because they add more growth than Alternative 1 and the Preferred Alternative.

Under the adopted LOS, By 2044, based on city population growth, the city will need 20,000 square feet of city facilities, 8,000 square feet of police facilities, and 31,000 square feet of public works shops. If the City were to annex the UGA at some point by 2044, this need would increase to 23,000 square feet of city facilities, 9,000 square feet of police facilities, and 37,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-30.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would increase. 24,000 s.f. of general government facilities would be needed and 13,000 s.f. of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 28,000 s.f. of general government facilities and 15,000 s.f. of police facilities based on proposed LOS changes. See Exhibit 7-28. The City would also need to add more police officers. Currently, there are 21 officers. With city population growth under Alternative 3, like Alternative 2, the City will need 35 officers. If the City were to annex the UGA, 41 officers would be needed. This means an increase of 14-20 officers, depending on whether the UGA were to be annexed.

Exhibit 7-30: Alternative 3 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	23,000	8,400	27,700	13,000
Police	7,700	9,000	1,300	14,700	7,000
Public Works Shops	17,100	36,600	19,500	36,600	19,500

Source: City of Sumner, 2023; BERK, 2023.

Fire and EMS

Fire and EMS impacts would be similar as described under Alternative 2 since Alternative 3 expects the same amount of citywide growth. The housing growth distribution varies somewhat, due to Alternative 2 reclaiming the Cava mine site, however impacts to Fire and EMS are expected to be similar.

Schools

Sumner-Bonney Lake School District

Like Alternative 2, Alternative 3 will have the most impact to schools because it adds more growth than Alternative 1 and the Preferred Alternative. Under Alternative 3, like Alternative 2, Sumner-Bonney Lake School District is expected to serve approximately 998 more students than they do currently. Alternative 2 is expected to add an estimated 603 additional elementary school students, 228 additional middle school students, and 166 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 3, like Alternatives 1 and 2 and the Preferred Alternative, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Like Alternative 2, Alternative 3 will have the most impacts to schools because it adds more growth than Alternative 1. Under Alternative 3, Dieringer School District is expected to serve approximately 31 more students than they do currently. Alternative 3 is expected to add an estimated 22 additional elementary school students and 9 additional middle school students.

Parks

Under Alternative 3, like Alternative 2, Sumner parks and trails are anticipated to serve 3,000 more residents and 5,313 more workers from 2020-2044 in the city than they do currently. To address the increase in demand, the City will need to add two more active recreation facilities, 19 informal recreation facilities, and 18 acres of parks, to meet the draft minimum levels of service (Exhibit 7-24).

Compared to Alternative 1, demand for parks may be higher in the East and West portions of the City, due to more housing growth under Alternative 3. Unlike Alternative 2, Alternative 3 does not plan for housing growth on the current Cava mine site, so parks demand in this area will be lower.

Sewer

Citywide impacts for Alternative 3 are consistent with those described under Impacts Common to All Alternatives and is similar to Alternative 2.

Water

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives and Alternative 2.

Stormwater

Under Alternative 3, there is anticipated to be less creation of impervious surface compared to Alternative 2 and more than Alternative 1 and the Preferred Alternative. Alternative 3 anticipates most growth in previously developed areas, which will utilize previous impervious surfaces, while Alternative 2

will also develop the Cava mine site which is mostly undeveloped with minimal impervious surfaces. Other citywide impacts are expected to be similar to those described under Alternative 2.

Power and Natural Gas

Under Alternative 3, citywide impacts are expected to be similar to those described under Alternative 2.

Telecommunications

Under Alternative 3, citywide impacts are expected to be similar to those described under Alternative 2.

7.3.6 Preferred Alternative

City Facilities and Police

The Preferred Alternative, along with the Alternative 1, will have the least impacts to city facilities and police services because it adds the least growth of the alternatives. The impacts for the Preferred Alternative are consistent with impacts common to all alternatives and Alternative 1.

Fire and EMS

Under the Preferred Alternative, East Pierce Fire and Rescue stations serving Sumner are anticipated to serve 5,916 more people than they do currently if the UGA is incorporated by 2044. The impacts for the Preferred Alternative are consistent with impacts common to all alternatives and Alternative 1.

Schools

Sumner-Bonney Lake School District

Growth under the Preferred Alternative is similar to Alternative 1, though as the growth is distributed differently, the impacts to school districts are slightly different. Like Alternative 1, the Preferred Alternative plans for less growth than Alternatives 2 and 3 and therefore is likely to have a lower impact.

Under the Preferred Alternative, Sumner-Bonney Lake School District is expected to serve approximately 682 more students than it does currently. This includes an estimated 413 elementary school students, 156 middle school students, and 113 high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 3, like Alternatives 1 and 2 and the Preferred Alternative, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Under the Preferred Alternative, Dieringer School District is expected to serve approximately 4 more students than it does currently based on growth within Sumner, including 3 elementary school students and 1 middle school student. This is lower than Alternative 1, due to differences in the distribution of citywide growth.

Parks

Under the Preferred Alternative, Sumner parks and trails are anticipated to serve 1,985 more residents and 5,313 more workers from 2020-2044 in the city than they do currently (same as Alternative 1). To address the increase in demand, the City will need to add two more active recreation facilities, 15 informal recreation facilities, and 14 acres of parks, to meet the draft minimum levels of service (Exhibit 7-24).

Sewer

Impacts are consistent with those described under Alternative 1, since the overall growth is the same. Under the Preferred Alternative, the WWTP will likely have a maximum monthly flow capacity deficit without capacity upgrades. This deficit would likely be accommodated if the WWTP capacity were increased to 9.2 mgd per the Wastewater Treatment Plant Phase III Feasibility Study. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary. While projected wastewater flows generated from the city under the Preferred Alternative would be slightly less than Alternatives 2 and 3, overall citywide flows are similar and would be processed at the WWTP regardless of where they are generated.

Water

Citywide impacts for this alternative are consistent with those described under Alternative 1. If the City does not receive approval for the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd, the City's existing sources may be insufficient to meet the projected maximum day demand by the year 2028, as noted by the Water System Plan. The increased population and employment by year 2044 would result in increased demand for water service, placing additional load on the current water supply system. Growth under the Preferred Alternative would be primarily in the East Sumner, and Town Center. Overall demand placed on the City's water system is similar regardless of where the growth occurs.

Stormwater

Citywide impacts for this alternative are consistent with those described under Alternative 1. No significant increase in new impervious surfaces or removal of vegetation is anticipated. The majority of the development under Alternative 1 is anticipated to occur in areas that already consist of mostly impervious surfaces, including East Sumner, and Town Center, which have been previously developed.

Power and Natural Gas

Citywide impacts for this alternative are consistent with those described under Alternative 1. This growth in population and employment will increase the demand for power and natural gas, requiring infrastructure upgrades. PSE would continue to provide natural gas services on demand. Compared to Alternatives 2 and 3, more demand would come from Town Center and East Sumner. The overall utility demand placed on the City is similar regardless of where the growth occurs.

The Preferred Alternative, like Alternatives 2 and 3, also includes new greenhouse gas emissions reduction policies, including policies around expanding access to electric vehicle charging infrastructure. This would likely shift some of the capacity between infrastructure types but would still place more demand on power utility infrastructure.

Telecommunications

Telecommunications infrastructure impacts under the Preferred Alternative are expected to be similar to Alternative 1. The housing and job growth will result in more demand on telecommunication infrastructure. Housing growth in the Town Center and East Sumner, as well as employment growth in the Sumner-Pacific Manufacturing Industrial Center, are the primary sources of this additional demand.

7.4 Mitigation Measures

7.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 and the Preferred Alternative mitigate potential impacts to public services and utilities:

City Facilities and Police

- Under Alternatives 2 and 3 and the Preferred Alternative, the city is preparing an updated Capital Facilities Plan which identifies future needs and funding sources.

Fire and EMS

- Alternatives 2 and 3 and the Preferred Alternative include a new Climate Change Resiliency element, which includes some hazard mitigation policies that could provide advanced resilience measures or preparation on fire and EMS in a citywide emergency.

Schools

- No incorporated plan features.

Parks

- No incorporated plan features.

Sewer and Water

- Alternatives 2, 3, and the Preferred Alternative include new comprehensive plan policies, including policies to seek regional planning efforts to address regional sanitary sewer and water concerns and emergency response, as well as implementing strategies that balance cost, benefits, health and safety, and promote affordability and equity to sanitary sewer and water services.
- Alternatives 2, 3, and the Preferred Alternative include revised comprehensive plan policies, including supporting proactive water conservation efforts throughout the City and septic system policies based on best practices.

Stormwater

- Alternatives 2, 3, and the Preferred Alternative include new and revised comprehensive plan policies, including policies in Capital Facilities and Public Services, Environment, and the new Climate Change element, to encourage low-impact development, upgrade systems to address flooding, and retain flood storage capacity.
- Alternatives 2, 3, and the Preferred Alternative update critical areas regulations for the latest best available science, which could better protect structures from flooding through updated stream buffers.

Power, Natural Gas, and Telecommunications

- Alternatives 2, 3, and the Preferred Alternative include new comprehensive plan policies, including policies to seek regional planning efforts to address regional utility concerns and emergency response, as well as implementing strategies that balance cost, benefits, health and safety, and promote affordability and equity of utilities to all communities.
- Alternatives 2, 3, and the Preferred Alternative include a new Climate Change Resiliency Element, which includes policies to improve energy conservation and efficiency.
- Alternatives 2, 3, and the Preferred Alternative includes a new comprehensive plan policy that facilitates the conversion from natural gas to alternative technologies and energy sources and support advancement of telecommunications within the City.

7.4.2 Regulations and Commitments**City Facilities and Police**

- Under all alternatives, the City is planning to construct new public works shops totaling 83,050 square feet. This will provide adequate square footage to meet the adopted LOS under all alternatives.
- All alternatives propose retaining the existing City Hall and Public Works Shops in public use land use designation.

Fire and EMS

- The East Pierce Fire and Rescue Capital Facilities Plan outlines future projects to improve service.

Schools

- The Sumner-Bonney Lake and Dieringer School Districts have capital facilities plans that outline future projects to address capacity issues.
- The City of Sumner implements school impact fees in permits for new development.

Parks

- Sumner has adopted a park impact fee in its municipal code at Chapter 12.38 addressing residential and non-residential uses.

- Sumner adopted an updated Parks and Trails Plan in 2024, which details system needs and capital projects.

Sewer

- The U.S. Environmental Protection Agency (EPA) regulates wastewater discharge under the Federal Water Pollution Control Act and the Clean Water Act. EPA administers the National Pollutant Discharge Elimination System, which requires permits for various types of discharge to streams and rivers, including treated wastewater effluent. In Washington State, EPA delegates its permitting authority to the Washington State Department of Ecology (Ecology).
- Public sanitary sewer system operations in Washington State are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington (RCW), as well as RCW Title 57.
- The City manages its sewer system under SMC Title 13, Public Services.
- The City has adopted the 2020 Sanitary Sewer Comprehensive Plan.
- The Capital Facilities Element of the City's Comprehensive Plan contains policies relating to level of service for the City's sanitary sewer system.
- The City's 2024 Capital Facilities Plan contains policies relating to level of service for the City's sanitary sewer system.
- Long-term goals noted in the 2023-2024 City of Sumner Biennial Budget include regulating new pretreatment code to support the WWTP and the community, replacing the end-of-life biosolids dryer, and modernizing the entire biosolids treatment system.

Water

- The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years.
- Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater.
- The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.
- The City has adopted the 2020 Water System Plan.
- The Capital Facilities Element of the City's Comprehensive Plan and the Capital Facilities Plan contain policies relating to level of service for the City's water system and addressing needs.
- Long-term goals noted in the 2023-2024 City of Sumner Biennial Budget include securing water rights to meeting present and future demands of the water system, continuing to replace aging water distribution mains, and continuing to comply with changing distribution mains.

Stormwater

- All alternatives retain existing buffers along rivers, streams, and wetlands.
- Sumner-specific strategies in the Pierce County Hazard Mitigation Plan include those to retain and expand flood storage capacity and to limit new homes and businesses from being sited in flood hazard areas.

- Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls.
- The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate.
- LID is an approach to stormwater quantity and quality control that mimics the predeveloped hydrology of a project site by using site design techniques. All alternatives retain goals, policies, and implementing regulations that support the development and implementation of stormwater management techniques such as LID.
- The Capital Facilities Element of the City's 2024 Comprehensive Plan contains policies relating to level of service for stormwater drainage. Objective 1.7.1 states "Establish and maintain the Level of Service as the 25-year storm event, except in those areas where the 100-year storm design is appropriate to protect the natural environment.
- Through Chapter 13.48 SMC, the City applies the standards included in the 2019 Ecology Stormwater Management Manual for Western Washington and the 2019-2024 Western Washington Phase II municipal stormwater permit's Minimum Technical Requirements for New Development and Redevelopment to new development and redevelopment of public and private improvements. The City also applies the 2012 Puget Sound Partnership Low Impact Development Technical Guidance for Puget Sound. The City requires documentation of LID practices in each project subject to stormwater requirements.
- The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.
- The City of Sumner currently implements the floodplain regulations required by the National Flood Insurance Program (NFIP) and through its Shoreline Master Program (SMP) and critical areas regulations (Sumner Municipal Code [SMC] 15.52). The City of Sumner has adopted a code (SMC 15.52.250) for future floodplain development which prohibits any increase in flood levels as a result of development.
- The National Marine Fisheries Service (NMFS) provided a biological opinion in 2008 on the effects of FEMA's National Flood Insurance Program (NFIP) on endangered species protected under the Endangered Species Act (ESA) (discussed in the Comprehensive Plan Update EIS in 2010). The biological opinion included reasonable and prudent alternatives (RPAs) that govern how the NFIP can be implemented along streams and rivers that support listed salmon populations. One of the RPAs regarded restriction of development within the 100-year floodplain. It specified that affected communities:
 - Either prohibit all development in the 100-year floodplain; or
 - Allow development to proceed only if ecological functions of the floodplain are preserved or compensated (i.e. mitigated).
- The City of Sumner currently reviews impacts on the ESA on a permit by permit basis through preparation of Habitat Management plan and annual agency consultation.
 - The City responds to the 2008 biological opinion by requiring development in the floodplain to preserve or compensate for loss of ecological functions of the floodplain.

- The City will continue to implement requirements of the NFIP to protect new and existing development in and near floodplains.
- The City will continue to implement SMC 15.52.250 to prevent increases in flood elevations.
- The City has adopted the Washington State Department of Ecology (Ecology) Low Impact Development Manual (LID) and a requirement for LID approaches to stormwater management for new development.
- The City will continue to cooperate with Pierce County Water Programs and King County implement conveyance improvements required along rivers.
- The City will continue to enforce the Shoreline Master Program and critical area regulations as currently adopted or as amended in the future.
- White River Restoration Project is a major flood protection project that will restore floodplain habitat, replace the Stewart Road Bridge, and improve flood protection in the Lower White River reach.

Power, Natural Gas, and Telecommunications

- The City should continue to implement the Washington State Energy Code.
- The adopted Comprehensive Plan includes some policies around energy conservation and efficiency.

7.4.3 Other Potential Mitigation Measures

City Facilities and Police

- No additional proposed mitigation measures

Fire and EMS

- No additional proposed mitigation measures

Schools

- No additional proposed mitigation measures

Parks

- Update the park impact fee as appropriate.

Sewer

- The City could implement recommendations of the Sanitary Sewer Plan to correct existing deficiencies in the 6-year planning period.
- The City could identify additional improvements to the sewer system for the 20-year planning period to address deficiencies projected in the long term.
- The City could partner with the City of Bonney Lake if another plant expansion becomes necessary. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, expansion would likely be funded heavily by Bonney Lake.

Water

- The City could implement an aggressive water conservation program – including water reuse and recycling or demand management measure – for residential, commercial, and industrial users.
- The City could expand watershed protection by acquiring additional land around the existing watershed.
- The City could choose to fund more public education and outreach to water conservation programs.

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 2019 Stormwater Manual as adopted by the City.
- The City could implement stronger code & design incentives for LID, such as bonuses for pervious surfaces and green roofs.
- The City could choose to fund more public education on water quality for residents and businesses.

Power, Natural Gas, and Telecommunications

- Consistent with City policies, the City should provide annual updated population, employment, and development projections to PSE so they can evaluate actual patterns and rates of growth and compare these patterns to electrical demand forecasts.
- The City could coordinate and cooperate with other jurisdictions in the implementation of multijurisdictional electric utility facility additions and improvements.
- The City could choose to fund more public education and outreach to promote renewable energy technologies.

7.5 Significant Unavoidable Adverse Impacts

7.5.1 City Facilities and Police

To meet adopted and proposed LOS for general government facilities and police the City will need to add building square footage and commissioned officers under all growth alternatives. The 2044 need for public works shops will be fulfilled by the new shops once completed. Impacts can be mitigated by capital facilities and police resource planning. No significant unavoidable adverse impacts are expected.

7.5.2 Fire and EMS

Growth is expected under all alternatives which will increase demand for fire and EMS services and associated equipment and personnel needs. Impacts can be mitigated through capital and personnel planning to meet these needs. No significant unavoidable adverse impacts are expected.

7.5.3 Schools

Both the Sumner-Bonney Lake and Dieringer School Districts will see student enrollment growth due to increased housing units under all alternatives. Impacts can be mitigated through school district facility and personnel planning. No significant unavoidable adverse impacts are expected.

7.5.4 Parks

Increased demand for parks will occur under all alternatives due to growth. Impacts can be mitigated through the parks planning process. No significant unavoidable adverse impacts are expected.

7.5.5 Sewer and Water

Additional population, employment, and industrial/commercial growth throughout the City's service area would result in increased demands on sanitary sewer facilities and water services. Advance planning for the sewer and water system and capital facility improvements should minimize the possibility of unavoidable impacts. No significant unavoidable adverse impacts are expected.

7.5.6 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.

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, 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.

7.5.7 Power, Natural Gas, and Telecommunications

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.

8 Transportation

8.1 Introduction

This section provides a summary of the current transportation conditions and potential impacts associated with the Sumner Comprehensive Plan and associated Transportation Plan. Transportation impacts are identified through a comparison of the No Action Alternative (Alternative 1) to the Action Alternatives (Alternatives 2 and 3) and the Preferred Alternative.

8.2 Affected Environment

A detailed discussion of the affected environment is provided in the draft Sumner Transportation Plan.

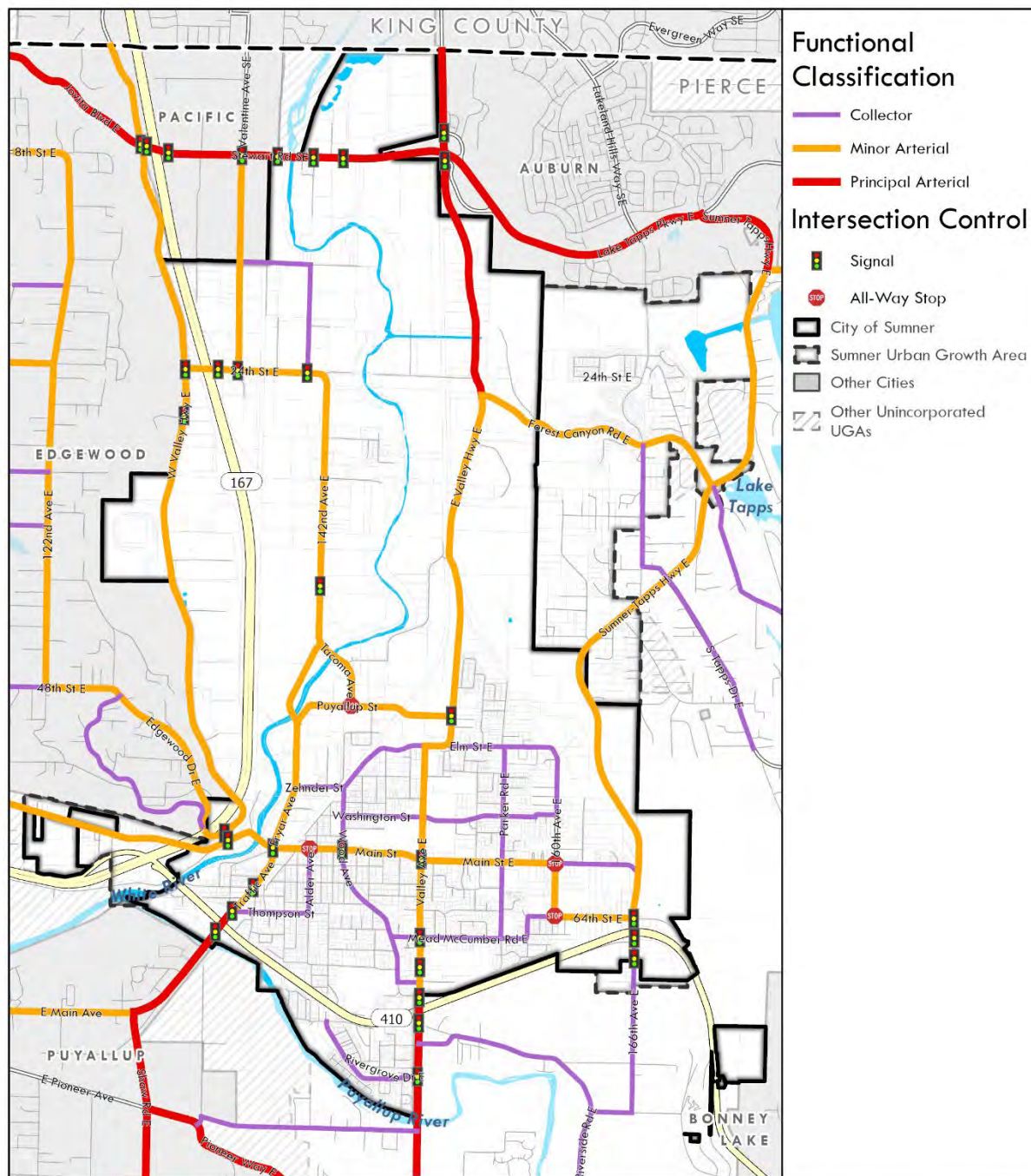
8.2.1 Street System

The street system is described in terms of general facility characteristics as well as traffic volumes and operations.

Freeways, Arterials, and Collectors

Exhibit 8-1 summarizes the existing traffic control and functional classification of the city street system. Two major limited access, divided state highways serve Sumner, SR 167 and SR 410. The major north-south arterials serving the city include East Valley Highway, West Valley Highway, Sumner-Tapps Highway, 142nd Avenue E, 136th Avenue E, Valley Avenue, and Traffic Avenue. A number of collector arterials provide connectivity between residential areas of Sumner to arterial roadways and the regional freeway system. The collectors are also vital in connecting the residential areas to the central business district and are excellent candidates for improvements to active mode facilities. In general, most of the collector roads in Sumner are two-lane roadways with turn lanes and signals provided at a limited number of cross streets.

Exhibit 8-1. Existing Traffic Control and Functional Classification



CITY OF SUMNER

Existing Traffic Control and Functional Classification

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



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Miles



CITY OF
SUMNER
WASHINGTON

Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

Traffic Volumes

Daily traffic volumes were provided by the city and weekday PM peak hour traffic volumes were collected in March 2023 by IDAX at key intersections throughout the city. Daily traffic volumes are highest along Valley Avenue East (SR 162) and Sumner-Tapps Highway with approximately 25,000 to 30,000 vehicles per day in the city. Comparing 2023 traffic volumes with 2015 Transportation Plan traffic levels, shows weekday PM peak hour traffic growth was largest at intersections serving the north part of the city industrial areas where most of the growth has been concentrated over the past ten years. The largest increase in weekday PM peak hour traffic volumes occurred at the intersection of 142nd Ave and 24th St E, where traffic increased by 5%. At the access ramps to SR 167, traffic volumes have grown modestly between one tenth of a percent to 1.5%. The city's lowest growth in volumes occurred along the SR 162/Valley Avenue corridor. This pattern of little to no change in traffic volumes is thought to be a result of changing patterns in weekly commuter patterns. Since the COVID-19 pandemic travel patterns have changed with more people working from home or having more flexible hours where they may not commute daily or during the evening period.

Traffic Operations

Traffic volumes were used to evaluate traffic operations in Sumner at 43 study intersections. Traffic operations analysis provides a quantitative method for evaluating existing transportation conditions. Intersection operations were evaluated based on the level of service (LOS) methodologies of the Highway Capacity Manual (HCM) (Transportation Research Board). Criteria range from LOS A, indicating free-flowing conditions with minimal vehicle delays, to LOS F, indicating extreme congestion with long vehicle delays. At signalized intersections, LOS is measured in terms of average delay per vehicle. At unsignalized intersections, LOS is measured in terms of the average vehicle delay and is typically reported for the worst traffic movement instead of for the whole intersection.

The current adopted LOS standards set by each jurisdiction are summarized below:

- City of Sumner
 - LOS D all intersections except as specifically noted
 - Exception to the LOS D standard are:
 - Traffic Avenue/Main Street/Fryar Avenue (LOS F)
 - Main Street/Alder Avenue (LOS F)
 - Valley Avenue East/Main Street (LOS F)
 - West Valley Highway East/Valley Avenue/Sumner Heights Drive (LOS F)
- WSDOT/PSRC
 - LOS D for Highways of Statewide Significance (HSS) in urban areas
 - LOS C for Highways of Statewide Significance (HSS) in rural areas
 - LOS D for Regional Significance State Highways (RSSH), Tier 2

Because SR 167 is a designated HSS, the State requires local jurisdictions to adopt this LOS standard for HSS facilities in their Comprehensive Plans. For non-HSS facilities, the State requires that an agency coordinate with WSDOT in establishing a LOS standard for those facilities. SR 410 and SR 162 are not

HSS-designated facilities. Puget Sound Regional Council (PSRC) has adopted LOS standards for regionally significant state highways or state transportation facilities that are non-HSS such as SR 410 and SR 162. SR 162 and SR 410 both Tier 2 RSSH. Based on the PSRC tiered LOS system, both SR 410 and SR 162 have an adopted LOS D standard. SR 410 is also part of the National Highway System within the City.

Generally, traffic operations have remained consistent over the last 10 years. Four intersections do not meet the currently adopted LOS standard during the weekday PM peak hour operating at LOS E or F.

Exhibit 8-2 provides a comparison between 2015 and 2023 LOS, delay, and worst movements at the study intersections not meeting the LOS standard. Poor operations are known issues at the SR 162 and SR 410 interchanges and the East Valley Highway/Forest Canyon Road East intersection. The City of Sumner's 6-Year Transportation Improvement Program 2024-2029 includes improving the Stewart Road SE/Butte Avenue SE intersection. The city is currently considering installing a new signal at Butte Avenue in 2023.

Exhibit 8-2. Weekday PM Peak Hour LOS Comparison

Intersection	2015			2023		
	LOS ¹	Delay ²	WM ³	LOS	Delay	WM
Stewart Rd/Butte Ave SE	Not Studied in 2015			F	186	SB
East Valley Hwy E/Forest Canyon Rd	D	29	WB	F	327	WB
Sumner-Tapps Hwy E/SR 410 WB Ramps	F	>50	WB	F	61	WB
Valley Ave/74th St E	C	19	WB	F	110	EB

Source: Transpo Group, 2023.

Notes:

1. LOS = level of service based on the Highway Capacity Manual (HCM)
2. Average delay in seconds per vehicle.
3. WM means worst movement and SB means southbound, WB means westbound, NB means northbound, EB means eastbound.

8.2.2 Traffic Safety

A review of citywide collision records was completed to identify potential safety issues for vehicles, pedestrians, and cyclists. The traffic safety analysis included collision data for a five-year period from January 1, 2018 through December 31, 2022. Four (4) fatalities occurred over the 5-year period and 17 serious injury crashes. The number of collisions occurring at locations in the city are generally low to moderate a moderate concentration of collisions occurring along Main Street, Traffic Avenue and 166th Avenue E/Sumner Tapps Highway.

8.2.3 Transit and Rail Service

Sound Transit provides bus service to the Sumner Sounder Train Station facility located on the west side of Traffic Avenue at Maple Street. Transit routes that serve the Sumner Train Station include Routes 578

and 596. In addition, Pierce County provides Beyond the Borders Connector bus service for eligible residents to public transportation, medical services, employment, shopping, and social activities. Sound Transit's Sounder line offers commuter rail service between Lakewood and downtown Seattle with stops in Tacoma, Puyallup, Sumner, Auburn, Kent, and Tukwila. Exhibit 8-3 illustrates transit service in Sumner.

8.2.4 Freight Train Traffic

The main BNSF railroad line through the region travels northeast to southwest through the City of Sumner, paralleling East Main Street/Traffic Avenue. The at-grade crossings within the city are located at Maple Street, Main Street, Zehnder Street, Puyallup Street, and west of East Valley Avenue at 150th Avenue. The rail line is used by freight train, passenger rail, and commuter rail services.

8.2.5 Pedestrian and Bicycle Facilities

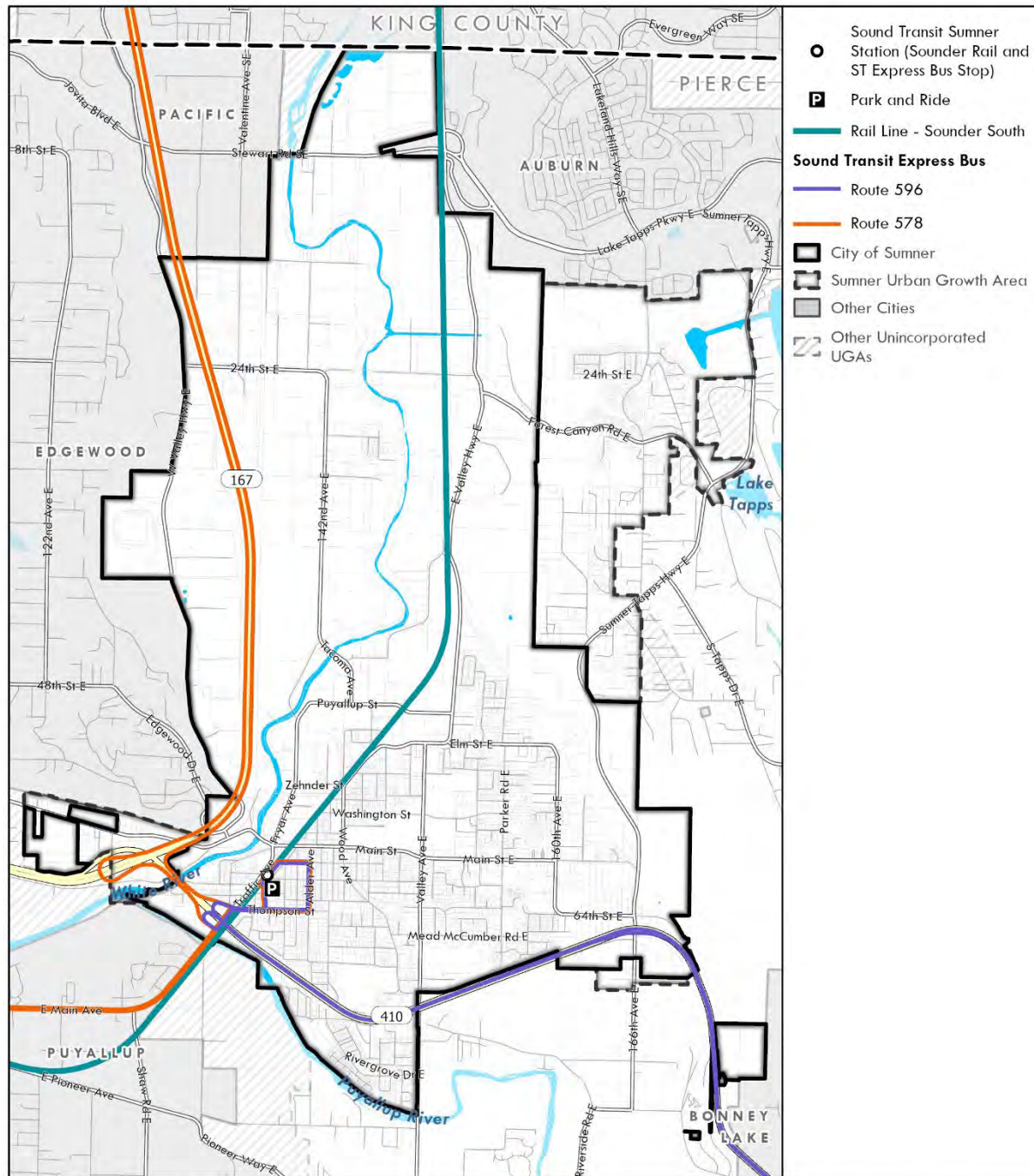
Continuity in pedestrian and bicycle access within the city provides for increased safety, comfort, and ease for residents and recreational users. The city is striving to create a fully integrated system for these modes of transportation and recognizes the need to prioritize locations where it expects heavy non-motorized use, such as routes connecting residential areas to recreational facilities and schools, and places of employment.

Exhibit 8-4 illustrates the current non-motorized system within the city. The city's existing transportation system was historically designed and constructed for vehicular traffic. The existing system provides access for people on foot, bike, or other modes primarily with sidewalks, bike lanes, and off-street trails. Sidewalks are located intermittently around the city, mostly along arterial roadways located within Sumner's central business district and nearby neighborhoods.

8.2.6 Transportation Demand Management

The City of Sumner has adopted a commute trip reduction (CTR) program. The CTR program establishes goals consistent with State legislation. The individual demand management strategies that are typical elements of the CTR and TDM programs are different for employment and residential developments. In addition, the Manufacturing and Industrial Center (MIC) and Town Center Subarea Plans described TDM strategies to reduce employment and residential drive alone trips including shuttles and transit options, improving bicycle and pedestrian connectivity and incentive programs led by employers.

Exhibit 8-3. Transit Service



CITY OF SUMNER

Existing Transit Service

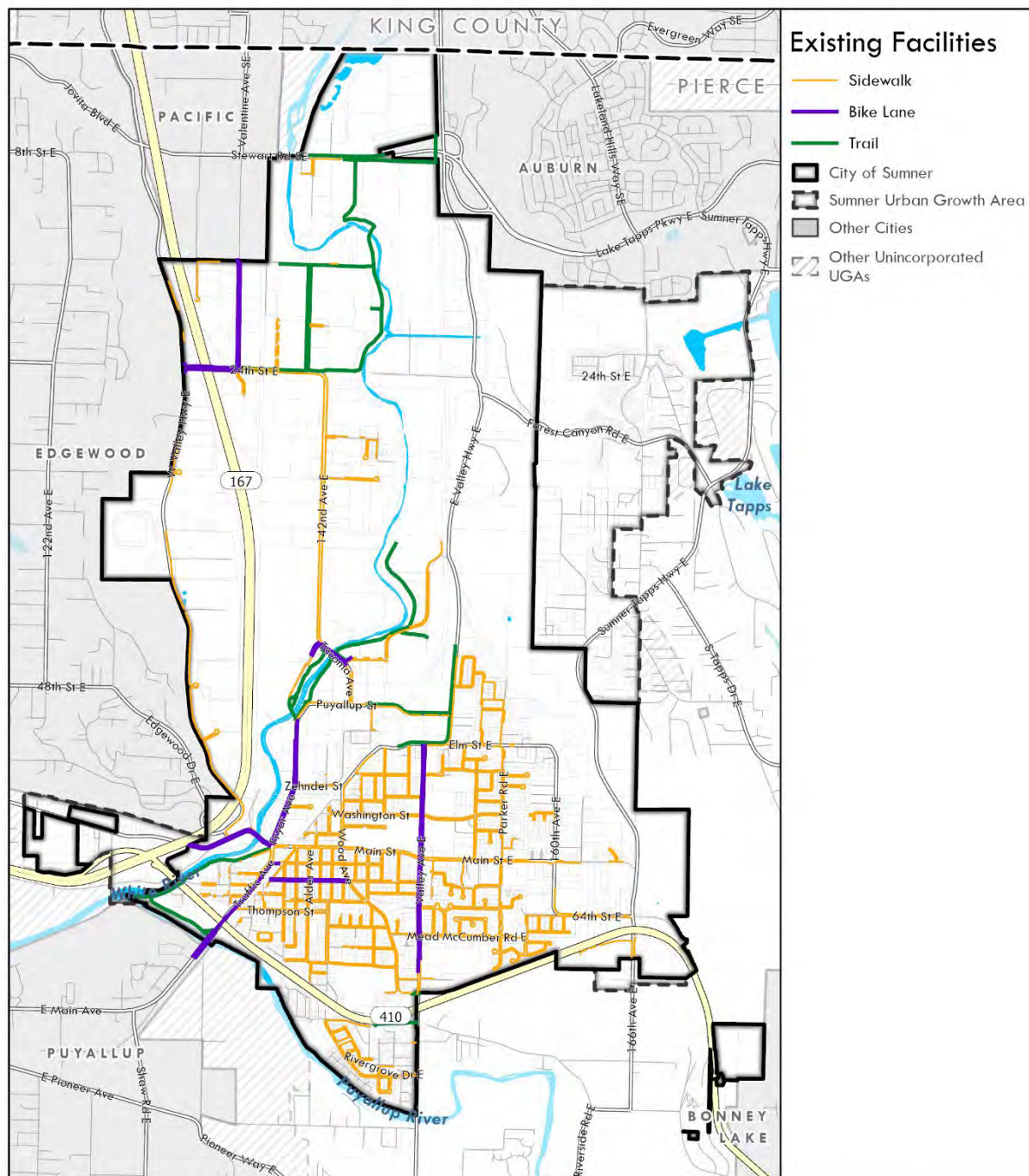
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

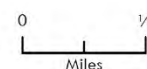
Source: City of Sumner, 2023; Transpo, 2024.

Exhibit 8-4. Existing Non-Motorized Facilities



CITY OF SUMNER

Existing Non-Motorized Facilities



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

8.2.7 Technology

Transportation System Management and Operations (TSMO) is an integrated approach to optimize the performance of existing infrastructure by implementing multimodal, intermodal, and often cross-jurisdictional systems, services and projects. Most of the city's current transportation infrastructure is outdated and there are limited abilities to provide TSMO without future upgrades. The city is currently looking into investments in fiber systems and will be considering what upgrades are needed and leveraging the fiber project to allow for TSMO.

8.3 Impacts

8.3.1 Thresholds of Significance

Multimodal level of service (LOS) standards are required for non-motorized transportation facilities, locally owned arterials, and transit routes that serve urban growth areas, to serve as a gauge to judge system performance, and to help achieve the statewide goal of environmental justice. The City of Sumner has adopted vehicle LOS standards and as part of the 2024 Comprehensive Plan Update is proposing pedestrian and bicycle LOS standards. There are no public transit services in Sumner; therefore, no transit LOS standards are adopted or proposed.

LOS standards are used to evaluate impacts. The LOS standards used to evaluate the Sumner transportation system are described below and are based on the proposed 2024 Comprehensive Plan Update multimodal LOS standards.

Vehicle

Vehicle LOS in the transportation study area is set by Sumner, Pacific and WSDOT. There are no proposed changes to the City of Pacific and WSDOT vehicle LOS standards with the adopted 2024 Comprehensive Plan. The Sumner vehicle LOS standards are proposed to change by eliminating the LOS F standard at Traffic Avenue/Main Street/Fryar Avenue, Main Street/Alder Avenue, Valley Avenue East/Main Street, and West Valley Highway East/Valley Avenue/Sumner Heights Drive intersections. The proposed vehicle LOS standards are as follows.

- Sumner
 - LOS D
 - Exception allows left turns and through movements on side streets intersecting with arterials to operate below the adopted LOS D standard, when the LOS affects relatively low traffic volumes and may not meet warrants for traffic signals.
- Pacific
 - LOS D
- WSDOT/PSRC⁴

⁴ Level of Service Standards for Washington State Highways, 2010

- LOS D for Highways of Statewide Significance (HSS) in urban areas
- LOS C for Highways of Statewide Significance (HSS) in rural areas
- LOS D for Regional Significance State Highways (RSSH), Tier 2

There are no adopted pedestrian and bicycle LOS standards. The non-motorized system is evaluated based on the proposed 2024 Comprehensive Plan LOS standards described below.

Pedestrian

The LOS standards for the pedestrian network are described in Exhibit 8-5 and the future network identified on Exhibit 8-6. A green LOS indicates a facility meets adopted roadway standards. The city utilizes these standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the Sumner land use plan.

Exhibit 8-5 Pedestrian LOS Standard

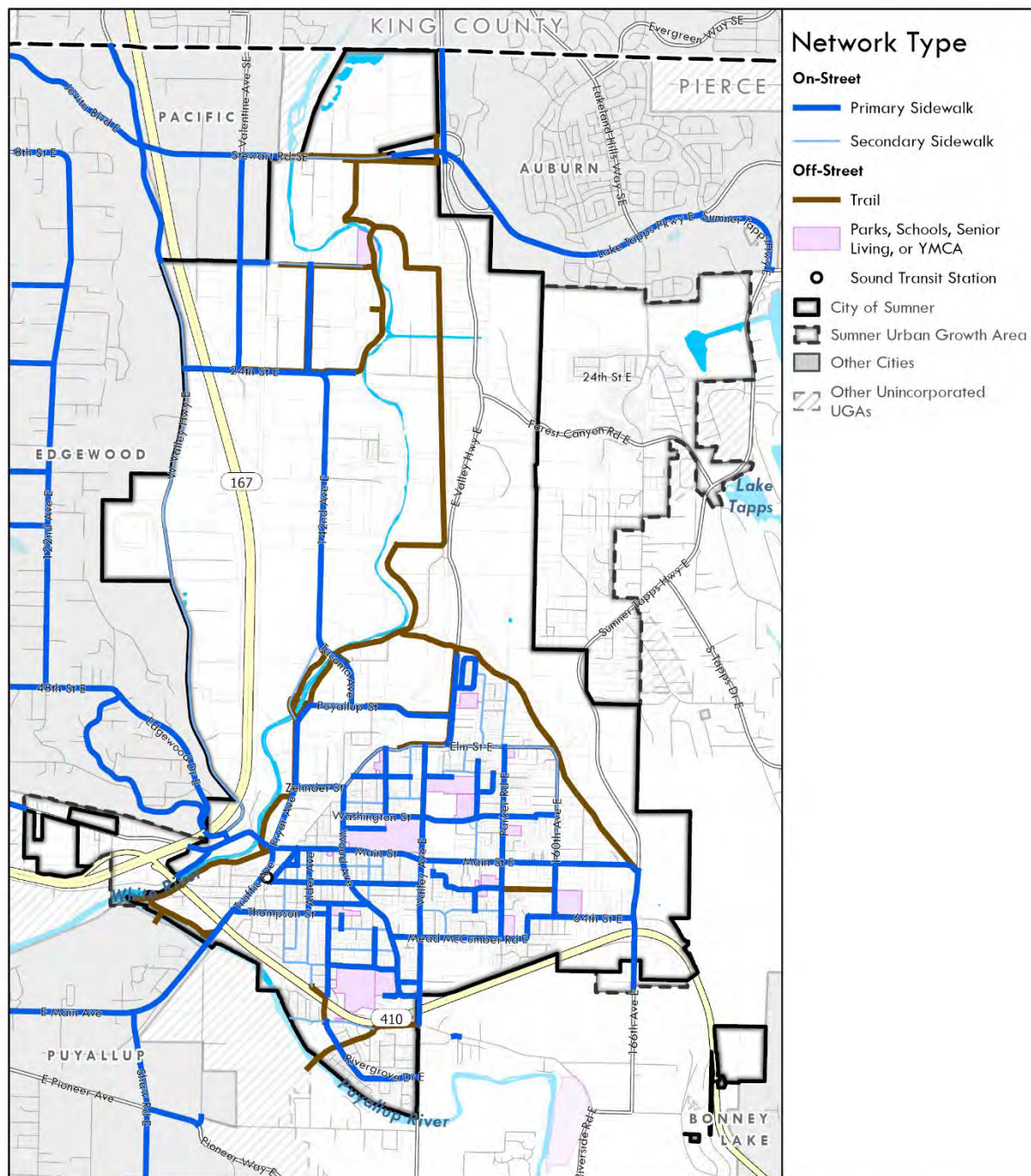
LOS	Primary Route	Secondary Route
	Meets City standards, facilities on both sides	Meets City standards, facilities on one or both sides
	Facilities exist, but only on one side	N/A
	No facilities exist, does not meet standards	No facilities exist, does not meet standards

Source: Transpo Group, 2023.

Bike

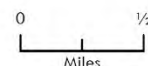
A future bike network was identified and is shown on Exhibit 8-7. The bike LOS identified through an understanding of the availability of bike facilities along designated routes. Bike facilities could include sharrows, dedicated bike lanes, or protected bike lanes. A green LOS is the standard for the bike routes. Like the pedestrian LOS, Sumner utilizes these bike standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the city's land use plan.

Exhibit 8-6. Future Pedestrian Network



CITY OF SUMNER

Future Pedestrian Network

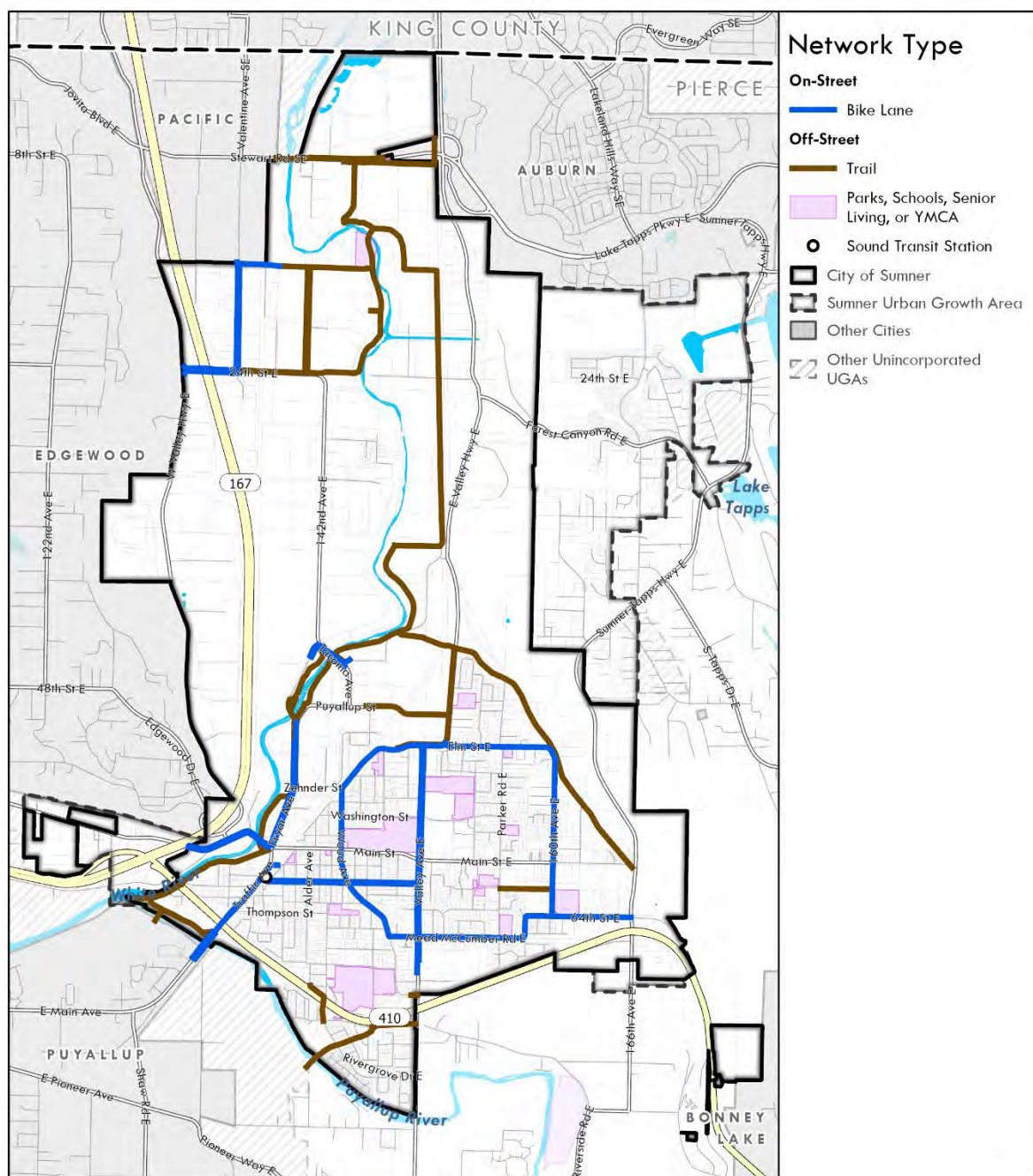


Map Date: February 2024

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Source: City of Sumner, 2023; Transpo, 2024.

Exhibit 8-7. Future Bike Network



CITY OF SUMNER

Future Bike Network

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

There are currently no local transit routes providing service within Sumner. If transit service is established within the city, Sumner will develop LOS standards.

8.3.2 Impacts Common to All Alternatives

The following conditions and impacts are common to all alternatives, including Alternative 1 (No Action).

Travel Forecast Model and Transportation Network Assumptions

A travel demand forecasting model was developed to assist in defining future transportation system needs. The model uses the VISUM software package and forecasts weekday PM peak hour traffic volumes based on the 2044 land use alternatives. The model study area includes a portion of the City of Pacific and parts of Pierce County just beyond the city limits.

The model was calibrated to match existing base year traffic volumes (2023) and then used to develop a baseline 2044 traffic forecast. City, County, and State transportation improvement projects likely to be funded and built by 2044 were included in the future baseline model and are described below. The 2044 baseline model only included city projects that are in design, construction, or recently built. The 2044 travel forecasts were used to identify future transportation needs.

Exhibit 8-8 summarizes the future baseline transportation improvement projects that were assumed to be completed as part of the baseline 2044 transportation system modeling. The projects listed in the exhibit are planned improvements with either full or partial funding and would be completed before 2044 by Sumner or other agencies.

Exhibit 8-8. 2044 Baseline Transportation Improvements

Location	Project Description
SR 167: SR 410 to City of Auburn	Add southbound high occupancy or toll (HOT) lane
Butte Avenue SE/Stewart Road SW	Construct a traffic signal with additional capacity including: -Northbound and southbound left-turn lanes -Eastbound left-turn lane and right-turn lane
Stewart Road SW: Butte Avenue SE to 140th Avenue Court E	Widen to 5 lanes including a center two-way left-turn lane
Main Street/Wood Avenue	Pedestrian and signal improvements
SR 410 WB Ramps/166th Avenue E	Construct roundabout
SR 410/SR 162 Interchange	Construct roundabouts
64th Street/164th Avenue E	Construct roundabout
Sumner Tapps Highway/60th Street E	Construct signal. Remove eastbound left-turning movement restrictions
166th Avenue E: SR 410 Ramps to 64th Street E	Widen to 4 to 5 lanes
SR 167/I-5 Connection: Puyallup to Fife	Construct remaining 4 miles of SR 167 between Meridian and I-5

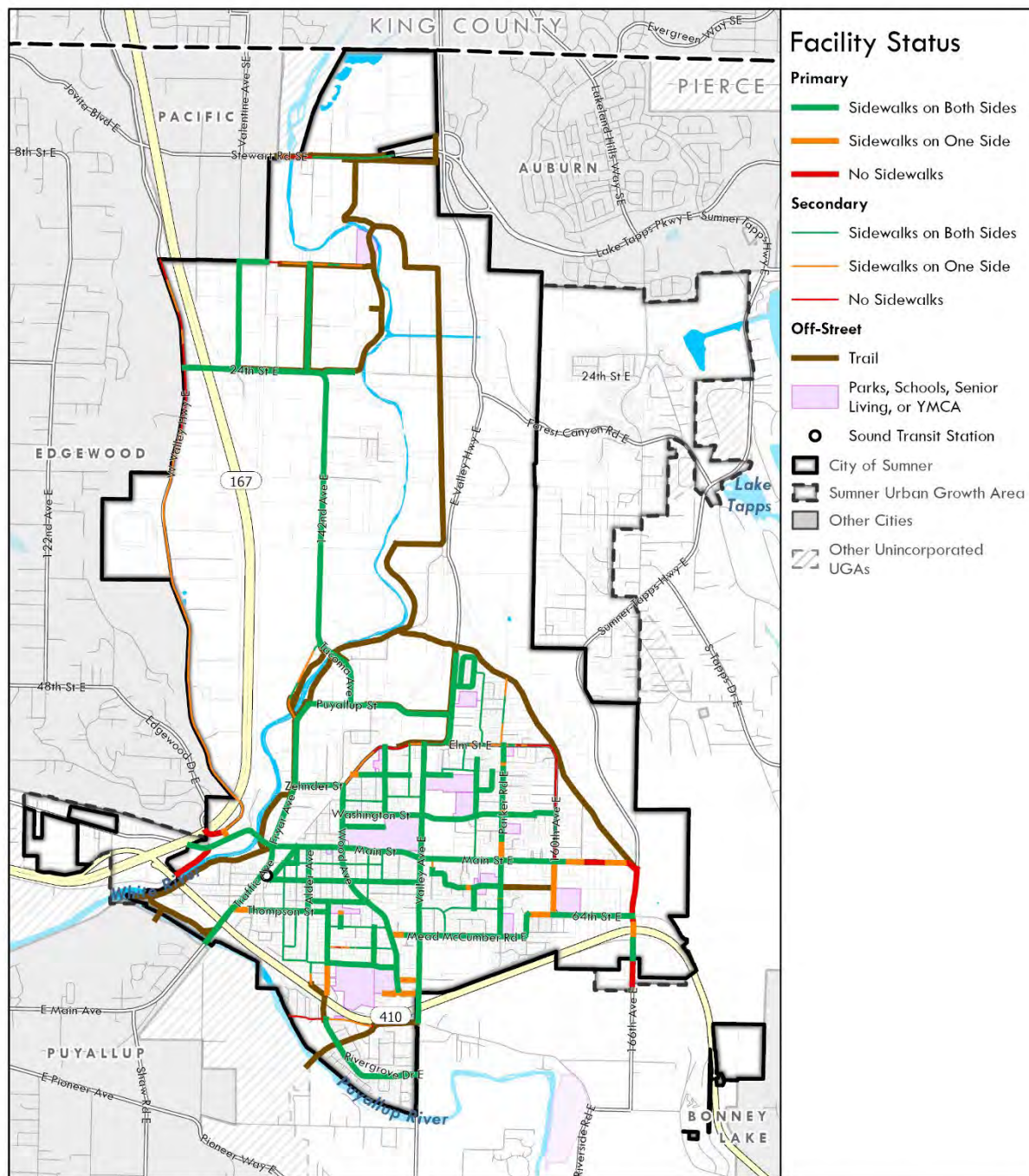
Pedestrian

Applying the standards described above, the pedestrian LOS analysis is shown on Exhibit 8-9. The LOS is determined by comparing the 2044 future pedestrian network to the existing, planned, and funded pedestrian network. The pedestrian LOS analysis shows most of the future pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors such as Elm Street and 160th Avenue E that have missing sidewalk. Impacts would be mitigated by identifying long-term projects that would implement the orange LOS for primary routes and green LOS for secondary routes.

Bike

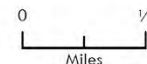
The LOS analysis for the bike network is shown on Exhibit 8-10. The LOS is determined by comparing the 2044 future bike network to the existing, planned, and funded bike network. The bike LOS analysis shows that bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. The East Sumner Subarea Plan envisioned additional bike connectivity in this area as development occurred. These impacts would be mitigated by identifying long-term project that would implement the green LOS for bike routes.

Exhibit 8-9. Future Pedestrian Level of Service



CITY OF SUMNER

Future Pedestrian Level of Service

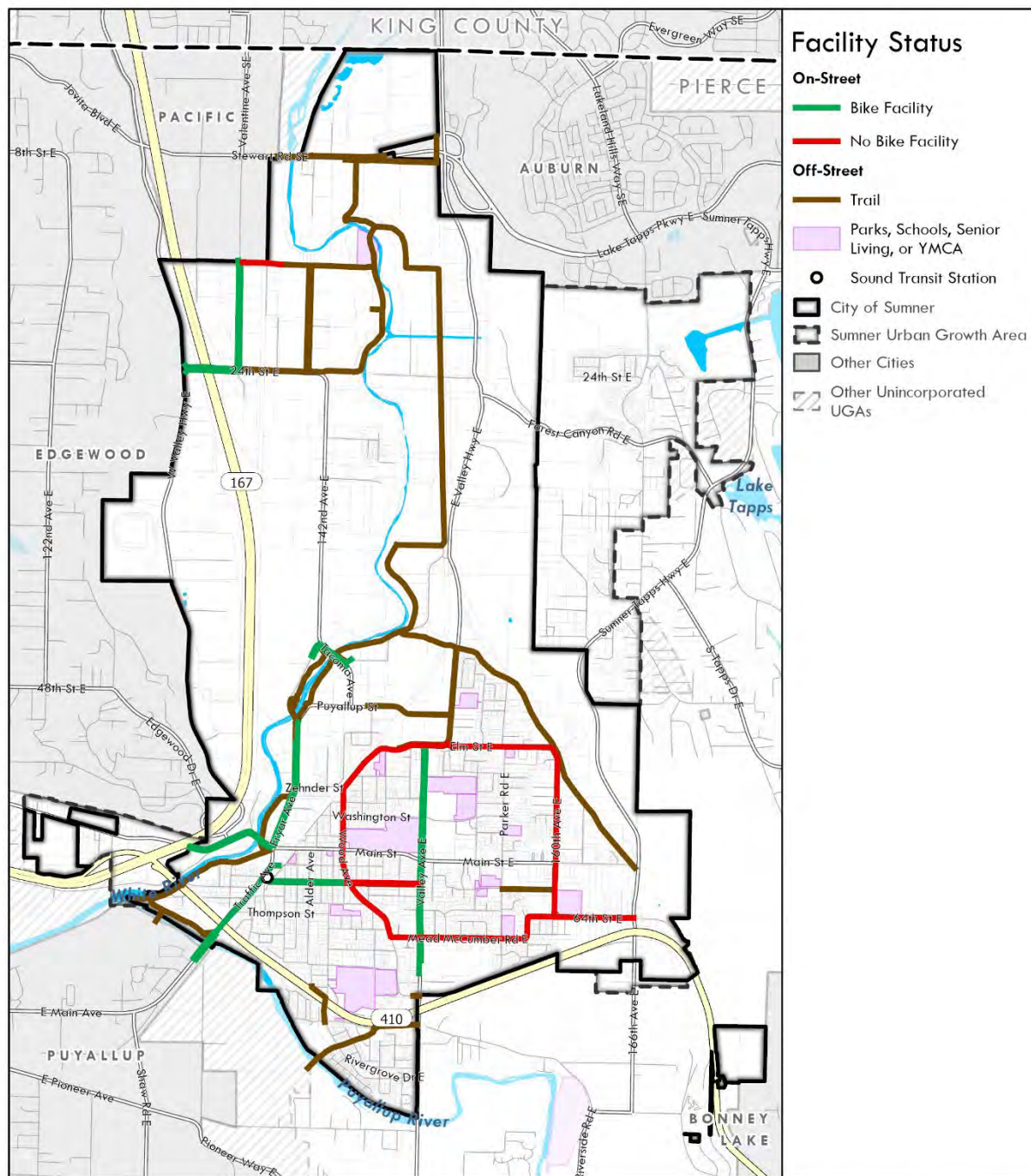


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Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

Exhibit 8-10. Future Bike Level of Service



CITY OF SUMNER

Future Bike Level of Service



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2023; Transpo, 2024.

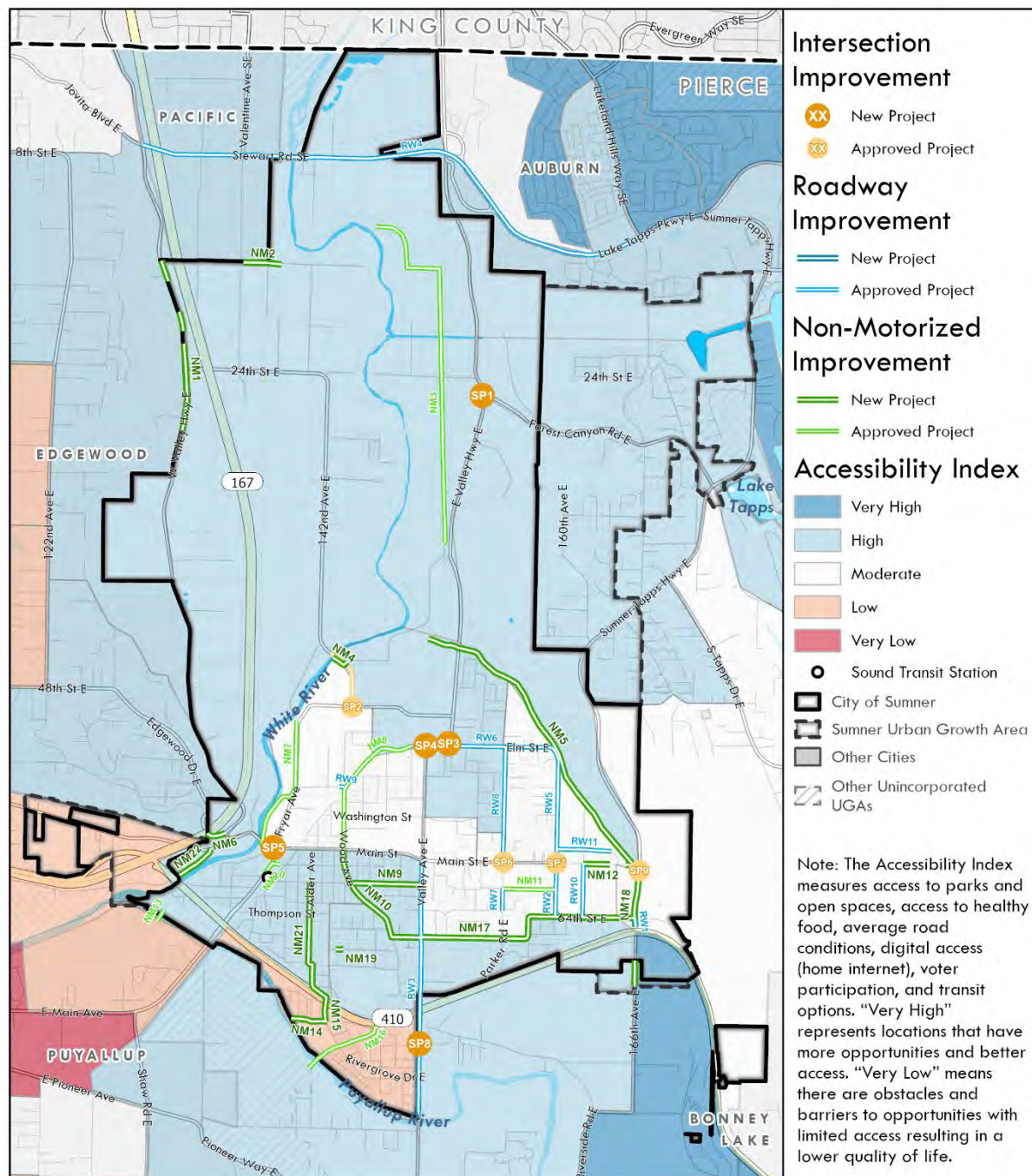
Equity

Transportation equity for Sumner was reviewed based on the accessibility index. The accessibility index measures access to parks and open spaces, access to healthy food, average road conditions, digital access (home internet), voter participation, and transit options. A very high accessibility index represents locations that have more opportunities and better access. A very low index means there are obstacles and barriers to opportunities with limited access resulting in a lower quality of life.

Exhibit 8-11 shows the accessibility index for Sumner, which is consistent with the alternatives. Most of Sumner has a high index except for the Riverview neighborhood south of SR 410 with a low index and East Sumner and areas north of Main Street with a moderate index. SR 410 provides a barrier for the Riverview neighborhood resulting in low accessibility. The Transportation Plan incorporates non-motorized, roadway and intersection improvements that will increase the accessibility index throughout Sumner including in Riverview, East Sumner and north of Main Street.

Exhibit 8-11 also shows the transportation improvements overlayed on the current accessibility index for Sumner. The “approved” transportation improvements are included for all alternatives and the “new” improvements are only included with the Preferred Alternative and Alternatives 2 and 3. There will be greater improvements in accessibility throughout Sumner and especially in the Riverview, East Sumner, and north of Main Street areas with the Preferred Alternative and Alternatives 2 and 3 given the additional transportation improvements especially non-motorized connections that connect north and south of SR 410 as well as east-west through the City.

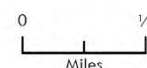
Exhibit 8-11: Accessibility Index and Transportation Improvements



CITY OF SUMNER

Accessibility Index and Transportation Improvements

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: Pierce County, 2023; Transpo 2024.

8.3.3 Alternative 1 (No Action)

This section describes the transportation-related impacts of Alternative 1. Alternative 1 would increase land use density resulting in growth in traffic over current conditions.

Land Use

Future 2044 forecasts for land use growth throughout the city and its Urban Growth Area (UGA) under Alternative 1 are consistent with development levels evaluated as part of the 2015 Comprehensive Plan. Exhibit 8-12 summarizes 2044 land use data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA).

Exhibit 8-12. Alternative 1 2044 Land Use Allocation

Land Use by Subarea	Alternative 1		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	938	1,245
MIC	0	0	0
Other	593	147	740
Total Growth	900	1,085	1,985
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK, 2023.

As shown in Exhibit 8-12, the number of housing units and jobs increase in all areas of the city except for the number of housing units in the MIC remaining consistent with the existing conditions. Exhibit 8-13 provides a summary of the total anticipated housing units and jobs under Alternative 1.

Exhibit 8-13. Alternative 1 2044 Total Land Use

Land Use by Subarea	Alternative 1
Housing Units	6,356
Jobs	24,919

Source: BERK, 2023.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the land use estimates of housing and employment into daily person trips by trip purpose. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-14 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternative 1. As shown in Exhibit 8-14, Alternative 1 results in an increase of approximately 2,500 weekday PM peak hour trips and 6,000 VMT.

Exhibit 8-14. Alternative 1 Weekday PM Peak Hour Vehicle Trips and Vehicle Miles Traveled (VMT)

	Existing	Alternative 1	Increase
Vehicle Trips	10,071	12,544	+2,473
VMT	23,682	30,015	+6,333

Source: Transpo Group, 2023.

The 2044 weekday PM peak hour traffic volumes and average annual growth rate for Alternative 1 was forecast in the study area and is summarized in Exhibit 8-15 for key intersections.

Exhibit 8-15. Alternative 1 PM Peak Hour Traffic Volumes

Intersection	2023 Existing	2044 Alternative 1	
	PM Peak Volumes	PM Peak Volumes	Average Annual Growth
Stewart Road SE/Butte Avenue SE	1,675	2,315	2%
E Valley Highway E/Forest Canyon Road E	1,525	1,860	1%
Puyallup Street/Tacoma Avenue	860	1,090	1%
E Valley Highway E/Elm Street E	1,425	1,710	1%
Valley Avenue/Elm Street E	1,120	1,280	1%
Sumner Heights Drive E/W Valley Highway E	820	1,085	1%
Traffic Avenue/Main Street	2,080	2,520	1%
Alter Avenue/Main Street	750	910	1%

Intersection	2023 Existing		2044 Alternative 1	
	PM Peak Volumes	PM Peak Volumes	Average Annual Growth	
Valley Avenue/Main Street	1,810	2,235	1%	
Parker Road E/Main Street E	960	1,270	1%	
160th Avenue E/Main Street (60th Street E)	1,085	1,540	2%	
Sumner-Tapps Highway E/SR 410 WB Ramp	1,675	1,985	1%	
Valley Avenue/SR 410 EB Ramp	2,150	2,965	2%	
Valley Avenue/74th Street E	1,915	2,545	1%	

Source: Transpo Group, 2023.

As shown in Exhibit 8-15, the average annual growth rate at the studies intersections is approximately 1 to 2%. The growth overall represents an increase in traffic volumes at key study intersections of 160 to 815 weekday PM peak hour trips for the Alternative 1 condition by 2044.

Traffic Operations

Traffic operations were evaluated at 43 intersections based on the HCM methodology. Intersection improvements were assumed based on the transportation improvement list outlined. Traffic signal timing was optimized for each alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes. Exhibit 8-16 summarizes the existing and Alternative 1 operations at intersections where further review and potential improvements may be needed.

Exhibit 8-16. Alternative 1 Weekday PM Peak Hour LOS Summary

Intersection	2023 Existing			2044 Alternative 1		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	F	186	SB	C	33	-
E Valley Highway E/Forest Canyon Road E	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	C	19	-	F	84	-
E Valley Highway E/Elm Street E	D	30	NBL	F	57	NBL
Valley Avenue/Elm Street E	D	31	NBL	E	43	NBL
Sumner Heights Drive E/W Valley Highway E	C	29	-	D	41	-
Traffic Avenue/Main Street	D	43	-	E	58	-
Alder Avenue/Main Street	B	11	-	B	14	-

Intersection	2023 Existing			2044 Alternative 1		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Valley Avenue/Main Street	C	23	-	C	32	-
Parker Road E/Main Street E	C	24	SB	F	56	SB
160th Avenue E/Main Street (60th Street E)	C	16	-	E	47	-
Sumner-Tapps Highway E/SR 410 WB Ramp	F	61	WB	A	7	0.54
Valley Avenue/SR 410 EB Ramp	F	80	-	B	12	0.87
Valley Avenue/74th Street E	F	110	EB	F	>180	EB

Source: Transpo, 2024.

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections, where SB = southbound, WB = westbound, NBL = northbound left-turn and EB = eastbound.

Overall, the analysis finds that most of the study intersections operate at LOS D or better during the weekday PM peak hour with the projected growth under Alternative 1. As shown in Exhibit 8-16, the following intersections are anticipated to improve with Alternative 1 compared to existing conditions during the weekday PM peak hour with the planned and funded improvements:

- **Stewart Road SE/Butte Avenue SE** - Completion of the traffic signal is anticipated to improve operations to LOS D
- **Sumner-Tapps Highway E/SR 410 WB Ramp** - The planned roundabout results in LOS A conditions
- **Valley Avenue/SR 410 EB Ramp** - The planned roundabout results in LOS B conditions

Exhibit 8-16 shows that eight (8) intersections are forecast to degrade below LOS D during the weekday PM peak hour under Alternative 1 conditions. Most of the poor intersection operations during the weekday PM peak hour under Alternative 1 is projected along E Valley Highway and Valley Avenue. This is consistent with the observed regional cut-through traffic, which avoids congestion along SR 167 and uses routes through Sumner. Other intersections impacted by shifts in traffic and growth in the City of Sumner are the Parker Road E/Main Street E and 160th Avenue E/Main Street E intersections.

8.3.4 Alternative 2

This section describes the transportation-related impacts of Alternative 2. Alternative 2 would increase land use density resulting in growth in traffic over current conditions and Alternative 1. Impacts of Alternative 2 are identified through a comparison to Alternative 1 (No Action) conditions.

Land Use

Future 2044 forecasts for land use growth throughout the city and its Urban Growth Area (UGA) under Alternative 2 represents growth beyond what was planned for in 2015. Exhibit 8-17 and .

Exhibit 8-18 summarize 2044 land use growth data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA) under Alternative 2 as it compares to Alternative 1.

Exhibit 8-17. Alternative 2 2044 Land Use Allocation

Land Use by Subarea	Alternative 2		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	938	1,245
MIC	0	0	0
Other	593	1,162	1,755
Total Growth	900	2,100	3,000
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK, 2023.

Exhibit 8-18. 2044 Land Use Growth Allocation for Alternatives 1 and 2

Land Use by Subarea	Alternative 1	Alternative 2	Increase
Housing Units			
Town center	1,245	1,245	+0
MIC	0	0	+0
Other	740	1,755	+1,015
Total	1,985	3,000	+1,015
Jobs			
Town center	330	330	+0
MIC	3,900	3,900	+0
Other	1,083	1,083	+0
Total	5,313	5,313	+0

Source: BERK, 2023.

As shown in Exhibit 8-18, no growth is anticipated in the number of jobs comparing Alternatives 1 and 2. The number of housing units increases by 1,015 units throughout the city under Alternative 2 compared to Alternative 1. Exhibit 8-19 provides a summary of the total anticipated housing units and jobs under Alternative 2.

Exhibit 8-19. 2044 Total Land Use for Alternatives 1 and 2

Land Use by Subarea	Alternative 1	Alternative 2	Increase
Housing Units	6,356	7,371	+1,015
Jobs	24,919	24,919	+0

Source: BERK, 2023.

As shown in Exhibit 8-19, Alternative 2 shows over 7,300 housing units and 24,900 jobs within the city and surrounding study area by 2044. Representing an increase of 3,000 housing units and 5,313 jobs over 2020 conditions.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the above land use estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-20 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternative 2 as they compare to existing and Alternative 1 conditions.

Exhibit 8-14 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternatives 1 and 2. As shown in Exhibit 8-14, Alternative 2 results in an increase of approximately 1,000 weekday PM peak hour trips and 1,100 VMT compared to Alternative 2 as a result of the additional housing planned within Sumner.

Exhibit 8-20. Alternatives 1 and 2 Weekday PM Peak Hour Vehicle Trips and Vehicle Miles Traveled (VMT)

	Alternative 1	Alternative 2	Increase
Vehicle Trips	12,544	13,626	+1,082
VMT	30,015	31,122	+1,107

Source: Transpo Group, 2023.

The 2044 weekday PM peak hour traffic volumes and average annual growth rate for Alternative 2 was forecast in the study area and is summarized in Exhibit 8-21 for key intersections.

Exhibit 8-21. 2044 Weekday PM Peak Hour Traffic Volumes for Alternatives 1 and 2

Intersection	Alternative 1		Alternative 2	
	PM Peak Volumes	Average Annual Growth	PM Peak Volumes	Average Annual Growth
Stewart Road SE/Butte Avenue SE	2,315	2%	2,375	2%
E Valley Highway E/Forest Canyon Road E	1,860	1%	1,970	1%
Puyallup Street/Tacoma Avenue	1,090	1%	1,155	1%
E Valley Highway E/Elm Street E	1,710	1%	1,795	1%
Valley Avenue/Elm Street E	1,280	1%	1,330	1%
Sumner Heights Drive E/W Valley Highway E	1,085	1%	1,110	1%
Traffic Avenue/Main Street	2,520	1%	2,610	1%
Alter Avenue/Main Street	910	1%	955	1%
Valley Avenue/Main Street	2,235	1%	2,340	1%
Parker Road E/Main Street E	1,270	1%	1,310	1%
160th Avenue E/Main Street (60th Street E)	1,540	2%	1,605	2%
Sumner-Tapps Highway E/SR 410 WB Ramp	1,985	1%	2,025	1%
Valley Avenue/SR 410 EB Ramp	2,965	2%	3,025	2%
Valley Avenue/74th Street E	2,545	1%	2,590	1%

Source: Transpo Group, 2023.

As shown in Exhibit 8-21, the average annual growth rate at the studies intersections is approximately 1 to 2% with both Alternatives 1 and 2. The growth overall represents an increase in traffic volumes at key study intersections of 200 to 875 PM peak hour trips with Alternative 2 by 2044. Alternative 2 results in approximately 25 to 100 more weekday PM peak hour trips at the study intersections compared to Alternative 1 due to the additional housing planned with Alternative 2.

Traffic Operations

Similar to Alternative 1, traffic operations were evaluated at 43 intersections based on the HCM methodology. Intersection improvements were assumed based on the transportation improvement list outlined. Traffic signal timing was optimized for each alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes. Exhibit 8-16 summarizes the Alternative 1 and Alternative 2 operations at intersections where further review and potential improvements may be needed.

Exhibit 8-22. 2044 Weekday PM Peak Hour LOS Summary for Alternatives 1 and 2

Intersection	Alternative 1			Alternative 2		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	C	33	-	D	36	-
E Valley Highway E/Forest Canyon Road E	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	F	84	-	F	106	-
E Valley Highway E/Elm Street E	F	57	NBL	F	64	NBL
Valley Avenue/Elm Street E	E	43	NBL	E	45	NBL
Sumner Heights Drive E/W Valley Highway E	D	41	-	D	43	-
Traffic Avenue/Main Street	E	58	-	E	60	-
Alder Avenue/Main Street	B	14	-	B	15	-
Valley Avenue/Main Street	C	32	-	D	37	-
Parker Road E/Main Street E	F	56	SB	F	66	SB
160th Avenue E/Main Street (60th Street E)	E	47	-	F	56	-
Sumner-Tapps Highway E/SR 410 WB Ramp	A	7	0.54	A	8	0.55
Valley Avenue/SR 410 EB Ramp	B	12	0.87	B	13	0.88
Valley Avenue/74th Street E	F	>180	EB	F	>180	WB

Source: Transpo, 2024.

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections.

Overall, the analysis finds that intersection operations during the weekday PM peak hour are similar between Alternatives 1 and 2. Alternative 2 would result in increases in delay due to additional growth in traffic volumes; however, intersections not meeting the LOS D standard would be the same between the alternatives.

8.3.5 Alternative 3

This section describes the transportation-related impacts of Alternative 3. Alternatives 2 and 3 have the same levels of development but allocated differently throughout the city. Alternatives 2 and 3 represent growth beyond what was planned for in 2015.

Land Use

Exhibit 8-23 and Exhibit 8-24 summarize 2044 land use data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA) under each alternative.

Exhibit 8-23. Alternative 3 2044 Land Use Allocation

Land Use by Subarea	Alternative 3		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	1,002	1,309
MIC	0	0	0
Other	593	1,098	1,691
Total	900	2,100	3,000
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK, 2023.

Exhibit 8-24. 2020-2044 Land Use Growth Allocation for the Alternatives

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Housing Units				
Town center	1,245	1,245	1,309	+64
MIC	0	0	0	+0
Other	740	1,755	1,691	-64
Total	1,985	3,000	3,000	+0
Jobs				
Town center	330	330	330	+0
MIC	3,900	3,900	3,900	+0
Other	1,083	1,083	1,083	+0
Total	5,313	5,313	5,313	+0

Source: BERK, 2023.

As shown in Exhibit 8-24, no growth is anticipated in the number of jobs across the alternatives. Alternatives 2 and 3 both increase the number of units by 3,000 units compared to 2020 conditions but would be allocated the growth to different areas of the city. As shown in the exhibit, 64 units are allocated to the Town Center under Alternative 3 instead of being allocated to other areas of the city, as these units are under Alternative 2.

Exhibit 8-25 provides a summary of the total anticipated housing units and jobs under Alternative 3 as it compares to Alternatives 1 and 2.

Exhibit 8-25. 2044 Total Land Use by Alternative

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Housing Units	6,356	7,371	7,371	0
Jobs	24,919	24,919	24,919	0

Source: BERK, 2023.

As shown in Exhibit 8-25, Alternatives 2 and 3 have the same number of households and jobs. Both Alternatives 2 and 3 represent an increase in housing units of 1,015 over Alternative 1.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the above land use estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-26 summarizes the weekday PM peak hour vehicle trip generation and VMT for the existing conditions and alternatives.

Exhibit 8-26. Weekday PM Peak Hour VMT and Vehicle Trips by Alternative

	Existing	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Vehicle Trips	10,071	12,544	13,626	13,542	-84
VMT	23,682	30,015	31,122	30,907	-215

Source: Transpo, 2024.

As shown in the exhibit, Alternative 3 results in less weekday PM peak hour trips and VMT compared to Alternative 2.

Traffic Operations

Given the same level of development between Alternative 2 and Alternative 3 with only a small change in household allocation as well as the slight decrease in VMT and vehicle trips shown in Exhibit 8-26, the traffic volumes and traffic operations for Alternative 3 would be similar to Alternative 2. No new impacts are anticipated with Alternative 3.

8.3.6 Preferred Alternative

This section describes the transportation-related impacts of the Preferred Alternative. Alternative 1 and the Preferred Alternative have the same levels of development but allocated differently throughout the city.

Land Use

Exhibit 8-23 and Exhibit 8-24 summarize 2044 land use data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA) under each alternative.

Exhibit 8-27. Preferred Alternative 2044 Land Use Allocation

Land Use by Subarea	Preferred Alternative		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	938	1,245
MIC	0	0	0
Other	593	147	740
Total	900	1,085	1,985
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK, 2023.

Exhibit 8-28. 2020-2044 Land Use Growth Allocation for the Alternatives

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative	Increase (Preferred Alternative – Alternative 1)
Housing Units					
Town center	1,245	1,245	1,309	1,245	+0
MIC	0	0	0	0	+0
Other	740	1,755	1,691	740	+0
Total	1,985	3,000	3,000	1,985	+0
Jobs					
Town center	330	330	330	330	+0
MIC	3,900	3,900	3,900	3,900	+0
Other	1,083	1,083	1,083	1,083	+0
Total	5,313	5,313	5,313	5,313	+0

Source: BERK, 2023.

As shown in Exhibit 8-24, no difference is anticipated in the number of jobs across the four alternatives and the number of housing units is the same between Alternative 1 and the Preferred Alternative.

Exhibit 8-25 provides a summary of the total anticipated housing units and jobs under the Preferred Alternative as it compares to Alternatives 1, 2, and 3.

Exhibit 8-29. 2044 Total Land Use by Alternative

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative	Increase (Preferred Alternative – Alternative 1)
Housing Units	6,356	7,371	7,371	6,356	0
Jobs	24,919	24,919	24,919	24,919	0

Source: BERK, 2023.

As shown in Exhibit 8-25, Alternative 1 and the Preferred Alternative have the same number of households and jobs. Alternatives 2 and 3 have the same number of households and jobs and represent an increase of 1,015 households over Alternative 1 and the Preferred Alternative.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the above land use estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-26 summarizes the weekday PM peak hour vehicle trip generation and VMT for the existing conditions and alternatives.

Exhibit 8-30. Weekday PM Peak Hour VMT and Vehicle Trips by Alternative

	Existing	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative	Increase (Preferred Alternative – Alternative 1)
Vehicle Trips	10,071	12,544	13,626	13,542	12,550	+6
VMT	23,682	30,015	31,122	30,907	30,016	+1

Source: Transpo, 2024.

As shown in the exhibit, the Preferred Alternative results in very similar weekday PM peak hour trips and VMT compared to Alternative 1.

Traffic Operations

Given the same level of development between Alternative 1 and the Preferred Alternative with only a small change in household allocation as well as the slight increase in VMT and vehicle trips shown in Exhibit 8-26, the traffic volumes and traffic operations for Alternative 1 would be similar to the Preferred Alternative. No new impacts are anticipated with the Preferred Alternative.

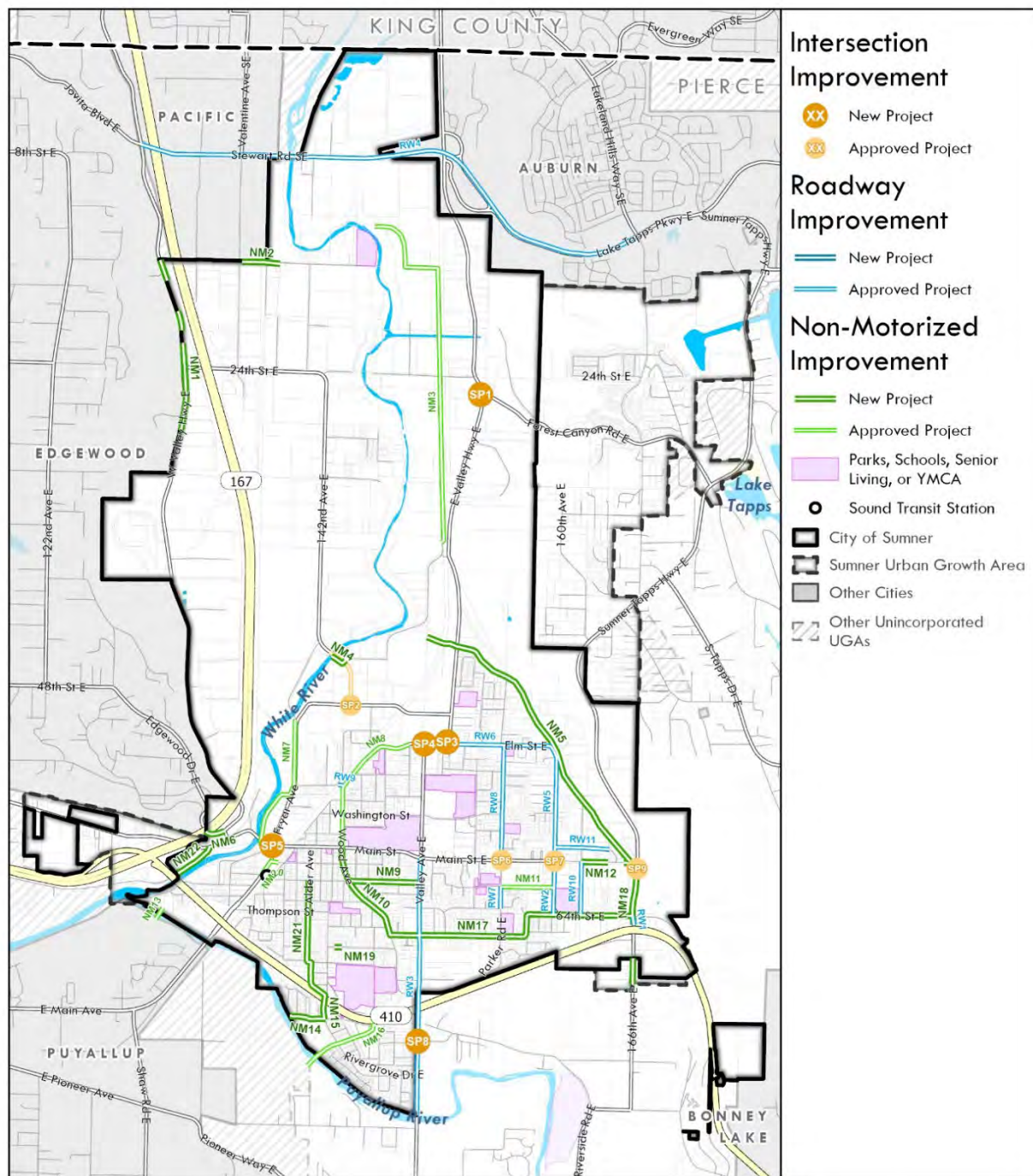
8.4 Mitigation Measures

8.4.1 Incorporated Plan Features

- All Alternatives would implement Transportation Element policies that address circulation system classification and design, concurrency standards, transit coordination and improvements, non-motorized facilities, financing including impact fees, and joint transportation planning, among other policies. The two Action Alternatives include implementation of the Transportation Element.
- The Preferred Alternative and Alternatives 2 and 3 include updates to the vehicle LOS policy.
- The Preferred Alternative and Alternatives 2 and 3 include new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Comprehensive Plan Land Use Element.
- A comprehensive list of improvement projects and programs are included as part of the Alternatives to meet the existing forecast transportation needs of the City (see Exhibit 8-31). The improvements

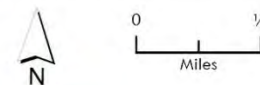
address safety, capacity, trail connections, expanded non-motorized transportation facilities, and roadway preservation needs. They also cover upgrades to existing roads and construction of new roadways and interconnected street systems to support the forecast economic development and growth in the city and its UGA. The roadway and intersection projects incorporate needs for pedestrians and bicyclists that will use the same corridors. A map of proposed transportation improvements is shown in Exhibit 8-31 and described in detail in the Transportation Plan Update. Alternative 1 incorporates only the “approved” projects while the Preferred Alternative and Alternatives 2 and 3 incorporate both the approved and new projects. In addition, the Preferred Alternative and Alternatives 2 and 3 incorporate new programs and recommendations described in the Transportation Plan such as the signal replacement program and exploring additional transit service for Summer.

Exhibit 8-31: 20-year Improvement Projects



CITY OF SUMNER

20-Year Improvement Projects



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2023; Transpo, 2024.

8.4.2 Regulations and Commitments

- SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to reflect multimodal transportation impact fees.
- The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places.
- The City collects mitigation fees for trails (see Section 3.10).
- The City policies indicate commitment to pursue expansion of the Pierce Transit benefit district. If transit service is implemented within Sumner, the City will develop a transit LOS standard.

8.4.3 Other Potential Mitigation Measures

The City is committed to reassessing their transportation needs and funding sources each year as part of their annual Six-Year Transportation Improvement Program (TIP). This allows the City to match the financing program with the shorter-term improvement projects and funding. The Transportation Plan also includes goals and policies to periodically review land use growth, adopted level of service standards, and funding sources to ensure they support one another and meet concurrency requirements.

8.5 Significant Unavoidable Adverse Impacts

Increases in future development will result in increased traffic volumes. Under all alternatives, the City has established levels of service that can be met with proposed transportation improvements and programs. Greater mobility through bicycling and walking could be achieved with the proposed non-motorized plan under the Preferred Alternative and Alternatives 2 and 3. Although congestion can be addressed through the mitigation measures presented in this document, the increase in auto traffic itself is considered a significant unavoidable adverse impact.

9 Natural Environment

9.1 Introduction

This section discusses potential impacts, and mitigation of impacts, to the natural environment, including earth, water resources, and plants and animals, under the plan alternatives described in Chapter 2: Alternatives. Vulnerability to wildfire is also discussed in this section, in response to new requirements in the Growth Management Act relating to climate change planning.

9.2 Affected Environment

9.2.1 Earth

Geologically hazardous areas in Sumner include landslide, erosion, seismic, and volcanic hazard areas. Seismic hazard areas are subject to earthquake-induced ground shaking, slope failure, settlement, fault rupture, and soil liquefaction. Volcanic hazards are lahars, debris flows, and related flooding associated with volcanic activity from Mount Rainier. Landslide and erosion hazards include a variety of downslope ground movements triggered by saturation of slopes by precipitation, erosion or undercutting of slopes, and earthquakes.

The purpose of protecting these areas is to regulate land disturbing activity in areas not suited for development to protect lives, property, and public infrastructure.

Citywide

The City is within a broad and flat valley created by glacial events. A widespread mudflow, named the Osceola Mudflow, occurred approximately 5,600 years ago and deposited mud and alluvium from Mount Rainier over existing glacial drift on the lowland plains. It contains a high amount of clay, silt, and sand, with a smaller proportion of gravel. This material can be up to 75 feet thick in the White River Valley.

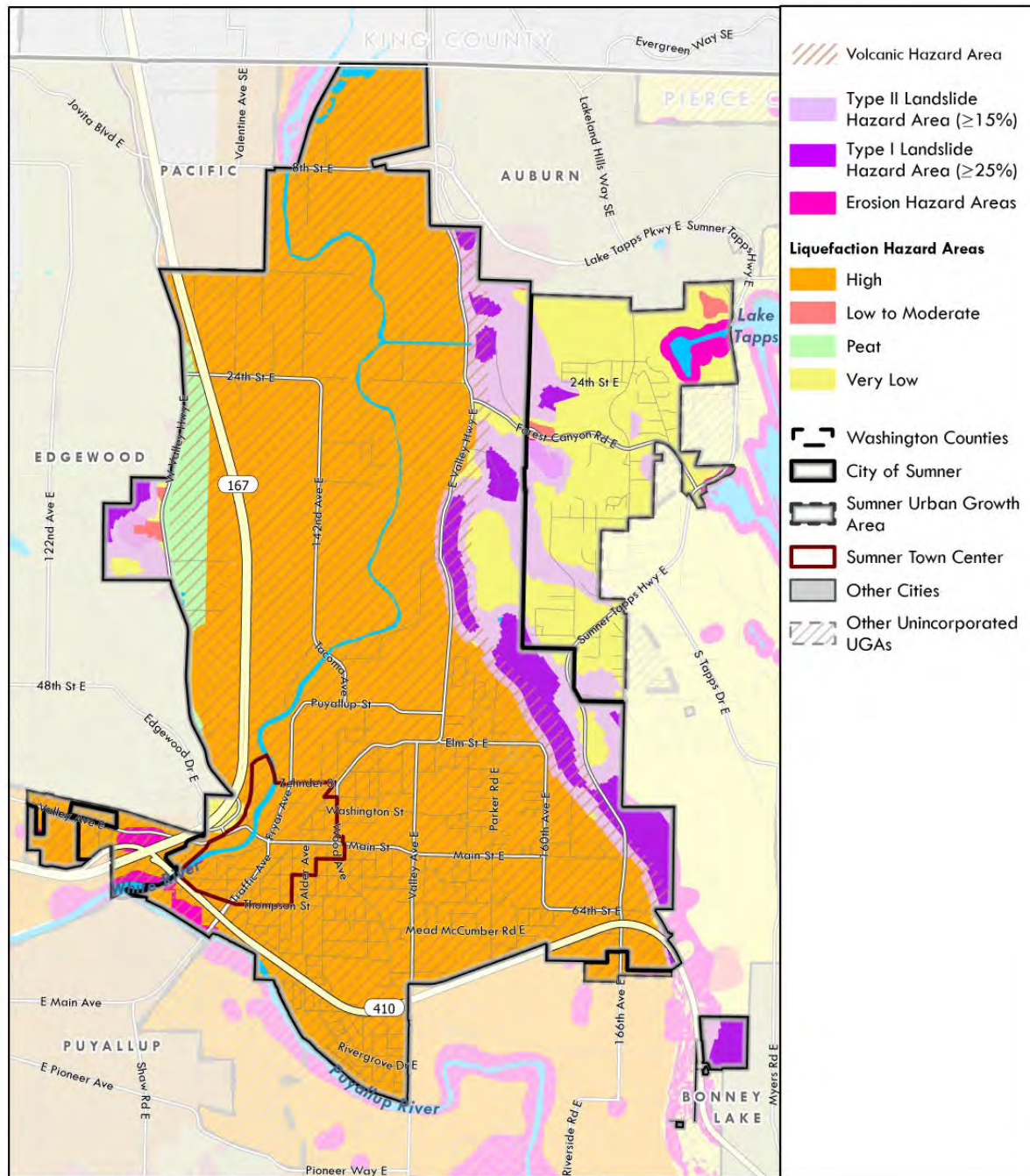
Erosion and landslide hazard areas are located on the slopes along Sumner's east and west borders (Exhibit 9-1). Landslides are not uncommon in Sumner and significant landslides have occurred in the recent past.

The majority of Sumner is located within a volcanic hazard area (see Exhibit 9-1). The White and Puyallup River valleys are in the potential path of debris flows from Mount Rainier if an eruption occurs. The city's close proximity to Mount Rainier and its connection with the Puyallup River increases the City's

vulnerability and risk of a lahar. A large portion of the City is also within a high potential dynamic settlement and liquefaction hazard areas and is also therefore in a susceptible seismic hazard area (see Exhibit 9-1). The Tacoma fault line is north of Sumner, approximately 8 miles away.

Pierce County has adopted a Region 5 All Hazard Mitigation Plan (HMP) in collaboration with Region 5 cities in Pierce County. The plan includes a Sumner-specific addendum with local strategies. The HMP identifies natural, man-made, and technological hazards and threats to the Sumner community and provides mitigation measures to address and reduce these impacts. Regular review and update of the HMP occurs within a five-year cycle. As part of this plan the city has developed an emergency communication system including a smart phone app, and an evacuation plan (Exhibit 9-2), which outlines routes to avoid volcanic hazards should they occur.

Exhibit 9-1: Sumner Geologically Hazardous Areas



CITY OF SUMNER

Geologically Hazardous Areas

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

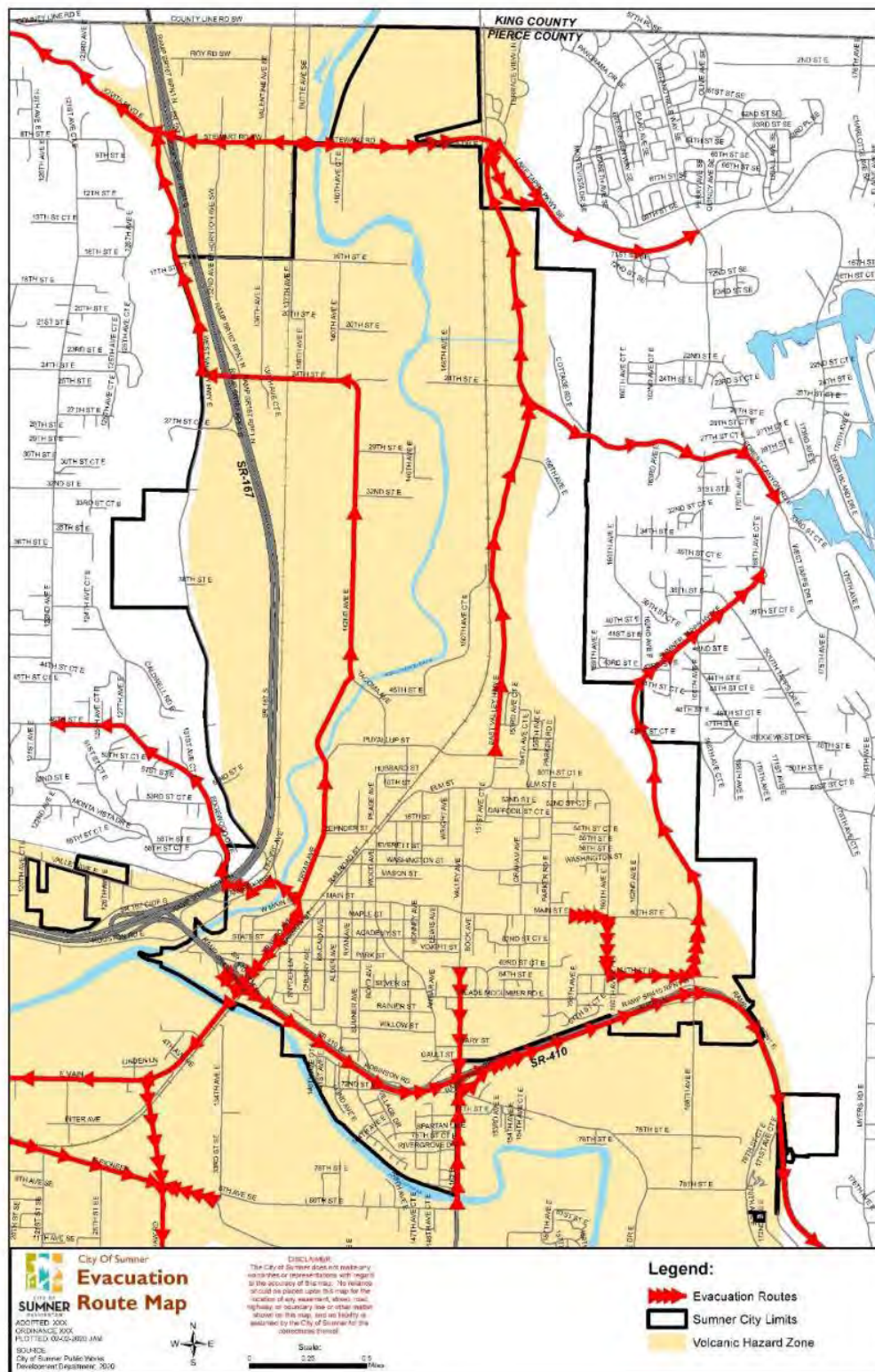


Map Date: February 2024

Source:

Source: Parametrix, 2023; City of Sumner, 2023.

Exhibit 9-2: Evacuation Routes



Source: Parametrix, 2023; City of Sumner, 2023.

Exhibit 9-3: Sumner Geologically Hazardous Areas

Hazard	Description	Summary
Erosion	Soil units susceptible to erosion by wind, water, and unstable slopes	Some erosion hazard areas exist along the city's east and west borders.
Landslides	Steep Slopes underlain by weak, fine, and unstable geology	West of West Valley Hwy East contains slopes greater than 40% which are susceptible to landslide and erosion.
Seismic Hazards	Active faults and earthquake locations	None
Volcanoes	Volcano hazards	The City of Sumer lies within a Lahars hazard zone
Liquefaction	Liquefaction Susceptibility zone under alluvium deposit	Sumner has a moderate to high liquefaction susceptibility in most of the city with small portions in the center of the city with a high susceptibility rating

Source: WDNR Washington Geologic Information Portal, 2023.

Geologically hazardous area regulations are found in Sumner Municipal Code (SMC) Title 16, Division III:

- SMC 16.50 Landslide and Erosion Hazard Area
- SMC 16.52 Seismic Hazard Area
- SMC 16.54 Volcanic Hazard Area

North Portion

The North Portion of Sumner contains a hillside to the west of West Valley Hwy East, which contains slopes greater than 40% which are susceptible to landslide and erosion. The liquefaction hazard at the base of these hillsides is considered to be high. Soils in this area are predominantly Puyallup fine sandy loam, Snohomish silty clay loam, Sultan silt loam, and Puget silty clay loam per the USDA web soil survey.

East Portion

Topography in the East Portion is a combination of flat land with a high susceptibility of liquefaction and steep slopes on the eastern hillslope of Sumner city limits. Much of the East Portion of Sumner is susceptible to landslides due to the 20% and 40% or greater slopes along the eastern hillslope leading to Lake Tapps (see Exhibit 9-1). The land at the top of these hills and within Sumner city limits, has low susceptibility to liquefactions (see Exhibit 9-1). Soils in this area are predominantly Alderwood gravelly sandy loam on 15 to 30% slopes, Briscot loam, and Xerochrepts on 45 to 70% slopes per the USDA web soil survey).

Lands with State permits for mineral extraction include the CTI Pit/Cava gravel mine and Corliss Pit/gravel mine, both of which are located along the eastern hillslope of Sumner city limits.

South Portion

Topography in the South Portion is relatively flat. South Sumner is subject to volcanic hazards and seismic hazards as is the rest of the city. The South Portion of Sumner contains a small area of sloped hills and subsequent landslide and erosion risk. Soils in this area are predominantly Puyallup fine sandy loam, Pilchuck fine sand, and Sultan silt loam per the USDA web soil survey.

West Portion

The terrain in the western section is generally level until reaching east of West Valley Hwy East, where it transitions to sharp slopes. Soils typically consist of Snohomish silty clay loam, Semiahmoo muck, and Puget silty clay loam per the USDA web soil survey.

There is a small area along the mid-western City boundary with steep slopes along the White River and the Puyallup River which are highly susceptible to landslides and erosion.

There is a small mapped non-metallic mineral (peat) west of 167 and east of West Valley Hwy East between 27th St Ct E and 38th St E per the USDA web soil survey.

Sumner UGA

The UGA has areas susceptible to landslides due to the 20% to 40% slopes, with areas of 40% to 100% slopes around the western arm of Lake Tapps. The majority of the area is mapped as very low liquefaction hazard, with one small segment of high liquefaction hazard along Forest Canyon Road East. The UGA is outside of the volcanic (lahar) hazard area.

9.2.2 Water Resources

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

Surface Water

The major surface water bodies within the City of Sumner are the White River (Type S), Puyallup River (Type S), Salmon Creek (Type F), and Sotain Creek/Milwaukee Ditch (Type F). Other streams are: Stewart Road Creek (Type F), Dieringer Flume (tailrace) (non-typed, thus assumed Type F), as well as a number of non-fish bearing tributaries. Stream types are as shown on Exhibit 9-8, DNR stream types are Type S (shoreline of the state), Type F (fish bearing), and Type N (Non-fish bearing includes both perennial and seasonal).

Surface water bodies within the Sumner UGA are the White River, Salmon Creek, and Sotain Creek/Milwaukee Ditch. The Puyallup River bounds the UGA to the south and a small portion of Lake Tapps is located within the UGA to the northeast. The rivers and the Lake Tapps reservoir are subject to the Sumner Shoreline Master Program. Other streams are: Stewart Road Creek, Dieringer Flume (tailrace), as well as a number of non-fish bearing tributaries.

White (Stuck) River

The lower portion of the White River flows north to south through the middle of the city, in the north and west portions. The White River originates from the Emmons and Fryingpan glaciers on the north face of Mount Rainier, it flows 68 miles from its mountain source to its confluence with the Puyallup River, according to Shared Strategy Development Committee's Puget Sound Salmon Recovery Plan and Kerwin report on Salmon Habitat Limiting Factors. The river has a drainage area of approximately 494 square miles.

The lower White River is regulated by the Mud Mountain Dam at river mile (RM) 28, which diverts upstream flows to Lake Tapps. These flows then rejoin the White River through either the Lake Tapps diversion or the Dieringer Flume, located at approximately RM 3.6. Additionally, the river is subject to flood control modifications such as diking, levees, and gravel removal to deepen the channel. Levees reduce floodplain connectivity and increase peak flows within the main channel, therefore also causing increased flood water elevations further downstream (unless the levees are breached). Due to the extensive flood control efforts, certain habitat elements such as pool frequency, refugia, and off channel habitat do not function properly within the lower White River. Buffers are set by the Shoreline Master Program and range from 50 feet for urban and 200 feet for Urban Conservancy and Natural shoreline designations.

The White River experiences typical sediment loading issues common to glacial fed river system. In its upper reaches, it cuts through glacial and mudflow deposits, resulting in substantial transportation of sediments. It has been estimated to transport about 440,000 to 1,400,000 tons of sediment annually. The sediments are deposited in the lower reaches, including the vicinity of Sumner, leading to aggradation and flooding problems in the river valley per the Kerwin report.

Within Sumner city limits, three segments of the White River are currently listed on the Washington State Department of Ecology's 303(d) list of impaired waters of the state. The 303(d) list identifies all assessed waters within the state that are impaired by pollutants and do not meet state surface water quality standards and are not expected to improve within the next two years.

The assessed waters are categorized to describe their current state of water quality. Category 5 waters are those polluted waters that require a total maximum daily load (TMDL) or other water quality improvement (WQI) plan. These make up the 303(d) list. The reach of the White River, extending from the northern City limits to approximately 1.5 miles downstream is listed as a Category 5 water for pH, dissolved oxygen, and temperature. It is also listed as a Category 4c water for instream flow. Category 4c waters are impaired from non-pollutant sources or waters that are impaired by causes that cannot be addressed through a TMDL. A second segment from the vicinity 32nd Street East to 1.3 miles downstream is listed as Category 5 for temperature. A third segment, covering 0.2 miles near the confluence with Puyallup River is also listed as Category 5 for temperature.

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

Puyallup River

The Puyallup River serves as the southwest border of city limits, in the south portions. Within this reach, the river has been substantially altered through channelization and loss of riparian and off-channel habitats. The river originates from the Klapatche area on the southwest slopes of Mount Rainier and drains to Commencement Bay. Since at least 1980, summer low flows in the Puyallup River have declined continuously, despite the closure of new surface water withdrawals and the establishment of minimum flow requirements (Kerwin 1999). The lower portion of the Puyallup River now only provides a migration corridor for salmonids as it has been dramatically altered and restricted by human developments. Within the City of Sumner, the Puyallup River is listed as Category 5 for temperature on the 303(d) list. Buffers are set by the Shoreline Master Program and range from 100 feet for Residential and 200 feet for Urban Conservancy designations.

Salmon Creek

Salmon Creek in the east portion of the city, originates in the Orton Junction area south of Sumner and is joined by several Type N (non-fish bearing) tributaries. Salmon Creek then flows northwest to join the White (Stuck) River. The stream is surrounded by steep slopes to the northeast throughout much of its length and is primarily bordered by residential land use to the southeast. The forested, steep slopes provide priority habitat for terrestrial species, and the stream is on Washington State Department of Fish and Wildlife (WDFW)'s Priority Habitat and Species (PHS) list as a 'biodiversity corridor' (WDFW 2023). The stream provides habitat for Coho, Chum, and Chinook salmon, and Steelhead and Cutthroat trout. It has a number of culvert-related fish passage barriers. Its width ranges from approximately 3 to 4 feet at its upper reaches and up to 10 feet near its mouth. The stream supports a number of riparian wetlands.

Sotain Creek/Milwaukee Ditch

Located in the north portion, this stream runs from the northern city limits at 16th Street East south along SR167 to approximately 48th Street East where it crosses under SR 167 and the railroad to join the White River. It has been heavily channelized by SR167, the railroad and former agricultural land uses. The stream generally ranges from 3 to 4 feet wide in its northern reaches and from 8 to 10 feet wide near its mouth. The stream is bordered by a number of riparian wetlands, but existing buffers are generally narrow because of existing development.

Stewart Road Creek

This stream was relocated from the vicinity of the Lake Tapps Parkway Stormwater Treatment Pond during the reconstruction of Stewart Road (Exhibit 9-4). Stewart Road Creek, located in the east portion, meanders approximately 1,600 feet from Stewart Road south to within 175 feet of the White (Stuck) River and then flows through wetland and culvert to outfall at the river. According to WDFW's PHS map, the stream is utilized by Steelhead trout, Cutthroat trout, and Coho salmon.

Exhibit 9-4: Steward Road Creek

Source: Parametrix, 2023.

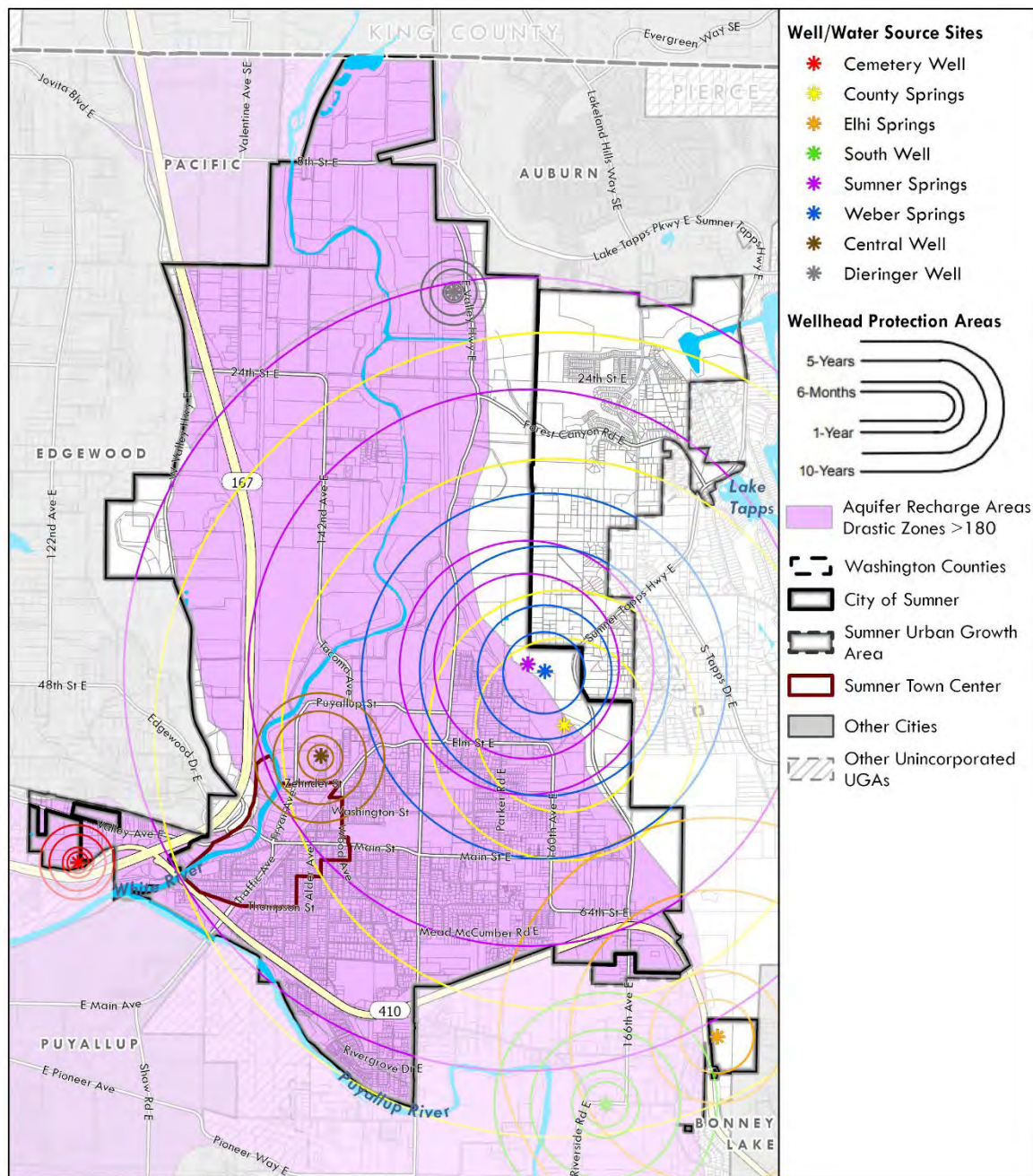
Dieringer Flume / Tailrace Canal

The Dieringer Flume (tailrace canal) is a manmade channel flowing west from the Dieringer Powerhouse on East Valley Highway East to the White River approximately 0.2 miles north of 24th Street East. The channel is approximately 60 to 70 feet wide with boulder/cobble substrate. It is located in the east and north portion of the city. Water levels and flow rates in the channel are controlled by Cascade Water Alliance, which maintains the powerhouse and canal. Although the powerhouse is no longer used for power, water is piped from Lake Tapps to the powerhouse. Migrating adult salmonids may enter the canal from the White (Stuck) River during high velocity flows in the summer and fall. As part of the multi-agency future White River Restoration Project, the tailrace course will be altered and integrated into new floodplain habitat areas.

Groundwater

The majority of the City of Sumner is located within a highly susceptible wellhead protection (10-year travel time) area (Washington Department of Health 2023). See Exhibit 9-5. The City has rights to use four springs and four wells. The springs are located on the hill on the east side of the city: Sumner, County, and Elhi Springs, Elhi is currently inactive (BHC Consultants, 2020). the wells are West Well, South Well, Central Well, and the Dieringer well. The west well is used primarily for irrigation (BHC Consultants, 2020). Groundwater quality is tested on an annual basis for organics and inorganics. Water quality in Sumner is generally very good per the City's General Water Plan Update.

Exhibit 9-5: Aquifer Recharge Areas and Groundwater Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: City of Sumner, 2023; Parametrix, 2023.

Wetlands

Wetlands in Sumner are primarily associated with the White River, Sotain Creek, and Salmon Creek. Wetlands primarily occur along the base of the slopes on both the western and eastern sides of the city; west of SR 167, along the East Valley Highway corridor, and along Salmon Creek. There are also wetland complexes in the floodplain of the White River, with smaller patches of wetland mapped throughout the city, according to City mapping and the USFWS Wetland Inventory. Wetlands are important for providing habitat, storm and flood water storage and filtration, groundwater recharge, recreational/educational opportunities, and shoreline protection.

9.2.3 Plants and Animals

Fish and wildlife habitat conservation areas are areas of critical importance to sustain needed habitats and species for the functional integrity of the ecosystem in Sumner Municipal Code and Washington Administrative Code (SMC 16.56.050 and WAC 365-190-130). These areas include designated critical habitat for federally or state-listed endangered, threatened, or sensitive species of fish, wildlife, or plants; areas containing species of local importance, waters of the state including lakes and streams. Sumner regulates plants and animal habitat in SMC 16.56 Wildlife Habitat Areas. Wetlands are regulated separately under SMC 16.46, thus are not treated as fish and wildlife habitat conservation areas under the regulations. Streams and wetlands are also described in *Water Resources*.

Citywide

The City of Sumner has a variety of habitats including streams, riparian areas, wetland, forests, and open space. The White River and its riparian corridor, which flows south through Sumner and into the Puyallup River, is an important habitat feature (Exhibit 9-8). The White River and a number of tributaries such as Salmon Creek support habitat for fish including anadromous salmon habitat. Open spaces and the forested areas along the eastern and western hillsides bordering Sumner provide additional habitat to support wildlife. Sumner has three areas zoned for resource protection (publicly-owned restoration sites) which provide valuable long-term protection (see Chapter 3: Land Use). Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River. The rivers and streams within the study area are generally affected by channelization, levees, and the close proximity of residential, industrial, and commercial land uses. Development often directly abuts or encroaches on the riparian buffer of the rivers and streams. This reduces the connectivity of rivers and streams with their natural floodplains, creating more area that is affected by floods, and reduces quality and complexity of aquatic/riparian habitat. Common vegetation in riparian areas within the study area includes invasive species such as reed canary grass and Himalayan blackberry. Other common vegetation is deciduous trees such as red alder, black cottonwood, and willows. Species recorded within the White and Puyallup Rivers include Coho, Pink, Chinook salmon, Bull trout, Steelhead trout, and Cutthroat trout. Of these, the US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) list Bull trout, Chinook salmon and Steelhead trout as threatened under the Endangered Species Act (ESA). Exhibit 9-6 identifies the ESA-listed and state-listed threatened or endangered fish species that are known or expected to occur in Sumner streams.

According to the National Wetland Inventory (NWI) and existing City maps, there are wetlands along the western edge of city limits, west of SR 167, along the East Valley Highway corridor, along Salmon Creek and the White and Puyallup Rivers, and smaller patches of wetland along the valley floor in east, southwest, and southeast Sumner. Wetlands are important for providing habitat, storm and flood water storage and filtration, groundwater recharge, recreational/educational opportunities, and shoreline protection. WDFW also identifies a large biodiversity area on the forested hillside above Salmon Creek in East Portion of the city.

Wildlife utilizing this biodiversity area and other open space within the study area include terrestrial species commonly found in developed suburban environments such as raccoon, opossum, squirrels, skunk, coyote, other small rodents, crows, woodpeckers, red-tailed hawk, and songbirds. Wetlands and riparian areas are utilized by great blue herons and waterfowl. Developed areas, especially residential neighborhoods with trees and landscaping, provide additional habitats for urban-adapted wildlife, such as raccoons, squirrels and some bird species.

Like most of Western Washington, Sumner is within the Pacific Flyway, a migratory bird route that extends from Alaska to South America. Open spaces, forests and wetland areas on the valley floor in Sumner provide habitat for migratory birds. According to USFWS Information for Planning and Consultation (IPaC), bald and/or golden eagles are most likely present and breeding in the Sumner and have been observed along the White River. Bald eagles and golden eagles continue to receive protection under the federal Bald and Golden Eagle Protection Act (16 USC 668-668d), which prohibits take (defined to include pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing bald or golden eagles), possession, and commerce of these species. Proposals for commercial or residential development within 660 feet of bald eagle nests, roost sites, or foraging areas may be required to comply with federal guidelines for bald eagle management. North American Wolverine, Marbled Murrelet, Streaked Horned Lark, Yellow-billed Cuckoo, Monarch butterfly, and Taylor's Checkerspot butterfly might be found within Sumner; however, there is no known critical habitat for these federally or state listed species within the city.

Exhibit 9-6: Threatened and Endangered Fish Species Known or Expected to Occur in Sumner

Species	Water Body Name	Federal Status	State Status
Bull Trout	White River, Puyallup River	Threatened	Candidate
Fall Chinook Salmon	White River, Salmon Creek, White River tributaries, Puyallup River	Threatened	Candidate
Winter Steelhead	White River, Salmon Creek, White River tributaries, Puyallup River	Threatened	None
Coho	White River, Salmon Creek, White River tributaries, Puyallup River	Candidate	None

Source: WDFW, 2023.

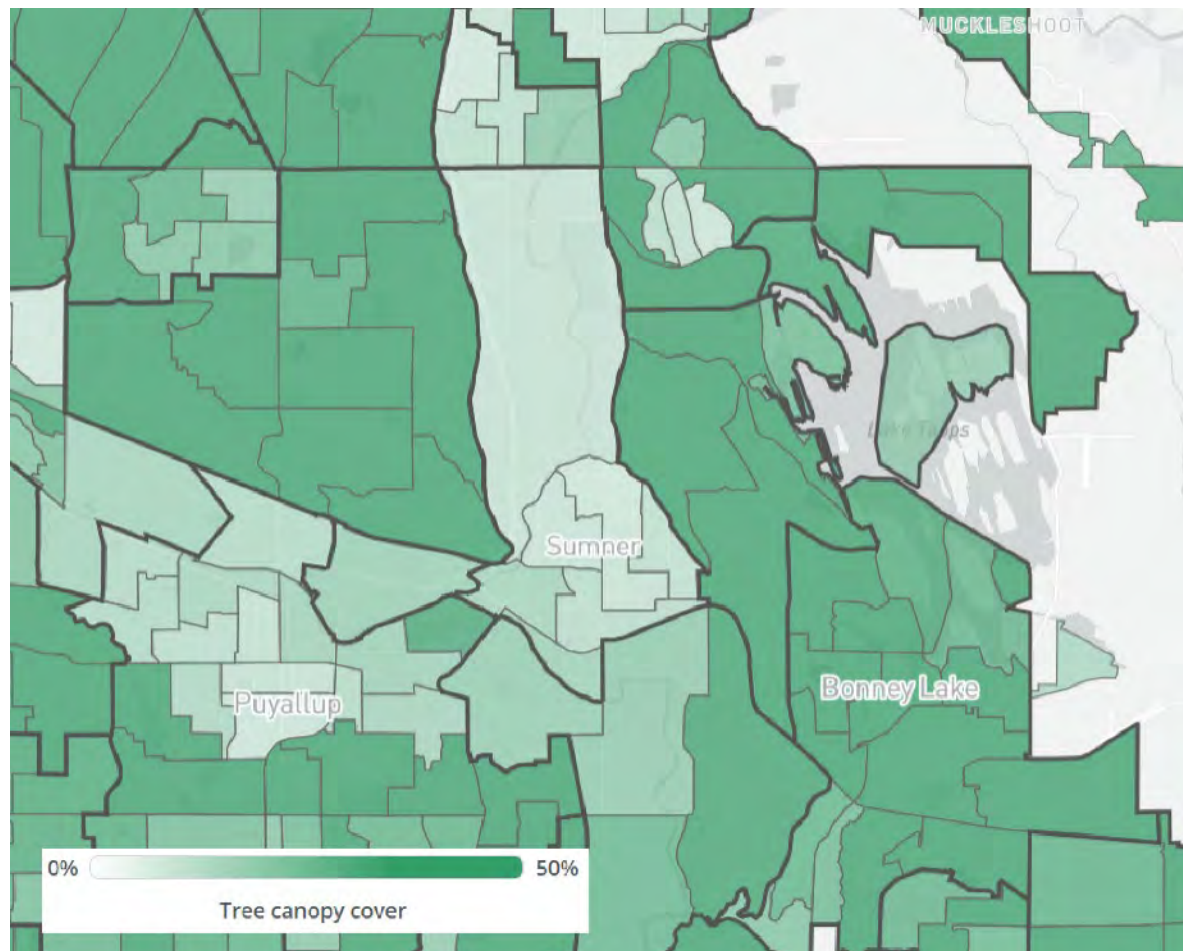
Note that lack of observations does not necessarily mean that the species is absent from an area.

According to the Washington Natural Heritage Program (WNHP), there are no known or historical rare plants or rare and high-quality ecosystems within the city.

Culturally significant plants are present in the undeveloped areas in Sumner, particularly within riparian corridors, wetlands, and forested slopes. Plants have been traditionally collected by tribes for generations for a variety of purposes, food, and construction of tools and clothing.

Mapping from Tree Equity Score, a tool created by American Forests, shows that Sumner's block groups range from 11% to 20% tree canopy cover (Exhibit 9-7). This is low compared to neighboring jurisdictions: block groups in Edgewood show 44 to 48% tree canopy cover, block groups immediately to the east range from 48 to 63% canopy cover, and block groups to the southwest show 21 to 33% cover. Areas to the north and south are more similar to Sumner's canopy cover. The block groups in the West Portion, which includes Town Center, and South Portion show the highest percentages in Sumner, at 19 and 20% canopy cover respectively. Part of Sumner's low tree canopy cover may be explained by its agricultural history where extensive clearing occurred on the valley floor.

Sumner's urban tree canopy is regulated primarily by the City's critical areas code (SMC Title 16) that protects forested slopes, zoning code (SMC Title 18, such as landscaping requirements in Chapter 18.41), and the City's street tree code, Chapter 12.42 SMC, which establishes policies for tree planting, preservation, and maintenance on City-owned lands and public right-of-way. Sumner also has a Forestry and Parks Commission, which advises the City on issues related to parks, recreational facilities, the cemetery, trails, trees, and planting strips. The Commission is responsible for developing and implementing the Sumner Urban Forestry Strategy Plan and ensuring the City maintains its designation as a Tree City USA. To qualify as a Tree City USA, cities must have a tree board or department, a public tree care ordinance, a community forestry program with an annual budget of at least \$2 per capita, and an Arbor Day observance and proclamation.

Exhibit 9-7: Tree Canopy Cover (from Tree Equity Score)

Source: American Forests, 2023.

North Portion

Land in North Sumner is primarily zoned light industrial and interchange commercial, with smaller areas of heavy industrial, resource protection, and low density residential. According to the NWI and city maps, the northern portion of North Sumner contains mapped wetlands and are classified primarily as forested/shrub wetlands. They are primarily located between the northern border of Sumner, east of Butte Avenue SE to E Valley Highway E, and south to 16th Street E. There are also mapped wetlands on the west side of the North Portion of Sumner. They are classified as forested/shrub and emergent. They provide low to high water quality function and poor to excellent habitat value per DNR and City mapping.

The White River runs south through North Sumner and is an important river in the area that supports salmon runs. It flows into the Puyallup River and has historically been important for spawning salmon. It is mapped as being a migration corridor for threatened species including bull trout and Steelhead, Chinook, other species include Chum, Cutthroat, and Coho per WDFW. The White River is mapped as a Type S and is a shoreline of the state. There are also wetlands associated with White River.

East Portion

Land in the East Portion of Sumner is currently used for low, medium, and high density residential, urban village, general commercial, public, and private utilities, agricultural fields, and open space. There are mapped wetlands within portions of the East Sumner area. According to the NWI, they are freshwater emergent and forested wetlands. They are primarily located between 60th St E and 64th St E, west of Sumner Tapps Highway E., as well as within the riparian areas associated with Salmon Creek. They provide low to moderate water quality function and habitat value. Some of the wetlands are actively mowed and provide limited habitat value. The maintained fields and other open space in the vicinity provide habitat for accustomed urban species.

Salmon Creek runs south to north along the eastern end of the East Sumner Neighborhood. It is primarily straightened and channelized in this area but has a narrow band of forested riparian buffer consisting of red alder, black cottonwood, willow, and scattered coniferous trees. Salmon Creek is mapped as being a migration corridor for steelhead trout, coho, Chinook, chum, and pink salmon by WDFW and classified as Type F (Fish bearing) by WDNR. According to spawner surveys conducted by the Puyallup Tribe for the study period between 1991 and 2010, an average of 16 Chinook, 7 Coho, and 56 Chum return to Salmon Creek annually. There are also wetlands associated with Salmon Creek. The City has ongoing restoration projects along Salmon Creek, including expanding the floodplain and buffer and replacing fish-barrier culverts.

South Portion

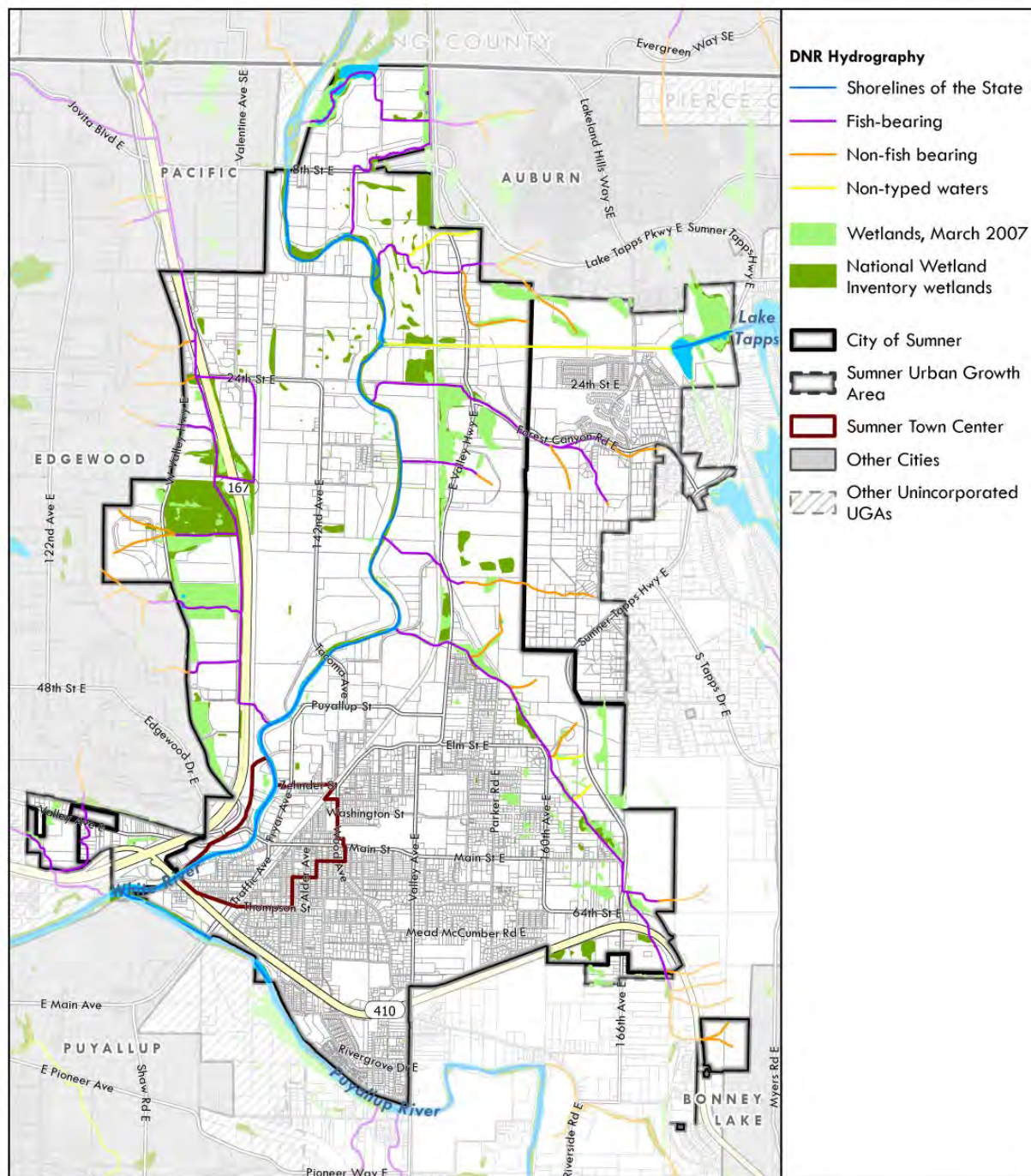
The land use in the South Portion comprises a range of low to high density residential areas, as well as urban village and areas with public-private utilities and facilities. There is a small portion of mapped wetlands within the riparian areas associated with the Puyallup River. These wetlands consist of forested/shrub and one emergent wetland, and a small cluster of freshwater ponds in the residential areas per USFWS mapping. They provide low to moderate water quality function and poor to fair quality ranking for ecological integrity according to WDNR.

The Puyallup River flows along Sumner's southern border and is mapped as a migration corridor for Chinook, coho, chum, cutthroat, steelhead, bull trout, and pink salmon per WDFW 2023. The Puyallup River is a Type S (shoreline of the state) per WDNR. The river provides important habitat for salmon spawning.

West Portion

Land use in the West Portion comprises of light industrial, heavy industrial and general commercial areas, along with some low density residential and multi-family/commercial uses within the town center area. Mapped wetlands within portions of West Sumner include forested/shrub and emergent wetlands per USFWS.

Exhibit 9-8: Important Areas for Fish and Wildlife



CITY OF SUMNER

Streams and Wetlands

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



Map Date: February 2024

Source: Parametrix, 2023; City of Sumner, 2023.

9.2.4 Wildland Urban Interface

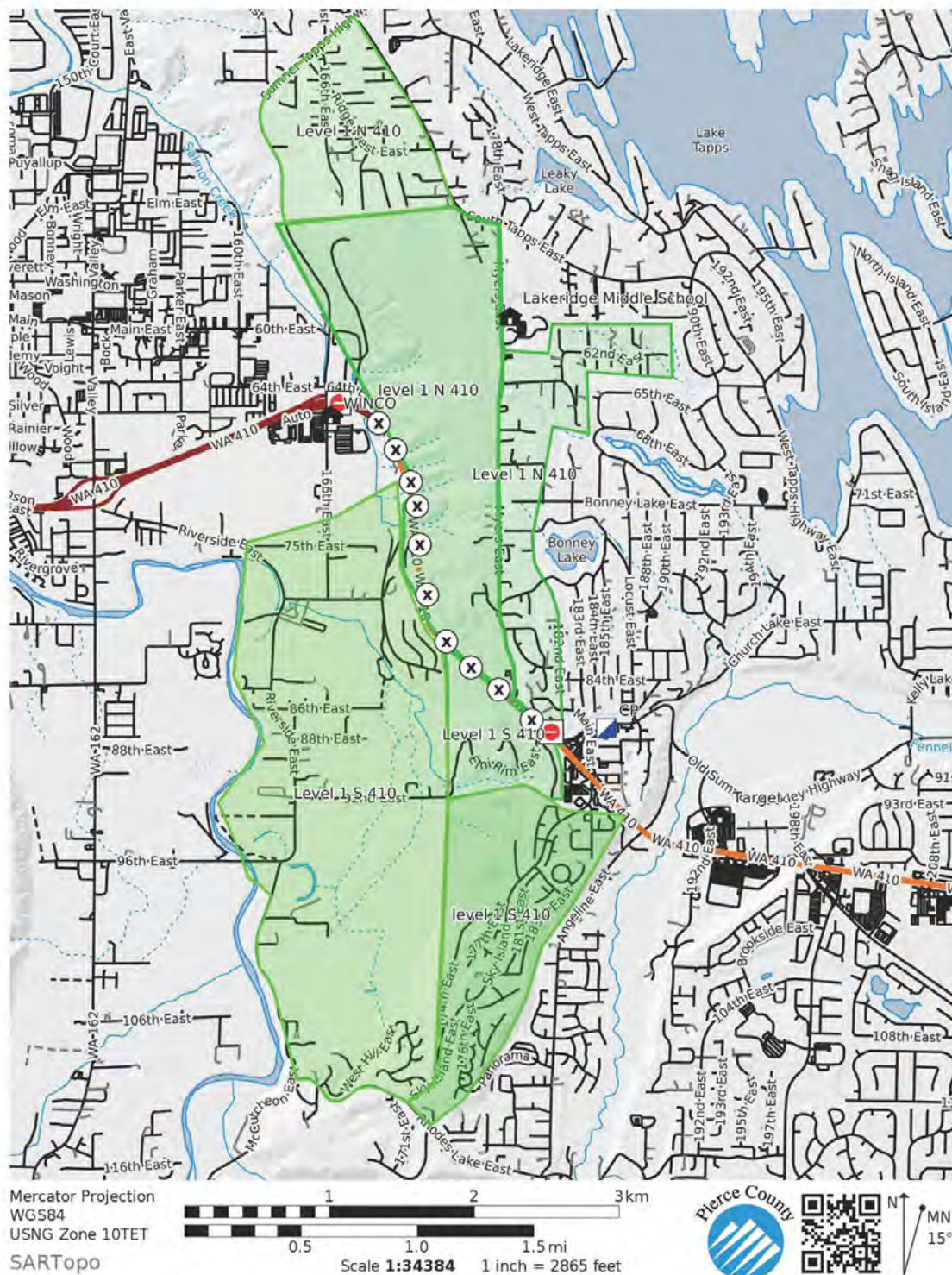
Several areas of Sumner have been mapped by the Washington State Department of Natural Resource in 2019 as wildland urban interface (WUI), specifically “intermix”. Intermix areas are those areas where structures intermingle with wildlands. To be considered intermix, a development must be surrounded on two or more sides by wildlands. While the WUI is not the same as wildfire risk, the WUI does show areas where development is located near burnable vegetated cover.

In Sumner, the intermix areas are found primarily along the east hillside (Exhibit 9-10). Intermix areas are also found on the west side of the city along West Valley Highway East and in the Sumner UGA east of the city. One area shown on State mapping, the valley floor within the MIC, is unlikely to pose a hazard per lack of trees.

While most of Sumner is not in the WUI, fires have affected the city in the past. In 2020, the Sumner Grade Fire prompted evacuations in parts of Sumner and surrounding areas (Exhibit 9-9).

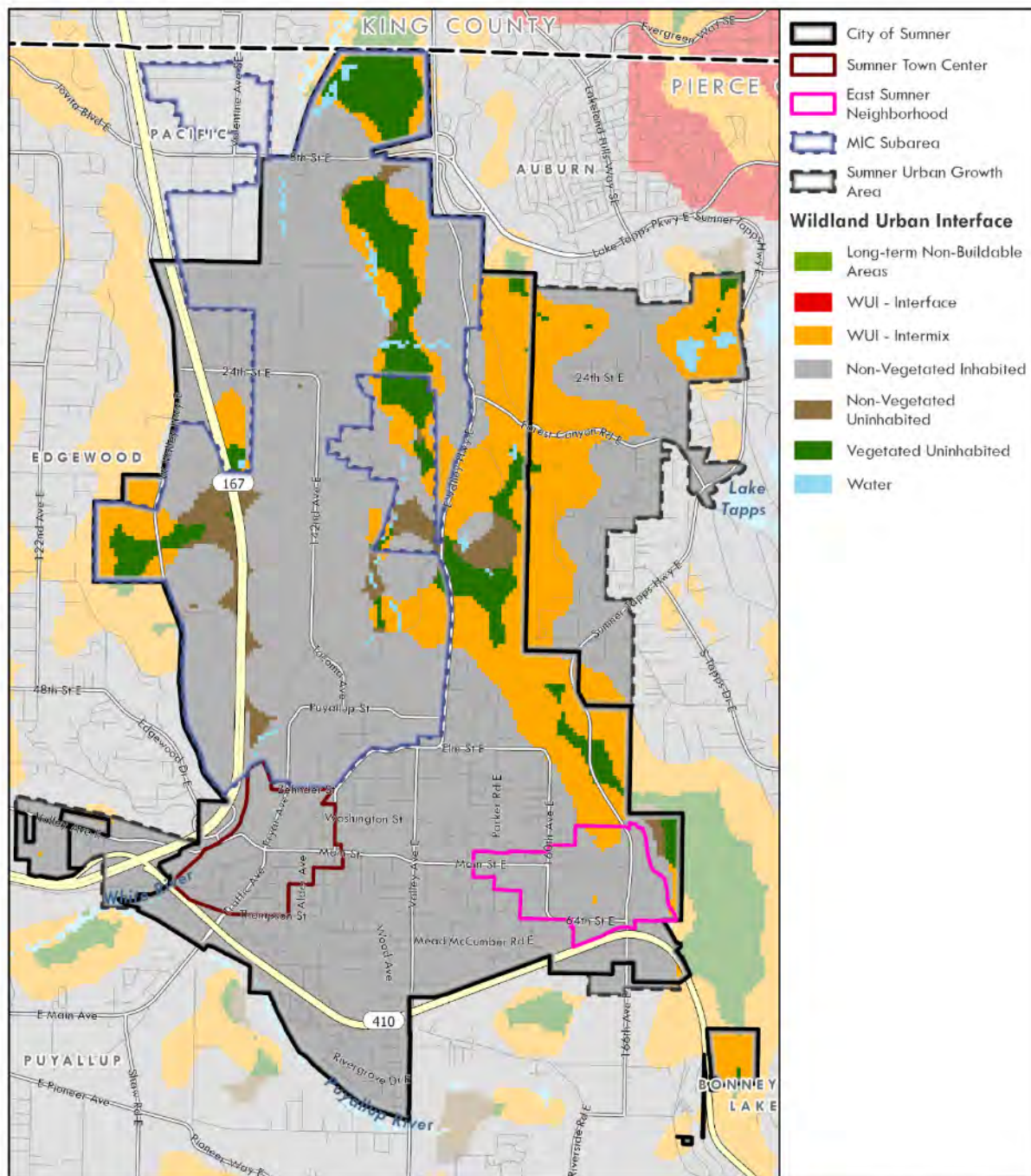
Exhibit 9-9: Sumner Grade Fire Evacuation Map (9/13/2020)EVACUATIONS LEVELS: **LEVEL 1** **LEVEL 2** **LEVEL 3**

EFFECTIVE 09/13/20 AT 6:00 PM



Source: Pierce County, 2020.

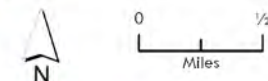
Exhibit 9-10: Wildland Urban Interface



CITY OF SUMNER

Wildland Urban Interface

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner, 2023, BERK, 2023.

9.3 Impacts

9.3.1 Thresholds of Significance

Impacts of the alternatives are considered significant if they would:

- Increase the exposure of people to risk of injury or substantial damage to structures and infrastructure due to a geologic hazard.
- Increase in the delivery of stormwater contaminants to fish-bearing streams.
- Increase the net loss of fish and wildlife habitat including wetlands, streams, and vegetation.
- Increase jobs and/or housing in designated wildland urban interface (WUI) areas with vulnerability to wildfires.

Related thresholds and analysis on tree canopy and wildfire risk are found in Chapter 3: Land Use.

9.3.2 Impacts Common to All Alternatives

Earth

Citywide

New development will occur under all alternatives. Most of the city is within seismic (including liquefaction) and volcanic (including lahar) hazard areas, thus new development would be exposed to these hazards. New development is within or abutting landslide or erosion hazard areas, and potentially vulnerable to a greater risk of damage from these hazards. Construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs. Growth and construction would not create or accelerate seismic or volcanic hazards. Future developments would need to comply with building, land use and critical areas regulations.

North Portion

The North Portion is primarily flat so there is low risk of erosion and landslides. Therefore, despite substantial job growth in the MIC in this area, and some housing growth outside of the MIC, in all alternatives, increased exposure to erosion and landslide risks is not expected to occur here.

East Portion

Housing and job growth is anticipated under all alternatives in the East Portion. This includes growth East of East Valley Highway and west of Sumner-Tapps Highway East, which is an area of steep slopes, which are susceptible to landslide and erosion. Development of these areas could increase the instability of these slopes and put people and property at an increased risk of landslide.

South Portion

Though it is not a focus of growth under any alternative, some housing growth is expected in the South Portion, between SR 410 and the Puyallup River. Similar to the North Portion this area is relatively flat and

has limited susceptibility to landslide and erosion. Construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs.

West Portion

All alternatives include job and housing growth in the West Portion, with an emphasis on the Town Center. There are some steep slopes mapped along the White River, and development in these areas would increase the risk of exposure to erosion and landslides. This higher level of growth would put more people at risk of injury or substantial damage to structures and infrastructure from erosion and landslides.

Sumner UGA

In the UGA, new development within or abutting landslide or erosion hazard areas, would be potentially vulnerable to a greater risk of damage from these hazards.

Water Resources

Citywide

Housing, population, and job growth will occur under all alternatives. In general, population growth and development activities have direct and indirect impacts on local water quality. The increase in population, work force, and the resulting development activity to accommodate this growth could result in a higher potential for releases of pollutants into surface waterbodies. Increased traffic volumes produce more contaminants in stormwater that requires treatment prior to discharge. All alternatives will raise the number of vehicle trips and vehicle miles traveled (see Chapter 8: Transportation). Increased development and impervious surfaces often result in less vegetation coverage that can naturally filter runoff. This, in turn, leads to higher runoff volumes entering the surrounding rivers and streams and reduces groundwater recharge rates. The majority of the City of Sumner is within a critical aquifer recharge area and is therefore 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. Increased impervious surfaces and less vegetated cover can also increase temperature and decrease habitat quality in streams and wetlands.

North Portion

Job growth under all alternatives, which is focused in the North Portion in the MIC, could bring additional people and businesses to the North Portion. Much of this area is already developed, so impervious surface cover is unlikely to expand. The North Portion contains the White River, Sotain Creek, other streams and numerous wetlands which would be vulnerable to pollutants from stormwater and habitat loss.

East Portion

Salmon Creek, and a number of Type F and Type N streams flow to the White River through the East Portion of Sumner. Both types of streams provide valuable habitat to plant and animal species. There are

also a number of mapped wetlands including riparian wetlands along Salmon Creek, which runs at the base of the slope through the East Portion. The East Portion would see housing and job growth under all alternatives, which could result in more impervious surfaces and impacts to water resources.

South Portion

The South Portion is all within close proximity of the Puyallup and White Rivers, which would receive any stormwater carrying pollutants from the South Portion. The South Portion is not a focus area for growth under any alternative but will see some housing growth which could result in some increase in impacts to water resources.

West Portion

The West Portion includes both the White River and Type F streams which would be vulnerable to pollutants carried by stormwater. All alternatives include job and housing growth in the West Portion, especially in the Town Center. This area is already highly developed; however, some increase of impervious surface would be expected.

Sumner UGA

Some new housing and job growth would occur under all alternatives in the Sumner UGA, which could have impacts to water resources through the creation of more impervious surfaces.

Plants and Animals

Citywide

All alternatives provide opportunities for development within currently vegetated areas, thereby all have the potential to impact habitats, including streams, riparian areas, wetlands, tree canopy, and open space.

Vegetation

Any form of development would directly affect vegetation by physically removing trees, shrubs, and non-woody plants, whether native or landscaped. Vegetation provides a variety of functions including fish and wildlife habitat, intercepting sediment, stabilizing slopes, temperature reduction, providing culturally significant resources, and contributing to aesthetics. Removal of trees and tree canopy cover, in particular, would result in loss of these beneficial effects. Growth and new development will occur under all alternatives. This can include infill development on existing lots and in existing neighborhoods, such as building ADUs or homes on vacant lots, new subdivisions, and redeveloping larger low density residential properties. Site development and redevelopment will, in many cases, result in removal of trees. Additionally, vegetation disturbances would likely lead to increased establishment of non-native and invasive plants, which tend to establish quickly and colonize areas where soils have been disturbed.

Fish and Wildlife Habitat

Development of vacant or larger low density properties under all alternatives would lead to habitat loss, fragmentation, and reduced habitat connectivity. This further reduces the biodiversity of the area.

Development and increases in impervious surface also reduce quality of aquatic habitat by increasing peak flows, reducing low flows, introducing pollutants, increasing water temperatures, and reducing the amount of shade. Development may also result in conversion of wetlands or streams and thus complete loss of those habitats that support fish and wildlife.

Impacts to aquatic habitat can be minimized with compliance with regulations for all development projects. This includes, but is not limited to adhering to buffer requirements, complying with allowable in-water work windows, and meeting stormwater requirements, complying with state and federal requirements regarding fish, wildlife, and waters of the state/US.

The White River and a number of tributaries such as Salmon Creek, support habitat for fish including anadromous salmon habitat. The White and Puyallup Rivers are shorelines of the state and regulated under the Shoreline Master Program (SMP), which is not subject to periodic update as part of this review.

North Portion

The area west of West Valley Highway is partially forested, has two non-fish bearing stream mapped, and is located above a large wetland complex. Existing vegetated areas are wetlands, streams, or their buffers, which are protected under existing critical areas regulations. The White River is regulated under the SMP. The North Portion of the city currently has approximately 12% canopy cover. Expected development under all alternatives is primarily due to job growth in the MIC and located on previously developed land with large amounts of impervious surface and little to no trees.

East Portion

Type F (fish bearing) and Type N (non-fish bearing) streams flow to the White River through the East Portion of Sumner. Both types of streams provide valuable habitat for plant and animal species. There are also a number of mapped wetlands including along Salmon Creek, which runs at the base of the slope through the East Portion. The eastern half of the East Portion, there are large, forested areas with some wetlands zoned for LDR which could result in the loss of wetlands and tree canopy if developed. The East Portion has between 11 and 15% canopy cover. Housing and job growth is expected to occur in the East Portion under all alternatives which could result in impacts to plant and animal habitat.

South Portion

With the exception of small areas of wetlands in already developed areas, the South Portion does not contain mapped wetlands north of the Puyallup River. Development near the Puyallup River would need to comply with the existing SMP. The South Portion has higher tree canopy coverage than other areas at approximately 20 percent. The South Portion is not a focus for growth in any alternative, but would see some housing growth, which could result in impacts to tree canopy.

West Portion

In the West Portion of Sumner, which is already highly developed, there are few to no mapped wetlands. Development is likely to take place along the White River, likely involving replacement/redevelopment of previously developed properties, resulting in new, larger structures with some increase of impervious surface.

Due to the proximity of construction to the White River, there is an increased risk of pollutants, debris, or fill material, which are harmful to fish, entering the river during construction. With the exception of the riparian area of the White River, the West Portion does not contain a large quantity of trees. Existing tree canopy coverage is approximately 12 to 19% in the West Portion. Based on the small quantity of trees outside of the White River riparian area, the impact to tree canopy cover is expected to be minimal.

Sumner UGA

The UGA includes areas of forested habitat, as well as wetlands and streams including a stream along Forest Canyon Road that provides habitat for salmonids. Both fish bearing and non-fish bearing streams provide valuable habitat for plant and animal species. In the UGA, there are large, forested area with some wetlands zoned for LDR which could result in the loss of wetlands and tree canopy if developed.

The upper section of the diversion (or Tailrace Canal) which returns diverted water back into the White River from Lake Tapps is also located in this area under the transmission lines. The transmission corridor is managed for tree height, which provides opportunity for invasive species. However, it will remain relatively undeveloped under all alternatives and thus provides habitat for some wildlife.

Some job and housing growth will occur in the Sumner UGA under all alternatives, which could have impacts to tree canopy and habitat.

Vulnerability to Wildfire

Citywide

All alternatives increase housing and jobs in Sumner and in WUI intermix areas. This is likely to result in more population located in areas that could potentially be vulnerable to wildfire.

North Portion

There are several areas of this North Portion including the MIC that are expected to see job growth under all alternatives that may overlap with WUI in some areas at the western and eastern forested slopes. While some job growth is anticipated in a remaining portion of the former Sumner Meadows Golf Course, it is not located in or adjacent to forested hillsides.

East Portion

All alternatives assume some amount of job growth from commercial and mixed uses located in areas east of Valley Avenue. Housing growth is also expected under the alternatives in the East Portion, which borders the WUI intermix areas near Sumner-Tapps Highway East and East Valley Highway East and

generally along the eastern forested slopes at the edge of the city. In addition, this portion contains forested publicly-owned watersheds, which are particularly vulnerable to wildfire impacts affecting the broader population.

South Portion

The South Portion mostly does not include intermix areas, except for a small area towards Bonney Lake that is separated from the rest of the city. This area is not expected to see significant job or housing growth.

West Portion

The West Portion does not include any WUI intermix areas.

Sumner UGA

Under all alternatives, some growth is expected to occur in the Sumner UGA. The part of the UGA immediately east of the city includes large areas of forested hillside located in the WUI intermix. This area was affected by a severe wildfire event, the Sumner Grade Fire, in September 2020. All alternatives could expose more residents and workers to wildfire vulnerability.

9.3.3 Alternative 1 (No Action)

Earth

Under this alternative, no changes to the zoning map or land use would occur. No updates would be made to the Comprehensive Plan Environmental Element or the Critical Areas Ordinance. It still assumes growth and any development would be at risk of damage from geologic hazards as described in Impacts Common to All Alternatives.

Water Resources

Since this alternative maintains the existing Comprehensive Plan policies, land use, and zoning, the impacts would be consistent with those identified under Impacts Common to All Alternatives. Under this alternative, growth will still occur, particularly in the Town Center, East Sumner, and the MIC. Water quality will be affected by normal growth rates. All approved development has incorporated appropriate stormwater treatment measures such as LID per SMC 13.48 into their design and no substantial impacts are anticipated. There would be no updates to the critical areas code which would result in less protection for critical areas, primarily streams.

Plants and Animals

Impacts under the No Action alternative are similar to those described under Impacts Common to All Alternatives. Much of the growth under Alternative 1 is focused in Town Center, the MIC, and East Sumner, which are already highly developed, which makes Alternative 1 less likely to have impacts to wetlands, streams, and fish and wildlife habitat than the other alternatives. However, no updates would

be made to the Comprehensive Plan Environmental Element or the critical areas regulations. Regulations within the City regarding fish and wildlife and their habitats would remain the same. Updates to the critical areas regulations under Alternatives 2, 3, and the Preferred Alternative would increase buffer widths for streams; without these updates, there could be development closer to streams and result in more impacts to these habitats.

Vulnerability to Wildfire

Impacts for Alternative 1 are similar as described under Impacts Common to All Alternatives. Alternative 1 has the same job growth and housing growth as the Preferred Alternative, but less housing growth than Alternatives 2 and 3, resulting in comparatively less activity in intermix areas. Much of the housing growth under Alternative 1 is focused in the Town Center area, which does not overlap with intermix areas. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 1 is expected to have the least impacts related to wildfire vulnerability compared with Alternatives 2, 3, and the Preferred Alternative.

9.3.4 Alternative 2

Earth

Impacts citywide would be similar to those described in Impacts Common to All Alternatives; however, with increased densities allowed in LDR, MDR and HDR zones and the rezone of the Cava gravel mine allowing more development, more people and structures would be exposed to seismic, volcanic, erosion and landside hazards.

The Cava gravel mine site would not be reclaimed under Alternatives 1, 3, and the Preferred Alternative. Changing the zoning for the Cava gravel mine site to MDR from LDR in Alternative 2 would create the potential for increased development of an area with steep slopes and a risk of landslide and erosion. Development of steep slopes and removal of trees has the potential to increase instability of slopes and create or accelerate the risk of landslides. However, reclamation of the mine site, which has exposed soils, may reduce risk of landslides by conversion to impervious or vegetated surfaces through development.

More growth under Alternative 2 is also anticipated around East Sumner as a result of changes in housing types and maximum densities. These changes would increase populations in this area that are subject to potential geologic hazards such as seismic and volcanic hazards. However, the development of these areas would not create or accelerate these hazards.

In addition, Alternative 2 proposes housing growth in the East Portion, including higher density residential development at the Cava mine site, west of East Valley Hwy East. This hillside area has low, or no liquefaction areas and is outside the volcanic hazard area but is susceptible to erosion and landslides. Thus, there is less risk from seismic and volcanic hazards but more risk from erosion or landslides in this area.

Alternative 2 also includes slightly more housing growth in the South Portion than Alternative 1. Impacts in this area would be similar to those described under Alternative 1, with a slightly higher risk to people and structures.

Impacts in the West Portion would be similar to those described under Alternative 1; however, growth would be greater under Alternative 2 as a result of increased densities allowed in LDR, MDR, and HDR zoning designations. The higher intensity land use will increase populations in this area that is at risk from seismic and volcanic hazards.

Water Resources

In the current plan area, impacts would be similar to those identified under Impacts Common to all Alternatives. Alternative 2 includes an increase in units allowed per lot in LDR and MDR zones. This would lead to increases in impervious surfaces, but no additional pollution-generating surfaces are immediately proposed. Appropriate stormwater treatment measures will need to be evaluated and implemented if the changes should lead to an increase in parking lots or other pollution generating surfaces. The majority of the development anticipated under Alternative 2, with the exception of the Cava gravel mine site, is anticipated to occur in already-developed areas. Population increases anticipated can also directly and indirectly contribute to the release of pollutants to waterbodies as described in Impacts Common to All Alternatives.

The greatest impacts under Alternative 2 would be in the East Portion. The change to MDR zoning at the Cava gravel mine site will likely lead to an increase in impacts compared to Alternatives 1, 3, and the Preferred Alternative since it involves changes to the zoning density in a previously mostly undeveloped forested area and would lead to increases in impervious surfaces. Appropriate stormwater treatment measures will need to be evaluated and implemented if the rezoning should lead to an increase in parking lots or other pollution generating surfaces. Any fill of wetlands in the Cava gravel mine site would reduce the area's ability to reduce runoff and remove pollutants. Development of any form would have direct impacts on vegetation through the physical removal of trees, shrubs, and non-woody plants whether it native or landscaped. Removal of the forested area would increase runoff and stream temperatures. The development of the Cava mine site and the anticipated growth in the East Portion would bring additional population to this area.

Plants and Animals

Alternative 2 plans for more housing growth citywide than Alternative 1 and the Preferred Alternative, which could result in greater impacts to plants and animals than those described under Impacts Common to All Alternatives. New developments, which could take advantage of maximum density and housing type changes modifications in LDR, MDR, and HDR, and allowances for ADUs, would result in the removal of trees from lots that contained single-family homes or other low density housing types. This could result in a decrease in tree canopy and associated habitat. Effects of increasing the density of previously developed properties would be similar to those described under Impacts Common to All Alternatives. Much of the additional housing growth in Alternative 2, like Alternative 3, is located in the East and West Portions of the city.

Alternative 2 also includes housing growth on the Cava gravel mine site. The Cava gravel mine is a large, mined area surrounded by detention ponds, forested area, and wetlands. While the site used for gravel mining has been cleared and graded and contains little to no trees or habitat, the surrounding areas provide a large area of forested habitat. Development of the forested area around the Cava gravel mine site would likely disturb and remove valuable habitat and connectivity for species. Reclamation of the Cava site could improve habitat over the existing exposed gravel site. Under Alternative 2, the critical areas regulations would be updated, with the main change being an increase in the stream buffer for non-fish bearing streams. This buffer increase aims to reduce the detrimental effects of development on stream habitats for fish and wildlife. Larger buffers help reduce the amount of pollutants entering a stream, increase recruitment of wood for habitat, and help maintain stream temperature by providing shade.

Vulnerability to Wildfire

Housing and job growth in WUI intermix areas is similar as described under Impacts Common to All Alternatives. However Alternative 2, like Alternative 3, assumes more housing growth overall than Alternative 1 and the Preferred Alternative, which leads to greater growth in intermix areas. This is particularly true in the East Portion of the City, especially for the site of the current Cava Gravel Mine, which is within a WUI intermix area. Some of this area, however, may already have reduced vegetation due to the nature of the mining activity, and future redevelopment may include developer design provisions for wildfire defensible space. Alternative 2 redesignates the site from Low Density Residential to Medium Density Residential. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 2 is expected to have greater impacts related to wildfire vulnerability than Alternatives 1, 3, and the Preferred Alternative.

9.3.5 Alternative 3

Earth

Impacts would be similar to those described in Alternative 2, except impacts would be distributed differently throughout the city, as the Cava mine area would not be reclaimed under Alternative 3, but more growth is expected by using different incentives and mandates.

The Cava gravel mine site would not be reclaimed under Alternative 3. This would result in less risk of destabilizing erosion and landslide hazard areas in the Cava mine area and fewer people and structures at risk of landslide and erosion hazards than that under Alternative 2.

Elsewhere in the City, impacts would be similar as described in Alternative 2.

Water Resources

In the current plan area, impacts would be similar to those identified under Alternative 2, except Alternative 3 does not include zoning changes to the Cava gravel mine site.

Under Alternative 3, there is anticipated to be less creation of impervious surface than Alternative 2 and more than Alternative 1 and the Preferred Alternative. Alternative 3 focuses on development and redevelopment in areas that include existing development, and therefore utilizes existing impervious

surface, whereas Alternative 2 includes development at the Cava gravel mine site, which is mostly undeveloped. This will result in less development in this area and possible impervious surfaces under Alternative 3 than that described under Alternative 2.

Other citywide impacts are expected to be similar to those described under Alternative 2.

Plants and Animals

Impacts under Alternative 3 are similar to those described in Alternative 2, except for impacts on the Cava gravel mine site, which would not be reclaimed under Alternative 3. Alternative 3 plans for the same overall growth as Alternative 2, and in turn is expected to have greater impacts than Alternative 1 and the Preferred Alternative, Alternative 3 does not include the mine site used for housing. Instead, housing growth elsewhere in the city is slightly higher. Impacts to tree canopy and other vegetation could therefore be more dispersed under Alternative 3 than Alternative 2, and unlikely to disturb the forested area near the mine site. Like Alternative 2, under Alternative 3, the critical areas regulations would be updated, and stream buffers increased for non-fish bearing streams. Larger buffers help reduce the amount of pollutants entering a stream, increase recruitment of wood for habitat, and help maintain stream temperature by providing shade.

Vulnerability to Wildfire

Housing and job growth in intermix areas is similar as described under Impacts Common to All Alternatives. However Alternative 3, like Alternative 2, assumes more housing growth overall than Alternative 1 and the Preferred Alternative, which leads to greater growth in intermix areas. While Alternative 3 does not include the same density increases on the current Cava gravel mine site as Alternative 2, it does see greater housing growth in the East Portion of the city than Alternative 1 and the Preferred Alternative, especially along East Valley Highway East. This area overlaps with some intermix areas. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 3 is expected to have greater impacts related to wildfire vulnerability than Alternative 1 and the Preferred Alternative, but less than Alternative 2.

9.3.6 Preferred Alternative

Earth

Housing growth under the Preferred Alternative is the same as Alternative 1, however the Preferred Alternative includes more allowances for middle housing, has more flexible ADU regulations, and would not rezone the Cava mine site. Impacts would be similar to those described in Alternative 1, except impacts would be distributed differently throughout the city.

The Preferred Alternative and Alternatives 1 and 3 all avoid the reclamation and development of the Cava gravel mine site, thus reducing landslide and erosion risks compared to Alternative 2. The Preferred Alternative concentrates growth primarily in the Town Center and East Sumner with some growth in other areas, while Alternative 2 and 3 distribute growth more broadly, leading to potentially greater impacts in other hazard-prone areas.

Compared to Alternative 2, which proposes rezoning the Cava site for Medium Density Residential (MDR) use, the Preferred Alternative avoids additional risks associated with developing the Cava site. This makes the Preferred Alternative generally safer in terms of landslide and erosion hazards, with similar risks to Alternative 3 but with more focused development.

Water Resources

In the current plan area, impacts would be similar to those identified under Impacts Common to All Alternatives, except the Preferred Alternative does not include zoning changes to the Cava gravel mine site.

Under the Preferred Alternative, there is anticipated to be less creation of impervious surface than Alternatives 2 and 3 and more than Alternative 1. The Preferred Alternative focuses on development and redevelopment in areas that include existing development, and therefore utilizes existing impervious surface, whereas Alternatives 2 includes development at the Cava gravel mine site, which is mostly undeveloped. This will result in less development in this area and possible impervious surfaces under the Preferred Alternative than that described under Alternatives 2 and 3.

Plants and Animals

The Preferred Alternative offers improved protections for fish, wildlife, and their habitats compared to Alternative 1 by updating critical areas regulations. These updates, similar to those in Alternatives 2 and 3, increase buffer widths for streams, which helps safeguard wetlands, streams, and sensitive habitats. This approach ensures better environmental stewardship while focusing growth in developed areas like the Town Center and East Sumner.

In contrast to Alternative 2, which impacts forested areas and critical habitats around the Cava gravel mine due to its rezoning, the Preferred Alternative avoids this site, leading to less habitat disruption, fewer tree removals, and better species connectivity.

Alternative 3 also avoids development at the Cava mine site, preserving the forested area and minimizing habitat impacts. However, its broader growth distribution may result in more widespread impacts on tree canopy and vegetation across the city compared to the Preferred Alternative, which concentrates development in specific areas. Overall, the Preferred Alternative presents a more focused approach to minimizing habitat disruption compared to Alternatives 2 and 3 and avoids significant loss of habitat near the Cava site.

Wildfire Vulnerability

Impacts for the Preferred Alternative are similar as described under Impacts Common to All Alternatives. The Preferred Alternative reduces wildfire risk compared to Alternatives 2 and 3 by concentrating housing growth in less fire-prone areas like Town Center and East Sumner. Much of the housing growth under the Preferred Alternative is focused in the Town Center and East Sumner areas, which does not overlap with intermix areas. In all Alternatives, publicly owned watersheds located on the eastern hillside would be vulnerable to wildfire.

Housing and job growth in intermix areas follows a similar pattern to that described under Impacts Common to All Alternatives, with the north portion of the city experiencing higher job growth under the

Preferred Alternative compared to the other alternatives. The Preferred Alternative, like Alternative 1, assumes less housing growth than Alternatives 2 and 3, which leads to less growth in intermix areas. The Preferred Alternative does include more provisions for density citywide than Alternative 1, which could result in higher exposure, however less exposure than Alternatives 2 and 3 due to the smaller amount of housing growth. In all Alternatives, publicly owned watersheds located on the eastern hillside would be vulnerable to wildfire. The Preferred Alternative is expected to have greater impacts related to wildfire vulnerability than Alternative 1, but less than Alternatives 2 and 3.

9.4 Mitigation Measures

9.4.1 Incorporated Plan Features

Earth

- No specific incorporated plan features.

Water Resources

- Alternatives 2, 3, and the Preferred Alternative include updated critical areas regulations based on best available science, which could better protect water resources than existing code.
- Alternatives 2, 3, and the Preferred Alternative add new comprehensive plan policies and policy updates related to the environment and climate change, including policies to better protect vegetated stream and wetland buffers and to restore ecosystems.

Plants and Animals

- Updates to the critical area regulations would revise stream buffers and other regulations to consider best available science, which would improve protections for plants and animals.
- Alternatives 2, 3, and the Preferred Alternative include new and revised policies in support of tree planting and enhancing the urban tree canopy. They also include a new Climate Change Element that includes policies in support of wetland, floodplain, and general ecosystem protection.

Vulnerability to Wildfire

- Alternatives 2, 3, and the Preferred Alternative include climate resilience policies relating to wildfire risk mitigation, including adopting land use standards and connecting residents to information about construction and defensible space around structures. Both Alternatives contain policy support for managing public watersheds for resistance to wildfires.

9.4.2 Regulations and Commitments

Earth

- The City has adopted the International Building Code (SMC 15.08.010)

- Critical areas regulations provide restrictions and regulations on certain types of development and provide notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas (SMC 16.05, 16.50, 16.52, and 16.54).
- The 2020-2025 Pierce County Hazard Mitigation Plan includes an addendum for Sumner-specific strategies, which address a range of hazards including geologic hazards.
- 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.

Water Resources

- The City's critical area regulations (SMC 16.40-16.56) provide provisions for the protection of critical aquifer recharge areas, wetlands, and streams and their buffers. SMC 16.05 provides regulations relating to the control of erosion and sedimentation to reduce sediment pollution from construction activity. SMC 16.48 regulates development and land use in aquifer recharge areas while SMC 16.46 provides the regulations for development in or near wetlands and requirements for mitigation if filling of wetlands should occur.
- Water quality protection is also enacted by SMC 13.48: stormwater management regulations. These regulations "establish minimum requirements and procedures to control the adverse impacts associated with increased stormwater runoff and water quality degradation for all sites located within the city..." These regulations also adopt the use of the:
 - 2019 Ecology Stormwater Management Manual for Western Washington
 - 2019 – 2024 NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment
 - 2012 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound
- City of Sumner Development Specifications and Standard Details
- The Comprehensive Plan incorporates goals and policies that protect water quality as required by the Washington State Growth Management Act (GMA)
- The City of Sumner updated and adopted a revised Shoreline Master Program (SMP) in July 2020. It was approved by Ecology on June 26, 2020, and was effective as of July 9, 2020. The three basic goals of the Shoreline Management Act are to accommodate reasonable and appropriate shoreline use, protect environmental resources, and encourage public access. Additional measures that protect or restore surface water bodies are included in this document.
- Other federal and state regulations in effect to protect water quality are the Safe Drinking Water Act and the EPA's NPDES Phase II regulations for stormwater management. The Safe Drinking Water Act requires public water system wells to be protected from potential sources of contamination. The EPA authorized the Washington State Department of Health to implement this rule by establishing a Wellhead Protection Program for all current wellhead sources (such as the South Well, Sumner, Weber/Crystal, and County springs). The wellhead protection zones are the 10-year time travel boundary that represents the maximum distance around a pumping well from which a hypothetical contaminant in the groundwater could travel to the well in a 10-year period. The City currently

publishes an annual water quality report that summarizes test results of the wells and groundwater sources.

- A reclamation plan would be developed to achieve target post-mining land use on the Cava mine site when mining operations are completed. The plan would likely include plans for final slopes, drainage patterns, site hydrology, the degree of removal of mining-related structures, contamination, and water management of the site. The plan would also likely include steps to prevent air and water pollution and would take climate change into consideration.

Plants and Animals

- Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River.
- The adopted Shoreline Master Program regulates development within shoreline areas.
- Compliance with the National Flood Insurance Program (NFIP) Biological Opinion. The biological opinion required changes to the implementation of the NFIP in order to meet the requirements of the Endangered Species Act (ESA) in the Puget Sound watershed.
- The City's Critical Areas Ordinance (SMC 16.40-16.56) regulates impacts to wetlands, streams, fish and wildlife habitat conservation areas, critical aquifer recharge areas, and geologically hazardous areas, including erosion and landslide areas.
- The City of Sumner has stormwater regulations that implement the National Pollutant Discharge Elimination System (NPDES) permit requirements.
- SMC 18.41 requires maintaining at least 10% of a development site as landscaping.
- Sumner's Forestry and Parks Commission advises the City on issues related to urban forestry and is responsible for developing and implementing the Urban Forestry Strategy Plan. The Commission also ensures the City maintains its Tree City USA status.
- SMC 12.42 includes regulations for planting, preservation, and maintenance of trees on City-owned lands and public right-of-way.
- For Alternative 2, a reclamation plan would be developed to achieve target post-mining land use. The plan would include plans for final slopes, drainage patterns, site hydrology, the degree of removal of mining-related structures, contamination, and water management of the site. The plan would include steps to prevent air and water pollution and would take climate change into consideration.

Vulnerability to Wildfire

- Sumner is included in Pierce County's 2020 Hazard Mitigation Plan. Sumner-specific strategies include several related to fire mitigation, ongoing emergency operations reviews, and public education on fire safety.
- The City should implement a plan to manage the forested hillsides in the public watershed for climate resiliency and controlled fuel load.

9.4.3 Other Potential Mitigation Measures

Earth

- No additional potential mitigation measures.

Water Resources

- No additional potential mitigation measures.

Plans and Animals

- The City could conduct a Tree Canopy Assessment to better understand canopy loss in specific areas of the city and identify strategies to address canopy loss.
- The City could consider development of a tree ordinance designed to protect, enhance, or replace trees located on private property.

Vulnerability to Wildfire

- The City could apply the Wildland Urban Interface Code as part of its building code adoption (see RCW 19.27.560) and/or incorporate the defensible space guidelines into its landscaping code.

9.5 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 there. Implementing building codes and critical areas regulations will reduce potential risks. Implementation and updates to the Hazard Mitigation Plan will direct early notification of earthquakes and volcanic eruptions. There are no significant unavoidable adverse impacts related to other geologically hazardous areas.

Water Resources

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 all alternatives propose a considerable amount of new development, especially Alternatives 2 and 3, new development is expected to be contained to less than one hundredth of a percent of the White River watershed and would be insignificant.

Plants and Animals

All future development would likely have some impact, direct or indirect, to plants, animals and their habitat. Much of the plan area development and infrastructure improvements proposed under all alternatives are within areas that have been previously disturbed by agricultural activity or are in areas of residential development and the increased densities proposed under Alternatives 2, 3, and the Preferred

Alternative would not likely create a significant adverse impact to plants and animals or tree canopy cover. However, there would be a decrease in canopy cover under Alternatives 2, 3, and the Preferred Alternative with an increase in housing density. Under Alternative 2, the reclamation and development of the Cava gravel mine site and surrounding forested areas would further impact tree canopy from parts of the area that have not been disturbed by mining and a significant impact would be anticipated.

Vulnerability to Wildfire

All alternatives anticipate job and housing growth and will have associated impacts related to wildfire vulnerability, however, expected impacts can be mitigated through mitigation measures outlined above. No significant impact is expected.

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11 Abbreviations and Acronyms

ADU - Accessory Dwelling Unit

City - City of Sumner

CPPs - Countywide Planning Policies

CTR - commute trip reduction

DNR - Washington State Department of Natural Resources

DNS - determination of non-significance

Ecology - Washington State Department of Ecology

EIS - environmental impact statement

EMS - emergency medical services

EPA - U.S. Environmental Protection Agency

EPFR - East Pierce Fire & Rescue

ESA - federal Endangered Species Act

FEMA - Federal Emergency Management Agency

FTE - full-time equivalent

GC - General Commercial

GHG - greenhouse gas

GMA - Washington State Growth Management Act

gpd - gallons per day

gpm - gallons per minute

HOT - high occupancy or toll lane

HOV - high occupancy vehicle

HUD - U.S. Department of Housing and Urban Development

IC - Interchange Commercial

LDR - Low Density Residential

LID - low impact development

LOS - level of service

MDR - Medium Density Residential

MFTE - multifamily tax exemption

mg - million gallons

mgd - million gallons per day

MIC - Manufacturing/Industrial Center

NFIP - National Flood Insurance Program

NMFS - National Marine Fisheries Service

NPDES - National Pollutant Discharge Elimination System

OFM - Washington State Office of Financial Management

OSPI - Washington State Office of the Superintendent of Public Instruction

PCLS - Pierce County Library System

PMUD - Planned Mixed Use Development

Ppm - parts per million

PSE - Puget Sound Energy, Inc.

PSRC - Puget Sound Regional Council

RCW - Revised Code of Washington

SEPA - State Environmental Policy Act

SMC - Sumner Municipal Code

SR - state route

TAZs - transportation analysis zones

TDM - transportation demand management

TIP - transportation improvement plan

TMDLs - total maximum daily loads

TSMO - Transportation System Management and Operations

UGA - urban growth area

VMT - vehicle miles traveled

WAC - Washington Administrative Code

WDFW - Washington Department of Fish and Wildlife

WRIA - water resource inventory area

WSDOT - Washington State Department of Transportation

WUTC - Washington Utilities and Transportation Commission

WWTP - wastewater treatment plant

12 Distribution List

Federal Agencies

Federal Emergency Management Agency

National Marine Fisheries Services, Habitat Division

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Army Corps of Engineers, Seattle District

U.S. Environmental Protection Agency, Environmental Evaluation Branch

U.S. Fish and Wildlife

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

Tribes

Puyallup Tribe

Muckleshoot Tribe

Regional Agencies

Puget Sound Regional Council

Puget Sound Clean Air Agency

Counties

Pierce County, Planning and Land Services

Economic Development Board for Tacoma and Pierce County

Tacoma-Pierce County Health Department

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

Special Districts, Transportation, and Utilities

Burlington North Santa Fe Railroad

Cascade Water Alliance

Century Link

Dieringer School District

Pierce College

Pierce Conservation District

Pierce Transit

Puget Sound Energy

Sumner-Bonney Lake School District

Union Pacific Railroad Company

Washington Utilities & Transportation Commission

Williams Northwest Pipeline

City of Sumner

East Pierce Fire and Rescue

Finance (Capital Facilities)

Parks and Recreation

Police

Public Works

Sumner City Council

Sumner Planning Commission

Boards and Associations

Alderton-McMillin Community Planning Board

Puyallup River Watershed Council

Puyallup/Sumner Chamber of Commerce

Sumner Main Street Association

Master Builders Association

Community Organizations

Forterra

Futurewise

Audubon Society

Trout Unlimited

Newspapers

Bonney Lake and Sumner Courier-Herald

Citizens and Property Owners

The City has distributed notices to interested citizens.

13 Corrections and Clarifications

Introduction

This chapter describes corrections and clarifications made in the Final EIS to text and exhibits from the Draft EIS.

Preferred Alternative Updates

Analysis has been added and updates have been made throughout the Final EIS to reflect the Preferred Alternative.

2024 Parks and Trails Plan

The 2024 Parks and Trails Plan was adopted after the Draft EIS was published. The Final EIS contains updates throughout that refer to the new plan and remove references to the prior plan.

Low Density Residential Large Lot Bonus

In Chapter 6: Housing, Alternative 2 was correctly described as having a density bonus for larger LDR 8.5 and 12 lots outright, and Alternative 3 was described as having the same bonus but only where one unit is dedicated affordable, in line with the housing capacity model that supported the analysis. In other chapters, the bonus description was erroneously switched for Alternatives 2 and 3. This error has been corrected in the following sections of the Final EIS:

- Fact Sheet
- Chapter 1: Summary
 - Exhibit 1-3
- Chapter 2: Alternatives
 - 2.5.2 Alternative 2
 - 2.5.3 Alternative 3

▫ 2.5.5 Comparison of Alternatives

Other Updates

- Fact Sheet and Chapter 1: Summary (section 1.4.1) were updated to add the 2018 Supplemental EIS, for the Sumner Town Center Subarea Plan Update and Planned Action, to the list of prior environmental review.
- Chapter 2: Alternatives section 2.5.5 was updated for clarity. Growth numbers for housing, employment, and population were previously rounded to the nearest hundred and have been revised with the specific numbers.
- Chapter 3: Land Use includes a new exhibit (Exhibit 3-7) with a map of manufactured home parks in Sumner and descriptive text.
- Chapter 6: Housing, Exhibit 6-1 was updated to include the estimated housing supply in Sumner in addition to future targets.
- Chapter 6: Housing section 6.2.1 was updated to include references to E2SHB 1998 and ESSSB 5258.
- Chapter 6: Housing section 6.2.2 was updated to correct a percentage error under Older Adults (26.9% of the population in 2010 is the correct number).
- Chapter 6: Housing includes a new exhibit (Exhibit 6-8) with a map of manufactured home parks in Sumner and descriptive text in sections 6.2.2 and 6.3.2.
- Chapter 6: The method for calculating housing capacity for large lots in LDR 8 and 12 was refined for the Preferred Alternative analysis to ensure that only one fourplex was counted for each vacant or redevelopable large lot, regardless of lot size, instead of assuming double density for these lots.
- Chapter 7: Public Services and Utilities was updated with new levels of service for parks as detailed in the Capital Facilities Plan and based on benchmarking in the 2024 Parks and Trails Plan.

Appendices

Appendix A: Scoping Information

Appendix B: Supporting Analysis for HB 1220 Requirements

Appendix C: Climate Analysis Findings

Appendix D: Public Participation Summary

Appendix E: Draft EIS Comments and Responses

Appendix F: Best Available Science Memo

A. Scoping Information

Contents:

- Determination of Significance and Request for Comments on Scope of Environmental Impact Statement
- SEPA Scoping Fact Sheet
- Scoping Comment Letter: Puget Sound Energy
- Scoping Comment Letter: WSDOT



Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Sumner 2024 Comprehensive Plan Update

Date of Issuance: May 18, 2023

Lead Agency: City of Sumner

Agency File Number: SEPA-2023-0003

Contact: Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390
(253) 299-5520
annsi@sumnerwa.gov

Description of Proposal

The City of Sumner is required to update its Comprehensive Plan by December 31, 2024 to meet the requirements of the Washington State Growth Management Act and other regional policies. As part of the update, the City will amend all its plan elements and related plans and necessary implementing development regulations, including the Transportation Master Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

The Comprehensive Plan Environmental Impact Statement (EIS) will include environmental analysis of three plan alternatives and identification of impacts and mitigation measures. The EIS alternatives will consider a range of approaches to distributing Sumner's growth.

Location of Proposal

City of Sumner and Potential Annexation Areas within the Urban Growth Area.

Determination of Significance

The City of Sumner has determined that this proposal is likely to have a significant adverse impact on the environment. The City will prepare an environmental impact statement (EIS) as required under RCW 43.21C.080(2)(c).

The SEPA scoping period will seek input from the community on the topics and alternatives to be evaluated in the EIS. The EIS will analyze one No Action and two Action Alternatives that meet regional and state planning requirements and vary the number and location of housing and jobs. Further details on the alternatives and the EIS process can be found at <https://connects.sumnerwa.gov/planning-summers-future>.

The lead agency has identified topic areas for possible analysis in the EIS, including the following:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics
- Aesthetics

- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping

Agencies, affected tribes, and members of the public are invited to comment on the proposed scope of the EIS. Comments will be accepted on the proposed growth alternatives, EIS topic areas for analysis, probably significant adverse impacts, and mitigation measures. The 21-day EIS public scoping period begins at 5:00 pm PST on May 18, 2023 and ends at 5:00 pm PST on June 8, 2023. All scoping comments must be submitted in writing by this date.

Comments may be submitted by email or by mail (email is preferred). Please include your contact information in your comment (including a valid mailing or email address; an address is required to be considered an official party of record).

Email:

anncsi@sumnerwa.gov

Mail:

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

Appeal process: There is no administrative appeal of the determination of significance for a legislative action, per SMC 16.04.185.

Responsible Official

Ryan Windish
Community & Economic Development Director
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

SIGNATURE:



DATE SIGNED:

May 8, 2023

DATE ISSUED:

May 18, 2023

SEPA Scoping Fact Sheet

Sumner 2024 Comprehensive Plan Update

Why is Sumner updating the Comprehensive Plan?

Sumner is required to have and maintain a comprehensive plan under the Washington State Growth Management Act. The Sumner Comprehensive Plan includes a long-term vision for the city, community values, and goals and policies to guide decisions by staff and elected officials. A periodic update of the plan is required by December 31, 2024. This update is an opportunity for the City to address new state requirements and to plan for growth expected over the next 20 years.

The City will also update related plans and regulations alongside the Comprehensive Plan, including the Transportation Master Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

What is an Environmental Impact Statement?

An Environmental Impact Statement (EIS) is a document that provides environmental information about a proposal before a decision is made. An EIS is required, under the State Environmental Policy Act (SEPA), where the proposal is likely to have a significant environmental impact.

An EIS provides an opportunity for the public, tribes, and government agencies to comment on proposals. In an EIS, multiple alternative scenarios relating to the proposal, or “alternatives”, are evaluated. An EIS considers existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

What alternatives will be studied in the EIS?

Three alternatives will be studied in the EIS:

- Alternative 1 will be the No Action alternative. In this alternative, policies and development regulations remain the same, and growth occurs in line with the housing and job targets allocated by Pierce County.
- Alternatives 2 and 3 are Action Alternatives. Both Alternatives 2 and 3 are anticipated to include changes to policies and development regulations to meet regional and state planning requirements, including new requirements for affordable housing and “middle housing” alternatives to traditional single-family homes. Alternative 2 would assume that Sumner will grow to the housing and job targets allocated by Pierce County, while Alternative 3 would assume that growth would be in line with recent growth trends and plans and may exceed the adopted targets.

	Alternative 1 (No Action)	Alternative 2	Alternative 3
Updated policies	No Policies and development regulations remain the same	Yes Policies and development regulations change to meet regional and state planning requirements	Yes Policies and development regulations change to meet regional and state planning requirements
Growth (Population and Employment)	Growth meets the targets allocated by the County	Growth meets the targets allocated by the County, with amount and type of growth directed by new policies	Growth continues along recent trends and existing plans and may exceed the targets allocated by the County
Affordable and Middle Housing	No changes to existing regulations	Regulations are updated to meet new state requirements for affordable and middle housing	Regulations are updated to meet state requirements for affordable and middle housing

What topics will be analyzed in the EIS?

The following topics are proposed for review in the EIS:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

For each topic, the EIS will describe existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

What is scoping and how do I comment on the scope of the EIS?

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The scoping period for the Sumner Comprehensive Plan EIS is 21 days long and goes from 5:00pm PST on May 18, 2023 through 5:00 pm PST on June 8, 2023.

Comments may be submitted by email or by mail (email is preferred). Please include your contact information in your comment (including a valid mailing or email address; an address is required to be considered an official party of record).

Email:

annsi@sumnerwa.gov

Mail:

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

What happens after scoping?

After scoping, the City will finalize the alternatives and topics to be evaluated. The City will prepare a Draft EIS in 2023 and early 2024, alongside the development of the Comprehensive Plan. A comment period will follow the issuance of the Draft EIS in early 2024. The City will use feedback from the comment period to select a Preferred Alternative for further analysis in the Final EIS. The Preferred Alternative will be based on direction from the Planning Commission and City Council and evaluated in the Final EIS. The Comprehensive Plan and Final EIS are expected to be adopted in late 2024.



June 8, 2023

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

Re: City of Sumner 2024 Comprehensive Plan Periodic Update
Determination of Significance – Scoping Notice

Dear Ms. Siegenthaler:

This letter is in response to the City of Sumner's request for comments pertaining to the Determination of Significance (DS) issued on May 18, 2023 for the periodic update to the Comprehensive Plan. This periodic update is being conducted in accordance with the requirements of the Revised Code of Washington, specifically 36.70A and the 43.21C.

Puget Sound Energy (PSE) supports the City's issuance of the DS. As recognized by the City, this determination will require an Environmental Impact Statement (EIS) for the 10-year update to the Comprehensive Plan. The City's EIS will address potential impacts and mitigation measures for the three plan alternatives. PSE believes that each of the growth alternatives will have unavoidable impacts to electric and natural gas facilities and services. These impacts may or may not be determined to have significant adverse impact. All three growth alternatives should identify potential mitigations measures to address existing and future electric and natural gas facilities and services.

We have reviewed the City's Comprehensive Plan Elements document dated June 2023. The document identifies potential amendments to goals and policies in the Comprehensive Plan. These are outlined under the following sections: Values; Vision; Plan Monitoring and Amendment; Community Character; Governance and Permit Process; Family and Human Services; and Economic Development and Employment. These goals and policies should be reviewed for any potential impacts affecting electric and natural gas systems.

Ann Siegenthaler

June 8, 2023

Page Two

How will the Comprehensive Plan and EIS integrate implementation of the State's Clean Energy Transformation Act (CETA) through the development of a Climate Change and Resiliency Element with other elements in the Comprehensive Plan?

How will the Comprehensive Plan and EIS address the City's implementation of Transportation Electrification and Building Electrification? These energy strategies have potential impacts to both electric and natural gas transmission and distribution facilities. Such potential impacts and mitigation measures should be identified and evaluated as part of the EIS alternatives.

For information about PSE's efforts to address clean energy and climate initiatives, we encourage the City to review the following documents:

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – The CEIP builds on the vision established within the Integrated Resource Plan and the Clean Energy Action Plan. The CEIP acts as a roadmap for implementing clean energy actions, programs and investments over the next 4 years. On June 6, 2023 the Washington Utilities Transportation Commission (WUTC) conditionally approved PSE's initial 2021 CEIP. PSE will be addressing these conditions through ongoing CEIP amendment processes.

PSE would like to thank the City for the opportunity to provide comments at the Scoping phase of the update process. We would like to keep working with the City as the Comprehensive Plan moves forward through the participation processes at the Planning Commission and City Council.

Should there be any questions or information that we can provide to assist the City, please do not hesitate to contact me at (206) 604-3103 or at amy.tousley@pse.com. To establish PSE as an official Party of Record, please use the following PSE office address: 2711 Pacific Avenue S.E., Olympia WA 98501 for future notices issued under RCW 43.21C. Thank you.

Sincerely,

Amy L. Tousley

Amy L. Tousley
Senior Municipal Liaison Manager

Cc: Ryan Windish, Sumner Department of Community Development
Dave Andersen, WA Department of Commerce
Rich Doenges, WA Department of Ecology



**Washington State
Department of Transportation**

Olympic Region
7407 31st Ave NE, Lacey
P.O. Box 47440
Olympia, WA 98504-7440
360-357-2600 / Fax 360-357-2611
TTY: 1-800-833-6388
www.wsdot.wa.gov

June 8, 2023

Ann Siegenthaler, Senior Planner
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

Dear Ms. Siegenthaler:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the “Determination of Significance and Request for Comments on Scope of Environmental Impact Statement (EIS)” for the City of Sumner’s 2024 Comprehensive Plan Update. Alignment between local, regional, and state planning efforts is vital to advance shared interests in the comprehensive planning process.

WSDOT offers the following input in support of the City’s efforts.

Land Use Alternatives

WSDOT supports policies and plans that accommodate projected growth consistent with principles of compact, urban, transportation efficient development. WSDOT encourages the city to explore a range of land use alternatives that include elements to manage vehicle demand and minimize the need for costly roadway capacity expansion.

Transportation Alternatives

WSDOT encourages that transportation alternatives for the Comprehensive Plan Update begin from a foundational perspective of reducing vehicle travel demand and the need for additional capital investments through transportation-efficient land use strategies and related demand management policies. When considering options for addressing level of service deficiencies, WSDOT encourages consideration of a tiered approach, as follows:

- Begin with application of transportation system management and operations strategies to maximize efficient and safe use of current facilities.
- Consider targeted capital investments on the local transportation system to improve network connectivity and safety for all users.

Ann Siegenthaler
June 8, 2023
Page 2

- Address remaining deficiencies with targeted capital investments on the state highway system, with a financing plan that recognizes contributors to the underlying level of service deficiencies.

EIS Analysis Scope

WSDOT requests that the Transportation Element and EIS provide thorough analysis and documentation of the “estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions” (RCW 36.70a.070(6)(a)(ii)). WSDOT has a particular interest in the following Transportation Element requirements:

- Multimodal level of service standards for all locally owned arterials, locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas, and active transportation facilities.
- Multimodal level of service standards for state highways to gauge system performance.
- Specific actions and requirements for bringing into compliance transportation facilities or services that are below an established multimodal level of service standard.
- Forecasts of multimodal transportation demand and needs for at least ten years based on the adopted land use plan to inform the development of a transportation element that balances transportation system safety and convenience to accommodate all users of the transportation system.
- Identification of state and local system needs to equitably meet current and future demands.
- A transition plan for transportation as required in Title II 29 of the Americans with Disabilities Act of 1990.

State-owned facilities identified in the Plan need to be consistent with the statewide multimodal transportation plans as required under Chapter 47.06 RCW. These statewide plans include, but are not limited to, the WSDOT Highway System Plan, WSDOT Active Transportation Plan, Washington State Strategic Highway Safety Plan, and public transportation, freight, and rail plans.

Other Relevant WSDOT Priorities

WSDOT encourages consideration of the following statewide Legislative priorities during development of the Comprehensive Plan Update and the EIS:

- HB 1220: WSDOT supports the intent of HB 1220 to explicitly address the housing and transportation needs of low, very low, and extremely low-income households. WSDOT encourages the City to identify transportation policies and investments that will address transportation challenges faced by these lower income households wherever they are located in the planning area.
- Complete Streets: In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. It directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. While the statutory requirement is specific to WSDOT, we encourage our local partners to consider

B. Supporting Analysis for HB 1220 Requirements

Introduction

This document provides supporting analysis for HB 1220 requirements in the Sumner Comprehensive Plan periodic update. This supporting analysis is in addition to related discussion in the Final Environmental Impact Statement (FEIS), including demographic data, discussion on displacement, housing capacity findings by income band, and evaluation of consistency with state housing requirements.

The analysis in this document includes:

- Additional data on racially disparate impacts, displacement, and exclusion in housing
- A summary of policy analysis findings for racially disparate impacts, displacement, and exclusion in housing
- Method and assumptions details for the housing capacity analysis by income band (findings are described in the Housing section of the FEIS).
- Completed Department of Commerce “adequate provisions” checklists for housing production and affordability

Executive Summary of Findings

This analysis finds the following conclusions:

- Not unlike other communities in the Puget Sound, racially disparate impacts, displacement, and exclusion in housing appear to be present in Sumner, particularly around homeownership and housing cost burden. Housing cost burden is also higher for renter households. These impacts are particularly present for non-white households. This includes Hispanic or Latino households. The burden is also likely affecting Black or African American householders, American Indian and Alaska Native householders, Native Hawaiian and Other Pacific Islander householders though Census data reliability is a factor.
- Based on a review of policies some provisions could be a barrier to allowing opportunities for homeownership or affordable housing. This could include provisions that limit housing choices like middle housing, or that apply vague language that would be difficult to determine how to meet the policy intent (e.g. words like harmony, character, or similar). Changes should be made to specific adopted policies to address racially disparate impacts, displacement, and exclusion in housing (and such changes are proposed with the plan update).
- Based on a review of housing capacity analysis by income levels, as referenced in FEIS Chapter 6: Housing, Alternatives 2 and 3 and the Preferred Alternative have adequate capacity to meet housing needs by income band, while Alternative 1 (No Action) does not.

- Changes to Sumner’s policies and code are needed with the periodic update to ensure adequate provisions for housing affordability (and such changes are proposed with the plan update). This includes policy and code elements identified as possible means to address housing needs in Alternatives 2 and 3 and the Preferred Alternative, such as affordability incentives or mandatory affordability in some zones, allowing two units per residential lot, allowing two accessory dwelling units per lot, allowing triplexes and fourplexes on larger lots in Low Density Residential (LDR) zones, allowing multiplexes and small apartments in Medium Density Residential (MDR) and High Density Residential (HDR) zones, raising the maximum density in MDR zones, and providing policy support for religious organizations building affordable apartment housing.

Background: Racially Disparate Impacts, Displacement, and Exclusion

Data Analysis

The following data provides context to the policy analysis findings below and proposed comprehensive plan amendments to address racially disparate impacts, displacement, and exclusion. Additional demographic data is available in DEIS Chapter 4: Population and Employment.

According to American Community Survey (ACS) 5-year estimates for 2022, approximately 74% of the Sumner population identify as white and not Hispanic or Latino⁵ and 26% identify as persons of color (Exhibit B - 1, Exhibit B - 2).

Sumner’s Black or African American, American Indian and Alaska Native, Asian, and Native Hawaiian and Other Pacific Islander populations are each relatively small at 1-2% of the total population. 11% of the Sumner population identify as two or more races. 18% of the population are Hispanic or Latino.

Exhibit B - 1: Sumner: Race and Ethnicity (2022)

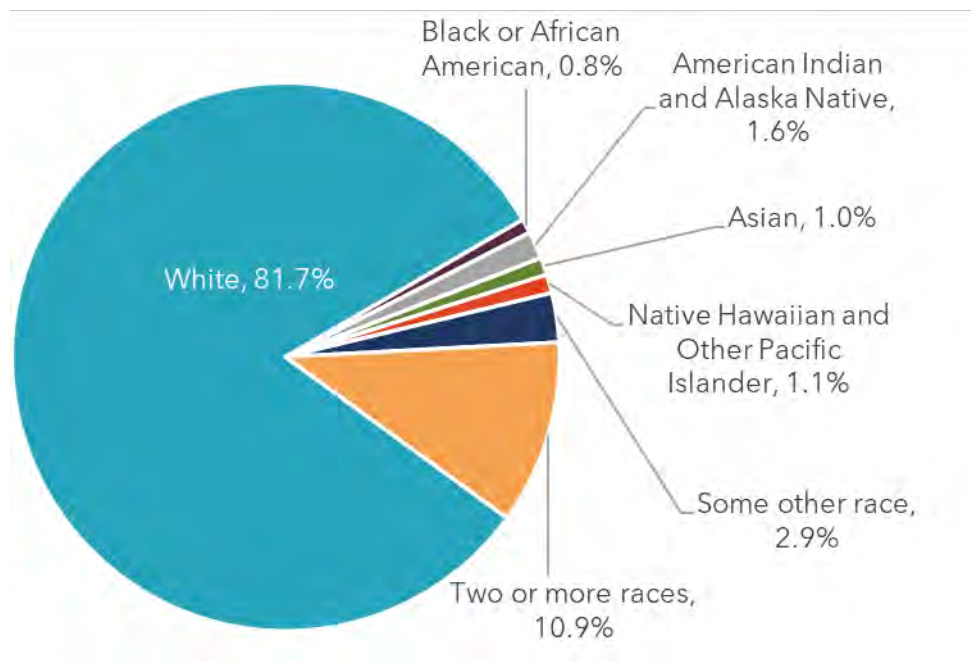
Race or Ethnicity	Number	Percent
Total population	10,589	100.0%
One race	9,440	89.1%
White	8,646	81.7%
Black or African American	90	0.8%
American Indian and Alaska Native	171	1.6%
Asian	109	1.0%
Native Hawaiian and Other Pacific Islander	116	1.1%
Some other race	308	2.9%

⁵ Race and ethnicity are considered separate and distinct identities. The ACS and the Census ask separate questions for race and for Hispanic or Latino origin.

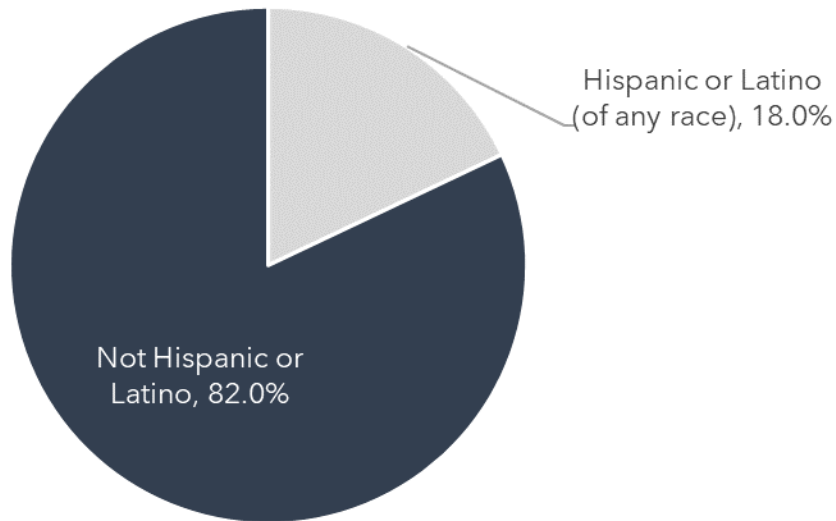
Race or Ethnicity	Number	Percent
Two or more races	1,149	10.9%
Hispanic or Latino (of any race)	1,901	18.0%
White and not Hispanic or Latino	7,822	73.90%

Source: ACS 5-year estimates, 2022.

Exhibit B - 2: Sumner: Race Chart (2022)

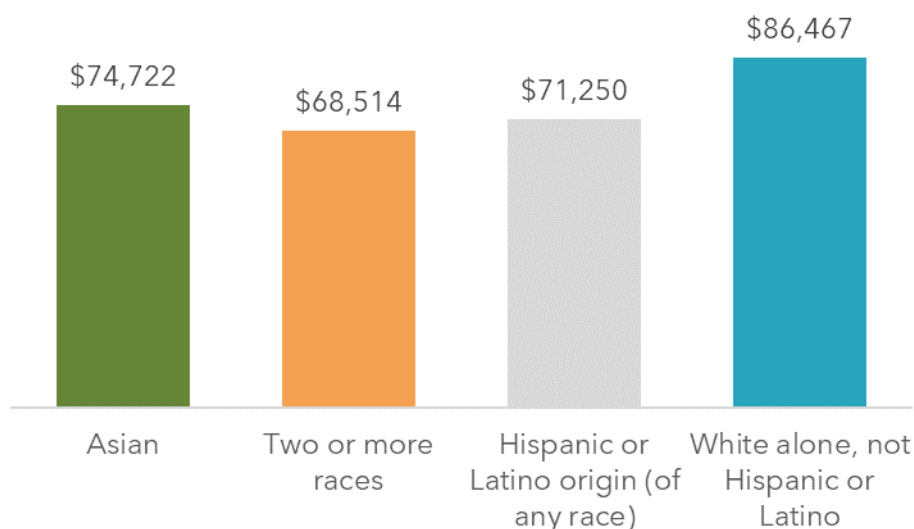


Source: ACS 5-year estimates, 2022.

Exhibit B - 3: Sumner: Hispanic or Latino Ethnicity (2022)

Source: ACS 5-year estimates, 2022.

Median household income in Sumner varies by the race and ethnicity of the householder, as shown in Exhibit B - 4. Of the race and ethnicity categories for which data is available, households with a white, not Hispanic or Latino householder have the highest median income at \$86,467. Other categories have lower median household incomes (\$74,722 for Asian householders, \$68,514 for householders with two or more races, and \$71,250 for Hispanic or Latino householders).

Exhibit B - 4: Sumner: Median Household Income by Race (2022)

Source: ACS 5-year estimates, 2022.

Note: Data is not available for median household income for some race categories, as the sample size is too small for the ACS to provide estimates. This includes Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander groups.

Approximately 86.1% of the population 5 years and over speaks only English at home, while 13.9% speak a language other than English at home (Exhibit B - 5). 6.7% of the population over 5 years old speaks English less than "very well". Spanish is the most commonly spoken language at home other than English (9.8% of the population), and some of the population speak other Indo-European languages (2.0%), Asian and Pacific Islander languages (1.6%), or other languages (0.6%) at home. Almost half of the population that speaks Spanish at home speaks English less than "very well" (4.6% of the total population).

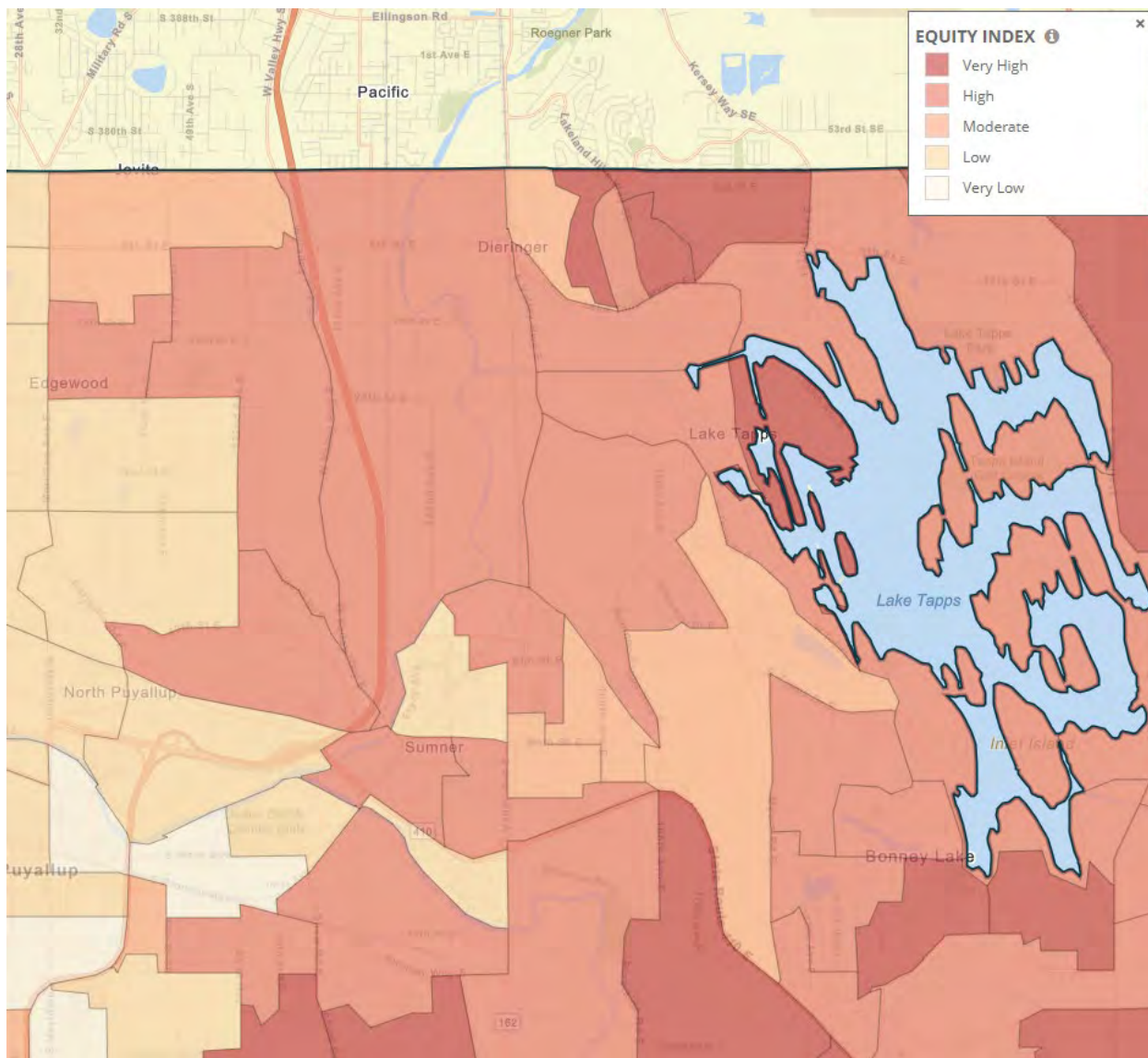
Exhibit B - 5: Sumner: Language Spoken at Home (2022)

	Estimate	Percent
Population 5 years and over	9,875	
English only	8,507	86.1%
Language other than English	1,368	13.9%
Speak English less than "very well"	660	6.7%
Spanish	966	9.8%
Speak English less than "very well"	459	4.6%
Other Indo-European languages	193	2.0%
Speak English less than "very well"	129	1.3%
Asian and Pacific Islander languages	154	1.6%

	Estimate	Percent
Speak English less than "very well"	43	0.4%
Other languages	55	0.6%
Speak English less than "very well"	29	0.3%

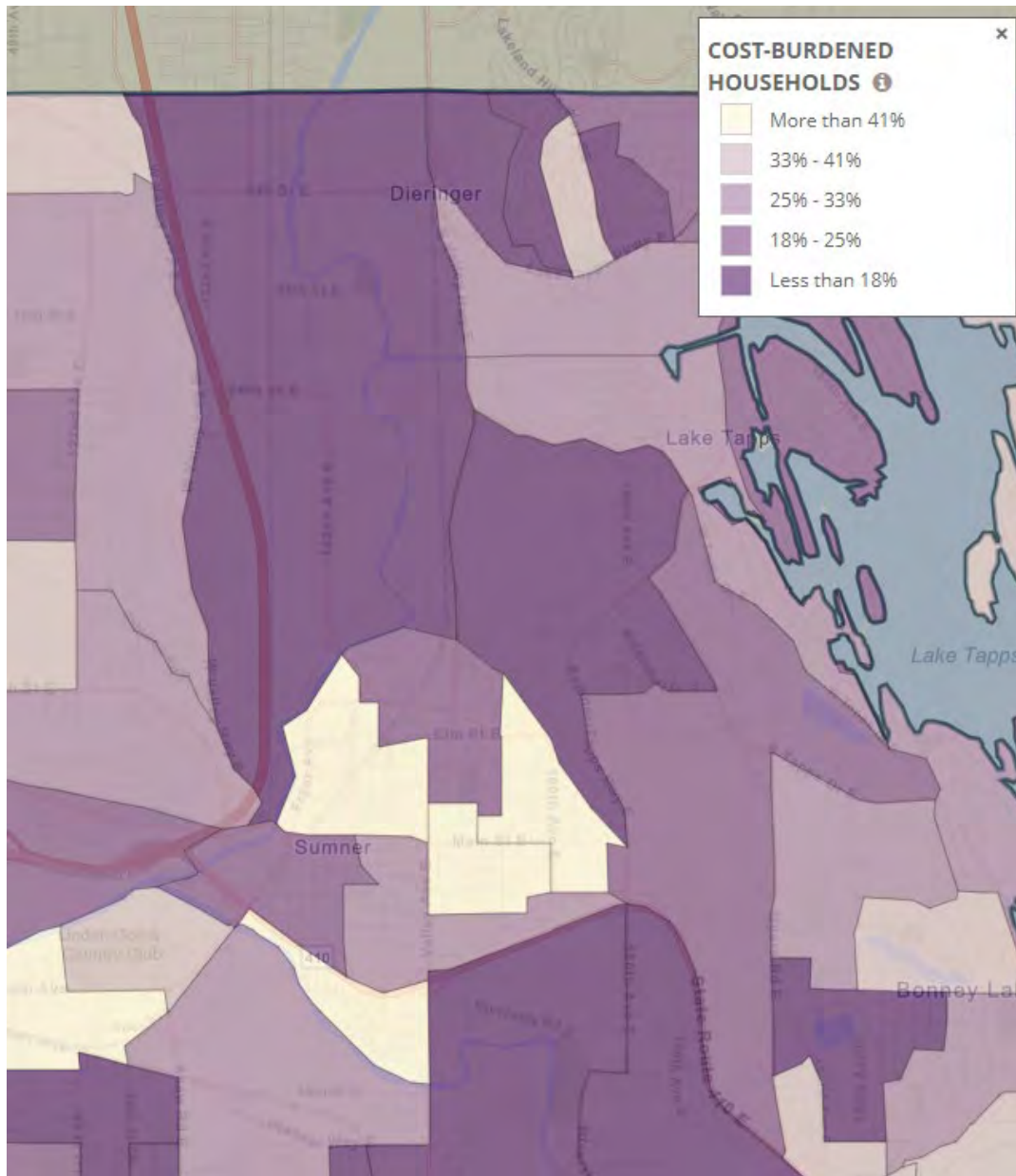
Source: ACS 5-year estimates, 2022.

Pierce County has developed a countywide Equity Index that averages accessibility, livability, education, economic, and environment subindices (Exhibit B - 6). "Very high" equity index indicates higher community conditions and "Very low" indicates comparatively lower community conditions. Much of Sumner is shown with high scores, but several areas on the east side of the city are considered "moderate" and an area north of Town Center and area south of SR 410 have low scores.

Exhibit B - 6: Sumner Vicinity: Pierce County Equity Index (2020)

Source: Pierce County Equity Index, 2023.

The Pierce County Equity Index tool also maps cost-burdened households, including both owner and renter households (see Exhibit B - 7). A household is considered cost burdened when spends 30% or more of its income on housing costs. In several block groups in Sumner, including one north of Town Center, two around East Sumner, and one south of SR-410, more than 41% of households are cost burdened.

Exhibit B - 7: Sumner Vicinity: Cost Burdened Households Map (2020)

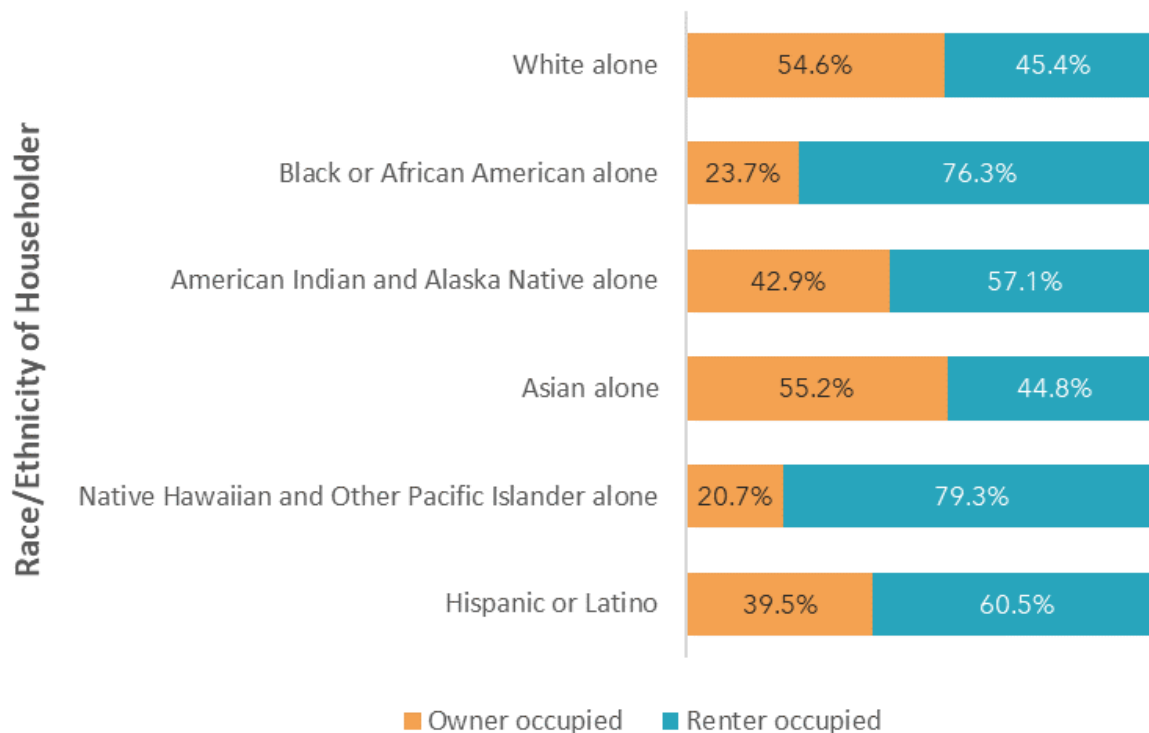
Source: Pierce County Equity Index, 2023. (Cost burden data from 2020.)

The 2020 Census provides data on housing tenure by race and ethnicity of the householder (Exhibit B - 8). The data shows that households with a white or Asian householder are mostly owner-occupied (54.6% and 55.2% respectively), while households with a Black or African American householder, American Indian and Alaska Native householder, or Native Hawaiian and Other Pacific Islander householder are more likely to be renter occupied (76.3%, 57.1% and 79.3% respectively). Households with a Hispanic or Latino householder are also more likely to be renter-occupied (60.5%). This data reveals a disparity in homeownership rates by race and ethnicity.

In Pierce County as a whole, households with a white, Asian, or American Indian and Alaska Native householder are more likely to be owner-occupied than renter-occupied (67.7%, 64.4%, and 51.7%, respectively). Households with a Black or African American householder or Native Hawaiian and Other Pacific Islander householder are more likely to be renters (61.7% and 66.7%, respectively). Households with a Hispanic or Latino householder are also more likely to be renter-occupied than owner-occupied (54.1% renters compared to 45.9% owners). These are similar homeownership rates by race and ethnicity as seen in the data for Sumner.

As discussed in DEIS Chapter 6: Housing, most of the city's housing stock is single-family homes (56.5%). The rental vacancy rate is estimated at 3.4 percent.

Exhibit B - 8: Sumner: Housing Tenure by Race and Ethnicity (2020)



Source: US Census Bureau, 2020.

2020 data from the US Department of Housing and Urban Development reveals additional disparities in housing cost burden (Exhibit B - 9 and Exhibit B - 10). Households that spend more than 30% of their income on housing costs are considered cost-burdened, with those spending more than 50% considered severely cost burdened.

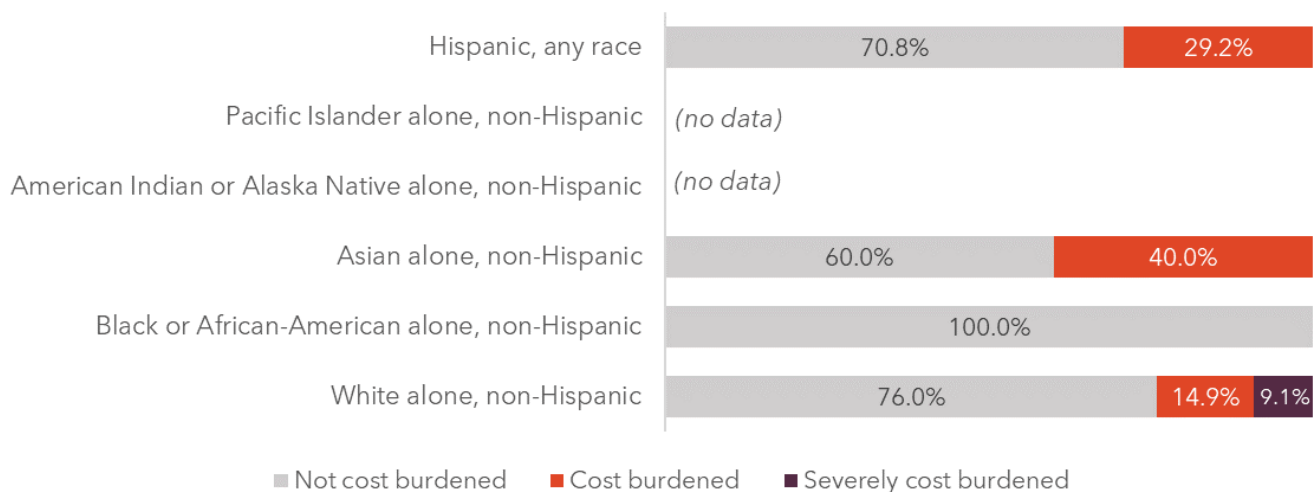
Most households with white non-Hispanic householders are not cost burdened (76.0% of owner households and 54.9% of renter households). This is similar for households with an Asian householder (60.0% of owner households and 66.7% of renter households are not cost burdened).

Households with a Hispanic householder are less likely to be cost burdened if owner occupied (70.8% not cost burdened) than if renter occupied (41.0% not cost burdened). While 100.0% of owner-occupied households with Black or African-American householders are not cost burdened, 100.0% of renter-occupied households are cost burdened or severely cost-burdened. Data for other race categories is limited.

Within the context of tenure by race (Exhibit B - 8), households with a Black or African American householder or Hispanic or Latino householder are both more likely to be renters, and if renters, are likely to be cost-burdened to some extent.

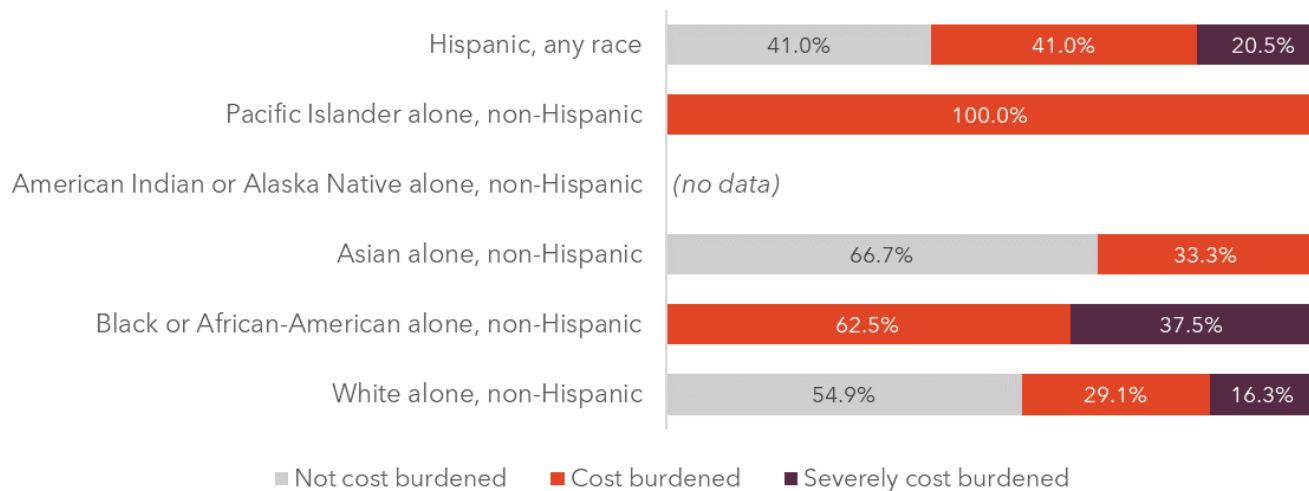
Across the race and ethnicity categories, owner households are less likely to be cost burdened. This suggests some correlation between homeownership and financial stability.

Exhibit B - 9: Sumner: Cost Burden by Race and Ethnicity - Owner Households (2020)



Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2016–2020.

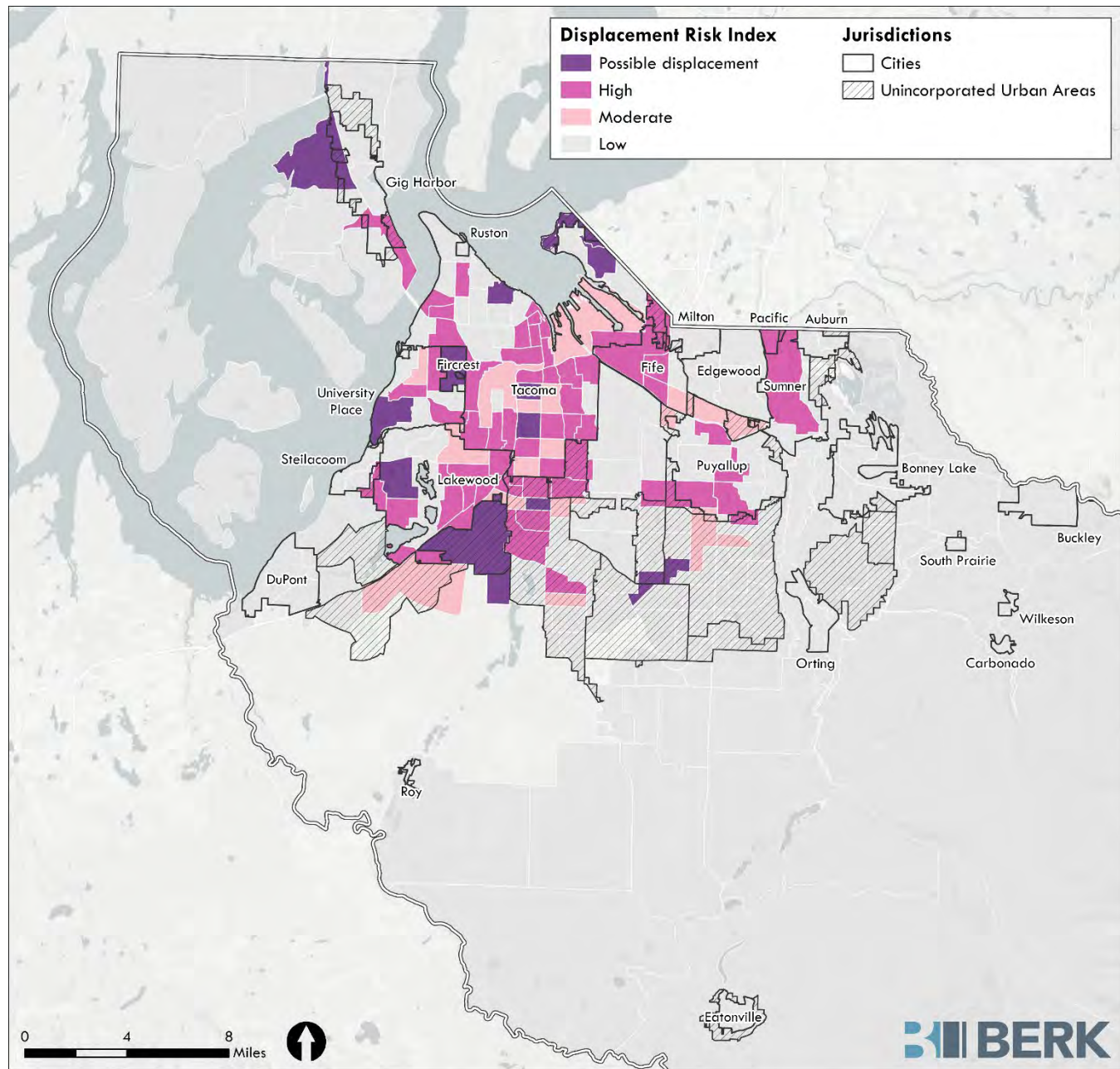
Note: Sample sizes for some categories (Asian Alone, Black or African-American, Pacific Islander, and American Indian or Alaska Native) are small and margins of error can affect reliability of the data.

Exhibit B - 10: Sumner: Cost Burden by Race and Ethnicity - Renter Households (2020)

Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2016–2020.

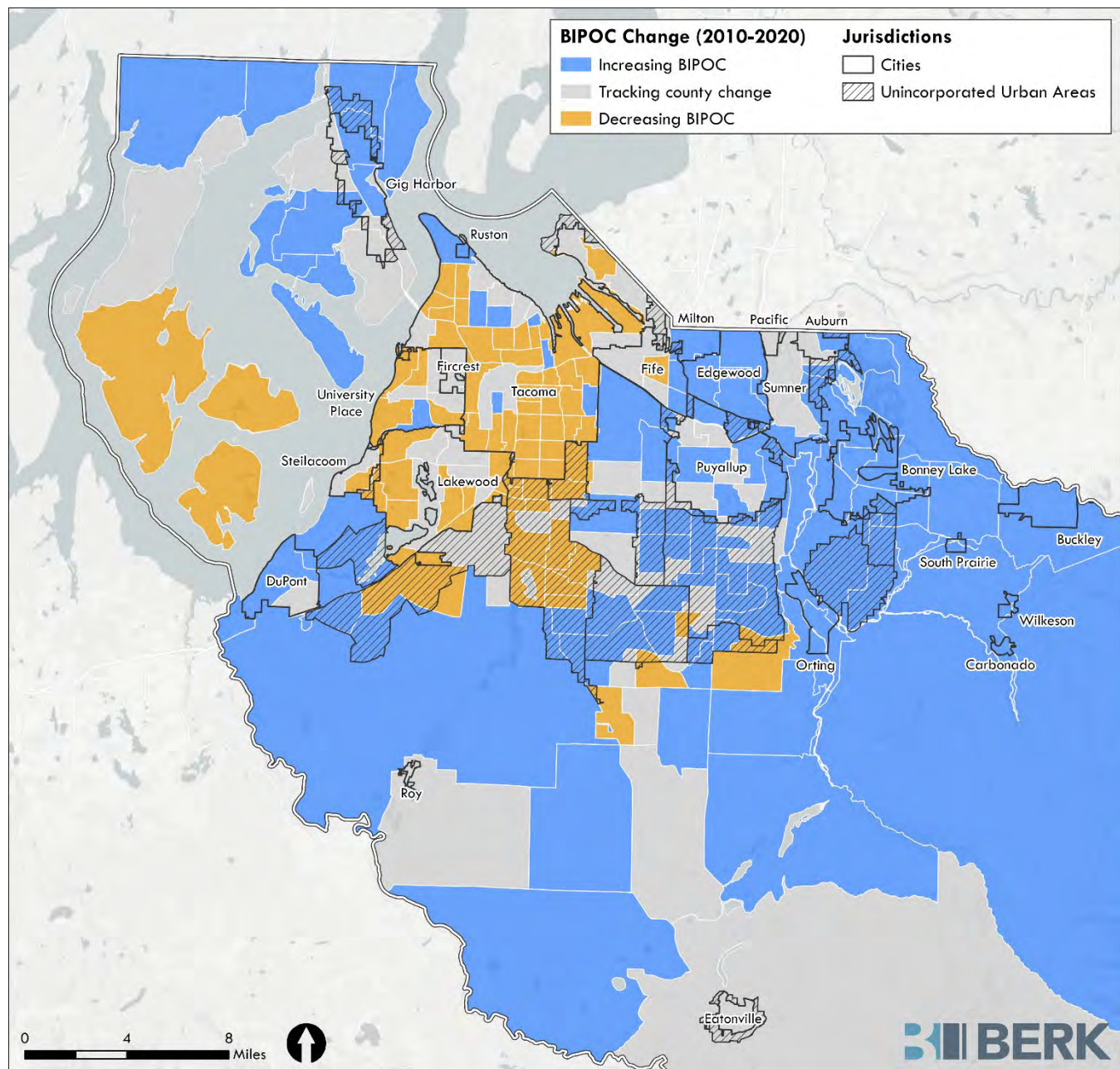
Note: Sample sizes for some categories (Asian Alone, Black or African-American, Pacific Islander, and American Indian or Alaska Native) are small and margins of error can affect reliability of the data.

Countywide mapping on displacement risk and demographic change also provide context for housing issues in Sumner. Displacement risk is considered to be high in most of Sumner, relative to other parts of Pierce County (Exhibit B - 11). However, most of Sumner saw a similar change in the Black, Indigenous, and Persons of Color (BIPOC) population to Pierce County as a whole from 2010-2020, and BIPOC populations increased faster than the countywide rate in areas to the south and at the edges of the city (Exhibit B - 12). This suggests that, while displacement risk is high, Sumner has not seen much recent displacement of BIPOC populations when compared with other parts of the county.

Exhibit B - 11: Displacement Risk in Pierce County (Index [Data](#) from 2010, 2015, 2020 and 2021)

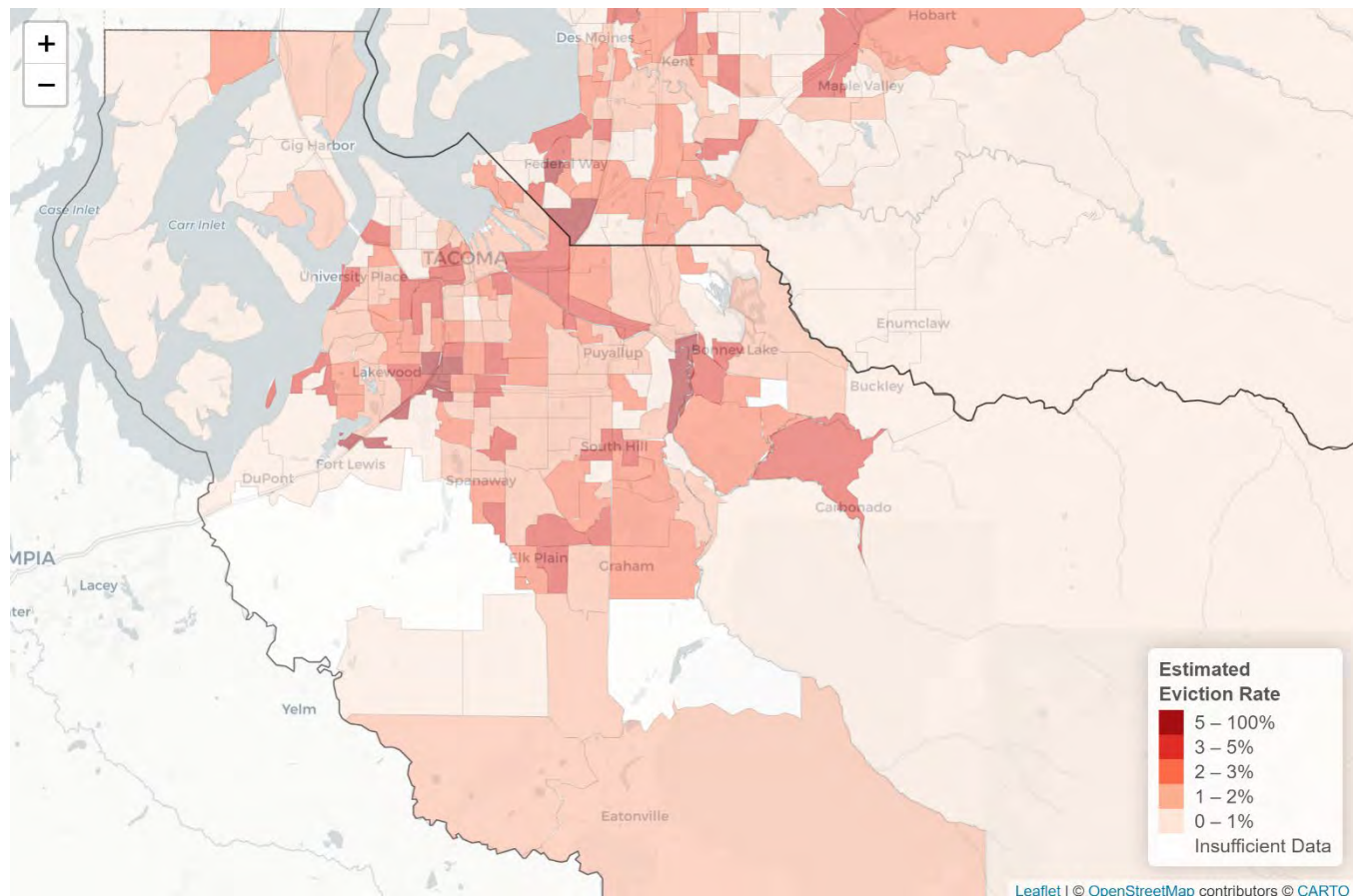
Source: Washington State Department of Commerce 2023; BERK, 2023.

Exhibit B - 12: BIPOC Change Score with Displacement Risk in Pierce County (2020)



Source: Washington State Department of Commerce 2023; BERK, 2023.

Eviction rate mapping from the University of Washington (2017) also shows Sumner as having a relatively low eviction rate when compared with other parts of Pierce County (Exhibit B - 13).

Exhibit B - 13: Estimated Eviction Rates in Pierce County by Census Tract, 2017

Source: [The Evictions Study](#), University of Washington, 2017.

Key Issues

Overall, the data suggests that the key issues in Sumner relating to racially disparate impacts are the racial and ethnic disparities in housing cost burden and homeownership, particularly for Black or African American and Hispanic or Latino households. While displacement indicators do not suggest high rates of displacement in recent years, displacement risk going forward is considered high in certain areas, per mapping from the Washington State Department of Commerce, and should also be addressed through policy decisions. Recent zoning changes in Town Center, specifically, to allow for higher densities could encourage development in this area, which could result in displacement of some single-family dwellings. With 6.7% of the population speaking English less than “very well”, the City should also strive to provide information relating to housing resources in multiple languages, particularly Spanish.

Policy Analysis

To review the Housing Element and related elements of the Comprehensive Plan, a series of evaluation questions were designed to identify policies and regulations that result in racially disparate impacts (RDI) and displacement and exclusion of housing. Key overarching questions, as described in the Commerce guidance for RDI review, include:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Or exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?

Each policy in the Housing Element, Land Use Element, and Community Character Element is reviewed using the criteria shown below. Policies evaluated as “C” or “A” are addressed in the Recommendation section.

The policy analysis has informed the preliminary drafts of the updated Comprehensive Plan elements and discussion with the Planning Commission.

Exhibit B - 14: Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement, and exclusion in housing.	"S" Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement, and exclusion in housing.	"A" Approaching
The policy may challenge the jurisdiction's ability to achieve the GMA goal for housing. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution and burdens imposed by the policy.	"C" Challenging
The policy does not affect the jurisdiction's ability to achieve GMA goal housing and has no influence or impact on racially disparate impacts, displacement, or exclusion.	"NA" Not Applicable

Source: BERK, 2023

Housing Element

Exhibit B - 15 applies the evaluation framework across the adopted Housing policies in the 2022 Plan, to inform the periodic update process.

The Housing Element evaluation highlighted some changes that could increase inclusion and reduce disparate impacts, such as:

- Adding policies in support of housing diversity and anti-displacement
- Adjusting wording of some policies, such as "protection," "single-family neighborhoods," "character of existing neighborhoods," and "appropriate"
- Add language on accommodating housing needs of all income levels
- Adding language to emphasize affordable senior housing
- Remove language that implies connections between multifamily housing and crime

Exhibit B - 15: Findings for Housing Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
Goal HS 1 Encourage the maintenance and preservation of existing housing stock and residential neighborhoods.	A	This policy supports housing preservation, which could inherently prefer single family homes over other housing types. Other policies in the Housing element should support housing diversity to mitigate this.	Rewritten to focus on investment in neighborhoods and rehabilitation of housing. (Goal 1)
Pol. HS 1.1 Encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing, such as temporarily waiving permit fees, completing public works projects, etc.	A	Antidisplacement policies should be added elsewhere in the housing element to mitigate any potential impacts of reinvestment in older neighborhoods.	Changed to focus on potentially waiving fees for low-income housing rehabilitation projects (Policy 1.1). New policy 1.2 added to encourage rehabilitation instead of demolition where feasible. New antidisplacement policies also added (Goal 6).
Pol. HS 1.2 Support the revitalization of older neighborhoods by keeping the streets and other municipal systems in good repair.	S	This policy is strong and supports existing housing and upkeep. Older neighborhoods with older buildings may also be more affordable, so investment in municipal systems in these areas could have positive equity impacts.	Changed to focus on equitable investment in municipal infrastructure. (Policy 1.3)
Po. HS 1.3 In cooperation with the County and Puget Sound Energy, promote the use of weatherization programs in existing housing.	A	There are a few more programs (energy efficiency, upgrades); suggest looking into additional resources in addition to weatherization programs.	Revised to emphasize support for households with lower incomes and seniors, and to call out specific types of assistance beyond weatherization.
Pol. HS 1.4 In order to balance the protection of viable neighborhoods and the need to provide for a range of housing to all life stages and economic segments, allow for accessory units in single-family neighborhoods.	A	This policy would be a better fit under Goal HS2, since it is not directly related to maintenance and preservation. The term "protection of viable neighborhoods" is unclear and could be replaced with more specific wording. Though the policy supports the use of ADUs, the policy could be rewritten to be	Removed this policy and replaced with a new policy to allow for two ADUs per lot (Policy 2.5.5). New policy added to support ADU development (Policy 2.5.6).

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
		more supportive of a variety of housing types or a new policy could be added on this topic. Consider changing language to low-density residential areas instead of single-family neighborhoods (this term can be exclusionary and does not accurately describe neighborhoods that allow single-family units in addition to ADUs and other housing types)	
Pol. HS 1.4.1 Maintain Design Guidelines to ensure new multi-family is consistent with the character of existing neighborhoods. Maintain design standards for neo-traditional single-family developments.	C	Design Guidelines can be coded and limit growth and increase displacement risk. Consider removing the requirements for future development to match existing features of single-family developments. Consider changing language to low-density housing instead of single-family, as low-density neighborhoods also now include duplexes (per HB1110 requirements). The language requiring consistency with "character of existing neighborhoods" is vague and could be exclusionary.	Removed, redundant with design guidelines policies in Community Character.
Pol. HS 1.4.2 Allow for accessory dwelling units in low density residential districts.	A	This policy is repetitive with 1.4. It, or a new policy, could be more inclusive of increasing different forms of density housing such as townhouses, mix of duplexes, triplexes, fourplexes, cottage housing, courtyard apartments, in addition to accessory dwelling units.	Revised to allow two units per lot (Policy 2.5.5). Other policies focus on other housing types.
Pol. HS 1.4.3 Review development regulations for obstacles to permitting accessory dwelling units	S	Identifying and lowering unnecessary burdens and barriers in permitting can increase housing stock and limit displacement.	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
Pol. HS 1.5 Accommodate local non-profit housing agencies' efforts to purchase and rehabilitate housing to meet affordable housing needs and special needs of the community.	S	Policy reflects the need for more affordable housing and acknowledges the different needs of the community.	N/A
Pol. HS 1.6 Multi-family housing outside the Town Center area and outside the ESUV should be "ground related" (individual housing unit entries are on the first floor and allows direct access to private ground-level usable open space). Examples of ground-related dwellings include single-family detached, single family semi-attached, cottages, tandem houses, and townhouses. This does not include mixed use commercial/residential buildings or "housing for the aged" such as assisted living facilities, continued care communities, board and care homes, hospices or nursing homes.	A	Though the policy encourages more diversified housing, limiting multi-family outside of the Town Center to ground-related middle housing types and excluding apartments of any kind could be prohibitive, as apartments are most likely to serve lower income levels. Consider revising to include small apartment buildings in the MDR zone (per the EIS action alternatives)	Removed this policy.
Goal HS 2 Provide a range of housing types for all life stages and economic segments of the Sumner community.	S	This policy meets the criteria of the housing element rubric by supporting equitable access to housing. It also aligns with new requirements in HB1220, to plan for housing at all income bands.	N/A
Pol. HS 2.1 Strive to meet the City's fair share of housing needs by planning that 25% of the	N/A	This policy is no longer relevant due to changes in state law.	Removed this policy.

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
growth population allocation is satisfied through affordable housing.			
Pol. HS 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.	N/A	This policy is no longer relevant due to changes in state law.	Removed this policy.
Pol. HS 2.2 Plan for an adequate supply of land in appropriate land use designations and zoning categories to accommodate projected household growth	A	This policy should be updated to include language on accommodating housing needs of all income levels. Unclear what "in appropriate land use designations" means, it could be used to justify the exclusion of moderate and high density housing and, by extension, people with household needs not met by low density housing. Consider removing "appropriate" and specifying, or removing this clause entirely.	Removed use of "appropriate" and added focus on all income bands (Policy 2.5).
Pol. HS 2.2.1 Through the Comprehensive Plan, Zoning Code, and Subdivision code, and Design Guidelines allow for a	A/S	This policy is strong and meets the criteria of the housing element rubric. It could be revised to include mention of middle housing.	Updated to reflect latest Growth Management Act languages (includes duplexes, triplexes, and townhomes). (Policy 2.5.1)

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
variety of housing types and lot configurations including multi-family housing, mixed use development, cluster development, zero-lot line and similar subdivisions, planned unit development, and non-traditional housing forms such as adult family homes.			
Pol. HS 2.2.2 Allow for a variety of lot sizes in low density residential districts including a percentage of lots larger and smaller than the minimum lot size.	S	This policy supports a variety of lot sizes, which can result in a variety of housing options at different costs.	N/A
Pol. HS 2.2.3 Allow for accessory units in low density residential districts.	A	To align with HB 1337, this could be updated to say "two accessory dwelling units per lot".	Revised to allow for two ADUs per lot (Policy 2.5.5)
Pol. HS 2.2.4 Participate in the development of data for buildable lands analysis as required by the Growth Management Act.	S	Buildable lands analysis helps the city plan to accommodate an adequate supply of housing at all income levels.	N/A
Pol. HS 2.2.5 Incorporate reasonable measures as necessary to accommodate the projected population growth.	S	This policy aligns with the buildable lands analysis process.	N/A
Pol. HS 2.3 Encourage a variety of housing available to all economic segments of the community.	A	The policy could be more specific and actionable, perhaps by including wording such as "through tools such as incentives"	Consolidated into another policy (2.5).
Pol. HS 2.3.1 Review the Zoning Code, Subdivision Code, Building Codes, and other development-	A	This policy supports housing affordability by reducing costs of development.	Updated to address unclear regulations and to consider unit type allowances; lot, site, and building dimensions.

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
control ordinances to identify and remove excessive, duplicative, or unnecessary regulations. The analysis shall consider in particular lot width, access widths, street improvement standards, parking, common service lines as well as other issues.		Consider adding more examples for the analysis based on the Commerce guidance for “Adequate Provisions”, such as permitted housing types, minimum lot sizes, maximum densities, and setbacks.	
Pol. HS 2.3.2 Review the City's administrative procedures and streamline the permit process for affordable housing developments.	S	This policy supports housing affordability by reducing the costs, including time costs, of development.	Revised to support permit process for housing generally with affordable housing as a priority. (Policy 2.5.10)
Pol. HS 2.3.3 Consider implementing strategies such as an inclusionary housing program, minimum densities, density bonuses, adaptive re-use, and others to promote affordable housing.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 2.3.4 Promote the development of senior housing units in proximity to needed services.	A	Housing types for seniors are needed. However, this policy could be improved by including wording about affordability of these senior housing units, to mitigate potential displacement impacts of low-income and BIPOC communities.	No changes made, but other policies address affordability (Policy 2.1)
Pol. HS 2.3.5 Provide for transit and pedestrian improvements to support special needs populations.	S	This policy meets the criteria listed in the rubric.	Revised to include older adults, lower income, and residents with limited access to a car (Policy 2.3).
Pol. HS 2.3.6 Consider participation in the preparation of	A	This policy could include County and more specific language on housing funds, for	Revised to stronger language (“participate, where appropriate”) (Policy 2.5.12). Other

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
applications for federal or state housing funds.		example, to expand programs that facilitate home ownership by low and moderate income families or provide assistance for repair, rehabilitation, energy efficiency, and weatherization.	policies revised to focus on programs for home repairs and upgrades.
Pol. HS 2.3.7 Identify and catalogue real property owned by the City that is no longer required for its purposes and is suitable for the development of affordable housing for very-low to moderate income households. The inventory shall be provided to the state Department of Commerce annually in accordance with state law.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 2.4 Provide for a jobs and housing relationship that satisfies the local need for housing and affordability	S	This policy is strong and meets the criteria of the housing elements rubric.	N/A
Pol. HS 2.5 Promote fair and equal access to housing for all persons in accordance with state law.	S	This policy could call out specific protected classes at risk of displacement and be more explicit about ensuring equal access to these residents. (e.g., without regard to special need, race, creed, color, national origin, religion, sex, family status, or disability, sexual orientation, or the presence of any sensory, mental, or physical disability, participation in Section 8 voucher program or other similar government housing subsidy programs.	Added specific step to connect residents to information on tenant protections (Policy 2.9).

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
Pol. HS 2.6 Make a biennial report to the City Council and the Pierce County Regional Council regarding the progress made in meeting community housing needs	S	This is supportive of the City meeting community housing needs.	Revised for latest language in GMA (Policy 2.10)
Pol. HS 2.7 The Town Center will contain “transition areas” that will be at reduced height (maximum 3 stories) to create more compatible transition between traditionally single-family residential zones and areas with increased height	A	Consider changing single-family to “low-density residential”.	Changes to “low-density residential”, other updates for clarity (Policy 4.4).
Pol. HS 2.8 Provide incentives for developing senior housing in the downtown such as permit fee waivers and reductions, parking requirement reductions, and multi-family tax exemptions	A	Policy should be reviewed to remove the word “downtown” as this is no longer a defined area in Sumner. The policy could be improved by emphasizing affordable senior housing.	Removed “downtown” (Policy 2.2). Other policies focus on affordable housing.
Pol. HS 2.9 Establish programs focused on promoting good management and reducing criminal activity in multi-family developments and areas. This could include crime free/resistant housing programs and “safe street” concepts in multi-family design and maintenance.	C	This policy implies a connection between multifamily housing and criminal activity, which may be discriminatory. This policy should be removed. It could be replaced with a more general policy on safety in residential areas throughout the city.	Revised to remove implied connection between multifamily housing and criminal activity. Rephrased to promote safety and deter vandalism in residential neighborhoods generally (Policy 1.4).
Goal HS 3 Encourage energy efficiency in housing developments.	S	Energy efficient buildings can help reduce energy costs for residents over time. However, implementing energy efficiency upgrades (or energy efficient new	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
		construction) can be expensive and raise housing costs. Therefore such policies should be combined with those supportive of subsidized energy efficiency upgrades and anti-displacement policies.	
Pol. HS 3.1 Promote the use of energy conservation features in the design of all new residential structures.	S	Energy efficient buildings can help reduce energy costs for residents over time.	Revised for more specifics on how to encourage energy efficiency (Policy 3.1)
Pol. HS 3.2 Promote higher density and infill developments that are located near major transportation links such as the Sumner Commuter Rail Station.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 3.3 Continue to enforce State Energy Code requirements.	N/A		N/A
Pol. HS 3.4 Establish standards for street widths, landscaping, and parking lots to reduce heat loss or provide shade.	S	Reducing heat from paved areas can lower energy costs for household cooling.	N/A
Pol. HS 3.5 Review and update codes as necessary regarding solar energy.	N/A		N/A
Pol. HS 3.6 Recognize and support energy conservation and efficiency programs.	A	Could have more acknowledgement and specifics to programs focused on energy efficiency upgrades for LMI households etc.	No change made, but other policies discuss programs for energy efficiency for lower income households.
Goal HS 4 Provide for a variety of housing types and densities in the	S	This policy encourages transit-oriented development and diversified housing types.	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
town center in close proximity to the rail station			
Pol. HS 4.1 Promote the construction of housing stock in the Town Center by at least 500-1000 dwelling units by 2035.	A	This policy supports housing development in an area with good access to services and transit. It could be combined with policies to ensure affordability of some of these units in Town Center.	No changes made. Other policies address affordability.
Pol. HS 4.2 Adopt greater height limit, 5-6 stories, for development at higher density in West Sumner and west of the White River to promote re-development of the area for transit-oriented development	S	This policy encourages housing supply and has specificity.	N/A
Pol. HS 4.3 Adopt greater height limits, 4-5 stories, east of the BNSF Railroad with a transition area to single-family residential at a maximum of 3 stories as appropriate.	S	This policy encourages housing supply and has specificity.	Revised policy 4.4 updates the “transition area” to a transition to low density residential zones.
Pol. HS 4.4 Encourage land assembly allowing for feasible and attractive housing or mixed housing/commercial developments. Waive permit fees associated with lot consolidation such as lot line adjustments. Facilitate matching compatible owners that can work jointly to consolidate and sell/develop.	S	Supporting land assembly can make housing development more feasible and attractive to developers, which can support the creation of more housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Plan Update (2024)
Pol. HS 4.5 Prohibit garden style apartments in the Town Center that would promote surface parking.	A	This policy is not prohibitive as long as the City allows other multifamily housing types.	No changes made. Other multifamily housing types are allowed in many other areas.
Pol. HS 4.6 In order to promote redevelopment prohibit new single-family residential development and limit expansion.	S	This policy is supportive of the development of higher density housing types, which are more affordable than new single-family units.	N/A
Pol. HS 4.7 Adopt a Multi-family Tax Exemption allowance per RCW 84.14 that would create substantial incentives for re-development in the Town Center by providing property tax relief for qualified multifamily and affordable housing developments for 8-12 years	S	This policy meets the criteria of the Housing Supply element rubric.	Revised to provide options for affordability and creating other incentives. (Policy 4.8)

Source: BERK, 2024

Land Use Element

Using a similar rubric, Land Use Element adopted policies (2022 plan) were examined to inform the periodic update. Exhibit B - 16 applies the evaluation framework across policies in the existing Sumner Comprehensive Plan's Land Use Element.

The Land Use Element evaluation identifies some policy revisions that could increase inclusion and reduce disparate impacts, such as:

- Clarifying vague or subjective language, such as "orderly development," "appropriate transitions," or "attractive"
- More specificity around compatibility and buffering, to ensure that multifamily housing is not stigmatized

Exhibit B - 16: Findings for Land Use Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Goal LU 1 Provide for orderly development within the Sumner community.	A	This overarching goal could be more specific and clear. "Orderly development" is vague.	Revised to remove "orderly development" and emphasize variety of land uses while preventing adverse impacts (Goal 1).
Pol. LU 1.1 Ensure appropriate transitions between land uses so that more intensive uses do not adversely impact adjacent uses.	A	This policy could be revised for clarity to focus on incompatibility rather than intensity (which could be used to exclude certain housing types).	No changes made. As written, the existing policy does not preclude more intense uses; but encourages transitions (e.g. buffers).
Pol. LU 1.1.1 Maintain the design guidelines and ordinances to achieve compatible and attractive new residential, commercial, and industrial uses.	A	Design Guidelines can hinder new construction if overly complex and restrictive.	No changes made. City to consider complexity of design guidelines as needed.
Pol. LU 1.1.2 Maintain zoning and subdivision regulations to ensure adequate setbacks, landscaping, and buffering are required where land use conflicts and impacts may occur.	A	Ensure zoning and subdivision regulations do not hinder density and diversity of housing types.	No changes made. Implementing regulations to be adjusted as needed.
Pol. LU 1.2 Encourage infill development on vacant properties with existing public services and public utilities, and new development in areas with existing or planned public facilities.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.2.1 Review existing capital facility plans and update them as necessary to ensure compatibility with land use plans.	S	This policy meets the criteria of the land use element rubric.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. LU 1.2.1 Review and develop incentive based programs that would facilitate the development of vacant properties to leverage economic development potential.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.3 Through the Land Use Plan and Community Character Element, strive to balance residential, commercial, industrial and public land uses.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.3.1 Annually review development regulations to remove unnecessary requirements and to balance environmental protection, public participation, and housing and economic development goals.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.4 Where appropriate, prepare subarea plans to implement the Land Use and Community Character Elements and ultimately integrate these plans into the Comprehensive Plan as a whole. Subarea plans shall specify in more detail the allowable uses, design themes, buffering, and protection of sensitive areas and resources.	N/A	This policy implements the Land Use and Community Character policies.	N/A
Pol. LU 1.5 Integrate existing neighborhood plans and design strategies into the Comprehensive Plan.	N/A	This policy depends on development of neighborhood plans: specific policies may exacerbate racially disparate impacts.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. LU 1.6 Implement the land use map and accompanying designation descriptions as presented in the section titled "Land Use Designations" and Figure 3 titled "Comprehensive Plan Land Use Map" through the adoption and maintenance of the Zoning Map.	N/A		N/A
Pol. LU 1.7 Ensure new development is consistent with the policies of this Plan through implementation of regulations, programs, and project specific review.	N/A		N/A
Pol. LU 1.8 Coordinate with adjacent jurisdictions and Pierce County through joint planning to ensure service provision and development is consistent with the goals of this Plan.	N/A		N/A
Pol. LU 1.8.1 In accordance with the Countywide Planning Policies promote and participate in joint planning of unincorporated lands within the Sumner Urban Growth Boundary as shown on Figure 3.	S	To mitigate potential racially disparate impacts, incorporate principles of anti-displacement, and encourage affordable housing, the joint planning process can work towards more inclusive and equitable urban growth.	N/A
Pol. LU 1.8.2 Request joint planning of lands immediately adjacent to the City limits and the Sumner Urban Growth Boundary	S	Collaboration in planning can provide opportunities to address housing needs.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
including land south of SR-410 and along SR-162. See Figure 1.			
Pol. LU 1.8.3 Joint planning would be completed prior to any modification of the Sumner Urban Growth Boundary and following review of growth demands and capacity.	N/A		N/A
Pol. LU 1.9 Consider annexing unincorporated lands addressed in the Sumner Comprehensive Plan and located within the Sumner Urban Growth when initiated by a private party and in order to resolve service conflicts and avoid creating unincorporated "islands".	N/A		N/A
Pol. LU 1.10 Ensure newly annexed lands are zoned in conformance with the Sumner Comprehensive Plan Land Use Plan Map.	N/A		N/A
Pol. LU 1.10.1 A subarea plan should be required prior to any large annexation of the Urban Growth Area or request for expansion of the Urban Growth Areas to ensure that newly annexed areas are compatible with and do not adversely affect rural land uses.	N/A	This policy relates more to protection of rural areas.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. LU 1.11 Support the Town Center Plan area as a "Countywide Center" as it relates to transportation funding.	S	In combination with policies in the Housing element to increase transit-oriented development, investments in transportation can improve resident access to opportunity.	N/A

Source: BERK, 2024

Community Character Element

The Community Character Element evaluation (2022 adopted plan) highlighted some overall adjustments that could increase inclusion and reduce disparate impacts (see Exhibit B - 17), such as:

- Amending vague language around community identity, neighborhood character, small town atmosphere, design, and character
- Amending "single-family character" language and preservation throughout
- Promoting low-density residential areas as locations where affordable and varied housing can be constructed
- Using clear standards and definitions for "quality" and "healthy" homes
- Ensuring design review promotes healthy quality housing, while not stifling development and further housing stratification
- Where it is relevant, include mention of multifamily and mixed-use residential/commercial areas

Exhibit B - 17: Findings for Community Character Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Goal CC 1 Maintain and enrich Sumner's quality of life encompassed in its friendly, small town atmosphere.	A	Vague language could impede new forms of housing.	Added language to emphasize that higher densities be allowed near services, so the policy is more balanced.
Pol. CC 1.1 Encourage development which enhances the human, pedestrian scale, creating a sense of community and place.	N/A	Does not necessarily conflict with higher density housing types.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 1.2 Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, work places, schools, parks, civic facilities, and community services essential to the daily life of residents.	A	Language around character and design could impede housing types, depending on how it is implemented through regulations.	No changes made. Regulations to be revised as needed to ensure a mix of housing types are feasible throughout the city.
Pol. CC 1.3 In concert with the Sumner citizens and business community, maintain design guidelines and a design code, as appropriate, which address streetscape, landscape, and building design. Materials and methods of construction should be specific to the region, exhibit continuity of history and culture, and compatibility with the climate, protect historic and archaeological resources, and promote the community's character and identity.	A	Vague language on promoting community identity could create barriers, depending on implementation.	Language changed to be more flexible: instead of protecting community character "reflect the historic context" (Policy 1.3).
Pol. CC 1.4 Implement and maintain a Zoning Code which implements the comprehensive plan and community vision.	S	Consistency between Zoning Code and comprehensive plan provides foundation for effective housing policy.	N/A
Pol. CC 1.5 Encourage in the community a continuous commitment to maintaining Sumner's character and quality of place, including land conservation and stewardship, wise	A	Vague language around character and quality of place could impede new forms of housing.	Language changed to focus more specifically on how resource conservation etc. enhance the character and sense of place (instead of referencing maintaining character more generally). (Policy 1.5)

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
management of streetscapes and public viewsheds, property maintenance, and historic preservation.			
Pol. CC 1.6 Implement design guidelines that discourage the use of franchise and corporate architecture that detracts from Sumner's unique sense of place.	N/A	Franchise and corporate architecture generally refer to commercial, not residential, buildings.	N/A
Pol. CC 1.7 Preserve the single-family residential scale and historic character of existing residential streetscapes through various means such as floor area ratio and setback requirements.	C	Preserving the single-family residential scale and historic character could lead to exclusion in housing. Consider striking the language of single-family and use "low-density residential" instead.	Rephrased to maintain "small-scale" residential rather than specifically single-family (Policy 1.6).
Goal CC 2 The Sumner community should be designed so that housing, jobs, daily needs, and other activities are within easy walking distance of each other.	S	This policy supports residents' access to housing, jobs, services, and other opportunities, and promotes health.	N/A
Pol. CC 2.1 Establish Urban Villages in the Planning Area. A mix of uses shall be allowed. Area plans shall be prepared to indicate in more detail allowable uses, design themes, buffering, public spaces, etc.	N/A	This generally implements the concept of urban villages.	N/A
Pol. CC 2.2 Define neighborhoods and districts by walking distance to neighborhood centers and other community facilities.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	Policy removed but other policies carry forward similar objective.

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 2.3 Together with Pierce Transit and other agencies explore the feasibility of transit for Sumner that is cost effective and is based on, a network of transit stops and a transit system in the neighborhoods and districts, consistent with the Community Linkages Map, connecting to the commuter rail stations, and neighborhoods.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 2.4 Through the use of form-based code, street and design standards promote pedestrian and bicycle friendly streets with trees and other amenities that enhance the streetscape.	S	Form-based codes can offer developers more flexibility and could therefore result in more housing and housing variety.	New policy language added under new 2.5 to prioritize accessible sidewalks, and equitable distribution of streetscape amenities.
Pol. CC 2.5 Encourage a mix of residential-scale civic, commercial, and service uses in neighborhood centers. Small community parks or greens shall be established where appropriate.	S	This policy meets the criteria of the community character element rubric.	Some updates to emphasize walking distance and for clarity (Policy 2.3.1).
Pol. CC 2.6 In recognition of the need for a variety of housing, allow through the Comprehensive Plan and Zoning Code a mix of residential uses as appropriate to the neighborhood character.	A	This policy encourages an increase in housing stock through diversity of housing types. However, "as appropriate to the neighborhood character" is vague and can limit housing development.	Minor changes (new Policy 2.4.) clarify that a mix of housing would be tailored to particular neighborhoods (e.g. targeted higher density areas) but does not preclude other housing types.

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 2.7 In conjunction with the Sumner School District, and the Dieringer School District, encourage the location of schools within walking distance of a majority of the population they are intending to serve.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 2.8 Create unique and safe walking and pedestrian crossings at major intersections through street and crosswalk design and incorporation of art.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Goal CC 3 Reinforce the downtown as the town center and commercial and cultural center of Sumner	S	This policy meets the criteria of the rubric.	N/A
Pol. CC 3.1 Plan for the downtown as Town Center and the community core encouraging a combination of commercial, civic, cultural, recreational, and residential uses.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 3.2 In cooperation with Pierce Transit and the Sound Transit, establish the Downtown as the intra-community transit hub and Town Center.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 3.3 Continue design review process for new and expanded uses. Any future amendments to the design	A	This policy could be a barrier depending on how burdensome the design standards are for developers.	Minor wording changes (Policy 3.3) encourage consultation with stakeholders in developing Design Guidelines, but do not add permit steps for developers.

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
regulations shall include consultation with Sumner Downtown Association, Sumner Historical Society, other civic groups, and citizens.			
Pol. CC 3.4 Through the Comprehensive Plan and Zoning Code and form based code, ensure a central role of the historic central business district, and limit competitive uses as appropriate.	A	Consider how “Competitive” is implemented (for example, does it refer to industrial uses, which may have impacts to other uses?)	N/A. The central business district is now part of Town Center Plan which allows unlimited housing density and commercial uses but prohibits “competitive” uses like industrial.
Pol. CC 3.5 Subject to a form-based code and design review, encourage infill residential development in the Downtown, such as “mixed use buildings” (multifamily units above ground-floor commercial), and “mixed use developments” (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 3.6 Work with stakeholders to visually and functionally link the Main Street Corridor from Highway 167 to the Urban Village.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 3.7 The City should, in partnership with the Sumner Downtown Promotion Association, actively recruit and	S	Mixed use buildings generally provide medium/high density housing units, which	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in Downtown away from Main Street and Alder Avenue and designated Activity Centers.		may be more likely to serve lower income bands than low density types.	
Pol. CC 3.8 Allow and encourage activities catering to a range of ages, interests, ethnicities, and other diverse attributes.	S	This promotes access to services and amenities.	Combined with policy 3.7.
Pol. CC 3.9 Encourage more housing in and near Downtown to strengthen Downtown businesses, take advantage of the commuter train, offer a range of housing in the community, and provide an active, social character.	S	This promotes housing development and access to services.	N/A
Pol. CC 3.10 Allow dining and other retail activities in the street right-of-way where adequate public sidewalk widths are found and explore the potential for seating space in the form of "parklets" in the right of way and in alleys were appropriate.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.11 Provide for community festivals, outdoor markets, performing arts, or other community events for all ages to	N/A	Does not directly relate to housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
promote business and activities in the Downtown.			
Pol. CC 3.12 Ensure Downtown is clean, safe, and convenient.	S	This supports neighborhood safety.	N/A
Pol. CC 3.13 Enhance “wayfinding” to and throughout Downtown. Have signs on the State routes, at gateways into Downtown, landmarks, public spaces, public parking and other areas.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.14 Improve existing public parking lots with signage, landscaping, lighting, and drainage.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.15 Provide and fund maintenance of Public Restroom facilities for the Downtown Business District.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.16 Maintain a high quality and attractive appearance. Work with Sumner Downtown Promotion Association and others to seasonally decorate Downtown with decorations, hanging baskets, lights, etc.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.17 Prohibit franchise architecture within the Town Center and regulate design through form-based code and	N/A	Franchise architecture generally relates to commercial buildings rather than housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
design and development guidelines.			
Pol. CC 3.18 Discourage, and in some cases prohibit, drive-thru businesses in the Town Center to encourage pedestrian oriented design and uses.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 3.19 Through the use of form-based code require new development within the Town Center to provide pedestrian amenities such as landscaping, plazas and fountains and buffer where appropriate.	A	This could impose additional costs on housing development in the Town Center. Engagement with developers would help ensure regulations are not overly prescriptive.	None. This could be adjusted through future engagement with developers if needed.
Pol. CC 3.20 Adopt a "form-based code" in the Town Center to ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.	A	This policy supports a form-based code, which offers predictability to developers, which saves time and costs in housing development.	None
Pol. CC 3.21 Development along Traffic Avenue should be in a range of 4-6 stories and be of a mid-rise urban style and provided for underbuilding parking.	S	This supports medium/higher density housing.	N/A
Pol. CC 3.22 The height in the Historic Subdistrict should be 3-4 stories to protect and preserve	S	This supports medium/higher density housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
the small town character and scale of Main Street and reduce conflicts with adjacent residential uses.			
Pol. CC 3.23 Ensure that adequate off-street parking is provided for multi-family development that is reflective of the transit-oriented nature of the Town Center Plan area without requiring expensive construction of parking that exceeds demand.	S	Parking requirements can be cost prohibitive to development.	N/A
Pol. CC 3.24 Every 5 years following adoption of the Town Center Plan conduct a study reviewing parking utilization and parking issues and make policy adjustments as needed.	S	Depending on findings, studies could indicate that less parking is needed, which could lift the parking cost burden for housing development.	N/A
Goal CC 4 Establish a community entry statement into and out of Sumner.	N/A	Does not directly relate to housing.	N/A
Pol. CC 4.1 Through street standards, design guidelines, and land use regulations, promote all entrances to the City, including Traffic Avenue and Valley Avenue, 160th Street as gateways to the community. The character of the Avenues shall be a boulevard with 64 median or other treatments. Gateway design standards for	N/A	Does not directly relate to housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
community entrances shall be applied.			
Pol. CC 4.2 Require pedestrian and bicycle oriented amenities and facilities at existing civic and community uses.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 4.3 Subject to a form-based code and design review, encourage infill residential development in the Downtown, such as "mixed use buildings" (multifamily units above ground-floor commercial), and "mixed use developments" (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core."	S	This supports more housing development and higher densities.	N/A
Goal CC 5 Provide for open space and recreation and protect sensitive areas from degradation.	S	Access to open space and recreation is essential for the wellbeing of all residents.	N/A
Pol. CC 5.1 In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complement's the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.	S	This policy is unlikely to be prohibitive, as long as the City is taking advantage of SEPA opportunities to offer flexibility.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 5.2 Promote the preservation of the natural terrain, drainage, and vegetation of the community.	N/A	This policy is standard and unlikely to have significant impacts to housing.	N/A
Pol. CC 5.3 Provide appropriate infrastructure to ensure environmental quality.	N/A	This policy is standard and unlikely to have significant impacts to housing.	N/A
Pol. CC 5.4 Promote the efficient use of renewable resources, water and energy through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling.	N/A	This policy is to “promote” not “require”, so is unlikely to impose additional development costs.	N/A
Pol. CC 5.5 Promote adequate provision of peripheral and internal open space and recreation uses through implementation of the Parks and Open Space plan.	N/A	This policy is to “promote” not “require”, so is unlikely to impose additional development costs.	N/A
Pol. CC 5.6 Encourage tree planting in the Town Center along sidewalks and in public open spaces.	N/A	This policy is to “encourage” not “require”, so is unlikely to impose additional development costs.	N/A
Pol. CC 5.7 Expand Heritage Park to a full block.	N/A	Does not directly relate to housing.	N/A
Pol. CC 5.8 Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.	N/A	Does not directly relate to housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 5.9 Continue to provide and fund maintenance of Public Restroom facilities for the historic Downtown Business District.	N/A	Does not directly relate to housing.	N/A
Goal CC 6 Promote a compatible and varied mix of land uses.	S	Encouraging land use variety could support more housing variety.	N/A
Pol. CC 6.1 Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other.	S	This supports variety in housing. While it imposes some style guidelines, it does not impose requirements.	N/A
Pol. CC 6.2 Where appropriate, utilize subarea planning to ensure that newly annexed and developed areas promote a walkable, transit friendly neighborhood with a varied mix of land uses and are compatible with surrounding areas	S	This supports a variety in the long-term city housing stock.	N/A
Goal CC 7 Promote the movement of people and goods and lessen the reliance on the automobile.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 7.1 Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets,	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
pedestrian paths, and bike paths should contribute to a system of fully-connected and interesting routes to all destinations. Their design should encourage pedestrian and bicycle use and discourage high speed traffic. The commuter traffic network should be focused around regional transit and freeway travel.			
Pol. CC 7.2 To lessen strip-commercial development and continued reliance on the automobile in new developments, encourage a balance of uses along the East Main Street. Certain highway oriented uses which rely on the private automobile for their primary source of access shall be limited. Front-yard parking shall be prohibited and interconnection of all parking lots shall be required. Infill multi-family developments may be allowed, including units above ground-floor commercial uses.	S	This supports multi-family development.	N/A
Pol. CC 7.3 Pedestrian-friendly streets with shade trees as well as landscaped boulevard medians shall be included in street standards for employment areas where practicable.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
Pol. CC 7.4 Prepare and implement a local street plan to promote a grid pattern and alleys.	S	A grid pattern can help ensure regularity in lot shapes, which could make them more feasible to develop within setback and other standards.	Policy rewritten but intent is similar (Policy 7.7).
Pol. CC 7.5 Strive for continuity in the sidewalk system that links new development to the existing sidewalk network. This may include pedestrian routes through a development for more direct access to transit stops.	S	This could offer flexibility to developers in how they implement sidewalk/connectivity standards while meeting community needs.	Policy removed and consolidated with another (Policy 7.2).
Pol. CC 7.6 Enhance circulation in Downtown by implementing the Sumner Transportation Plan. Circulation improvements should enhance auto and non-motorized travel and provide landscaping and gateway features: Improve the gateway Wood Avenue and Main Street intersection, Further promote travel modes by commuter rail and bus and explore additional alternative modes; Complete the nonmotorized trail system along the White/Stuck River.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Goal. CC 8 Promote the development of a Manufacturing/Industrial Center	N/A	Does not directly relate to housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Plan Update (2024)
and insure integration and compatibility of this area with adjacent neighborhoods and encourage pedestrian and transit connectivity and access.			

Source: BERK, 2024

Housing Capacity Analysis by Income Band

Chapter 6: Housing of the Sumner Comprehensive Plan FEIS includes the results of the housing capacity analysis by income band for each growth and comparison to targets. The following provides background on how the capacity analysis was performed.

Findings

The housing capacity analysis found that Alternative 1 (No Action) does not have adequate capacity for all income bands due to a capacity deficit for the 0-80% AMI category. Alternatives 2 and 3 and the Preferred Alternative do provide adequate capacity for all income bands. More details are included in FEIS Chapter 6: Housing.

Alternatives

As described in FEIS Chapter 2: Alternatives, Alternative 1 is the No Action Alternative, which carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Alternative 1 and the Preferred Alternative plan for 1,985 housing units from 2020-2044. Alternatives 2, 3, and the Preferred Alternative each have a different combination of policies aimed at achieving housing capacity for all income bands. Alternatives 2 and 3 Plan for 3,000 housing units from 2020-2044.

Steps

The housing capacity analysis followed the following steps:

- Used 2021 Pierce County Buildable Lands Report data (2020) as a base
- Updated parcel status (built out/underutilized/vacant) based on permit data from 2020-2023 and staff input on future pipeline projects
- Applied density, market factor, and housing type assumptions by zone for each alternative and categorized by affordability level (see Exhibit B - 18)
- Manually adjusted specific parcels with church property bonuses, potential rezone of Cava mine site from LDR to MDR, and allowances for triplexes and fourplexes on large lots in the LDR zone
- Summarized capacity by income band

Assumptions

Assumptions applied in the capacity analysis are as follows in Exhibit B - 18, Exhibit B - 19, Exhibit B - 20, Exhibit B - 21, and Exhibit B - 22.

Exhibit B - 18: Market Factor Assumptions

Zone	Vacant Market Factor	Underutilized Market Factor
CBD	10%	40%
GC	10%	40%
HDR - NORTH OF E MAIN	20%	40%
HDR - SOUTH OF E MAIN	20%	40%
IC	0%	0%
LDR-12	10%	20%
LDR-4	10%	20%
LDR-6	10%	20%
LDR-72	10%	20%
LDR-85	10%	20%
M1	0%	0%
M2	0%	0%
MDR - NORTH OF E MAIN	20%	40%
MDR - SOUTH OF E MAIN	20%	40%
NC	10%	40%
TC-3	10%	40%
TC-4	10%	40%
TC-5	10%	40%
TC-6	10%	40%
NC - EAST SUMNER OVERLAY	10%	40%
GC - EAST SUMNER OVERLAY	10%	40%
MDR - EAST SUMNER OVERLAY	20%	40%
HDR - EAST SUMNER OVERLAY	20%	40%

Notes: Market Factor was based on assumptions from the 2021 Buildable Lands Report, with some adjustments to underutilized market factor based on increased development interest in recent years.

Source: Pierce County Buildable Lands Report, 2021; BERK, 2023.

Zones were generally categorized for affordability according to Commerce guidance for “moderate cost communities” (see Exhibit B - 19 and Exhibit B - 20).

Exhibit B - 19: Housing Type Affordability Assumptions

Housing Type	Affordability Level
Low Density (detached single-family)	Higher Income (>120% AMI)
Moderate Density (townhomes, duplexes, multiplexes)	Moderate Income (>80-120% AMI)
Low-Rise (walk-up apartments, condos, 2-3 floors)	Low Income (0-80% AMI)
Mid-Rise (apartments, condos over 2-3 floors)	Low Income (0-80% AMI)
ADUs	Low Income (>50-80% AMI)

Source: Commerce, 2023.

Exhibit B - 20: Zone Affordability Assumptions

Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
CBD	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI
GC	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI
HDR – NORTH OF E MAIN	80-120% AMI	0-80% AMI	0-80% AMI	0-80% AMI
HDR – SOUTH OF E MAIN	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI
IC	N/A	N/A	N/A	N/A
LDR-12	120%+ AMI	80-120% AMI	80-120% AMI	80-120% AMI
LDR-4	120%+ AMI	80-120% AMI	80-120% AMI	80-120% AMI
LDR-6	120%+ AMI	80-120% AMI	80-120% AMI	80-120% AMI
LDR-72	120%+ AMI	80-120% AMI	80-120% AMI	80-120% AMI
LDR-85	120%+ AMI	80-120% AMI	80-120% AMI	80-120% AMI
M1	N/A	N/A	N/A	N/A
M2	N/A	N/A	N/A	N/A
MDR – NORTH OF E MAIN	80-120% AMI	0-80% AMI	0-80% AMI	0-80% AMI
MDR – SOUTH OF E MAIN	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI
NC	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI
TC-3	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*
TC-4	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*

Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alt.
TC-5	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*
TC-6	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
HDR – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
MDR – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
NC – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
GC – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	11% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*

Notes: *Town Center and East Sumner zones, despite allowing multifamily development, are assumed to provide capacity for 80-120%+ AMI because new developments in these areas typically serve higher incomes. In Alternatives 2 and 3 and the Preferred Alternative a portion of the capacity in these zones is considered affordable to lower income bands based on incentives or mandatory affordability. The Preferred Alternative assumes slightly more affordable units due to proposed changes to the MFTE programs.

Source: BERK, 2023.

Assumed densities for each zone are outlined in Exhibit B - 21. Alternative 1 density assumptions are based on those used in the 2021 Buildable Lands Report. Assumptions in Alternatives 2 and 3 and the Preferred Alternative are based on proposed code changes and the densities of recently permitted development projects in those zones.

Exhibit B - 21: Density Assumptions

Zone	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
CBD	25	25	25	25
GC	25	25	25	25
HDR - NORTH OF E MAIN	12	20	15	20
HDR - SOUTH OF E MAIN	12	20	15	20
IC	0	0	0	0
LDR-12	4	5	5	5
LDR-4	5	7	7	7
LDR-6	5	7	7	7
LDR-72	5	7	7	7
LDR-85	5	7	7	7
M1	0	0	0	0
M2	0	0	0	0
MDR - NORTH OF E MAIN	12	20	15	20
MDR - SOUTH OF E MAIN	12	20	15	20
NC	25	25	25	25
TC-3	76	76	76	76
TC-4	76	90	90	90
TC-5	76	76	76	76
TC-6	76	90	90	90
HDR - EAST SUMNER OVERLAY	12	28	28	28
MDR - EAST SUMNER OVERLAY	12	26	26	26
NC - EAST SUMNER OVERLAY	25	26	26	26
GC - EAST SUMNER OVERLAY	25	26	26	26

Source: Pierce County Buildable Lands Report, 2021; BERK, 2023.

Notes: Differences from Alternative 1 are in bold.

Other assumptions for each alternative include ADU capacity, density bonuses for religious properties, mine site redesignation in Alternative 2, allowances for triplexes and fourplexes on large lots in the LDR zone, and housing types in the LDR, MDR, and HDR zones (Exhibit B - 22). These assumptions align with the policies built into each alternative.

Exhibit B - 22: Housing Capacity Assumptions by Alternative

	Alternative 1	Alternative 2	Alternative 3	Preferred Alt
Percent of single family parcels with ADU "capacity"	5%	10%	15% [^]	7% [^]
Church density assumption	None	40 dua Serve less than 50% AMI	40 dua Serve less than 50% AMI	40 dua Serve less than 50% AMI
Rezoning	None	Cava mine site rezoned MDR	None	None
Units planned for (2020-2044)	1,985*	3,000*	3,000*	1,985*
LDR housing types	No changes	Duplexes allowed; fourplexes on larger lots allowed	Duplexes allowed; fourplexes on larger lots allowed where one is designated affordable	Duplexes allowed; fourplexes on larger lots allowed
MDR / HDR housing types	No change	Low-rise apartments/multiplexes allowed throughout	Low-rise apartments/multiplexes allowed throughout	Low-rise apartments/multiplexes allowed throughout

Notes: *900 units have been built since 2020 or are in the future permit pipeline. These units are expected to serve 80-120%+ AMI.

[^] Newest guidance from the Department of Commerce recommends that ADU capacity analysis assume no more than 10% of eligible lots. The Preferred Alternative ADU capacity analysis in the FEIS has therefore been adjusted to 7% recognizing that additional incentives could be implemented to increase ADU capacity.

Source: BERK, 2023.

Commerce “Adequate Provisions” Checklists

The following analysis is based on a review of the code, staff input from conversations with developers and experience reviewing proposals, and code comparison findings.

Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the clarity of development regulations for middle housing.	None.
Prohibiting some moderate density housing types, such as: ▪ Duplexes ▪ Triplexes ▪ Four/five/six-plexes ▪ Townhomes ▪ Cottage housing ▪ Live-work units ▪ Manufactured home parks	Yes.	LDR currently does not allow any middle housing types (though it does allow for ADUs). MDR and HDR allow townhomes, duplexes, manufactured home parks, and cottage housing. They also allow multiplexes where created by zero lot line subdivision.	Allow duplexes in LDR zones per HB1110 (proposed in Alternatives 2 and 3). Allow multiplexes / small apartments in MDR/HDR (proposed in DEIS Alternatives 2 and 3).
High minimum lot sizes	No.	Minimum lot sizes for middle housing types (where allowed) are the same or less restrictive than for single-family.	None.
Low maximum densities or low maximum FAR	Yes.	The MDR zone allows only 15 dwelling units per acre, which could make it challenging to	Raise the maximum density in MDR to better accommodate middle housing (proposed in

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		accommodate some middle housing types on some development sites, even though they are allowed (for example, townhomes or duplexes).	DEIS Alternatives 2 and 3 and FEIS Preferred Alternative).
Low maximum building heights (Guidance from Commerce middle housing model ordinance suggests 35 feet or higher)	No.	The LDR zone currently has a maximum height of 30 feet. MDR/HDR have 35-ft height, 45 ft in ESUV/HDR and mixed use buildings, and there is no height limit in TCC zone.	None.
Large setback requirements	Yes.	LDR rear and street side yard setbacks are larger than recommended in the Commerce model ordinance.	Consider changing the street side yard setback from 12 to 5 and the rear yard setback to 20.
High off-street parking requirements	Yes.	Parking requirements are within state regulations (for example, no off street parking required for ADUs within a half mile of the transit station). Middle housing types require the same or less parking per unit (depending on unit size) than single family detached housing. Current code does put the onus on the property owner to prove, with a parking study, that no on-site parking is needed when within a half mile of transit. This is in conflict with HB1110, which puts the onus on the city to prove that parking is needed if not waiving parking minimums	Remove requirement for property owners within half mile of transit to prove no parking is needed on-site. Apply current code provisions for senior housing and Town Center parking reductions to other housing/areas.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		outright in these areas near transit.	
High impervious coverage limits (lot coverage)	Yes.	Maximum lot coverage in MDR and some LDR zones is 35%. The Commerce model ordinance recommends no less than 40%. Maximum lot coverage in HDR is 45%.	Raise the maximum lot coverage in MDR and some LDR zones to 40%.
Lack of alignment between building codes and development codes	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with alignment between building codes and development codes.	None.
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	Yes.	Developers have given feedback on design standards being overly complex. The city does not have tree retention regulations except for in public spaces. Preservation of historic buildings downtown is encouraged in design guidelines but not required.	Consider reviewing design standards for clarity or provide handouts and continue the no-cost pre-application process to help applicants navigate the regulations. Draft plan policies would require DAHP review for older buildings but no required mitigation.
PROCESS OBSTACLES			
Conditional use permit process	No.	There is no conditional use permit required for any middle housing type in the LDR, MDR, or HDR zones.	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Design review	No.	Administrative design review is required for all duplex, multiplex, and townhome development, but design review is only required for single-family detached where there is a 10-lot subdivision occurring. Developer input during the HAP process did not identify design review for middle housing as a barrier.	None. Administrative design review for middle housing is specifically allowed under HB 1110.
Lack of clear and accessible information about process and fees	No.	Fees are displayed on the city website. Process for different projects is in Chapter 18.56 SMC. The City has a self-service platform through which applicants can apply for permits and pay invoices.	None.
Permit fees, impact fees and utility connection fees	Yes.	Building permit fees are based on value of construction and are likely to be lower per unit for middle housing. Impact ("mitigation") fees are lower for multifamily, duplexes & Zero Lot Line projects than single-family units per unit. ADU fees are one-half of single-family. Input from Public Works staff indicates that Sumner fees are generally low compared to other cities. However, developer sentiment generally suggests that impact fees and connection fees may still be a barrier to affordability.	Exempt ADUs and/or affordable senior housing (proposed under DEIS Alternatives 2 and 3 and FEIS Preferred Alternative). Consider reducing fees for all multiplexes, townhomes and other middle housing.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Processing times and staffing challenges	Yes.	The Housing Action Plan (2021) identified “improve the permit process” as a key strategy.	Implement steps identified in the HAP (create permit process fast track program, etc.), Code update 2023 streamlined process for Zero Lot Line Subdivisions. In future per HAP should raise upper threshold for short plat to 9 units, raise SEPA exemption levels for minor new construction
SEPA process	Yes.	The City has already undertaken planned actions in Town Center and East Sumner, which simplifies the SEPA process for developers. However, the Housing Action Plan (2021) identifies raising SEPA exemption levels for minor new construction as a strategy.	Raise SEPA exemption levels for minor new construction.
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes.	There is a lack of larger parcels in the city as it is largely built out.	The HAP identifies use of publicly owned land as an incentive for rent-restricted affordable housing. The City could consider assembling publicly-owned parcels for housing development if appropriate surplus property arises.
Environmental constraints	No.	There are some areas of steep slopes and wetlands but most parcels are not affected, particularly parcels that are close	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		to services and transit that would be suitable for affordable housing.	

Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations for Low Rise/Mid-Rise housing (i.e. apartments up to 3 stories)	Yes	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the clarity of development regulations. However, staff have heard from developers that some codes, such as Town Center, may be challenging to interpret.	Review development regulations for clarity, or provide materials to help applicants navigate the regulations; continue the no-cost pre-application consultation opportunity.
High minimum lot sizes	No.	Minimum lot sizes are not particularly high (5,000 s.f. per building site in MDR/HDR, including in East Sumner overlay).	None.
Low maximum densities or low maximum FAR	Yes.	Maximum density in MDR (outside of East Sumner) is 15, which may make it difficult to accommodate low-rise apartments where currently allowed.	Revisit maximum density in all MDR areas of the city (raised to 22 du/a in the Preferred Alternative)
Low maximum building heights	No.	Maximum heights are 35 feet in MDR/HDR, 35-45 feet in East Sumner, and 4-6 stories in the Town Center.	N/A
Large setback requirements	No.	Front yard setback is 10 feet in MDR, 20 feet in HDR. Rear yard setback is 25 feet in MDR, 20 feet in HDR.	N/A

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		Side yards for multifamily are 15-25 feet depending on adjacent zone. Setbacks in Town Center vary by district but are minimal and in some places include a maximum setback.	
High off-street parking requirements	No.	Multifamily dwellings are required to have one space per studio, one and a half spaces for each one or two bedroom units, and two spaces for three or more bedroom units. Visitor parking is required at one space per five units. In the Town Center Plan area, the part of Sumner with the best access to transit. 1.25 spaces are required for each unit. This may be reduced to 0.85 spaces per unit where within ¼ mile of the Sumner Sounder Station, on-street parking is available, and a parking study shows that proposed parking will meet market demand of the development. Single-family units are required to provide two spaces per unit, which is more than multifamily units with two or fewer bedrooms.	To respond to new State guidelines, code will be updated for ADUs and dwellings near the high capacity transit station.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
High impervious coverage limits (building coverage)	Yes.	Maximum lot coverage is 45% in HDR and 35% in MDR. Maximum coverage in the Town Center ranges from 70-100%.	Apartments are currently allowed south of E Main in MDR, and a maximum lot coverage of 35% may make this challenging to achieve.
Lack of alignment between building and development codes	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with alignment between building codes and development codes.	None.
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	No.	No ground floor retail requirements. Minimum open space for multifamily is 50 square feet of private open space and 200 square feet of common open space per unit. Design review standards are applied to multifamily development but design review has not been raised by developers as a barrier in HAP engagement. The city does not have tree retention regulations except for in public spaces. Preservation of historic buildings in the historic district is encouraged in design guidelines but not required. Draft plan policies would require DAHP review but no required mitigation.	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
PROCESS OBSTACLES			
Conditional use permit process	No.	Low-rise and mid-rise buildings are not conditional uses in any zone.	N/A
Design review	Yes.	All low-rise and mid-rise apartment/condo developments are required to go through design commission review to ensure they fit the city's multifamily design guidelines.	Consider updating design guidelines to more specific, quantitative requirements.
Lack of clear and accessible information about process and fees	No.	Fees are displayed on the city website. Process for different projects is in Chapter 18.56 SMC. The City has a self-service platform through which applicants can apply for permits and pay invoices.	None.
Permit fees, impact fees and utility connection fees	No.	Building permit fees are based on value of construction and are likely to be lower per unit for low and mid-rise housing. Impact ("mitigation") fees are less expensive for multifamily than single-family units per unit.	None.
Process times and staffing challenges	Yes.	The Housing Action Plan (2021) identified "improve the permit process" as a key strategy.	Implement steps identified in the HAP (for example, create permit process fast track program)
SEPA process	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the SEPA	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
process for low-rise and mid-rise development.			
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes.	There is a lack of larger parcels in the city as it is largely built out.	The HAP identifies use of publicly owned land as an incentive for rent-restricted affordable housing. The City could consider assembling publicly-owned parcels for housing development if appropriate surplus property arises.
Environmental constraints	No.	There are some areas of steep slopes and wetlands but most parcels suitable for higher density housing or affordable housing are not affected.	None.

Supplementary barrier review checklist for PSH and emergency housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities) ⁶	Yes.	Code currently does not allow emergency shelter, emergency housing, PSH, or transitional housing within a half mile of any other facility of these types.	Proposed code revises spacing requirements to 880 feet, based on Commerce guidance.
Parking requirements	No.	Parking requirements are the same as required for housing types of similar scale and for hotels/motels. Through the conditional use permit process parking needs for the project would be established.	None.
On-site recreation and open space requirements	No.		None.
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone			None
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	Yes.	The code currently limits PSH and transitional housing to one family per dwelling unit. Emergency shelters and emergency housing are limited to no more than five	Proposed code revises maximum occupants to tie to building/fire code, per Commerce guidance.

⁶ Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
		families or 20 occupants, whichever is fewer.	
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	Yes.	The code currently limits PSH and transitional housing to no more than 10 housing units per parcel in LDR, MDR, and HDR. Maximum is 25 dwelling units per acre in commercial districts.	Proposed code sets occupancy limits to align with building/fire code, and establishes spacing limits at 880 feet per state guidelines
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No.	None.	N/A

Accessory dwelling unit barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
- Consistent with HB 1337 (2023) - Must allow two ADUs on each lot in urban growth areas; - May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals; - Must allow an ADU of at least 1,000 square feet; - Must set parking requirements based on distance from transit and lot size; - May not charge more than 50% of the impact fees charged for the principal unit; - Must permit ADUs in structures detached from the principal unit; - May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; - May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; - Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; - Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; - Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and - May not require public street improvements as a condition of permitting ADUs.	Yes.	Existing code does not meet HB1337 requirements relating to owner occupancy, allowing both attached and detached ADUs, building height, setbacks, building entrance, and design standards.	Code revisions to bring the SMC in line with HB1337 requirements.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Unclear development regulations	No.	This has not been raised as an issue by applicants. The City also has a page on its website to direct applicants to the right permits for ADUs and next steps.	None.
Large setback requirements	Yes.	Setbacks could be more flexible where abutting an alley and where more restrictive than principal unit for side yards.	Code revisions to bring setbacks in line with HB1337 requirements.
Off-street parking requirements	Yes.	Parking requirements are generally in line with HB1337, except in that the code puts the onus on the property owner to demonstrate that an ADU within one half-mile of the Sumner transit station has adequate street parking if not providing off-street parking.	Remove requirement for property owner of ADU within one half mile of the Sumner transit station to provide on street parking is available.
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	Yes.	Administrative design review is required for ADUs where it is not required for infill detached single-family.	Revise code to remove design review requirement for ADUs where there is no review for detached single family.
PROCESS OBSTACLES			
Lack of clear and accessible information about process and fees	Yes.	More clarity could be added for impact fees (currently some are in SMC and some on city permit website)	Consider adding summary of fees that apply to ADUs on permits webpage; continue no-cost pre-application consultations.
Permit fees, impact fees and utility connection fees that are not proportionate to impact	No.	ADU fees are half of single family.	The City could consider exempting ADUs from some fees.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Processing times and staffing challenges	Yes.	The Housing Action Plan (2021) identified “improve the permit process” as a key strategy.	Implement steps identified in the HAP (for example, create permit process fast track program)

Checklist for local option tools for addressing affordable housing funding gaps

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Housing and related services sales tax (RCW 82.14.530)	Adopted. Chapter 3.22 SMC.	N/A
Affordable housing property tax levy (RCW 84.52.105)	N/A	N/A
REET 2 (RCW 82.46.035) – GMA jurisdictions only and only available through 2025	N/A	N/A
Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	N/A	N/A
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	N/A	N/A
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Not applicable (Sumner does not have a population over 30,000)	N/A
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	Not adopted.	The City does have public land that could be considered in the future for affordable housing.
Impact fee waivers for affordable housing projects (RCW 82.02.060)	Adopted for school impact fees.	N/A
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	N/A	N/A
Multifamily Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	MFTE available in Town Center (market rate or affordable) and East Sumner (affordable only).	All EIS alternatives plan to continue or expand the MFTE program. The Preferred Alternative makes MFTE affordable only in Town Center and expands the affordable MFTE area in East Sumner.
General funds (including levy lid lifts to increase funds available)	N/A	N/A

* Some tools may be unavailable for certain jurisdictions. For example, only GMA jurisdictions can use REET 2, or the surrounding county may have already implemented the housing and related services sales tax. See MRSC's summary of [Affordable Housing Funding Sources](#) for more details and the Association of Washington Cities (AWC)/MRSC booklet on [Homelessness & housing toolkit for cities](#) (2022).

C. Climate Analysis Findings

Background

House Bill 1181 (2023) added new requirements to the Growth Management Act on planning for climate change. The City must include policies in the comprehensive plan (in a greenhouse gas emissions reduction sub-element and resiliency sub-element) that “reduce overall greenhouse gas emissions” and “enhance resiliency to and avoid the adverse impacts of climate change.” Commerce has provided guidance on how to meet the new requirements, including criteria for screening adopted and proposed policies. Sumner has until 2029 to meet the new requirements and is including some policy changes to address these topics in the 2024 periodic update. Further work to ensure consistency with the requirements may be completed from 2024-2029.

Sumner has existing policies throughout the adopted plan that address climate resiliency and emissions reduction. New and revised policies are included with the Comprehensive Plan Periodic Update (2024). The Comprehensive Plan Periodic Update also includes a new Climate Change element that maps to the relevant policies elsewhere in the plan.

Climate Impacts in Sumner

Sumner and the rest of Pierce County are expected to be impacted by climate change in the 20-year planning period. The Pierce County Climate Vulnerability Assessment, based on data from the University of Washington Climate Impacts Group, found that by the 2040-2069 period (compared to the 1980-2009 period), Pierce County could expect:

- An average 12% increase in the maximum daily precipitation with the 2-year storm⁷
- Median change in average temperature in the June-August period of 6.3 degrees Fahrenheit
- Higher number of high fire danger days (ranges from 6-14 additional days throughout the County)
- Increase in number of days above 90 degrees Humidex⁸ of about 19.8 days.

Climate Impacts Group mapping⁹ also shows:

- Sumner is at a higher risk for heat waves than some other parts of Pierce County (Exhibit C - 2).
- In Sumner, the White River could see a 30% increase and the Puyallup River could see a 25% increase in their peak streamflows when comparing the 1980-2009 average and the 2040-2069 predicted average. This indicates a higher potential for flooding and a larger area of flooding during peak flows (see existing Floodplain Map in Exhibit C - 1)

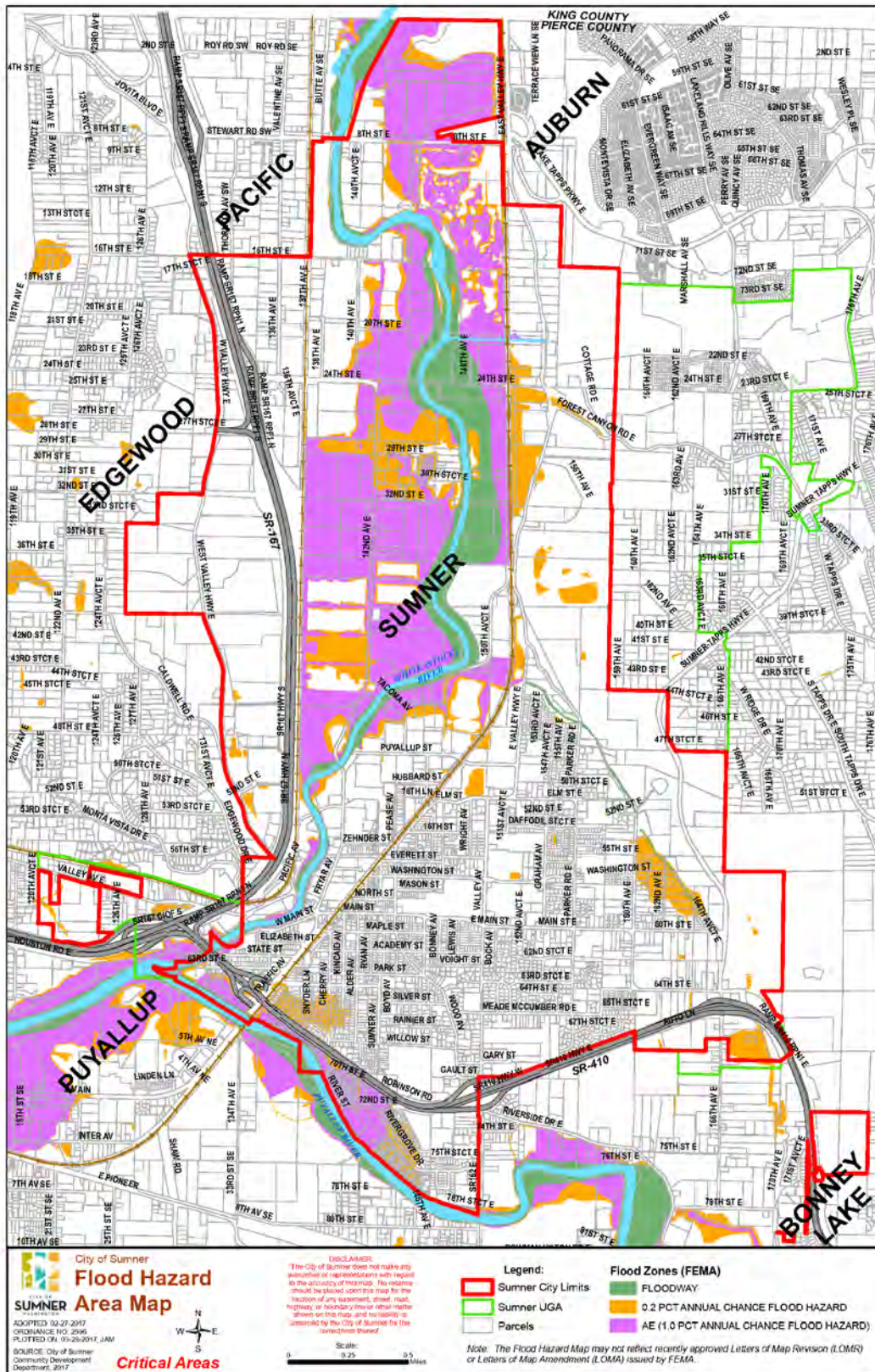
⁷ A two-year storm is a storm that has a ½ (or 50%) probability of occurring in any one-year period.

⁸ Humidex is an index used to describe how hot weather feels to the average person, considering the temperature and the humidity.

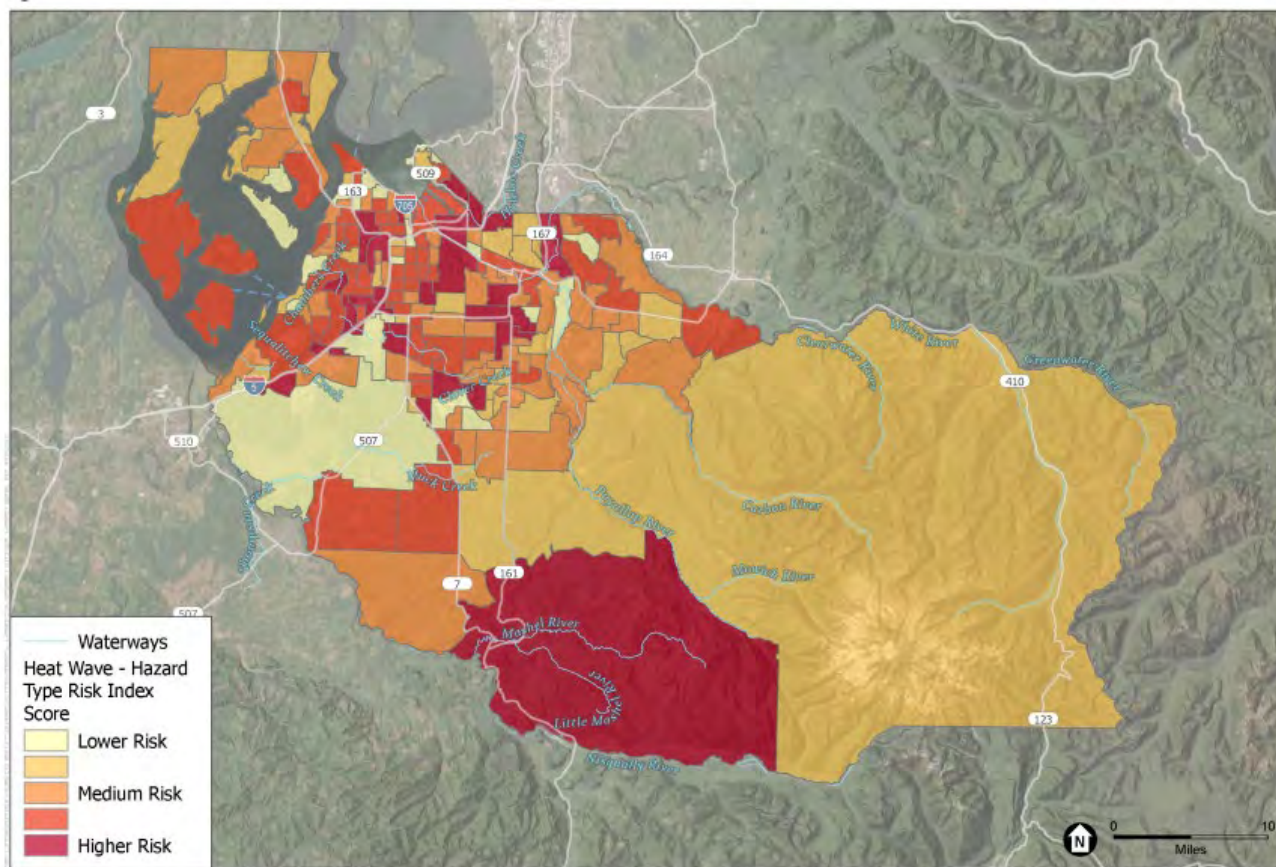
⁹ data.cig.uw.edu/climatemapping/

Some portions of the city are also at higher risk of wildfires. These areas, on the east and west sides of Sumner, are categorized as “intermix”, where structures or developments are surrounded on two or more sides by wildlands (Exhibit C - 3).

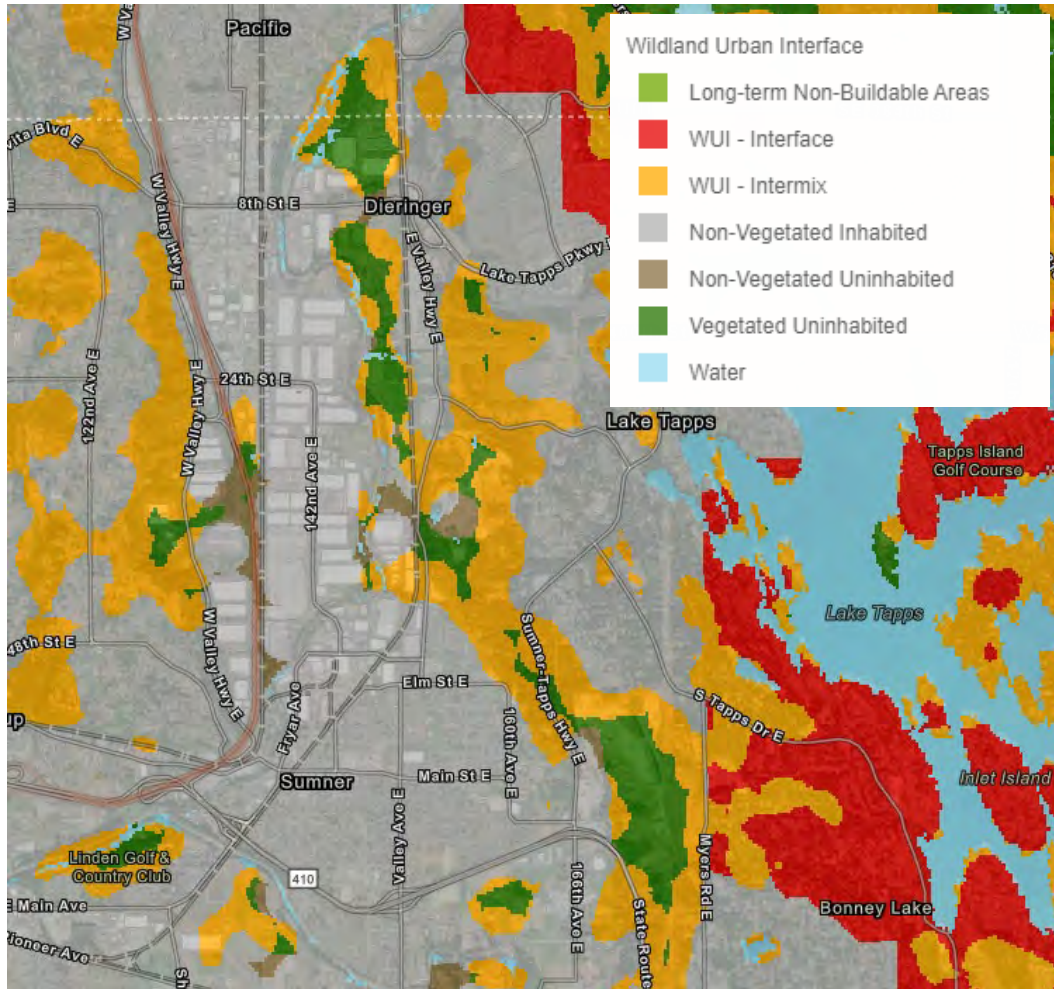
Exhibit C - 1: Flood Hazard Area Map



Source: City of Sumner, 2017.

Exhibit C - 2: Heat Wave Risk Index

Source: Pierce County Climate Vulnerability Memo, 2022; Maxar, 2021; Pierce County, 2022; Pierce County/ESA, 2023; FEMA, 2023.

Exhibit C - 3: Wildland Urban Interface (Department of Natural Resources)

Source: Washington State Department of Natural Resources, 2019.

Existing Policies

Adopted policies in the 2022 Comprehensive Plan were screened based on the Commerce guidance.

Resiliency

The Commerce guidance requires that jurisdictions include policies relating to climate resiliency for each of the following sectors:

- Agriculture and food systems¹⁰
- Buildings and energy
- Cultural resources and practices

¹⁰ Food systems refer to the range of actors involved in food including food producers, processors, distributors, sellers, and consumers. While Sumner does not have much agriculture, other components of the food system are relevant and should be made more resilient through policy.

- Economic development
- Emergency management
- Health and wellbeing
- Ecosystems
- Transportation
- Waste management
- Water resources
- Zoning and development

Sumner’s adopted policies already include policies that are likely to improve climate resiliency for most of these sectors. However, the City does not have any existing policies related to the resiliency of agriculture and food systems or economic development. There are also opportunities for stronger policies for some topics and for integration of relevant policies from the Sumner portion of the Pierce County Hazard Mitigation Plan (2020). Below is a review of adopted policies (2022), followed by an analysis of 2024 proposed new/revised policies to address opportunities and gaps.

Exhibit C - 4: Resiliency Policy Analysis

Sector	Adopted Policies (2022)
Agriculture and food systems	▪ None
Buildings and energy	▪ Meet LEED silver certification for major construction of City facilities (Capital Facilities 2.1) ▪ Encourage land conservation and stewardship (Community Character 1.5) ▪ Enforce State Energy Code (Housing 3.3) ▪ Support energy efficiency and conservation programs (Housing 3.6) ▪ Support tree planting along streets and parking lots (Utilities 4.5)
Cultural resources and practices	▪ Protect shoreline areas with historic and cultural values (Shorelines 7) ▪ Protect anadromous fisheries (Environment 3.8)
Economic development	▪ None
Emergency management	▪ Maintain Emergency Management Plan (Family and Human Services 2.1.8) ▪ Education on natural hazards and notification systems (Environment 2.1)
Health and wellbeing	▪ Encourage tree planting in Town Center (Community Character 5.6)

Sector	Adopted Policies (2022)
	- Programs for emergency and temporary housing (Family and Human Services 2.2) - Minimize potential for loss of life and damage from White River and Puyallup flooding (Environment 2.2) - Protect community from flooding (Shoreline Goal 8) - Protect hillsides from landslide failures (Environment 2.5) - Reduce erosion impacts (Environment 2.6) - Urban forestry strategy (Parks 2.2; Environment 3.3)
Ecosystems	- Wetland protection (Parks 1.8, 2.8, 2.13, 2.14; Environment 1.4.5, 2.2.4, 3.2) - Protect wildlife areas (Environment 3.1, 3.11) - Implement ordinances that protect streams, habitat, wetlands (Capital Facilities 1.7.5)
Transportation	- Policy support for transit shelters (Transportation 5.4) - Incentives for low impact development (Transportation 6.5) - Align transportation facilities away from environmentally sensitive areas (Transportation 6.1)
Waste management	- Promote natural drainage (Community Character 5.4) - Eliminate development of new septic systems and community sewage systems (Capital Facilities 1.8.2) - Support recycling through curbside program, education, using recycled products (Capital Facilities 1.9.1) - Reduce waste in accordance with Solid Waste Plan (Capital Facilities 1.9.2) - Seek funding for stormwater improvements (Capital Facilities 1.7.3) - Ensure stormwater infrastructure is properly maintained and operated (Capital Facilities 1.7.6)
Water resources	- Development regulations and surface water quality management plan (Environment 1.4) - Education on surface water quality impact reduction (Environment 1.4.3) - Implement regulations to prevent groundwater quality degradation (Environment 1.5.1) - Seek to expand watershed protection by acquiring land (Capital Facilities 1.6.4)

Sector	Adopted Policies (2022)
	▪ Develop wellhead and groundwater protection program (Capital Facilities 1.6.6) ▪ Require new development to provide for facilities that reduce water quality/quantity impacts (Capital Facilities 1.7.2)
Zoning and development	▪ Standards for streets/parking to reduce heat and provide shade (Housing 3.4) ▪ Parks and open space development in Town Center (Community Character 5.8) ▪ Require trees and vegetated barriers between busy roadways and schools/residential areas (Environment 1.1.7) ▪ Low impact development in city facilities (Environment 1.4.8) ▪ Encourage low impact development in private projects (Environment 1.4.7, 1.4.9) ▪ Identify changes to development regulations to promote low impact development (Environment 1.4.10)

Source: BERK, 2024.

Emissions Reduction

The Commerce guidance requires the City to consider its key emissions sources and include policies that reduce those emissions. The Pierce County Communitywide Geographic Greenhouse Gas Emissions report (2022) confirmed that the following sources are relevant in Pierce County:

- Electricity/Heating/Cooling
- Transportation
- Solid Waste / Landfill / Wastewater
- Natural Gas / Propane Transport and Non-heating Uses
- Industrial Processes
- Land Use / Tree Loss / Agriculture (note: agriculture is not a major use in Sumner, so agriculture is not a likely source of emissions)

Existing Sumner policies address most of these sources, however, some specific policies could be added relating to transportation, industrial processes, and natural gas / propane transport and non-heating uses (assumed to be mostly related to industrial processes).

Exhibit C - 5: Emissions Reduction Policy Analysis

Sector	Adopted Policies (2022)
Electricity/Heating/Cooling	▪ Promote efficient use of renewable resources, energy efficient building design (Community Character 5.4) ▪ Promote use of energy conservation features in new construction (Housing 3.1) ▪ Enforce State Energy Code (Housing 3.3) ▪ Support energy efficiency and conservation programs (Housing 3.6) ▪ Incorporate green development practices into all City construction (Environment Goal 2) ▪ Meet LEED silver certification for major construction of City facilities (Capital Facilities 2.1) ▪ Leverage City's purchasing power to expand markets for green building products (Capital Facilities 2.2)
Transportation	▪ Support for bicycle and pedestrian infrastructure and transit (Transportation, Community Character; multiple policies) ▪ Encourage pedestrian scale development and mixed uses, walkability (Transportation, Community Character; multiple policies) ▪ Programs to reduce transportation system demands through HOV lanes, flexible work schedules and remote work, transportation demand management, commute trip reduction (Transportation 5.8) ▪ Support vehicle emissions testing, air quality studies, cleaner burning fuels (Transportation 6.3) ▪ Consider environmental impacts in development and operation of transportation system (Transportation 6.1) ▪ Support locating schools within walking distance of service population (Community Character 2.7) ▪ Require pedestrian and bicycle amenities at neighborhood centers and civic and community uses (Community Character 4.2) ▪ Promote higher densities near transit (Housing 3.2, Housing Goal 4) ▪ Encourage alternative modes of transportation (Environment) ▪ Encourage alternative fuels and electric vehicles (Environment)
Solid Waste / Landfill / Wastewater	▪ Promote recycled construction materials (Environment 1.8)

Sector	Adopted Policies (2022)
	▪ Support recycling through curbside program, education, and using recycled products for City purposes (Capital Facilities 1.9.1) ▪ Implement policies for waste reduction in accordance with Solid Waste Plan (Capital Facilities 1.9.2)
Natural Gas / Propane Transport and Non-heating Uses	▪ None
Industrial Processes	▪ Encourage “clean” industries (Economic Development 1.7)
Land Use / Tree Loss / Agriculture	▪ Encourage tree planting in Town Center (Community Character 5.6) ▪ Urban forestry strategy (Parks and Open Space 2.2 / Environment 3.3)

Gaps and Opportunities

Resiliency

- No policies that address agriculture and food systems. Agriculture has little presence in Sumner, but the City should still consider policies related to food system resiliency
- No policies specific to economic development resiliency
- No policies relating to fire risk
- Opportunity to strengthen cultural resources resiliency
- Opportunity to add policies for human health and well-being (related to air pollution, cooling, and extreme heat) and emergency management
- Opportunity to emphasize tree planting as a resilience measure
- Opportunity to strengthen transportation system resiliency
- Opportunity to add emphasis on resilience to flooding and water quality impacts
- Opportunity to bring relevant policies from Hazard Mitigation Plan into the comprehensive plan

Emissions Reduction

- Opportunities to increase emissions reductions from transportation
- Opportunities to further encourage walkability and more density in some neighborhoods with access to services
- Opportunity to clarify the connection of tree planting to air quality and carbon emissions
- Opportunity to emphasize energy efficiency of new development and retrofitting existing buildings
- Opportunity to encourage sustainable industrial processes
- Opportunity to encourage renewable energy use

- Opportunity to further encourage materials recycling

Proposed Policies

The following policies are included in the 2024 Comprehensive Plan Periodic Update in the relevant elements:

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Capital Facilities 3.0	Consider the impacts of climate change and incorporate climate resiliency measures in capital facilities projects.	New	X	X	
Capital Facilities 3.1	Reduce the City's carbon footprint by incorporating, where practicable, green development practices in all buildings the City constructs, remodels and renovates.	Revised		X	
Capital Facilities 3.2	The City should meet a LEED® Silver certification for new construction or additions or major renovations of City facilities over 5,000 gross square feet in area only when long term economic benefits may be realized, including the reduction of operating costs, enhanced asset value, optimized building performance and a healthier workplace for its employees.	Revised	X	X	
Capital Facilities 3.3	Implement energy-saving technologies in all City facilities as facilities are built or remodeled, such as energy efficient lighting, water-conserving appliances.	New	X	X	
Capital Facilities 3.4	Leverage the City's purchasing power related to capital improvement projects to help expand the markets for green building products, including recycled-content materials and clean, renewable energy technologies.	Adopted		X	
Capital Facilities 3.5	Initiate programs to replace and upgrade stormwater systems to accommodate future increased conveyance requirements due to climate change and urban flooding.	New	X		
Capital Facilities 3.6	Support the planting of trees along street edges and parking lots and large expanses of asphalt to create a pleasing environment and to increase energy efficiency by reducing heat absorbed by asphalt that increases ambient temperatures.	Adopted	X	X	
Capital Facilities 3.8	Facilitate the conversion to cost-effective and environmentally sensitive alternative technologies and energy sources.	Adopted		X	
Capital Facilities 3.10	Install generators for all identified critical facilities without adequate generators.	New	X		Yes

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Capital Facilities 3.11	Construct a floodwall or setback levee on the Puyallup River in the Rivergrove Drive neighborhood in order to reduce the flooding on adjacent properties.	New	X		Yes
Capital Facilities 15.2.2	Encourage the use of low impact development (LID) and stormwater best management practices to manage stormwater runoff where feasible.	New	X		
Capital Facilities 15.4	Review, develop, and implement design and development standards to meet the City's goals to improve water quality and reduce flooding, as well as reflect the requirements and manuals of state and federal agencies, as appropriate.	Revised	X		
Capital Facilities 16.1	Support recycling within the community through a curb-side program, education and using recycled products for City purposes wherever feasible.	Adopted	X	X	
Capital Facilities 16.2	Implement programs for waste reduction in accordance with the adopted Solid Waste Plan.	Adopted	X	X	
Community Character 1.1	Encourage development that enhances the human/pedestrian scale, creating a sense of community and place.	Adopted		X	
Community Character 1.5	Encourage in the community a commitment to natural resource conservation and stewardship, management of attractive streetscapes, property maintenance, and historic preservation, which enhance Sumner's community character and sense of place.	Revised	X		
Community Character 2.3	Identify for each neighborhood center a walking distance area. A walking distance area is indicated by a circle with a radius of generally 1,500 feet (one-quarter mile) and an estimated walking time of approximately 5 minutes.	New		X	
Community Character 2.3.1	Encourage a mix of residential-scale civic, commercial, and service uses and other community amenities to locate in neighborhood centers and within the walking distance area. Small community parks or greens, or similar neighborhood gathering spaces, should be established where appropriate.	Revised		X	
Community Character 2.3.2	Together with Pierce Transit and other agencies explore the feasibility of a transit system for Sumner that is cost effective and is based on a network of transit stops and a transit system in transit linkages connecting the neighborhoods to each other and districts consistent with the Community Linkages Map, connecting to the commuter rail stations, and neighborhoods.	Revised		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Community Character 2.3.3	In establishing transit stops and linkages, give priority to improvements located within walking distance of neighborhood centers and in neighborhoods most in need of transit options.	New		X	
Community Character 2.5	Through the use of form-based code, street and design standards, promote pedestrian and bicycle friendly streets with trees and other amenities that enhance the streetscape.	Adopted		X	
Community Character 2.5.1	Prioritize sidewalk improvements within neighborhood centers' walking distance, ensuring adequate and accessible sidewalks, ramps and street crossings.	New		X	
Community Character 2.5.2	Ensure that streetscape amenities, such as sidewalks and street trees, are equitably distributed amongst neighborhoods.	New		X	
Community Character 2.6	Create unique and safe pedestrian crossings at major intersections through street and crosswalk design and incorporation of art.	Revised		X	
Community Character 2.7	In conjunction with the Sumner-Bonney Lake School District, and the Dieringer School District, encourage the location of schools within walking distance of a majority of the population they are intending to serve.	Revised		X	
Community Character 3.2	In cooperation with Pierce Transit and Sound Transit, establish the Town Center area as the intra-community transit hub.	Revised		X	
Community Character 3.2.1	Where feasible, create transit linkages from all neighborhoods in Sumner to the transit hub.	New		X	
Community Character 3.2.2	Prioritize the establishment of a transit service along Main Street between East Sumner and the Town Center.	New		X	
Community Character 3.6	The City should, in partnership with the downtown business association(s) and Chamber of Commerce, actively recruit and promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in the Town Center, away from Main Street and Alder Avenue and designated Activity Nodes.	Revised		X	
Community Character 5.4	Promote the efficient use of renewable resources, water and energy through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling.	Adopted	X	X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Community Character 5.6	Encourage tree planting in the Town Center and along major community streets and in public open spaces.	Revised	X	X	
Community Character 5.7	Maintain Sumner's Tree City USA designation through supporting the urban forestry program for maintaining and restoring tree canopy throughout the city.	New	X	X	
Community Character 5.9	Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.	Adopted	X		
Community Character 6.0	Promote a compatible and varied mix of land uses across the city.	Revised		X	
Community Character 6.1	Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected and encouraged. Both sides of the streetscape should complement each other.	Revised		X	
Community Character 6.2	Where appropriate, utilize subarea planning to ensure that newly annexed and developed areas promote a walkable, transit friendly neighborhood with pedestrian-friendly streets and a varied mix of land uses that are compatible with, and provide connections to, surrounding areas.	Revised		X	
Community Character 7.0	Promote the movement of people and goods and lessen the reliance on the automobile.	Adopted		X	
Community Character 7.1	Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets, pedestrian paths, and bike paths should contribute to be provided to create a system of fully-connected and interesting routes to all destinations. Street design should encourage pedestrian and bicycle use and discourage high speed traffic.	Revised		X	
Community Character 7.2	All new development shall provide appropriate pedestrian connections that connect residential areas to nearby commercial areas, recreation areas, transit stops and community or civic centers that provide services.	New		X	
Community Character 7.3	Transit station traffic should be discouraged and limited on neighborhood streets, and instead directed to arterials and freeways.	New		X	
Community Character 7.4	Work with Sound Transit, Pierce Transit and other providers to explore ways to reduce through-traffic in Sumner, such as additional park and ride sites outside of Sumner and shuttle services.	New		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Community Character 7.5	To lessen strip-commercial development and continued reliance on the automobile in new developments, encourage a balance of uses along East Main Street. Front-yard parking shall be prohibited and interconnection of all parking lots shall be required where appropriate. Highway-oriented uses which rely on the private automobile for their primary source of access shall be limited.	Revised		X	
Community Character 7.6	Pedestrian-friendly streets with shade trees as well as landscaped boulevard medians shall be included in street standards for industrial and commercial areas where practicable.	Revised		X	
Community Character 7.7	New development shall provide appropriate improvements and connections to the city street grid, as shown in adopted City policies, City street plans, and neighborhood circulation plans, in order to promote a connected street system that increases walkability and diffuses traffic.	Revised		X	
Community Character 7.8	Enhance circulation in the Town Center by implementing the Town Center Plan street prototypes and cross-sections.	Revised		X	
Community Character 7.9	Complete Sumner's segments of the nonmotorized regional trail system along the White and Puyallup Rivers, and support connections from all neighborhoods, downtown and employment centers to this regional trail.	Revised		X	
Economic Development and Employment 1.7	Encourage industries and industrial processes that are sustainable and environmentally responsible and that contribute to the local community.	Revised		X	
Economic Development and Employment 5.0	Improve the resiliency of the local Sumner economy to climate change and reduce its carbon emissions where practicable.	New	X	X	
Economic Development and Employment 5.1	As part of Sumner's Comprehensive Emergency Management Plan, identify potential measures that could support a sustainable economic recovery for businesses after a disaster.	New	X		
Economic Development and Employment 5.2	Support local businesses' efforts to bolster climate preparedness and continuity of operations by connecting them with programs that increase resiliency, such as onsite renewable energy generation, energy storage, and back-up power.	New	X		
Economic Development and Employment 5.3	Support where possible, programs and agencies that work with employees and businesses to facilitate a green jobs pipeline.	New	X	X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Economic Development and Employment 5.4	Support the resilience of the local food economy by encouraging farmers' markets and expanding community gardening opportunities on private development sites and non-profit agency sites.	New	X		
Economic Development and Employment 5.5	Promote purchasing from local businesses to support economic development and reduce emissions associated with the transportation, production, and distribution of goods.	New		X	
Environment 1.6	Consider environmental justice in future project and policy decisions and ensure the benefits associated with environmental stewardship projects are equitably distributed throughout the city.	New	X		
Environment 1.7	Develop a continuing program to assist the public with preventing storm damage through the proper use of vegetation and trimming of dangerous limbs.	New	X		Yes
Environment 1.8	Work with Pierce County to continue education programs related to winter preparedness as part of their preparedness education program.	New	X		Yes
Environment 1.9	Expand public education campaigns regarding fire safety, including information on wildfire hazards and protecting homes.	New	X		Yes
Environment 1.10	Maintain a program of street tree planting to boost carbon sequestration, improve air quality, and counter heat island effects, particularly in overburdened communities.	New	X	X	
Environment 2.1	In order to reduce emissions and reliance on the automobile as the primary method of transportation, encourage alternative modes of transportation.	Revised		X	
Environment 2.5	Support infrastructure, codes and permit processes that encourage alternative fuels and electric vehicles.	Revised		X	
Environment 5.1	Implement development regulations and a surface water quality management plan to protect water quality.	Adopted	X		
Environment 5.2	Maintain regulatory requirements for adequate vegetated stream buffers to protect functions and values such as temperature reduction, as well as filtration and attenuation (slow release) of surface water runoff.	New	X		
Environment 5.3	Protect wetlands and wetland buffers to protect functions and values, such as flood attenuation, through water storage and water filtration.	New	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Environment 5.5	Work with other agencies to educate the general public and developers on the potential surface water quality degradation resulting from development and human activity and how to reduce impacts.	Adopted	X		
Environment 5.7	Continue to implement wetland regulations as an essential part of water quality protection	Revised	X		
Environment 5.8	Continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development.	Adopted	X		
Environment 5.9	Incorporate low impact development principles and practices into the design, construction and operation of all city facilities and city-funded projects when economically feasible.	Revised	X		
Environment 5.10	Require residential and commercial developers to incorporate low impact development techniques, where feasible, that preserve a site's natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.	Revised	X		
Environment 5.11	Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.	Adopted	X		
Environment 6.1	Implement regulations to prevent groundwater quality degradation	Adopted	X		
Environment 6.3	Collaborate with adjacent jurisdictions and agencies within watersheds of the White and Puyallup Rivers to protect groundwater resources which support the Sumner water supply.	Adopted	X		
Environment 6.4	Protect trees and vegetation in areas that contribute groundwater discharge and recharge.	New	X		
Environment 7.0	Protect life and property in natural geologically hazardous areas and special flood hazard areas. Geologically hazardous areas include landslide, erosion, seismic, and volcanic hazard areas.	Revised	X		
Environment 7.1	Work with other agencies to develop and implement inclusive public education and notification systems related to geologically hazardous areas.	Revised	X		
Environment 7.1.1	In conjunction with other agencies, including Pierce County, school districts, and East Pierce Fire and Rescue, implement an emergency	Adopted	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	notification system and evacuation plan to provide early warning of impending natural disasters. As necessitated by new development, the system and plan shall be periodically revised.				
Environment 7.1.2	Use title and plat notices for new development to inform current and future property owners of potential risk from applicable geologically hazardous areas and special flood hazard areas.	Revised	X		
Environment 7.1.3	In conjunction with Pierce County, the federal government, the Red Cross, and other applicable agencies, educate the general public about the risks associated with geologically hazardous areas and special flood hazard areas and methods to reduce risk.	Revised	X		
Environment 7.1.4	Create a disaster resistant and resilient community through proper design of critical facilities, inclusive public education of the public, and land use planning.	Adopted	X		
Environment 7.1.5	Emergency notification systems and evacuation plans should consider the diverse needs of the population to address accessibility, access to technology, and language.	New	X		
Environment 7.2	Minimize the potential for loss of life and damage to public and private investments resulting from flooding in special flood hazard areas, such as along the White (Stuck) and Puyallup Rivers.	Revised	X		
Environment 7.2.1	Work with the appropriate agencies to secure easements and make the necessary improvements along the riverbanks to ensure damage is minimized and environmental impacts are mitigated.	Adopted	X		
Environment 7.2.2	Work with other agencies to modify the operational mandate of the Mud Mountain Dam to reduce flood risk.	Adopted	X		
Environment 7.2.3	Work with appropriate agencies to develop and implement regulations to reduce flood damage, including reinforced building design, compensatory flood storage, limitations on the location of building in floodplains, and adoption of a "zero-rise" standard or floodplain development.	Adopted	X		
Environment 7.2.4	Continue to implement wetland protection and stormwater management regulations to help mitigate flooding impacts to the community.	Adopted	X		
Environment 7.2.5	Acquire property that is located within flood prone areas as necessary to implement flood protection projects and plans.	New	X		Yes
Environment 7.2.6	Continue and expand public education related to floods.	New	X		Yes

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Environment 7.3	Implement and enforce the wetlands and floodplain regulations to retain the existing flood storage capacity.	New	X		Yes
Environment 7.4	Seek mitigation projects to increase flood storage as necessary to meet the adopted level of service for stormwater and flood conveyance.	New	X		Yes
Environment 7.5	In partnership with tribes, Pierce County, and private business, plan and develop a flood protection and habitat restoration area on 170 acres of city owned property generally east of the White River and south of Stewart Road.	New	X		Yes
Environment 7.6	Work with surrounding jurisdictions including the Dieringer and Sumner-Bonney Lake School Districts; East Pierce Fire and Rescue, Pierce County, and nearby cities and towns to coordinate and collaborate where possible on the creation and implementation of appropriate flood hazard mitigation measures.	New	X		Yes
Environment 7.7	Continue to update and implement floodplain development regulations which limit the opportunity for new homes and businesses to be constructed in flood hazard areas through the City's Flood Damage Prevention Ordinance, Critical Areas Regulations and Shoreline Master Program.	New	X		Yes
Environment 7.8	Continue to include and update mitigation requirements in floodplain development regulations which can significantly reduce the potential for flooding to negatively impact drinking water sources, pipelines, septic systems, sewer lines, and water lines that intersect flood hazard areas.	New	X		Yes
Environment 7.11	Require new development to address potential landslides, runoff, and other geologic hazards, to protect hillsides and surrounding development from landslides or other geologic hazards and the impacts associated with building on steep slopes.	Revised	X		
Environment 7.12	Take measures to reduce erosion and other geologic hazards in all areas, particularly in areas with high risk of erosion, and the associated impacts.	Revised	X		
Environment 7.13	Implement land use and environmental regulations with flexibility to include protecting geologically hazardous areas.	Revised	X		
Environment 8.1	Implement regulations and programs to protect unique, valuable and critical plant, fish, and wildlife habitat conservation areas, including flexible design standards.	Revised	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Environment 8.2	Protect shorelines, fish and wildlife habitat conservation areas, and wetlands through appropriate regulations, acquisition, and non-regulatory policies such as education, stewardship, density credits, restoration, etc.	Revised	X		
Environment 8.3	Maintain an urban forestry strategy to encourage the planting of trees on public and private property.	Adopted	X	X	
Environment 8.3.1	Within the urban forestry strategy develop specific standards for planting of public trees such as minimum size, type, minimum soil conditions, and maintenance requirements.	Adopted	X	X	
Environment 8.3.2	Incorporate climate resilience strategies into the City's urban forest management, such as increasing citywide species diversity, native or climate resilient species, and increasing tree planting in areas with low canopy cover.	New	X	X	
Environment 8.3.3	Manage City watershed lands on forested hillsides to improve climate resiliency and resistance to extreme events such as wildfires.	New	X		
Environment 8.4	Take measures to protect forested hillside areas, which provide environmental benefits such as slope stability, wildlife habitat, water filtration, and attenuation (slow release), from the impacts of development.	Revised	X		
Environment 8.5	Work with other agencies and the public to support restoration of the White River and its tributaries including Salmon Creek, and continue to support and implement the White River Restoration Project, to restore salmon habitat and reduce flood risks.	Revised	X		
Environment 8.6	Give priority consideration to conservation and protection measures that preserve and enhance areas where anadromous fisheries and endangered, threatened, and sensitive species have a primary association.	Revised	X		
Environment 8.7	Allow for the clustering of development at higher densities on a portion of a property when preserving fish and wildlife habitat conservation areas or wetlands on site.	Adopted	X		
Environment 9.0	Reduce greenhouse gas emissions and encourage energy efficiency.	New	X	X	
Environment 9.1	Encourage, through incentives and technical support, energy conservation, energy efficiency, efficiency in building materials and site design, and the application of sustainable, or "green" design practices in all public and private development including large	Revised	X	X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	commercial and industrial projects, residential subdivisions, and infrastructure such as streets, within the City.				
Environment 9.2	Identify and evaluate potential changes to land use and development regulations to support and promote energy efficient, sustainable and green development.	Revised	X	X	
Environment 9.2.1	Ensure that the Sumner design guidelines and zoning regulations have the flexibility to accommodate, and provide incentives for, the installation of green energy features.	New	X	X	
Environment 9.2.2	Require street trees and on-site landscaping in all new developments.	New	X	X	
Environment 9.3	Require proposed rezones that significantly increase vehicle miles traveled to conduct a greenhouse gas emissions analysis and to propose mitigation.	Revised		X	
Environment 9.4	Promote a healthy and sustainable environment in terms of air quality and climate, energy resources, and active lifestyles by using prudent building design and construction methods such as recycled construction materials, reducing space heating and electricity usage, reducing water consumption and waste generation, and encouraging alternative travel modes such as transit, walking, and biking.	Adopted	X	X	
Environment 9.5	Consider adopting City purchasing policies that prioritize sustainable and recycled products.	New		X	
Environment 10.0	Establish regulations and processes to allow and streamline permits for new energy technologies, such as battery storage facilities, small- and large-scale solar facilities, and similar alternative technologies.	New	X	X	Yes
Environment 10.1	Explore ways to streamline and reduce costs in the permitting process for residential-scale solar facilities.	New	X	X	
Family and Human Services 1.3	Support local food banks and other no-cost food support programs by disseminating information, creating supportive development regulations and fees, and pursuing funding sources.	New	X		
Family and Human Services 2.1.5	Maintain a Comprehensive Emergency Management Plan.	Adopted	X		
Family and Human Services 2.2.1	Support programs, partnerships and regulations that promote develop adequate access to emergency and temporary housing.	Revised	X		
Family and Human Services 2.4.4	Develop response and recovery procedures that speak to the specific needs of the population served by the Sumner Senior Center.	New	X		Yes

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Family and Human Services 5.4	Complete and expand the Sumner trail system and look for areas to partner with others on additional recreational facilities.	Revised		X	
Family and Human Services 5.5	Ensure parks and recreation facilities are distributed equitably throughout the community and accessible within walking distance of most residences.	New	X		
Family and Human Services 5.6	Maintain a safe, attractive, interconnected sidewalk system to increase neighborhood walkability and connections to services.	New		X	
Family and Human Services 6.0	Support programs and services that advance climate resiliency and emergency preparedness in the community	New	X		
Family and Human Services 6.2	Ensure that parks and recreation facilities serve as refuges during extreme heat, cold, and smoke events.	New	X		
Family and Human Services 6.2.1	Identify indoor recreation facilities and potential refuges with the YMCA, School District, Senior Center and other partners.	New	X		
Family and Human Services 6.2.2	Provide for tree canopy and shade elements in parks and public lands.	New	X		
Family and Human Services 6.2.3	Enhance shoreline public access as a refuge from heat island effects, while protecting natural functions/features.	New	X		
Governance and Permit Process 1.7	Ensure that City government sets the example for compliance and innovation in its own operations and facilities with regard to water and energy efficiency, sustainable building design, low impact development, noise and glare reduction, water and air quality, and accessibility for people with disabilities.	Revised	X	X	
Historic and Cultural Resources 1.1.4	Require developers to immediately stop work and notify the City, DAHP, the Puyallup Tribe, and the Muckleshoot Tribe if any artifacts of possible historic, cultural, or archeological value are uncovered during excavation.	New	X		
Historic and Cultural Resources 1.2	Work with tribes, agencies and property owners to encourage measures that protect, enhance, and restore ecosystems that could be adversely impacted by climate change, in order to make available cultural foods and other resources for indigenous tribes.	New	X		
Historic and Cultural Resources 1.7	Work with property owners and historic preservation societies toward protecting or adapting significant historic sites prone to floods, extreme snow events, and other hazards worsened by climate	New	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	change through building retrofits, green infrastructure, and other strategies.				
Housing 3.0	Encourage energy efficiency in housing developments.	Adopted		X	
Housing 3.1	Encourage, through incentives and technical support, energy conservation, energy efficiency in building materials and site design, and the application of sustainable, or “green” development practices.	Revised		X	
Housing 3.2	Reduce reliance on automobiles by promoting higher density and infill developments that are located near major transportation links such as the Sumner Commuter Transit Station, and by supporting a network of transit stops connecting neighborhoods to the station.	Revised		X	
Housing 3.3	Continue to enforce the energy efficiency requirements in the State Energy Code and other Washington State building codes.	Revised	X	X	
Housing 3.4	Establish standards for street widths, landscaping, and parking lots to reduce heat loss or provide shade.	Adopted	X	X	
Housing 3.4.1	Adopt flexible street standards to allow for narrower streets in appropriate locations to reduce pavement area.	New	X	X	
Housing 3.5	Recognize and support energy conservation and efficiency programs.	Adopted	X	X	
Housing 3.6	In cooperation with the County, Puget Sound Energy, and other providers, promote programs that help minimize utility costs for residents, particularly seniors and households with lower incomes, such as bill assistance, permitting and fee assistance, weatherization programs, pipe repairs, and installation of energy efficient heating and cooling appliances in existing housing.	Revised	X	X	
Housing 6.1	Consider working with agencies to provide public information on County/State programs on eviction prevention, property tax assistance, mortgage assistance, energy assistance, and foreclosure prevention counseling.	New	X		
Land Use 4.1	Implement the Town Center Subarea Plan (TCP) and Form-Based Code, to support dense, mixed-use development and walkable neighborhoods near the transit center.	New		X	
Land Use 6.1	Promote land use planning that supports walkability, tree canopy, access to services that meet daily household needs, access to parks and open space, and access to healthy and culturally relevant foods.	New		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Land Use 6.2	Consider the environmental health and other impacts of land use decisions on overburdened communities (minority, low-income, tribal, or indigenous populations that potentially experience disproportionate environmental harms and risks). Encourage the participation of these communities in the decision-making process.	New	X		
Land Use 6.3	Ensure that adequate landscape screening and trees are provided around sources of significant noise and air pollutants that may affect schools and neighborhoods.	New	X		
Land Use 6.4	Mitigate the environmental health effects of climate change, including air quality, stormwater, and heat impacts, through the acquisition of parks and open space and tree planting, prioritizing overburdened communities.	New	X		
Land Use 6.5	Engage with the community on the topic of climate impacts and adaptation strategies.	New	X		
Land Use 6.6	Support energy efficiency and upgrade programs that reduce health risks for vulnerable populations due to extremes of heat and cold.	New	X		
Land Use 6.7	Adopt land use standards and connect residents to informational resources to mitigate wildfire risk.	New	X		
Land Use 6.8	Study the potential impacts of a citywide tree retention program on climate resilience and housing development.	New	X		
Land Use 6.9	Support small-scale agricultural uses in residential developments, and local community gardens sponsored by public agencies, non-profit organizations, and private development.	New	X		
Parks 1.1.2	Parking • Further develop trailheads • Add parking improvements, including ADA options • EV charging/parking	New (2024 Parks and Trails Plan)		X	
Parks 1.1.4	Weather • Covered court & shade structures • Spray park	New (2024 Parks and Trails Plan)	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Parks 2.1.1	Paths/trails for walking/jogging	New (2024 Parks and Trails Plan)		X	
Parks 2.1.3	Fix drainage issues to increase availability of fields for soccer, football, lacrosse & other sports as well as passive use.	New (2024 Parks and Trails Plan)	X		
Parks 2.2	Provide spaces for people to experience nature	New (2024 Parks and Trails Plan)	X		
Parks 2.2.1	Construction/maintenance of Sumner Link Trail	New (2024 Parks and Trails Plan)	X	X	
Parks 2.2.2	Find places in new park designs to incorporate nature, potential Tribal horticulture.	New (2024 Parks and Trails Plan)	X		
Parks 2.2.3	Continue nursery to replace lost trees with mature trees.	New (2024 Parks and Trails Plan)	X		
Parks 2.2.4	Find strategies to protect White River Restoration habitat areas from unauthorized use.	New (2024 Parks and Trails Plan)	X		
Parks 2.3	Provide spaces to build community	New (2024 Parks and Trails Plan)	X		
Parks 3.0	Integrate and connect parks, trails and open spaces with various users for easy access.	New (2024 Parks and Trails Plan)		X	
Parks 3.1	Biking routes for recreation/transportation	New (2024 Parks and Trails Plan)		X	
Parks 3.1.1	Develop bike lanes to encourage non-vehicular transportation and links (TMP, Tourism Plan)	New (2024 Parks and Trails Plan)		X	
Parks 3.1.2	Promote bike trails linking downtown and industrial area (Tourism Plan)	New (2024 Parks and Trails Plan)	X	X	
Parks 3.1.3	Complete Rivergrove Pedestrian Bridge to reconnect Rivergrove to amenities (TMP)	New (2024 Parks and Trails Plan)		X	
Parks 3.1.4	Complete bridge over Puyallup River to connect Sumner/Rivergrove to regional system	New (2024 Parks and Trails Plan)		X	
Parks 3.1.5	Work with region to further connect and promote regional trail system	New (2024 Parks and Trails Plan)	X	X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Parks 3.3	Pedestrian access	New (2024 Parks and Trails Plan)		X	
Parks 3.3.1	Activate alleys to balance pedestrian access from Main Street	New (2024 Parks and Trails Plan)		X	
Parks 3.3.2	Complete Rivergrove Pedestrian Bridge to reconnect Rivergrove to amenities (TIP)	New (2024 Parks and Trails Plan)		X	
Parks 3.4	ADA, Senior access	New (2024 Parks and Trails Plan)	X	X	
Parks 3.4.1	Blend of improvements for ADA and senior access.	New (2024 Parks and Trails Plan)	X	X	
Shoreline 2.0	Increase public access to the shoreline and preserve and enhance views of the shoreline.	Adopted	X		
Shoreline 2.1	Objective: To provide for public access to publicly owned shoreline areas, except where deemed inappropriate due to safety hazards, inherent security problems, environmental impacts, or conflicts with adjacent uses. Require dedication of property or easements to provide for public access across private property as a condition of non-water dependent development.	Adopted	X		
Shoreline 6.0	Preserve, protect, and restore to the greatest extent feasible the physical, biological, and visual attributes of the shoreline environment.	Adopted	X		
Shoreline 6.1	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.	Adopted	X		
Shoreline 6.2	Objective: To designate and develop areas where there is an opportunity to restore, enhance, and conserve the natural shoreline for the benefit of fish and wildlife habitat.	Adopted	X		
Shoreline 7.0	Identify, preserve, protect, and restore shoreline areas having historical, cultural, educational, or scientific values.	Adopted	X		
Shoreline 8.0	Protect the City of Sumner from losses and damage created by flooding.	Adopted	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Shoreline 8.1	Objective: To seek regional solutions to flooding problems through coordinated planning with state and federal agencies, other appropriate interests, and the public. To ensure that flood hazard protection projects have a positive environmental benefit and that emphasize long-term solutions over short term solutions.	Adopted	X		
Transportation 1.5	Adopt construction guidelines that will reduce the potential failure of key bridges and transportation routes.	New	X		Yes
Transportation 3.4	Work in conjunction with the County to continue its Bridge Retrofit Program.	New	X		Yes
Transportation 6.0	Promote the design of multimodal transportation facilities that support local and regional growth centers by providing an interconnected system of pedestrian and bicycle facilities.	Revised		X	
Transportation 6.1	Develop pedestrian and bicycle level of service guidelines to assess completion of the established pedestrian and bicycle network in the Sumner Transportation Plan.	New		X	
Transportation 6.2	Maintain the Sumner Link Trail as a regional non-motorized corridor and prioritize projects that enhance the trail with neighborhood connections, trailheads, and amenities.	New		X	
Transportation 6.3	Ensure design standards for the transportation system facilitate and encourage access and circulation by pedestrians and bicyclists, and provides connections to schools, parks, community facilities, transit and commercial districts.	Revised		X	
Transportation 6.4	Development proposals shall provide for convenient non-motorized connections where feasible, commensurate with the scale and occupancy of the development.	Revised		X	
Transportation 6.5	Sidewalks will be provided on both sides of all City streets unless special circumstances, such as topography or environmental constraints, make it cost prohibitive.	Adopted		X	
Transportation 6.6	Prioritize sidewalks on sides of the street where no sidewalks exist, particularly along school routes.	Revised		X	
Transportation 6.7	Construct a separate system of multi-purpose trails to serve transportation and recreation needs of the community. Connect the system with adjacent communities to facilitate regional connectivity. Implement the trail system and connections to the arterial, collector,	Revised		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	and other pedestrian and bicycle facilities per the Sumner Parks and Trails Plan.				
Transportation 6.8	Develop and maintain street cross-section designs that promote street trees, separated sidewalks, and wide sidewalks along commercial uses; and develop and maintain cross-section designs for mid-block pedestrian and bike corridors that encourage non-auto circulation.	Revised		X	
Transportation 7.2	Continue working with transit providers to expand and enhance bus transit service and a regional park-and-ride system that serves regional destinations and neighborhoods and employment areas of Sumner.	Revised		X	
Transportation 7.5	Support construction of improved pedestrian and bicycle connections with local and regional transit service. Work to provide pedestrian safety improvements along arterials and bike lockers and facilities at transit connections.	Revised		X	
Transportation 7.7	Support a shuttle or autonomous transit that would connect the Historic Downtown area with eastern areas of the city.	Revised		X	
Transportation 7.9	Support the use of high-capacity transit and commuter train by the entire Sumner community. Encourage housing near the train station for households desiring transit availability, provide services and businesses that cater to residents and train commuters, and provide safe connections for pedestrian and bicycle commuters.	Revised		X	
Transportation 8.0	Promote programs that reduce the demand on the transportation system.	Revised		X	
Transportation 8.1	Encourage the use of high occupancy vehicles (HOV) programs – buses, carpools, and vanpools – through both private programs and under the direction of Pierce Transit and Sound Transit	Revised		X	
Transportation 8.2	Promote the use of transit, carpools, or vanpools.	Revised		X	
Transportation 8.3	Promote reduced employee travel during the daily peak travel periods through flexible work schedules and programs for telecommuting or at an alternate work site closer to home.	Revised		X	
Transportation 8.4	Encourage employers to provide TDM measures in the workplace through such programs as preferential parking for HOVs, transit pass subsidies, improved access for transit vehicles, and employee incentives for using HOVs.	Revised		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Transportation 8.5	Implement the provisions of the State Commute Trip Reduction Act.	Adopted		X	
Transportation 8.6	Consider pricing programs as an option for reducing reliance on single-occupancy vehicle (SOV) travel.	New		X	
Transportation 8.7	Incentivize transit oriented and higher density land uses that encourage walking or biking near transit stations.	New		X	
Transportation 10.0	Establish a transportation system with minimal environmental impact and energy consumption that provides for a high quality of life to be enjoyed by the residents.	Revised		X	
Transportation 10.1	Incorporate environmental factors into transportation decision-making, including attention to human health and safety by designing transportation facilities within the Sumner UGA minimizing adverse environmental impacts resulting from both their construction and operation.	Revised	X		
Transportation 10.1.1	The City of Sumner shall fulfill this need by: • Considering environmental costs of development and operation of the transportation system • Aligning and locating transportation facilities away from environmentally sensitive areas • Working with the State to incorporate appropriate structural and vegetative sound abatement as part of highway widening projects • Mitigating unavoidable environmental impacts wherever possible • Soliciting and incorporating the concerns and comments of interested parties • Considering the social equity and environmental justice impacts of transportation projects • Evaluate street cross-sections for efficient and effective use of pavement and landscaping features and low impact design.	Revised	X		
Transportation 10.3	Support and implement projects that promote cleaner burning and alternative fuels such providing electric vehicle charging infrastructure.	New		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Transportation 10.3.1	The City shall: Support vehicle emissions reduction and cleaner burning fuels programs Coordinate with Sound Transit and other jurisdictions on Commute Trip Reduction (CTR) programs for major employers in the Sumner planning area Require air quality studies of new major developments likely to have significant impacts created by site-generated traffic Promote other TDM Programs Work with the private and other public sectors to introduce cleaner burning fuels for the existing motorized fleet, and vehicles powered by alternate fuel sources Support and implement projects that promote cleaner burning and alternative fuels such providing electric vehicle charging infrastructure.	Revised		X	
Transportation 10.4	Promote, through regulations and incentives, the use of low impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems. Low impact development should be included in new transportation projects where possible.	Revised	X		
Transportation 10.5	Increase the resilience of the transportation system and support security and emergency management to protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.	Revised	X		
Transportation 10.6	Reduce greenhouse gases by expanding the use of conservation and alternative fuel sources and by reducing vehicle miles traveled by increasing alternatives to driving alone.	Revised		X	
Transportation 10.7	Convert public fleets to zero-emission vehicles.	New		X	
Transportation 10.8	The City should promote and allow telework wherever possible	New		X	
Transportation 10.9	Expand public electric vehicle charging stations and encourage and incentivize private electric vehicle charging stations.	New		X	

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Transportation 11.8	Develop and charge a multimodal transportation impact fee for the purposes of building a transportation network that supports multiple travel operations.	New		X	
Utilities 1.0	Facilitate the development of natural gas and alternative energy utilities at the appropriate levels of service to accommodate the growth that is anticipated to occur in Sumner.	Revised		X	
Utilities 1.4	Facilitate conversion from natural gas to cost-effective and environmentally sensitive alternative technologies and energy sources.	New		X	
Utilities 1.4.1	Review design and development standards to determine improvements to encourage alternative energy sources.	New		X	
Utilities 1.4.2	Develop strategies to enhance existing public education and outreach campaigns to promote sustainable practices and alternative energy.	New		X	
Utilities 1.4.3	Promote existing state-level policies and initiatives, funding programs, and incentive programs for renewable energy technologies.	New		X	
Utilities 4.1.1	Connect residents to State and local resources such as utility bill or deposit assistance programs and subsidies to supplement tenant-based rental assistance, in order to increase protection for vulnerable households.	New	X		
Utilities 4.1.2	Support programs that assist low-income households with utility-related home repairs, weatherization, and other energy-efficient improvements to owner-occupied and rental housing.	New	X		
Utilities 6.2	Prioritize utilities-related actions to ensure adequate service and minimal service disruptions for historically underserved populations.	New	X		
Utilities 6.4	Ensure that the City's Emergency Response Plan is coordinated with regional jurisdictions and utility providers to include local measures for communicating and addressing utility outages and emergencies.	New	X		
Utilities 6.5	Coordinate and prioritize messaging that is in plain language, short, culturally appropriate, in languages prevalent in the area, and in multiple formats, such as audio, large print, and captioning.	New	X		
Utilities 7.1	Prioritize the provision of cost effective, energy-efficient new technologies to underserved populations.	New	X		

Policy #	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Utilities 7.2	Prioritize the use of new technologies, programs, and applications that increase the reliability, affordability, and accessibility of utility services and pay options.	New	X		

Other Requirements

HB 1181 includes the following additional requirements to be incorporated in the comprehensive plan update. Sumner covers these requirements in the 2024 Comprehensive Plan Periodic Update and related documents.

Exhibit C - 6: HB 1181 Other Requirements

Element	Change	New or Amended?	Additional Actions
Land Use	Designate green spaces, urban and community forests within the urban growth area.	New	None; parks plan and urban forestry strategy already meet this.
Land Use	Give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.	New	None; policy review above and proposed policies within the chapters address this topic.
Land Use	Should consider urban planning approaches that reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state.	New	None; policy review above and proposed policies within the chapters address this topic.
Land Use	Must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the Firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development from wildfire prone landscapes, and protecting existing residential development and infrastructure through	New	Added policy on wildfire mitigation.

Element	Change	New or Amended?	Additional Actions
	community wildfire preparedness and fire adaption measures.		
Capital Facilities	Include inventory of green infrastructure owned by public entities.	New	Included in Capital Facilities Plan
Transportation	Include estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions to assist in monitoring the performance of state facilities, to plan improvements for the facilities, and to assess the impact of land-use decisions on state-owned transportation facilities.	Amended; 'Multimodal level of service' replaced 'traffic.'	Included in Transportation Plan
Transportation	Include inventory of active transportation facilities.	New	Included in Transportation Plan
Transportation	Include multimodal level of service standards for locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve the goals of this chapter consistent with environmental justice.	Amended; bold text added.	Included in Transportation Plan
Transportation	For state-owned transportation facilities, multimodal level of service standards for highways, as prescribed in chapters 47.06 and 47.80 RCW, to gauge the performance of the system. The purposes of reflecting multimodal level of service standards for state highways in the local comprehensive plan are to monitor the performance of the system, to evaluate improvement strategies, and to facilitate coordination between the county's or city's six-year street, road, active transportation , or transit program and the office of financial management's ten-	Amended; added multimodal and active transportation.	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
	year investment program. The concurrency requirements of (b) of this subsection do not apply to p. 13 E2SHB 1181.SL transportation facilities and services of statewide significance except for counties consisting of islands whose only connection to the mainland are state highways or ferry routes. In these island counties, state highways and ferry route capacity must be a factor in meeting the concurrency requirements in (b) of this subsection.		
Transportation	Include specific actions and requirements for bringing into compliance transportation facilities or services that are below multimodal level of service standard.	Amended; added multimodal. Removed 'locally owned' descriptor for transportation facilities.	Included in Transportation Plan
Transportation	Include forecasts of multimodal transportation demand and needs within cities and urban growth areas, and forecasts of multimodal transportation demand and needs outside of cities and urban growth areas, for at least ten years based on the adopted land use plan to inform the development of a transportation element that balances transportation system safety and convenience to accommodate all users of the transportation system to safely, reliably, and efficiently provide access and mobility to people and goods. Priority must be given to inclusion of transportation facilities and services providing the greatest multimodal safety benefit to each category of roadway users for the context and speed of the facility.	Amended; bold text added. 'Multimodal transportation' replaced 'traffic.'	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
Transportation	Identification of state and local system needs to equitably meet current and future demands. Identified needs on state-owned transportation facilities must be consistent with the statewide multimodal transportation plan required under chapter 47.06 RCW. Local system needs should reflect the regional transportation system and local goals, and strive to equitably implement the multimodal network.	Amended; bold text added.	Included in Transportation Plan
Transportation	Include a transition plan for transportation as required in Title II of the Americans with Disabilities Act of 1990 (ADA). As a necessary step to a program access plan to provide accessibility under the ADA, state and local government, public entities, and public agencies are required to perform self-evaluations of their current facilities, relative to accessibility requirements of the ADA. The agencies are then required to develop a program access plan, which can be called a transition plan, to address any deficiencies. The plan is intended to achieve the following: Identify physical obstacles that limit the accessibility of facilities to individuals with disabilities; Describe the methods used to make the facilities accessible; Provide a schedule for making the access modifications; and Identify the public officials responsible for implementation of the transition plan.	New	Sumner adopted a transition plan in 2016. The City has received a Commerce Climate Grant to do an update of the plan as part of meeting HB 1181 requirements.
Transportation	If probable funding falls short of meeting the identified needs of the transportation system, including state transportation facilities , a discussion of how additional funding will be raised, or how land use assumptions will be	Amended; added state transportation facilities	None.

Element	Change	New or Amended?	Additional Actions
	reassessed to ensure that level of service standards will be met.		
Transportation	Active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles.	Amended; 'active transportation' replaced 'pedestrian and bicycle.'	Included in Transportation Plan
Transportation	After adoption of the comprehensive plan by jurisdictions required to plan or who choose to plan under RCW 36.70A.040, local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a locally owned or locally or regionally operated transportation facility to decline below the standards adopted in this transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development. These strategies may include active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, and other transportation systems management strategies. For the purpose of this subsection (6), "concurrent with the development" means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years. If the collection of impact fees is delayed under RCW 82.02.050(3), the six-year period required by this subsection (6)(b) must begin after full payment of all impact fees is due to the county or city. A development proposal may not be denied for	Amended; bold text added.	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
	causing the level of service on a locally owned or locally or regionally operated transportation facility to decline below the standards adopted in the transportation element of the comprehensive plan where such impacts could be adequately mitigated through active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, or other transportation systems management strategies funded by the development.		
Park & Recreation	Include an evaluation of tree canopy coverage within the urban growth area.	New	Tree canopy impacts are described in the EIS. The City has also received a Commerce Climate Grant to do a tree canopy assessment.

D. Public Participation Summary

This Appendix contains a summary of the various outreach efforts the City conducted during the 2024 Comprehensive Plan Update, and the types of community comments/responses.

Sumner Connects web page

- Information posted regarding the overall process, what the Comprehensive Plan is.
- Information and frequent updates posted starting in January 2023.
- Materials for Planning Commission review posted prior to meetings.

City e-News and social media

- Periodic updates in monthly e-News

City Newsletter “Community Connections” (printed, direct delivery)

- Winter 2023 article explaining the Comprehensive Plan and opening for submitting proposed changes.
- Summer 2023 short description & link to project page
- Fall 2023 project update
- Winter 2024 project update

Distribution of informational flyer

- Direct mail and delivery to agencies and service providers June 2023

City of Sumner Open House events - Flyers and Display Board

- Spring Open House April 2023
- Fall Open House October 2023
- Spring Open House April 2024

Public meetings, hearing notices, and Draft EIS Comment Period

- Planning Commission and City Council meetings discussing the Comprehensive Plan were open to the public and accessible virtually.
- Notices published in newspaper and on City website for public hearings
- Notices published for SEPA Environmental reviews during the Plan adoption process
- A 60-day comment period was held for the Draft EIS and Draft Plan from March 1, 2024 to April 30, 2024. 44 comment letters were received and nine people gave public testimony at a Planning Commission Public Hearing on April 4, 2024. A City Council public hearing was held on December 2, 2024. Four people gave public testimony.

In addition to the above outreach efforts, the City hosted several community events where the Sumner community had an opportunity to voice concerns and priorities. While these were separate events not connected to the Comprehensive Plan update, the events provided additional insights into community concerns and priorities that can inform policymakers. General community events are listed below:

1. 2022 City Budget Survey

In the results of the online 2022 Budget Survey, the community identified the following priorities (with 1 being most important)

1. Ensuring prompt police response time
2. Maintaining streets
3. Managing growth
4. Maintaining parks, trails & open space
5. Protecting the environment
6. Promoting traffic, bike & pedestrian safety
7. Attracting the right mix of new businesses
8. Expanding parks & adding amenities
9. Preparing for natural disasters.

2. Youth Forum(s)

January 2023, March 2023, Elhi Hill January 2023

- Common themes expressed were the need for more recreation facilities, more public transportation, more activities for teens.

3. Community Summit(s)

April 18, 2023

- Flyers were provided with information on the Comprehensive Plan and the website link

4. Communities for Families (CFF)

May 2023, June 2023

- Flyers were provided with information on the Comprehensive Plan and the website link
- This event features numerous service providers.

5. Senior Center Meet-the-Mayor session

July 2023: Some of the priority needs/concerns expressed were:

- Need affordable senior housing
- Need better transit
- Need better traffic control, speed enforcement, safe crossings

E. Staff Comment Responses: Comprehensive Plan and DEIS

This appendix includes responses to the comments received on the Draft Environmental Impact Statement (DEIS). The DEIS was issued on March 1, 2024 and included a 60-day comment period, which ended on April 30, 2024. 44 written comment letters from agencies and members of the public were received via email, and nine people gave public testimony at the Planning Commission public hearing on April 4, 2024.

Responses to comments in this appendix address the issues raised during the public comment period for the DEIS and Draft Comprehensive Plan. A response is provided for each comment. The responses are intended to provide clarification of information presented in the DEIS and Comprehensive Plan and to make corrections and updates where needed. The text of the Comprehensive Plan has been revised as appropriate in response to comments and to reflect new or updated information, and revised text has also been incorporated into the Final EIS (FEIS).

The appendix includes the following:

- Table with a summary of each comment and the staff response
- Comment letters in full

#	Commenter	Date	Comment (Summarized by Staff)	Response
Government Agencies				
1-1	Commerce	4/30/24	Add inventory of existing housing by income band, bring racially disparate impacts and displacement risk analysis from the DEIS Appendix B into the comprehensive plan.	The City has added the inventory of existing housing by income band (per the Commerce HAPT tool) and described key findings on racially disparate impacts and displacement in the Planning Commission recommended draft Housing Element as suggested.
1-2	Commerce	4/30/24	Bring forecast for multimodal transportation for 10 years and projection of state and local system needs into the comprehensive plan. Add inventory of air, water, and ground transportation facilities and services.	The Planning Commission recommended Transportation Element brings information in from the supporting draft Transportation Plan and DEIS as suggested, including documentation of the forecast multimodal transportation, projection of state and local system needs, and complete an inventory of air, water and ground transportation to meet RCW 36.70A.070(6)(a)(i), RCW 36.70A.070(6)(a)(iii)(F), RCW 36.70A.070(6)(a)(iii).

#	Commenter	Date	Comment (Summarized by Staff)	Response
1-3	Commerce	4/30/24	Add itemized project costs for sanitary sewer to the Capital Facilities Plan.	The City has itemized project costs already included in the 2020 Sewer Capital Improvement Plan into the Planning Commission recommended draft Capital Facilities Plan as suggested.
2-1	DAHP	4/30/24	Consultations w/DAHP should be managed by the City as the lead agency, not the applicant...Should state that the City will consult w/DAHP when a project has the potential to impact a potentially eligible historical resource.	The City can assist developers, but does not have the resources to take the lead in conducting historic reviews of every project affecting a 45-year old building. As with other regulations, the burden is on the applicant to obtain documentation from agencies or consultants with expertise, with the City in the role of assisting the developer. Policy language is proposed to clarify that the City has a greater role in the consultation process.
2-2	DAHP	4/30/24	Concern about removing Ryan House references. Concern about removing text related to components of a historic preservation program (developing a program, conducting surveys).	The proposed amendments to the Comprehensive Plan do not promote or require demolition of the Ryan House. The amendments maintain general policies that support historic preservation City wide but remove specific obligations related to the Ryan House. Note that there are 2 other registered historic buildings in Sumner, so historic preservation efforts should be broader than just the Ryan House. New revisions to historic preservation policies retain some of the earlier references, while keeping options open for City and other property owners. Obligations that bind the Council's discretion related to the budget process were removed. New revisions keep references to a historic preservation program, including historic documents and oral histories.
2-3	DAHP	4/30/24	DAHP is pleased to see City making an effort to better include Tribal concerns around Cultural Resources, plan specifically calls out the Muckleshoot Indian Tribe and Puyallup Tribe. DAHP encourages the City to consult more widely on projects.	The City has a good working relationship with the Tribes as a result of years of collaboration and consultation on the White River Restoration Project and this will continue. Legal notice for SEPA always goes to both tribes.

#	Commenter	Date	Comment (Summarized by Staff)	Response
3-1	DNR	3/5/24	Add references to the WAC and WGS Geologic Information Portal.	The City has added the suggested references in the draft plan and code updates where they are most applicable.
4-1	Pierce County (Surface Water Management)	4/29/2024	No comment at this time, but reserve the right to comment if there are changes to the Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement.	The City acknowledges that the County may provide further comments through the legislative review and adoption process.
5-1	PSE	4/17/2024	Suggest model language for energy equity, energy efficiency, green energy options, peak load shifting, carbon free electrical generation and storage, new and upgraded transmission lines/substations/distribution lines, distributed energy resources, vegetation management, public funding, wildfire mitigation, gas decarbonization. Suggest model language for EVs.	▪ Proposed policies in the Draft Comprehensive Plan address issues of energy equity, energy efficiency, alternative energy options, and system resiliency. This includes several policies that specifically reference collaboration with PSE or utility providers generally (such as Utilities 2.4 and 6.1-6.4, Housing 3.6). ▪ The Comprehensive Plan has policies that address electric vehicles (EVs) and charging infrastructure including: - o Environment 2.5 – Support infrastructure, codes and permit processes that encourage alternative fuels and electric vehicles. - o Transportation ▪ 10.3.1 – Support and implement projects that promote cleaner burning and alternative fuels such as providing electric vehicle charging infrastructure. ▪ 10.9 Expand public electric vehicle charging stations and encourage and incentive private electric vehicle charging stations.
6-1	PSRC	4/19/2024	Use growth assumptions consistent with countywide growth targets (specifically, housing)	The Planning Commission recommended Preferred Alternative and the staff's corresponding analysis for levels of service and transportation modeling now reflect the city's assigned growth targets per the Pierce County Countywide Planning Policies. (This has taken the form of an alternative that meets the 1,985 growth target combined with policies that meet the affordable housing targets under HB 1220).

#	Commenter	Date	Comment (Summarized by Staff)	Response
6-2	PSRC	4/19/2024	Update the Sumner-Pacific MIC Subarea Plan to ensure consistency with adopted growth targets and the Regional Manufacturing/Industrial Center Consistency Tool. Make the Sumner-Pacific MIC employment targets more prominent in the comprehensive plan.	The growth targets for employment can be met by the Preferred Alternative and the MIC growth assumptions are folded into it. The City plans to affirm/evaluate the Sumner-Pacific MIC Subarea Plan as needed in the next plan update cycle (within two years). The draft plan has an existing reference to the Sumner-Pacific MIC employment target in the Housing element. Additional references to the Sumner-Pacific MIC have been added to the Planning Commission recommended draft Comprehensive Plan Economic Development element.
6-3	PSRC	4/19/2024	Add discussion of current employment and commuting characteristics	Data from the Census On The Map tool has been used to add analysis to the Population and Employment section of the EIS on employment and commuting characteristics and a description of commuter patterns has been added to the Planning Commission recommended Economic Development element.
7-1	WDFW	4/30/24	WDFW does not support Alternative 1, or fully support Alternative 2 or 3. The increased environmental protections in Alternatives 2 and 3 fall short of fully meeting WDFW's management recommendations.	Staff recognize the need to mitigate impacts to critical areas. Impacts will still occur under the Preferred Alternative due to growth based on the targets adopted by Pierce County. The Preferred Alternative continues to emphasize growth in the Town Center and East Sumner, which are already largely developed. Mitigation measures for the Preferred Alternative are proposed in the FEIS to address habitat fragmentation, open space corridors, and stormwater runoff. Rationale for best available science for proposed stream buffers is also included as an appendix to the FEIS (Best Available Science Memo dated 8/12/24).
7-2	WDFW	4/30/24	Consider using low-impact development and green infrastructure during infill development. Support for early adoption of the climate change goals and action plans outlined by the Department of Commerce.	Sumner Municipal Code 13.48.020.D (Chapter 13.48 Stormwater Management) states that "the city of Sumner requires that all applicants for residential, commercial, institutional and government agency projects implement low impact development (LID) strategies and practices in their stormwater site plan. LID standards and criteria are set forth in the manuals and the Sumner Development Specifications and Standard Details as therein referenced. The city engineer, or his or her designee, may waive LID strategies if he deems that this type of stormwater management is not applicable or feasible for a particular project." Requirements for Planned Mixed Use

#	Commenter	Date	Comment (Summarized by Staff)	Response
				Development (SMC 18.26.090) also include a criterion that "project design incorporates the use of one or more of the following low impact development (LID) techniques consistent with city design and construction standards: bio-retention, soil amendment, permeable paving, vegetated roofs, minimal excavation foundations, rooftop rainwater collection." Chapter 18.41 (Required Landscaping) also includes a low impact development option, for which additional information is available to applicants upon request. Noted, the draft plan includes a new climate change element based on guidance from the Department of Commerce.
7-3	WDFW	4/30/24	Urge the city to consider adopting Site Potential Tree Height at age 200 method for riparian management zone, and using WDFW's riparian resources (based on current best available science). When departures are made from the best available science, justification must be provided (WAC 364-195-915(1)(c)) and adaptive management should be followed.	The City has prepared an FEIS attachment outlining the best available science rationale for the proposed stream buffers, supporting the draft development regulations (Best Available Science Memo, dated 8/12/24). The City considered WDFW's guidance in the development of the draft regulations and has proposed adopting equal protection of non-fish bearing streams and fish-bearing streams, as WDFW recommends. A buffer of 100 feet is proposed for 95% removal or more of phosphorus, sediment, and most pesticides, and 80% removal for surface runoff containing excess nitrogen.
8-1	WSDOT	4/30/2024	Include multimodal LOS impacts to state-owned facilities	The City of Sumner has developed multimodal level of service (LOS) standards as part of the Comprehensive Plan including evaluation of intersection operations using the traditional LOS measures based on Highway Capacity Manual (HCM) and review of LOS for walking and biking based on pedestrian and bicycle facility presence and connectivity. Public transit does not currently operate within Sumner; therefore, the Comprehensive Plan identified that LOS will be developed in the future if service is implemented. LOS is evaluated for state-owned intersections based WSDOT's adopted LOS standard. LOS at intersections that do not meet the standard are summarized in DEIS Exhibits 8-16 and 8-22 with additional detail provided in the Transportation Plan. Pedestrian

#	Commenter	Date	Comment (Summarized by Staff)	Response
				and bicycle LOS is determined by comparing the future non-motorized network shown on DEIS Exhibits 8-6 and 8-7 with the EIS Alternative networks. The future non-motorized network identified as part of the Comprehensive Plan considers state-owned transportation facilities including connectivity along and to SR 162 as well as access north and south of SR 410 and east and west of SR 167. Pedestrian and bicycle impacts of the Comprehensive Plan and associated land use are shown on DEIS Exhibits 8-9 and 8-10. In most cases, the LOS is shown as "green" meeting standard; however, there are a few identified areas that do not meet standard. For facilities that do not meet the standard, improvement projects have been identified (see DEIS Exhibit 8-27) to mitigate the impacts of the Alternatives.
Businesses				
9-1	Blais, J for Merlino	4/30/24	Support for mine zoning change to MDR (Alternative 2)	The Planning Commission recommended draft Comprehensive Plan includes a proposed policy that supports the development of mine sites into housing once mining activities complete. Any map change proposal will be processed through a future comprehensive plan docket.
Individuals				
10-1	Adams, R.	3/27/24	Keep in the policy wording referring to agricultural history and small-town, single-family; concern about apartments, preserving history, increased density; preserve the Ryan House, maintain role of Sumner Historical Society, etc.	The wording about agricultural heritage and small-town character is not in policy and does not make any changes to the community. Planning for apartments and increased density are direct responses to growth targets assigned to Sumner, and affordable housing targets assigned to Sumner by the State. In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are other policies that support historic preservation without having to specifically call out and otherwise obligate city funding to the Ryan House. The comprehensive plan is intended to be high level policy direction, not make budget decisions or mandates.

#	Commenter	Date	Comment (Summarized by Staff)	Response
11-1	Adams, R.	4/18/24	Make documents available on background of legal case regarding Ryan House, clarity of funds raised, expenses estimates, and project phasing.	All comment letters and attached documents are made available with the Final EIS. All legal documents related to the Ryan House are publicly available through the Pierce County Superior Court. Numerous other records about the history of the project and the litigation are available on the City's Sumner Connects page: https://connects.sumnerwa.gov/ryan-house .
11-2	Adams, R.	4/18/24	Superior Court case Findings of Fact and Conclusions state City did not follow own comprehensive plan in moving quickly to demolish the Ryan House, proper notice was not given, and a new comprehensive plan is needed with public engagement before decisions made.	The Planning Commission does not make the decision on the future of the Ryan House – it is a budget and policy decision. Consistent with the court's holding, the City undertook extensive public engagement throughout the Comprehensive Plan update process (see EIS Appendix: Public Participation Summary), and that engagement has been ongoing since January 2023 consistent with that public participation plan.
11-3	Adams, R.	4/18/24	Comments on project costs for rehabilitating the Ryan House, question on which figure is correct for design costs, comment that enough funds are available for rehabilitation and phasing and scaling back features is an option. Please save the Ryan House, provides value to historic downtown.	The Planning Commission does not make budgetary decisions related to City parks or City facilities, or budget decisions at all. The Planning Commission is merely advisory. All costs and other budgetary decisions are made by the City Council.
11-4	Adams, R.	4/18/24	Attachments provided to comment letter: ▪ Nancy Ryan Dressel v City of Sumner and Drew McCarty case findings of fact and conclusions of law (4/8/2024) ▪ Letter from Washington Trust for Historic Preservation to Carmen Palmer (Communications Director, City of Sumner), notifying that Ryan House is now included in their list of state's Most Endangered	All comment letters and attached documents are made available with the Final EIS. The Planning Commission does not make budgetary decisions related to City parks or City facilities, or budget decisions at all. The Planning Commission is merely advisory. All costs and other budgetary decisions are made by the City Council.

#	Commenter	Date	Comment (Summarized by Staff)	Response
			Historic Places, similar projects are often phased, City has secured majority of estimated needed funding (2/2/2024) ▪ Sumner Connects Page, annotated by commenter, with details on funding and costs for Ryan House rehabilitation project (accessed 9/22/23) ▪ Cost estimate from Akana, annotated by commenter ▪ Screenshot and table of option overview and costs for Ryan House rehabilitation project	
12-1	Armstrong, P.	3/28/24	Questions about timing of public comments, meetings don't allow enough openings to comment and process doesn't give enough comment opportunities in general, public does not have a voice or say, cannot provide comment before meetings as asked because have yet to hear what staff/council have to say, example of public pushback on a project in Gig Harbor that resulted in new City Council/Board Members	The City has provided numerous opportunities to comment on the Comprehensive Plan update from public hearings to open houses to Planning Commission and City Council meetings (see EIS Appendix: Public Participation Summary).
12-2	Armstrong, P.	3/28/24	City plans to demolish historical buildings on Main Street, concerns about higher rents for businesses in new buildings, opposition to apartments and duplexes along Main Street, and concerns about apartments without parking. Comments about development projects in other cities, apartments,	There are no policies in the Comprehensive Plan that promote or require demolition of the Ryan House. The 2018 Town Center Plan contains policies and zoning that would allow for additional housing units at higher densities and off-street parking is required for these projects consistent with being in a walkable downtown close to transit. Higher density housing creates more capacity and is a component of creating more affordable housing in Sumner as a direct response to state legislative mandates.

#	Commenter	Date	Comment (Summarized by Staff)	Response
			traffic. Against demo of the Ryan House.	
12-3	Armstrong, P.	3/28/24	Comments on BERK Consulting's previous projects. Comment that Auburn Main Street now has tall apartments, lack of street life, lack of people shopping. BERK Consulting has worked with Sound Transit, comment suggesting this influences the proposed Sumner Comprehensive Plan. BERK Consulting worked on a plan in Burien for apartments and a large fountain, Burien town center safety concerns, concern fountain supplying water for non-residents.	BERK is a public policy and planning firm that predominantly works for cities, counties, and state agencies across the states, primarily on long-range plans and studies. BERK has professional planners that help communities create and update plans, based on each community's vision and needs; these plans are ultimately vetted by members of the public, agencies, planning commissions, and city councils who adopt them. Plans also respond to state requirements such as planning for housing at all income levels and providing objective design standards as well as many others. Property owners, developers, and governmental agencies implement their plans and regulations meeting their local requirements and standards. If a community wishes to change the type of development or design standards they may do that within the framework of state laws. BERK does not work for agencies that have opposing interests; it should also be noted that long-range planning projects lend themselves to collaborative efforts between cities and counties.
12-4	Armstrong, P.	3/28/24	References to Nancy Ryan Dressel v City of Sumner and Drew McCarty case, City lost case to currently demolish the Ryan House. If the proposed plan proceeds this is temporary. Attorney hired by City of Sumner said this and other old properties on Main Street in Sumner will be demolished for the Town Center.	There are no policies in the Comprehensive Plan that promote or require demolition of the Ryan House, the amendments remove specific mandates related to the Ryan House that that bound the budgetary discretion and policy-making decision authority of the City Council. The 2018 Town Center Plan contains policies and zoning that would allow for additional housing units at higher densities and some buildings will likely be demolished and redeveloped. Higher density housing creates more capacity and is a component of creating more affordable housing in Sumner as a direct response to state legislative mandates.
			No to demolition of the Ryan House and historic properties on Main Street, no to build tall apartments and duplexes on Main Street.	

#	Commenter	Date	Comment (Summarized by Staff)	Response
13-1	Bierman, N.	3/14/24	Questions about 2 public comment periods.	There was a 60 day public comment period for the publication of the Draft Comprehensive Plan and DEIS, which ran from March 1-April 30. There was another concurrent public comment period for the Planning Commission public hearing which ran from March 12-March 27.
14-1	Bierman, N.	3/27/24	Keep references to Sumner Historical Society, including in policies about access to historic documents and collection of oral histories.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. New revisions keep references to historic documents and oral histories.
14-2	Bierman, N.	3/27/24	Keep specific references to Ryan House so that it can be restored.	There are policies that support historic preservation without having to specifically call out the Ryan House and inadvertently bind the budget decision making authority of the City Council
15-1	Burnett, T.	3/27/24	Preserve the charm & historic character of Sumner; concern about increase in apartments and cars	The Comprehensive Plan contains policies related to design and the small town feel of Sumner. Design and development guidelines are in place to promote this vision for Sumner. The 2018 Town Center Plan contains policies and zoning that would allow for additional housing units at higher densities and off-street parking is required for these projects consistent with being in a walkable downtown close to transit. Higher density housing creates more capacity and is a component of creating more affordable housing in Sumner as a direct response to state legislative mandates.
15-2	Burnett, T.	3/27/24	Keep policy wording about protecting historic resources, Sumner Historical Society, preserving Ryan House.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House.

#	Commenter	Date	Comment (Summarized by Staff)	Response
16-1	Carter, L.	3/26/24	Concern that policies will promote demolition of the old charming buildings in Sumner, and loss of tourism and Main Street Association, loss of Ryan House; design code should make new buildings appear similar to old; DAHP should have 30 days (not 28) to review projects.	▪ New revisions keep references to historic preservation program. ▪ There are policies that support historic preservation without having to specifically call out the Ryan House. ▪ Sumner has design guidelines that encourage new buildings to reflect historic context, but these are not mandatory. ▪ Staff has changed DAHP response time in proposed code to 30 days.
16-2	Carter, L.	3/26/24	Keep references to Sumner Historical Society, references to preservation programs; preserve Ryan House.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. New revisions keep references to historic preservation program.
16-3	Carter, L.	3/26/24	Attachment of screenshots of City of Sumner website with information about the Riverfront Apartments project and planning for the future.	All comment letters and attached documents are made available with the Final EIS.
17-1	Dressel, N.	3/27/24	Keep references to Sumner Historical Society, references to preservation programs; preserve Ryan House.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. New revisions keep references to historic preservation program.
18-1	Dressel, T.	3/27/24	Keep references to Sumner Historical Society, references to preservation programs; preserve Ryan House.	--SEE RESPONSE TO 17-1--

#	Commenter	Date	Comment (Summarized by Staff)	Response
19-1	Forsstrom, M.	3/25/24	Keep references to Sumner Historical Society, references to preservation programs; preserve Ryan House.	--SEE RESPONSE TO 17-1--
20-1	Foster, K.	Letter #1 03/22/24	Why were the applications for Comprehensive Plan Amendments not deemed completed after January 2023 closing date? Why is there 30-day gap between complete application & notice of PC hearing; this is an abbreviated comment period that doesn't meet RCW 36.70A.140. Is there conflict between the 3/27/24 and 4/30/24 posted deadlines, how can Commission make a decision before comment period ends.	▪ The applications (proposals for policy and code changes) were filed and deemed complete in February 2024 after extensive analysis to better identify the scope of the changes. There is no requirement for a different timeline. ▪ The complete application (description of proposals) is one of the first steps in the normal Comprehensive Plan amendment process, and usually occurs long before it is known what date there will be a public hearing. The Notice of DEIS Availability (published with Draft Comprehensive Plan) was issued 3/1/24 with a 60-day comment period (for both written comments and the scheduled public hearing), which meets State and City requirements. The Planning Commission public hearing occurred mid-way through the mandatory 60-day comment period, but did not prematurely cut off the public's ability to continue to submit comments and is in compliance with state law. ▪ The timing of notices and public hearing does meet the requirements of RCW 36.70A.140 (Ensure Public Participation). The City prepared and adopted a public participation plan. "Effective notice" was provided with the 60-day comment period (during which time both written and oral comments can be submitted), and then an additional public notice and comment period 15 days prior to the in-person public hearing. ▪ The 2 concurrent notice periods are 2 separate and distinct processes that are required by law. The notices stated the Commission public hearing date, which is an opportunity for taking public oral testimony, not making a decision on that date. The 4/30 deadline offered the public additional time, after the public hearing, to submit written comments. All public comments received by the deadlines (through 4/30) have been/are being forwarded to the Planning Commission and City Council prior to their decisions. As noted on the published agenda for the Commission April 4, 2024 public

#	Commenter	Date	Comment (Summarized by Staff)	Response
				hearing, the Commission would not/did not make a decision on the public hearing date.
20-2	Foster, K.	Letter #1 03/22/24	EIS Scoping notice May 2023 did not cite specific changes, such as Ryan House policy changes, flooding downtown with low-income apartments or tax incentives. After staff proposed changes to policies related to the Ryan House (and historic preservation), was a new application for Comprehensive Plan Amendments submitted?; shouldn't the City have withdrawn previous application and submitted a new one so public could participate?; does this require any changes to the EIS scoping process? Until 9/7/23 staff recommendation, Ryan House policies still indicated preservation. After that, City reversed the policies so the public didn't know until that point of the proposed policy changes affecting Ryan House.	▪ A Scoping Notice is by nature very early in the process when the full range of changes is not entirely certain, and its purpose is to solicit comments on the scope of the EIS and relevant areas of the environment, not provide a detailed list of every proposed policy and code change. Requiring such detail would contradict the purpose of consulting with various state and local agencies and engaging the public in determining specific changes throughout the process. ▪ There is no requirement for a new application or re-doing the EIS scoping process. The nature of the Comprehensive Plan amendment process is that policies and regulations evolve due to various reviews by governing bodies (Commission and Council), new information, and public comments. The EIS reviews these various changes under alternatives. Any changes are provided to the Commission before it is asked to make a decision. The City Council will also hold a public hearing after public noticing, where further changes to policies and regulations may occur, and ultimately be analyzed in the Final EIS. The amendment process is intended to be fluid and flexible in nature, which is the only way to ensure that Commissioner, Council, outside agency and public comments are received, processed and incorporated where appropriate. ▪ Policy updates in the Historic/Cultural Resources Element were first discussed with the Commission in August 2023 and September 2023. Staff had not, at that time, yet proposed any changes related specifically to Ryan House references contained in that element. ▪ Mr. Foster, as part of the Save our Sumner Committee filed suit in October, 2023 regarding the Ryan House demolition permit. In response to the petitioners' filing, and to comply with the Court's final holding, staff began edits to Historic/Cultural policies to remove absolute mandates and permit flexibility in the Comprehensive Plan policies so that future Council decisions would be and could be consistent

#	Commenter	Date	Comment (Summarized by Staff)	Response
				with Comprehensive Plan policies. Policy revisions were published in the Draft Comprehensive Plan/DEIS issued with public notices on 3/1/24. Petitioners and other parties interested in policies related to the Ryan House were re-directed to the Comprehensive Plan process, were able to review the newest policies during the 60-day comment period, and have submitted comments to the Commission. The public received ample notice and multiple opportunities to be heard on the proposed revisions to the policies.
20-3	Foster, K.	Letter #1 03/22/24	What third party consultants were engaged to assist with the drafting of the proposed Comprehensive Plan amendment and EIS? Were they advised mid-process that draft goals and policies were to be changed? How can goal and policy changes referencing Ryan House have been properly considered when City has violated the requirements of GMA and SEPA when issuing the demolition permit (per legal case judgement)?	The Fact Sheet in the EIS includes a list of preparers and contributors. The process of updating the Comprehensive Plan and supporting documents is an iterative process with changes taking place as the Planning Commission and City Council review and discuss. It is expected that some goals and policies would change mid-process. The City has followed state law requirements as it relates to the process of updating the Comprehensive Plan and this policy is separate from the lawsuit and order regarding the demolition permit. In fact, the ruling by the judge as a result of the lawsuit Comprehensive encouraged the City to go through the comprehensive plan amendment process, with public engagement, so that any decisions related to the Ryan House would be consistent with the Comprehensive Plan policies. Thus, specific mandates related to that City property were removed.
21-1	Foster, K.	Letter #2 3/27/24	Were the consultant and staff vetted for the same values and visions for Sumner as the citizens? Did you explore other communities where similar policies have been adopted? Sees a "massive citizen backlash" on recommendations related to the Ryan House and to transform Main Street into an apartment canyon.	▪ The Comprehensive Plan vision and values were reviewed and recommended by the Planning Commission who are citizens who live in the city, or who have a vested interest in the city, and the outcome. ▪ There are no policies being proposed that direct the City to demolish the Ryan House. Revised policies to remove "mandatory" language related to historic preservation were proposed by staff to not only comply with the Court's direction, but also write "goals," and "policies" rather than mandates or prohibitions that unintentionally override or bind Council's authority to make capital budget decisions.

#	Commenter	Date	Comment (Summarized by Staff)	Response
			Public would reasonably believe that due to court decision, the City would need to start over with the Comprehensive Plan process/policies affecting the Ryan House. For most of the process, it appears to the public that Ryan House was not going to be affected, that only minor edits would be made.	▪ The Court did not order that the entire periodic update to the comprehensive plan, that necessarily began in 2023, start over. The Court was well aware that the amendment process was already underway, and after acknowledging that, ordered that the comprehensive plan policies that were inconsistent with the issuance of a demolition permit be amended <i>with opportunity for public engagement</i> before a demolition permit could be issued. To receive that ruling, and then fail to address the policies that led to the litigation during the open comprehensive plan amendment process would be a dilatory endeavor. The public's opportunity to review the proposed revisions, submit public comments for a period of 60 days and speak at multiple public hearings and open houses began after the Court's ruling. ▪ The City issued the Draft Comprehensive Plan with updated historic preservation policies on 3/1/24 and provided for a 60-day public comment period. The City Council will also hold a public hearing with an additional comment period.
21-2	Foster, K.	Letter #2 3/27/24	The Notice of Public Hearing sent out 3/12/24 was confusing in that it has "Notice of Decision" at the top, and does not state the policy changes being made regarding the Ryan House. Conflicting public comment windows in notices.	The Notice of Public Hearing posted on the City website was erroneously published with a Notice of Decision graphic at the top (an inadvertent failure to fully edit the template), with also "Notice of Public Hearing" title. <u>It was corrected and posted 2 hours later.</u> There was a 60-day public comment period for the publication of the Draft Comprehensive Plan and DEIS, which ran from March 1-April 30. There was another concurrent public comment period for the Planning Commission public hearing which ran from March 12-March 27.
21-3	Foster, K.	Letter #2 3/27/24	Actual project costs for restoration are unknown, City did not authorize funding to prepare construction documents for bidding process, City did not seek alternative methods or materials, or consult a contractor for	The Planning Commission does not make budgetary decisions or recommendations to the City Council. All costs and other budgetary decisions are made by the City Council. When staff requested additional money to finalize the design efforts to get a full bid set, it was the City Council, in its complete discretion, that made a budget decision not to continue funding the design efforts.

#	Commenter	Date	Comment (Summarized by Staff)	Response
			numbers. Estimated number of \$2.2 million seems high. City already had grant money secured for \$1.7 million, funds were returned. City argued returned because not used in time, but letter from Chris Moore, Executive Director of the Washington Trust for Historic Preservation states grants are typically extended/augmented as work proceeds, suggested staged approach. City has responsibility to fund elements of comprehensive plans, failed in letting Ryan House deteriorate. City has spent millions of dollars on other parks/recreation assets.	
22-1	Fox, Ba.	3/24/24	Preserve the Ryan House	There are no policies in the Comprehensive Plan that require demolition of the Ryan House.
23-1	Fox, Be.	3/24/24	Preserve the Ryan House	--SEE RESPONSE TO 22-1--
24-1	Fox, M.	3/25/24	Keep references to working with others on design guidelines, protecting historic resources, working with Sumner Historical Society; Knoblauch Heritage Park should not be called "heritage," does not represent full heritage; need to preserve the Ryan House; keep references to historic preservation program.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. New revisions keep references to historic preservation program.
25-1	Griffin, R.	3/26/24	Preserve the Ryan House; massive apartments will replace historic buildings and change city character	There are no policies in the Comprehensive Plan that require demolition of the Ryan House.

#	Commenter	Date	Comment (Summarized by Staff)	Response
26-1	Henderson, A.	3/27/24	Preserve the Ryan House, keep it open for tours	--SEE RESPONSE TO 25-1--
27-1	Henderson, A.	3/27/24	Keep references to the Sumner Historical Society and Ryan House	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House.
28-1	Henderson, C.	3/27/24	Keep references to the Sumner Historical Society and Ryan House; keep references to historic preservation programs; concern about apartments What has City and Planning Commission done in securing funding for Ryan House restoration project? Did City apply for grants, contact contractors for second or third bid?	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. The Planning Commission does not secure funding for any projects in the City as that is not their role. Yes, the City applied for and received grants for the restoration of the Ryan House, but the costs of the project far exceeded the available funding so Council made the decision, in its complete discretion, to not fund the project. No bids were requested for the project but an Engineers Estimate was prepared.
29-1	Hendrix, La.	3/27/24	Keep references to the Sumner Historical Society and Ryan House; preserve the Ryan House, allow it to be a museum	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. Removing specific references to events and programs does not actually remove or prohibit those programs. New revisions keep references to historic documents and oral histories. Policies already encourage adaptive re-use of buildings without having to specify a list of historic buildings.

#	Commenter	Date	Comment (Summarized by Staff)	Response
30-1	Hendrix, Li.	3/27/24	Keep references to the Sumner Historical Society and Ryan House; preserve the Ryan House	--SEE RESPONSE TO 29-1--
31-1	Hill, C.	3/27/24	Proposed policies remove the preservation of the Ryan House; need to preserve Ryan House	There are no policies in the Comprehensive Plan that require demolition of the Ryan House.
32-1	Lien, G.	4/26/24	Maintain fish bearing buffer at 100 feet (not higher)	The staff recommendation is to maintain the existing buffer requirement for fish-bearing streams. The FEIS includes a rationale for the best available science for maintaining the fish-bearing stream buffer at 100 feet (Best Available Science Memo, dated 8/12/24).
33-1	Loeth, D.	3/26/24	Suggests a number of edits to historic preservation policies; keep/add references to Sumner Historical Society and also Ryan House; retain language to "avoid" impacts to resources; include the historical society and main street association in the historic preservation review process; etc.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. The term "avoid" was removed from the permit review process because that is a mandate that is not always possible to achieve.
34-1	Morrison, B.	3/25/24	Keep references to the Ryan House and having public access and other uses; preserve the Ryan House.	There are no policies in the Comprehensive Plan that require demolition of the Ryan House, the amendments merely remove capital budget decision mandates that inadvertently tied the decision making authority of the City Council. There are policies that support historic preservation and encourage adaptive re-use of buildings in general.
35-1	Morrison, B.	3/27/24	Concerns about ADUs, need for more flexible setbacks for corner lots. Does not support reducing height of ADU located within 15-30 feet of rear property line, should be same as side yards. Should be special considerations for corner lots due to wider street yard	▪ New state legislation requires that ADU height be allowed at 24 feet or the height of the main house. Sumner's proposed code complies with that, and actually has to increase the 18-foot height in the current code to meet this new requirement. ▪ State legislation requires that setbacks for ADUs cannot be more restrictive than the main house which is a 30-foot rear

#	Commenter	Date	Comment (Summarized by Staff)	Response
			setback required & rear yard often abuts neighbor's side yard.	yard setback in Sumner. Proposed code complies with the new state setbacks. ▪ However, the proposed code also provides a way for an ADU to have different height/setbacks than the State guideline. Under new code 18.12.030(A)(10)(b), a property owner may take a voluntary height restriction of 18 feet; if so, the ADU may be built 15 feet from the rear property line and 7.5 feet from the side yard property line. (These are the dimensions Sumner adopted for ADUs in 2022.) ▪ Corner lot side yards often abut a neighbor's rear yard as well as side yard; during adoption of ADU regulations in 2022, policy-makers expressed concerns about ADUs intruding in neighbors' backyards. ▪ Side yards & rear yards are defined in the code according to the orientation of the house, which creates consistency in administering building permits. Staff does not recommend that definitions or yards/setbacks be rewritten to accommodate ADUs on corner lots.
36-1	Morrison, H.	3/27/24	Keep references to the Ryan House; preserve the Ryan House	There are no policies in the Comprehensive Plan that require demolition of the Ryan House. Amendments were proposed and recommended to remove mandates that inadvertently bind the budget decision making authority of the City Council.
37-1	Parrick, L.	3/27/24	Keep references to the Sumner Historical Society, historic preservation activities, and the Ryan House	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House. Removing specific references to events and programs does not actually remove or prohibit those programs, it's just less limiting. New revisions keep references to historic documents and oral histories.

#	Commenter	Date	Comment (Summarized by Staff)	Response
38-1	Rang, Am.	3/27/24	Need to preserve Sumner's charm and history; concern about loss of agricultural lands, increased apartments & traffic; keep references to Sumner Historical Society; preserve Ryan House and use as a museum. The Historical Society has in the past had a good relationship with City, but the City has become difficult to communicate with/work with.	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. There are policies that support historic preservation without having to specifically call out the Ryan House.
39-1	Rang, Ad.	3/27/24	Protect the Ryan House	There are no policies in the Comprehensive Plan that require demolition of the Ryan House.
40-1	Rang, G.	3/27/24	Preserve the Ryan House; keep references to Sumner Historical Society	There are no policies in the Comprehensive Plan that require demolition of the Ryan House. There are policies that support historic preservation without having to specifically call out the Ryan House. In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations.
41-1	Ryan, M.	3/27/24	Keep references to the Sumner Historical Society and Ryan House; keep references to historic preservation programs	In response to this and similar DEIS comments, the draft Comprehensive Plan recommended by Planning Commission retains references to the Sumner Historical Society as an example of a historic preservation organization, while leaving language flexible enough to apply to other historic preservation organizations. Removing specific references to events and programs does not actually remove or prohibit those programs. New revisions keep references to historic documents and oral histories.

#	Commenter	Date	Comment (Summarized by Staff)	Response
42-1	Schmidt, L.	3/27/24	Keep references to the Sumner Historical Society and Ryan House; keep references to historic preservation programs	--SEE RESPONSE TO 41-1--
43-1	Shinstine, W.	3/27/24	Protect the Ryan House; mentions Orton Estate as a preservation example	There are no policies in the Comprehensive Plan that require demolition of the Ryan House.
44-1	Swarthout, S.	3/25/24	Preserve the Ryan House; keep historic buildings downtown, not apartments.	--SEE RESPONSE TO 43-1--
Public Hearing 4/4/24				
45-5	Adams, R.	4/4/24 (Public Hearing)	Concern about removing references to settlers or agricultural history; concern this means we can't have any part of our history anymore; don't remove references to Historical Society; need to stop demolition of Ryan House; court decision on Ryan House requires input from citizens, but neighbors were denied being able to go inside to see condition; City denied a contractor who offered to do restoration work for free.	--SEE RESPONSES TO WRITTEN COMMENTS 11-1 to 11-4, ABOVE--
45-4	Bierman, N.	4/4/24 (Public Hearing)	Protect Sumner's charm, especially downtown; preserve Ryan House; in Historic/Cultural section of the plan: On Policy 1.3 shouldn't remove Ryan House; Council decision to demolish Ryan House was ruled invalid without amending the Comprehensive Plan, so shouldn't be removing policies before the public has weighed in; why remove Historical Society references when Plan could name them and also list generic.	--SEE RESPONSES TO WRITTEN COMMENTS 14-1 AND 14-2, ABOVE-- The process of updating the Comprehensive Plan and supporting documents is an iterative process with changes taking place as the Planning Commission and City Council review and discuss. It is expected that some goals and policies would change mid-process particularly to reflect public comment, outside agency comment and Commissioners' and Councils' proposed revisions. The Comprehensive Plan contains draft goals and policies for comment and consideration.

#	Commenter	Date	Comment (Summarized by Staff)	Response
45-2	Burnett, T.	4/4/24 (Public Hearing)	Objections to growth/changing Sumner's character; reconsider demolishing of Ryan House; concerns about all the apartments coming into Town Center & amount of parking needed & traffic; preserve Heritage Park.	--SEE RESPONSES TO WRITTEN COMMENTS 15-1 AND 15-2, ABOVE--
45-3	Foster, K.	4/4/24 (Public Hearing)	Speaking on behalf of his family in Sumner. Concern that not enough open discussion in developing amendments, not adequate opportunities for asking questions, need citizen discussion groups; wording related to Vision stating that Sumner is progressive small city very vague & sounds like a "woke" policy; concern that some provisions appear that Sumner is fixing transportation for the region, which we should not be doing; referenced a Berk Consulting client list with many agency names & has concern that there is a conflict of interest.	--SEE RESPONSES TO WRITTEN COMMENTS 21-1 THROUGH 21-3, ABOVE--
45-1	Fox, M.	4/4/24 (Public Hearing)	Preserve the Ryan House, preserve Heritage Park fountain, should have specific reference to Sumner Historical Society since they are the group that has the expertise (e.g. Policy 1.3); don't change shall's to should, because allows City an option not to do this; referred to other proposed policies related to historic preservation, coordination with community groups, and Heritage/Knoblauch Park, that are concerning (noted these are included in her submitted letter); concern that City decision on Ryan	--SEE RESPONSE TO WRITTEN COMMENT 24-1, ABOVE--

#	Commenter	Date	Comment (Summarized by Staff)	Response
			House not consistent with policies; concerns regarding Heritage Park removal of name plaques.	
45-6	Henderson, A.	4/4/24 (Public Hearing)	Seems like proposals are ruining Sumner's charm; need to preserve Ryan House; the house is also an important site for historical education of future generations.	--SEE RESPONSE TO WRITTEN COMMENT 27-1, ABOVE--
45-7	Henderson, C.	4/4/24 (Public Hearing)	Believes that distrust for City is growing; added to this is that City did not follow proper procedure on Ryan House; another concern that new Windmill Apartments did not follow SEPA process, City wetland maps were not accurate, that projects connected to a City official are getting steamrolled through.	--SEE RESPONSE TO WRITTEN COMMENT 28-1, ABOVE--
45-9	Norris, J.	4/4/24 (Public Hearing)	Ok to make language for historical society more generic, still includes other organizations, and still allows Historical Society to continue; would like to see Historical Society step up & do more; supports more focus on historic preservation and cultural arts and literary events.	Correct observation that the proposed amendments do not prohibit the City to work with the Historical Society, but rather make the language more flexible to permit other organizations to work with the City in honoring the City's history. The proposed amended policies support historic preservation without naming specific properties or projects.
45-8	Yoder, J.	4/4/24 (Public Hearing)	Worked at Sunset Chev, gave some history about that; having a 3-minute limit to talk is frustrating; his dad's name was removed from Heritage Park with no notice; Ryan House was going to be demolished with no notice; no one cares about Sumner anymore.	The 3-minute public comment period, for each speaker who wishes to address the Council, is set by Council Resolution and is consistent with the meeting procedure of local jurisdictions. The plaques from Heritage Park, that were not damaged, were surplus and returned to members of the public who came to pick them up.

Letter 1



STATE OF WASHINGTON

DEPARTMENT OF COMMERCE

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

April 30, 2024

City of Sumner
 c/o Ann Siegenthaler, Senior Planner
 1104 Maple Street
 Sumner, WA 98390

Sent via electronic mail to amnsi@sumnerwa.gov

RE: Review of Submittal #2024-S-6918

Dear Ann:

Thank you for the opportunity to comment on proposed amendments to Sumner's comprehensive plan and development regulations as part of the 2024 Periodic Update. Growth Management Services received the proposed amendments on February 29, 2024, and processed them with material identification number 2024-S-6918.

Your submission represents a great deal of work and substantial progress towards the Periodic Update of your Comprehensive Plan due December 31, 2024. We are focusing our review on the following elements and offer our respective comments as follows:

Housing

The introduction to the Housing element appears to appropriately place focus on the adopted housing targets by income band, as presented in Figure 14-1: Adopted Housing Target by Income Band (2020-2044). However, in addition to housing targets, the Growth Management Act (GMA) also requires an inventory of *existing* housing by income band ([RCW 36.70A.070](#) (2)(a)). The numbers for this inventory can be found by utilizing Commerce's [Housing for All Planning Tool \(HAPT\)](#). To better align with statute, we recommend including an inventory of existing housing by income band in Figure 14-1.

Additionally, the GMA also requires housing elements to contain a review of racially disparate impacts and housing displacement risk ([RCW 36.70A.070](#) (2)(e)). A discussion of racially disparate impacts and housing displacement risk are not found in the draft comprehensive plan document. We recommend including these analyses, which appear in Appendix B of the [Draft Environmental Impact Statement](#), in the comprehensive plan itself.

1-1

Department of Commerce: Submittal ID 2024-S-6918

Transportation

Section 1 of the Transportation element effectively sets the tone for the plan by encouraging multi-modal transportation and Section 9 uses an equity lens to address access to transportation for those who may currently lack it. Additionally, by addressing environmental justice, greenhouse gas reduction, and resiliency in Section 10, the element appears to set the stage for future climate planning requirements in the transportation element, required under HB 1181 to be complete by June 30, 2029.

Like the draft Housing element, the draft Transportation element is missing a couple required components which are, however, found in the [Draft Environmental Impact Statement \(DEIS\)](#). We recommend adding the following components from the DEIS to the draft comprehensive plan:

- A forecast of multimodal transportation for at least ten years ([RCW 36.70A.070\(6\)\(a\)\(i\)](#)), as found in the Draft EIS in Exhibits 8-9 and 8-10 (PDF pages 254-255).
- A projection of state and local system needs ([RCW 36.70.070\(6\)\(a\)\(iii\)\(F\)](#)), as identified in the VMT analysis, Exhibit 8-26 (PDF page 266). Exhibit 5.5 in the draft Transportation element (PDF page 374) identifies 20-Year Transportation Improvement Projects, which may adequately reflect system needs.

Additionally, an inventory of air, water, and ground transportation facilities and services is required ([RCW 36.70A.070\(6\)\(a\)\(iii\)](#)), but not found in the draft comprehensive plan or DEIS. To better align with statute, we recommend adding these required components to the Transportation element of the comprehensive plan.

Capital Facilities

The draft Capital Facilities element appears to contain each of the required components and consider capital facilities through an equity lens. Within Chapter 6 of the draft Capital Facilities Plan (CFP), the proposed Capital Improvement Programs for various services (e.g. water and sanitary sewer) are provided. Based on review of the draft CFP, there are overall cost totals noted for the sanitary sewer capital improvement program (page 78 of the draft CFP) but itemized project costs are not identified on page 78 or in Appendix C which is the 2020 Sewer Capital Improvement Plan and Schedule. For consistency between

Recommendations for meeting requirements pertaining to the Capital Facilities element are outlined in [WAC 365-196-415\(2\)](#). Specifically, the financing plan (i.e. Capital Improvement Plan) “should forecast projected funding capacities based on revenues available under existing laws and ordinances, followed by the identification of sources of public or private funds for which there is reasonable assurance of availability”. For consistency between the draft CIPs presented, we recommend providing itemized project costs for sanitary sewer projects in the draft CFP, similar to that of Appendix B for the 2020 Water System Plan Capital Improvement Plan or Appendix D for the 2024 6-Year Transportation Improvement Plan.

1-2

1-3

Department of Commerce: Submittal ID 2024-S-6918

Congratulations to you and your staff for the good work these amendments represent. We understand the Public Hearing for these draft documents occurred on April 4, 2024, and extend our continued support to the City of Sumner and can make plans to attend upcoming meetings, should our services be requested. If you have any questions or concerns about our comments or any other growth management issues as you work on your update, please contact me at 360.725.3044 or eric.guida@commerce.wa.gov.

1-3

Sincerely,

Eric Guida

Eric Guida
Senior Planner
Growth Management Services

cc: David Andersen, AICP, Managing Director, Growth Management Services
Valerie Smith, Deputy Management Director, Growth Management Services
Anne Fritzel, Housing Programs Manager, Growth Management Services
Sarah Fox, Climate and Environmental Programs Manager, Growth Management Services
Carol Holman, Western Regional Manager, Growth Management Services
Ben Serr, Eastern Regional Manager, Growth Management Services

Letter 2

From: [Jolivette, Stephanie \(DAHP\)](#)
To: [Ann Siegenthaler](#)
Cc: [Roldan, Jeronimo \(DAHP\)](#); [Levesque, Maddie \(DAHP\)](#); [Elenga, Maureen \(DAHP\)](#)
Subject: DAHP Project 2024-04-02351 Sumner 2024 Draft Comprehensive Plan and Draft EIS
Date: Tuesday, April 30, 2024 2:27:23 PM
Attachments: [image009.png](#)
[image010.png](#)
[image011.png](#)
[2024-04-02351 DAHP Comments 2024 Draft Comprehensive Plan Draft EIS.pdf](#)

****EXTERNAL EMAIL****

Hello Ann Siegenthaler,

Please see the attached letter from the DAHP commenting on the proposed updates to the City of Sumner 2024 Draft Comprehensive Plan and Draft EIS.

Feel free to reach out if you have any questions or concerns as you finalize the EIS.

Best,
Stephanie




Stephanie Jolivette ([She/Her/Hers](#))
Local Government Archaeologist

Email: Stephanie.Jolivette@dahp.wa.gov

Mobile: (360) 628-2755 | Main Office: (360) 586-3065

Hours: 8AM - 4:30PM Monday to Friday

Physical Address: 1110 Capitol Way South Suite 30, Olympia, WA 98501

Mailing Address: PO Box 48343, Olympia, WA 98504-8343

www.dahp.wa.gov



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

April 29, 2024

Ann Siegenthaler
Senior Planner
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

In future correspondence please refer to:
Project Tracking Code: 2024-04-02351
Property: City of Sumner 2024 Draft Comprehensive Plan and Draft EIS - Ryan House Removal
Re: Cultural Resources Comment

Dear Ann Siegenthaler:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the Sumner 2024 Draft Comprehensive Plan. In general, we appreciate the City's effort to better incorporate Tribal Consultation into the Plan, and the emphasis on the role of early and adequate planning to avoid or minimize impacts to Cultural Resources.

2-1

Below are specific comments on updates to the plan in Chapter 11. Historic and Cultural Resources:

Section 1.1.3. Any consultation with the DAHP should be led by the lead agency, not the applicant. Only the lead agency can set permit requirements related to historically significant buildings in Sumner. Therefore, the City needs to actively participate in any discussions about impacts to historic buildings, rather than outsourcing this discussion to the DAHP and project applicants. We recommend that this section state that the City will consult with the DAHP anytime a project under review by the City has the potential to impact a potentially eligible historical resource.

Section 1.3. The DAHP is concerned about the removal of language intended to protect the Ryan House. This may contribute to the future demolition of the property by removing support for its continued use by the community. As a statewide agency, DAHP is committed to helping the city of Sumner identify methods and incentives for the preservation of its historic buildings and protection of its cultural resources. In Sumner, there is no preservation ordinance to specifically protect historic properties from demolition. As a significant part of Downtown Sumner, the Ryan House is an irreplaceable part of the city's heritage and should be protected through the language of the Comprehensive Plan.

2-2

DAHP recommends retaining language in Section 1.6 intended to support the development of preservation programs in the city, such as developing a local historic preservation plan; conducting surveys of cultural resources; preparing nomination documents for Washington State and National Historic Places Registers; performing public education activities including presentations to citizens, articles in the city newsletter, school presentations, and booths at city



events festivals. This language supports access to financial incentives for the preservation of Sumner's historic properties by encouraging activities of a Certified Local Government program.

2-2
cont.

Tribal Consultation. As stated above the DAHP is pleased to see the City making a specific effort to better include Tribal concerns around Cultural Resources into the Comprehensive Plan. We noted that the Muckleshoot Indian Tribe and Puyallup Tribe were both specifically called out for consultation on City permits. Although these are the closest modern reservations to the City of Sumner, we encourage the City to consult more widely on projects. The DAHP maintains a Tribal Contact List for THPO's and Cultural Resource Staff, and also maintains a GIS for locating Tribal Areas of Interest on our website here:

2-3

<https://dahp.wa.gov/archaeology/tribal-consultation-information>

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

Thank you for the opportunity to comment on this project. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Should you have any questions, please feel free to contact me.

Sincerely,



Stephanie Jolivette, M.A.
Local Governments Archaeologist
(360) 628-2755
Stephanie.Jolivette@dahp.wa.gov



Ann Siegenthaler

From: Sears, Tricia (DNR) <Tricia.Sears@dnr.wa.gov>
Sent: Tuesday, March 5, 2024 11:41 AM
To: Ann Siegenthaler
Cc: Sears, Tricia (DNR); Smith, Valerie (COM)
Subject: Sumner Comprehensive Plan and Development Regulation Amendment: WGS comments

****EXTERNAL EMAIL****

3/5/24

Hello Ann,

In keeping with the interagency correspondence principles, I am providing you with comments on the proposed changes to the Sumner Comprehensive Plan and Development Regulation Amendment (Commerce ID# 2024-S-6918).

3-1

I looked at the entire proposal and focused on areas related to WGS work.

There are no changes to the mineral resources lands text. There are changes to the geologically hazardous areas text. Those changes look good, particularly the changes to the newly titled Geologically Hazardous Areas and Special Flood Hazard Areas on page 90. Kudos to you for making all of these changes!

Recognizing the limitations of the current proposals, for consideration in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions.
- Consider adding a reference to the WGS Geologic Information Portal. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. [Geologic Information Portal | WA - DNR](#)
- If you have not checked out our Geologic Planning page, you may wish to do so. [Geologic Planning | WA - DNR](#)

Thank you for considering our comments. If you have any questions or need additional information, please contact me. For your convenience, if there are no concerns or follow-up discussion, you may consider these comments to be final as of the 60-day comment deadline of 4/29/24.

Cheerio,
Tricia

Tricia R. Sears (she/her/hers)
Geologic Planning Liaison
Washington Geological Survey (WGS)
Washington Department of Natural Resources (DNR)
Cell: 360-628-2867 | Email: tricia.sears@dnr.wa.gov

Letter 4

From: Elizabeth Weldin <elizabeth.weldin@piercecounitywa.gov>
 Sent: Monday, April 29, 2024 7:00 AM
 To: Lana Hoover <Lanah@sumnerwa.gov>; Ann Siegenthaler <AnnSi@sumnerwa.gov>
 Cc: Krystal Kyer <krystal.kyer@piercecounitywa.gov>; Greta Holmstrom <greta.holmstrom@piercecounitywa.gov>; Angela Angove <angela.angove@piercecounitywa.gov>; Erick Thompson <erick.thompson@piercecounitywa.gov>; Helmut Schmidt <helmut.schmidt@piercecounitywa.gov>; Dennis Dixon <dennis.dixon@piercecounitywa.gov>; Sarah Motsenbocker <sarah.motsenbocker@piercecounitywa.gov>; Kevin Dragon <kevin.dragon@piercecounitywa.gov>
 Subject: Comments/Party of Record Request: Sumner 2024 Comprehensive Plan Update (SEPA-2023-0003)

****EXTERNAL EMAIL****

Dear Ann Siegenthaler and Lana Hoover,

We are submitting comments for the City of Sumner's Notice of Application for the Draft Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement (SEPA-2023-0003). Please confirm receipt of this e-mail.

We currently have no comments but reserve the right to comment if there are changes to the Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement.

We would like to become a Party of Record for this project.

We appreciate your time.

Thank you.

Elizabeth Weldin
 Senior Planner
 Planning & Public Works | Surface Water Management
 (253) 798-2492

From: City of Sumner <mailto:lanah@sumnerwa.gov>
 Sent: Friday, March 1, 2024 8:45 AM
 To: Elizabeth Weldin <mailto:elizabeth.weldin@piercecounitywa.gov>
 Subject: Sumner 2024 Comprehensive Plan Update

Notice of Application/Notice of Hearing
 Sumner 2024 Comprehensive Plan Update

Notice of Availability of Draft Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement
 Notice of Planning Commission Public Hearing
 Pursuant to WAC 197-11-230 and WAC 197-11-455 the City of Sumner is issuing its integrated Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement (Volume II) for a 60-day public comment period. Draft Zoning Code Amendments are appended to the documents. A public hearing before the Planning Commission is scheduled to invite oral public comment.

Date of Issuance: March 1, 2024
 Lead Agency: City of Sumner
 Agency File Number: SEPA-2023-0003
 Contact: Ann Siegenthaler, Senior Planner, City of Sumner Community Development Department, 1104 Maple Street, Sumner, WA 98390, (253) 299-5520, <mailto:annsi@sumnerwa.gov>

Description of Proposal:

The City of Sumner is required to update its Comprehensive Plan by December 31, 2024 to meet the requirements of the Washington State Growth Management Act and other regional policies. As part of the update, the City will amend all its plan elements and related plans and necessary implementing development regulations, including the Transportation Management Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

The Comprehensive Plan Draft Environmental Impact Statement (Draft EIS) includes environmental analysis of three plan alternatives and identification of impacts and mitigation measures. The EIS alternatives consider a range of approaches to distributing Sumner's growth.
 Location of Proposal: City of Sumner and Potential Annexation Areas within the Urban Growth Area.

4-1

Public Comment Period: Agencies, affected tribes, and members of the public are invited to comment on the proposed contents of the Draft EIS and the integrated Draft Plan. Comments will be accepted from 5:00 pm PST on March 1, 2024 through 5:00 pm PST on April 30, 2024. All comments must be submitted in writing by this date.

Comments may be submitted by email or by mail (email is preferred). Please include your contact information in your comment (including a valid mailing or email address; an address is required to be considered an official party of record).

Email: mailto:annsi@sumnerwa.gov

Mail: Ann Siegenthaler, Senior Planner, City of Sumner Community Development Department, 1104 Maple Street, Sumner, WA 98390

Public Hearing: NOTICE IS HEREBY GIVEN that the Planning Commission has scheduled a public hearing for Thursday, April 4, 2024, at 6pm at Sumner City Hall Council Chambers. The public may attend in person or via the virtual Zoom meeting (link below) for the purposes of providing comments on the integrated Draft Comprehensive Plan, Zoning Code Amendments, and Draft EIS.

JOIN VIRTUALLY VIA ZOOM

MEETING: https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2F2r20.rs6.net%2Ftn.jsp%3Ff%3D001E0MIFvRbDPye-ZzsOvCO9vMccq3cXU2Q74kg0NEUe7BRX83AvZHRxgg3S8FtLN9W9Nzvl-Bd_moN4eVxozc5u8f65ytiXwgyB7CjgHd83OHdpueXlAKINRDQOGsojUVGddj6VWlUjoVWcguw8QX0dkHQPVBCdfop7L5uoCIWlv8%3D%26c%3DyIM6wb3Ru9IDHDPH82QEAZCo3ArDUcniaw8oqZkhX-XcRXzZVAjk3ig%3D%3D%26ch%3DyOrveBhtMjvE1vPlu1_sScpkIAoCJh6RDWC-m8SG_13olznRdDPAOQ%3D%3D&data=05%7C02%7Cannsi%40sumnerwa.gov%7C11a6b077398a4aba5fda08dc6854b321%7Cd2e17d565ed44f6d984778f1db76cd6f%7C1%7C0%7C638499960223019199%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAilCJQljoIv2luMzIlCjBTll6Ik1haWwILCjXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=aEdGe2phJ2TzhXifHpdWpPsZBe1swQLg9uIW%2Bjo%2F28%3D&reserved=0

Or by phone: 12532158782 (Tacoma) Webinar ID: 851 1570 7843

Responsible Official: Ryan Windish, SEPA Official, Community & Economic Development Director, City of Sumner, 1104 Maple Street, Sumner, WA 98390

Associated Documents:

The Draft EIS is posted on the City of Sumner's website

at https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2F2r20.rs6.net%2Ftn.jsp%3Ff%3D001E0MIFvRbDPye-ZzsOvCO9vMccq3cXU2Q74kg0NEUe7BRX83AvZHRxgg6mGY1ltRk-leSO3nzC4MGExh32nYmV82VtCcUenTvO3LIFYoXPdpdM_Q7RqyMRpQIPxj5LpTW81-KHtmLDOPCYCtpOqTbXzDyghctmmDaC5xmISCVMcGvHROSasQ%3D%3D%26c%3DyIM6wb3Ru9IDHDPH82QEAZCo3ArDUcniaw8oqZkhX-XcRXzZVAjk3ig%3D%3D%26ch%3DyOrveBhtMjvE1vPlu1_sScpkIAoCJh6RDWC-m8SG_13olznRdDPAOQ%3D%3D&data=05%7C02%7Cannsi%40sumnerwa.gov%7C11a6b077398a4aba5fda08dc6854b321%7Cd2e17d565ed44f6d984778f1db76cd6f%7C1%7C0%7C638499960223035316%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAilCJQljoIv2luMzIlCjBTll6Ik1haWwILCjXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=Wkxe8ALQgaurm3gRpDMdfcFvsaYsXZlNFPKNAATUwv%3D&reserved=0. Contact the staff person above if you are unable to access the documents online; alternate formats may be available at cost.

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Letter 5

Ann Siegenthaler

From: Brown, David P <David.P.Brown@pse.com>
Sent: Wednesday, April 17, 2024 5:26 PM
To: Ann Siegenthaler
Cc: Nhan, Christine
Subject: Sumner Comprehensive Plan - PSE Comments - April 2024
Attachments: PSE Comp Plan Language Comments April 2024.xlsx

****EXTERNAL EMAIL****

Dear Ann,

On behalf of Puget Sound Energy (PSE), I am reaching out to convey our thoughts for your consideration as part of the periodic update to the comprehensive plan and development regulations under the Revised Code of Washington (RCW), specifically Chapters 36.70A and 43.21C.

The attached spreadsheet contains suggested language as it relates to customer programs and our shared climate goals. In the attached, you will find 7 tabs grouped by category.

At PSE, we recognize that climate change is one of the biggest existential threats facing our planet today. As one of the largest producers of renewable energy in the Pacific Northwest, PSE has been an early leader in addressing climate change and investing billions in renewable resources and energy efficiency for homes and businesses. Now, PSE is on the path to meet the current and future needs of its customers and to deliver on the requirements to decarbonize operations and serve its customers and communities equitably. This transition is unprecedented in terms of the magnitude of the change and the accelerated time frame in which it must be achieved. By working together, we can successfully drive towards our shared clean energy goals.

PSE looks forward to providing input as the comprehensive plan items are discussed in more detail. Together, we can reduce emissions and keep energy safe, reliable, and affordable.

Thank you,
David

*David Parker Brown
Municipal Liaison Manager for Pierce County
Puget Sound Energy
david.p.brown@pse.com
206.304.2962*

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Energy Equity	
PSE Program	Model Comp Plan Language
Assistance Programs	
PSE's Bill Discount Rate (BDR): Our BDR program provides income qualified customers with ongoing help on their monthly energy bill. Depending on household income and size, customers can save 5% to 45% a month on your bill. PSE Home Energy Lifeline Program (HELP): PSE provides qualified customers with bill-payment assistance beyond the Washington state LIHEAP program. Customers do not need to owe a balance on their PSE bill to apply. LIHEAP Program: This government program provides financial assistance so eligible households can maintain affordable, dependable utility services and avoid disconnection. PSE can assist with eligibility requirements and applications.	
The Salvation Army Warm Home Fund: Administered by the SA and funded by voluntary contributions from PSE customers, employees, and investors. The Warm Home Fund provides short-term, emergency bill payment assistance to PSE customers facing financial difficulties.	
Payment Arrangements: PSE will work with customers to produce a manageable payment schedule with a realistic timeline for up to 18 months.	Partner with PSE to promote financial assistance and discounted billing programs for income qualified residents in order to ensure that the most vulnerable are not disproportionately impacted by the State's clean energy transition.
Budget Payment Plan: PSE provides customers with a predictable average monthly payment to reduce bill fluctuation and avoid unplanned high bills during winter heating months.	

Home Weatherization Assistance: This program provides free upgrades for single-family homes, manufactured homes or eligible apartment buildings. Upgrades can include insulation, duct sealing and much more.

Energy Efficiency Boost Rebates: PSE offers higher rebates on energy-efficient upgrades to income-qualified customers.

Low-Income Eligible Community Solar: This no cost program enables bill savings of up to \$40 per month for income eligible customers.

Electric Vehicles	
PSE Program	Model Comp Plan Language
PSE Up & Go EV Charging Programs	
PSE Up & Go Electric for Public: PSE helps organizations easily and affordably install public charging for all EV drivers.	
PSE Up & Go Electric for Fleet: PSE empowers businesses, municipalities and more with electrifying their fleets.	
PSE Up & Go Electric for Multifamily: PSE brings pole charging to multifamily properties to attract new residents and keep existing ones.	Support EV charging infrastructure throughout the community in order to support the decarbonization of our transportation sector.
PSE Up & Go Electric for Workplace: PSE brings charging to workplaces so employees can electrify their commutes.	
PSE Home Charging: PSE provides rebates and incentives for the installation of home EV charging stations.	

Energy Efficiency & Green Options	
PSE Program	Model Comp Plan Language
Energy Efficiency	
Home Energy Assessment: PSE offers a quick and convenient 3-step process to help customers understand and control their home's energy usage.	
Energy Efficiency Rebates:	
• Appliance program • Electric hybrid heat pump water heaters • Smart thermostats program • Weatherization program • Windows, water heat and space heat programs • Home weatherization assistance • Insulation	Partner with PSE to promote energy efficiency programs and initiatives. Expedite permitting processes related to energy efficiency upgrades.
Other PSE Energy Rebates:	
• EV chargers • New construction	
Clean Buildings Accelerator: PSE assists customers with complying with Washington's Clean Buildings Law (HB 1257, 2019).	
Green Options	
Green Power: PSE customers can voluntarily contribute to PSE investments in renewable energy projects in the Pacific Northwest.	
Solar Choice: PSE customers can voluntarily purchase solar energy from independent sources through PSE.	
Carbon Balance: PSE customers can voluntarily purchase carbon offsets from local forestry projects through PSE.	
Community Solar: PSE customers can voluntarily contribute to solar projects of their choice installed on such facilities as local school and community centers.	Partner with PSE to promote local investments and customer enrollment in clean energy projects and programs in order to achieve clean energy goals.
Renewable Natural Gas: PSE customers can voluntarily purchase blocks of RNG to lower than carbon usage and support the development of locally produced RNG.	
Green Direct: This program is offered to local municipalities and corporations seeking to reduce their carbon footprint by investing in large scale renewable energy projects. This program is currently full.	

Demand Response - Energy Management	
PSE Program	Model Comp Plan Language
Peak Load Shifting	
Time of Use (TOU) Program: PSE's current pilot program uses variable 24 hour pricing to incentivize customers to use less power during times of peak demand.	
Flex Rewards: This program encourages and financially incentivizes voluntary reduction in energy use during peak demand.	Partner with PSE to promote and support programs designed to decrease load on the grid during times of peak use.
Flex Smart: This program financially rewards customers for allowing PSE to make remote minor adjustments to thermostats during periods of high peak load and demand.	
Flex EV: This program incentivizes EV charging during off-peak hours.	

Grid Modernization & Infrastructure	
PSE Investments/Initiatives	Model Comp Plan Language
New Carbon Free Electrical Generation & Energy Storage Systems	
Wind and Hybrid Wind (co-located wind and battery): A variable source of power representing approximately 30% of PSE's future electric resource need by 2030. Solar and Hybrid Solar (co-located solar and battery): A variable source of power representing approximately 16% of PSE's future electric resource need by 2030. Utility-Scale Battery Energy Storage Systems (BESS): A technology that will allow energy to be stored for future use representing about 22% of PSE's future electric resource need by 2030. Types of energy storage technology include: • Chemical (e.g., Lithium-Ion, Iron-Air) • Thermal (e.g., carbon, molten salt) • Gravity (e.g., water pumping, mechanical) Variable generation sources (wind & solar) require large scale Battery Energy Storage Systems (BESS) to be fully utilized since the sun goes down when demand increases and wind often fades when most needed; such as during extremely cold weather. Batteries maximize electrical production from variable generation sources, help meet periods of peak demand, and provide greater reliability for the grid.	Partner with PSE to effectively meet rapidly increasing electrical demand as the City and region work to achieve a Clean Energy Transition by adopting codes that support siting existing and new technologies.
New and Upgraded Transmission Lines, Substations, and Distribution Lines	
New regional transmission lines are needed to serve new utility scale clean energy resources, such as wind and solar. New local transmission lines are needed to meet increasing local demand due to growth, EV's, and electrification of the heating sector (e.g., Sammamish to Juanita line in Kirkland). Transmission upgrades are needed to meet increasing local demand (e.g., Energize Eastside line in Redmond, Bellevue, Newcastle, and Renton upgraded from 115kv to 230kv) due to growth, EVs, and electrification of the heating sector. In order to assure continued capacity and reliability, new and larger substations will be needed to meet growing energy needs due to growth, EVs and electrification of the heating sector. Additional 12.5kv distribution lines will be needed to meet growing energy needs due to growth, EVs and electrification of the heating sector.	Expedite the local permitting and approval process in order to maintain grid capacity and reliability.
Behind the Meter - Distributed Energy Resources (DER)	
Customer Connected Solar: PSE assists customers with information and resources for installing residential solar projects and how to apply for interconnection and net metering with PSE. Battery Walls: PSE offers installation guidelines and a process whereby customers can report battery installations. Host An Energy Project: Community partners can get paid to lease space to PSE to develop distributed solar and/or battery storage projects. Distributed Renewables: PSE supports the development of commercial customer-owned renewable energy projects that generate between 100 kilowatts and 5 megawatts to interconnect to the PSE electrical distribution grid.	Promote and support the growth of customer owned distributed energy resources.
Vegetation Management	
Many cities are pursuing aggressive urban forestry programs in order to beautify their community, reduce heat islands, and to provide carbon offsets. Such policies should be balanced with the need to protect electrical system reliability around overhead lines.	Support ongoing vegetation management in order to maintain system reliability.
Public Funding	
Recent state and federal legislation, including the IIJA and IRA, have unlocked public funding for climate and environmental benefit. PSE is aggressively pursuing all applicable funding opportunities to support lower customer bills, reduced power costs, and investments in the grid and clean energy. PSE is also supporting municipalities, tribes, and non-profits in their applications for public funding.	Pursue public-private partnership to seek funding sources to accelerate clean energy projects.

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continued

Wildfire Preparedness	
PSE Program	Model Comp Plan Language
Wildfire Mitigation	
Situational Awareness: PSE evaluates the condition of the electric system, as well as the environment around it, using real-time weather data, wildfire risk modeling and pre-wildfire season inspections. Strengthening the electric system: PSE regularly maintains and updates the electric system to provide safe and reliable power to our customers. In areas of high wildfire risk, we identify maintenance and improvement activities that will further reduce the risk of wildfire, including <i>vegetation management</i>, equipment upgrades, and in some cases, moving power lines underground. Operational Procedures: During wildfire season, PSE may change some device settings or implement operational procedures to reduce the risk of wildfire. In the future, PSE may proactively turn off power during high wildfire risk conditions to help prevent wildfires. This is called a <i>Public Safety Power Shutoff (PSPS)</i>. Emergency Response: During an emergency, including an active wildfire, PSE will coordinate with local emergency officials and may implement emergency response procedures. This may include turning off power at the request of emergency officials for public and first responder safety.	Support PSE’s wildfire mitigation efforts including electric system upgrades, year-round vegetation management, and fire weather operational procedures. Work closely with utilities and local fire departments to lessen the risk and impact of wildfires.

Gas Conservation & Decarbonization	
PSE Program	Model Comp Plan Language
Gas Decarbonization	
Renewable Natural Gas Production Utilizing wastewater facility, landfill, or similar system.	Evaluate the potential for renewable, recoverable natural gas in exisiting systems.

Letter 6

Ann Siegenthaler

From: David Dixon <DDixon@psrc.org>
Sent: Friday, April 19, 2024 10:13 AM
To: Ann Siegenthaler
Cc: PlanReview; COM GMU Review Team; eric.guida@commerce.wa.gov
Subject: Sumner Comprehensive Plan DEIS Comments
Attachments: PSRC_Sumner Draft Comprehensive Plan_Comment Letter_April 2024.pdf

****EXTERNAL EMAIL****

Hi Ann,

Thanks for taking the time to meet with us to discuss the Sumner Draft Comprehensive Plan.

As I noted in our conversation, the DEIS and appendices contain strong narrative sections describing the background for many of the plan's goals and policies. Consider including content from, or references to, these sections in the Comprehensive Plan text.

Our comments on the plan are included in the attached document, with links to relevant resources. Please reach out if you have any questions.

Best,

David Dixon (he/him)

Associate Planner

Puget Sound Regional Council

Phone 206-464-6174

ddixon@psrc.org

www.psrc.org

We've moved!

1201 Third Avenue, Suite 500, Seattle, WA 98101



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Puget Sound Regional Council

1201 Third Avenue, Suite 500 Seattle, WA 98101-3055 | psrc.org | 206-464-7090

April 19, 2024

Ann Siegenthaler, Senior Planner
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

Subject: PSRC Comments on City of Sumner Draft Comprehensive Plan

Dear Ms. Siegenthaler,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Sumner draft comprehensive plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review while in draft form. This timely collaboration provides an opportunity to review plan elements for the 2024 comprehensive plan and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. Overall, we found few things to comment on. Importantly, though, we encourage the city to work towards a final draft that uses land use assumptions and capacity figures that are consistent with the city's adopted growth targets and to update the Sumner-Pacific Manufacturing/Industrial Center Subarea Plan to reflect the updated targets and [PSRC's regional centers framework](#). We will look forward to continuing to work with you as you prepare the comprehensive plan update.

We reviewed the draft plan using the PSRC Plan Review Consistency Tool. Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right:

6-1
continued

Plan Review Consistency Tool	PSRC Comment on Draft Sumner Plan
Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)	Housing needs assessment is strong, including recommended policy changes to address barriers to housing production.
Use consistent land use assumptions throughout plan (RCW 36.70A.070, WAC 365-196-430)	However, while zoned capacity for growth may exceed growth targets, the values used in transportation modeling and other elements must be substantially consistent with the adopted countywide growth targets. If adjustments to growth targets are needed , the city should coordinate through the countywide process.
Jurisdictions with regional centers: Support the update of regional center subarea plans to be consistent with the revised Center Plan Tools (DP-Action-8)	Please review and update the Sumner-Pacific MIC Subarea Plan as needed to ensure consistency with the city's adopted growth targets and the Regional Manufacturing/Industrial Center Consistency Tool . In 2025 PSRC will be monitoring individual centers and looking for consistency with VISION 2050. Employment targets should be more prominent in the comprehensive plan and incorporated into the subarea plan.
Develop a range of employment opportunities to create a closer balance between jobs and housing (MPP-Ec-18)	The plan would benefit from a discussion of the current employment and commuting characteristics of Fircrest's residents to coordinate land use, transportation, and economic development elements. The Census Bureau's On the Map tool provides information on commute and employment patterns.

6-1
continued

6-2

6-3

PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can also be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the adoption process. If you have any questions or need additional information, please contact me at 206-464-6172 or ddixon@psrc.org.

6-3
continued

Sincerely,



David Dixon, Associate Planner
Puget Sound Regional Council

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

Letter 7

From: [DFW R6SSolanning](#)
To: [Ryan Windish](#); [Ann Segenthaler](#)
Cc: [Lentes, Gwendolen A \(DFW\)](#); [Bryant, Jessica \(DFW\)](#); [Winter, Elliott \(DFW\)](#); [Whittaker, Kara A \(DFW\)](#); [Berejikian, Marian \(DFW\)](#); [Penk, Miles A \(DFW\)](#); [Eberly, Jennifer C \(DFW\)](#); [Guida, Eric \(COM\)](#)
Subject: WDFW Comments for City of Sumner's Draft Comp. Plan and Draft EIS
Date: Tuesday, April 30, 2024 3:40:14 PM
Attachments: [WDFW Letter For Sumner Draft CAO and Comp Plan 4.30.24.pdf](#)
[WDFW Letter For Sumner DEIS 4.30.24.pdf](#)

****EXTERNAL EMAIL****

Hello Ryan and Ann,

Please see the attached WDFW comments for the City of Sumner's Draft Comprehensive Plan, Draft Code Changes, and Draft Environmental Impact Statement. These letters were written to reply to Volume I and Volume II that the City issued for public review on March 1, 2024, and we request that our comments be added to the public comment record that closes today.

Thank you,

Jessica Bryant (she/her)

Regional Land Use Planner – Region 6

Washington Department of Fish and Wildlife

Jessica.Bryant@dfw.wa.gov

(564) 669-4755



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
 Coastal Region • Region 6 • 48 Devonshire Road, Montesano, WA 98563-9618
 Telephone: (360) 249-4628 • Fax: (360) 249-1229

April 29, 2024

City of Sumner
 ATTN: Ryan Windish, Community Development Director
 1104 Maple Street
 Sumner WA, 98390

Subject: WDFW Comments on the City of Sumner 2024 Draft Environmental Impact Statement

Dear Ryan Windish,

On behalf of the Washington Department of Fish and Wildlife (WDFW), we offer our comments on the proposed Draft Environmental Impact Statement (DEIS) outlined in Volume II, as part of the current periodic review under the Growth Management Act (GMA). WDFW is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

In recognition of our responsibilities, we submit the following comments for the City's DEIS; other comments may be offered in the future. We strive to maintain contact throughout this update process and look forward to continued engagement as the process moves toward completion.

WDFW Recommendations:

WDFW evaluated the three alternatives outlined in the City's DEIS and the below sections summarize the highlights and disadvantages of each alternative from our perspective. WDFW recognizes that by necessity, all alternatives result in increased urbanization of the City. Increased urbanization and its' encroachment upon natural resources may have unintended adverse impacts on habitats and ecosystems that humans and wildlife depend on. In our overarching comments section, we emphasize where we see opportunity to further improve these alternatives to increase the long-term resilience of the City's riparian ecosystems and their extensive co-benefits.

Alternative 1, "No Action"

Alternative 1 does not offer any extra environmental safeguards beyond the present levels. These protective measures currently fall short of WDFW's management recommendations that are based on the best available scientific evidence and the goals of GMA during this periodic update. Due to these factors, WDFW requests that the city not pursue Alternative 1.

Alternative 2

WDFW supports the environmental protections outlined in Alternative 2 that go beyond Alternative 1 such as concentrating urban growth within already developed areas, limiting expanded development to

7-1

Page 2

the Cava gravel mine, and increasing the environmental protections outlined in the City's critical area ordinance (CAO). However, as noted in the natural environmental chapter of the DEIS, this alternative has the highest level of expanded impervious surfaces of the three alternatives that will impact habitat fragmentation, open space corridors, and stormwater runoff. Due to these concerns, WDFW does not fully support this alternative.

Alternative 3

Similar to Alternative 2, WDFW has limited support for this alternative. The agency supports the compact growth focused in already developed areas, the promoted infill, and the increased protections within the CAO proposed in Alternative 3. As development pressures increase, habitat fragmentation, open space corridors and stormwater runoff may negatively impact the natural environment within the City.

The increased environmental protections outlined in Alternatives 2 and 3 fall short of fully meeting WDFW's management recommendations as detailed below.

Overarching Comments:

Our agency requests that the City of Sumner consider using low-impact development and green infrastructure during infill development to promote better air and water quality, stormwater management, climate adaptation measures, and limited impervious surfaces during development. Although not required until 2029 for Pierce County jurisdictions, WDFW supports early adoption of the climate change goals and [action plans](#) outlined by the Department of Commerce.

7-2

WDFW's management recommendation for full riparian function can be achieved using the Site Potential Tree Height at age 200 (SPTH₂₀₀). We urge the city to consider adopting this method for delineating riparian management zones in order to prevent any further loss of functions and values in these ecologically important and vulnerable priority habitats. This approach can also help to increase water and air quality, along with promoting habitat connectivity corridors and open spaces necessary for the urbanized environment of the city.

7-3

WDFW underscores that cities and counties shall include the best available science in developing policies and development regulations (RCW 36.70A.172). Our riparian resources, including but not limited to the Riparian Ecosystems, [Volume 1: Science Synthesis and Management Implications](#), [Volume 2: Management Recommendations](#), and the [SPTH₂₀₀ GIS mapping tool](#), are based on current best available science. We encourage the City of Sumner to follow these recommendations more closely as the City continues to develop and revise its' DEIS alternatives, Comprehensive Plan, and Critical Areas Ordinance. When departures from the best available science are made in policies and development regulations, scientifically based, reasoned justifications must be provided in the record (WAC 365-195-915(1)(c)). Adaptive management should be followed when departures from the best available science occur as outlined in WAC 365-195-920 (1)(b).

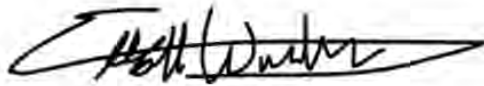
We value our relationship with the City and look forward to working collaboratively with everyone involved as this periodic update is brought to a successful conclusion, especially as you contemplate

Page 3

7-3
continued

revisions to the City's proposed Comprehensive Plan and Critical Areas Ordinance. If you have any questions or concerns, please feel free to contact me at 360-280-6622 or Elliott.Winter@dfw.wa.gov.

Sincerely,



Elliott Winter
Assistant Regional Habitat Program Manager
1111 Washington St. SE
Olympia, WA 98501

Cc: Gwen Lentes, Regional Habitat Program Manager (Gwendolen.Lentes@dfw.wa.gov)
Jessica Bryant, Regional Land Use Planner (Jessica.Bryant@dfw.wa.gov)
Kara Whittaker, LUCP Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)
Miles Penk, Area Habitat Biologist (Miles.Penk@dfw.wa.gov)
Jennifer Eberly, Habitat Biologist (Jennifer.Eberly@dfw.wa.gov)



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 Telephone: (360) 249-4628 • Fax: (360) 249-1229

April 29, 2024

City of Sumner
 ATTN: Ryan Windish, Community Development Director
 1104 Maple Street
 Sumner WA, 98390

Subject: WDFW Comments on the City of Sumner 2024 Draft Comprehensive Plan and Draft Code Updates

Dear Ryan Windish,

On behalf of the Washington Department of Fish and Wildlife (WDFW), we offer our comments on the 2024 Draft Comprehensive Plan and Critical Area Ordinances (CAO) Updates outlined in Volume I, as part of the current periodic review under the Growth Management Act (GMA). WDFW is dedicated to preserving, protecting, and perpetuating the state's fish, wildlife, and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities.

In recognition of our responsibilities, we submit the following comments for 2024 draft updates; acknowledging other comments may be offered in the future. We strive to maintain contact throughout this update process and look forward to continued engagement as the process moves to completion.

Draft Comprehensive Plan Update:

Community Character 1.3 – Design Guidelines. Maintain design guidelines and/or a form-based code that address streetscape, landscape, and building design to ensure high quality and compatible development....

WDFW recommends adding a reference to the Department of Commerce's [Menu of Measures](#) for climate planning guidance and a statement that low impact development (LID) should be followed for new and re-development projects.

Community Character 3.7 – Encourage more housing in Town Center to strengthen downtown businesses, take advantage of the commuter train, offer a range of housing in the community, and to provide an active, social character in the daytime and evenings.

We support the City offering a range of housing types in the Town Center and encourage the use of infill and housing types beyond single-family housing thereby ensuring a higher housing density within the urban area. Concentrated housing may prevent urban sprawl and deductions of habitat areas.

Page 2

Community Character 5.9 – Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.

We support the City of Sumner in identifying and taking steps to expand habitat protection and improve habitat quality and connectivity by acquiring parcels for parks and open spaces. We encourage the City to look for opportunities to connect these open spaces and to foster climate resilience using conservation area designations, buffers, and open space corridors.

Critical Areas Code Amendments:

Table 1. Recommended changes to proposed CAO language from WDFW. Policy language suggestions and their legal implications should be vetted by the jurisdiction receiving them.

Policy Number	Policy Language (with WDFW suggestions in red)	WDFW comment
16.40.060	"Fish and wildlife conservation areas"	A definition for fish and wildlife conservation areas should be added to this section of the code. Pierce County's municipal code currently defines these areas as: "Fish and wildlife habitat conservation areas" means a geographic area or areas necessary for maintaining species and may include areas of unique vegetation, successional stage, or habitat elements important to fish and wildlife, and may also include the connecting corridors between these areas.
16.40.060	"Mitigation"	A definition for mitigation should be added to the city's definition list that outlines the 6 steps of the mitigation sequencing process: avoid impacts; minimize impacts; rectify the impact, reducing or eliminating the impact over time; compensating for the impact; monitoring the impact and taking appropriate corrective measures.
16.40.060	"Riparian management zone" means the regulated buffer area that includes the land from the ordinary high water mark or channel migration zone, if present, to a specified distance as measured horizontally in each direction.	Please include channel migration zones in the riparian management zone definition.

Page 3

16.40.060	"Water Types"	The water types detailed in section 16.56.100 C. 1 should be defined in the definitions of the critical areas code.
16.40.100 G.	The following utility line activities...and the proposal protects and fully mitigates impacts to achieve no net loss to the critical area functions and values consistent with the best available science.	We encourage the added clarity for this exemption to achieve no net loss of any critical area.
16.40.105	Reconstruction, remodeling, or maintenance...does not increase the building footprint, development area, impervious surface area or construction impacts within the critical area or its buffer.	We appreciate the additional language specifying that this type of activity will not impact critical areas or their associated buffers.
16.40.120 F.	In the granting of all variances, the mitigation sequence shall apply, and consideration shall be given to the cumulative impact of additional requests for all actions in the area and the total impacts to critical areas functions and values resulting from granting the variances will be fully offset.	WDFW suggestions adding that variances should still comply with the mitigation sequence and that impacts to critical areas need to be fully offset.
16.40.120 G.	U.S. Fish and Wildlife Service and the National Marine Fisheries Service and State agencies, i.e. WDFW and WDNR, shall be sent a notice of application for any variance requesting the reduction of buffer widths on Type F streams.	Please change this code to state that state agencies shall also receive a notice of application in these variance cases.
16.40.150 D.	Whenever conflicts exist between federal, state or local laws, ordinances, or rules, the more restrictive provision shall apply.	WDFW supports this additional code.
16.56.060 B.	The Washington Department of Fish and Wildlife Priority Habitats and Species (PHS) Program;	Please update this language from the "Washington Department of Wildlife" to the "Washington Department of Fish and Wildlife"
16.56.080 B.	The habitat management plan for sites within 300 feet of documented critical areas or habitat for threatened, endangered, or sensitive fish and wildlife species (SMC 16.56.070) or sites containing a wetland, wetland buffer stream, or stream buffer (SMC 16.56.070) shall contain at a minimum:	We request that critical areas be added to this code to aid the definition of habitat here. This code has SMC 16.56.070(A) and (B) written but SMC 16.65.070 no longer appears to have subsections and this should be captured in this update.

Page 4

16.56.080 E.	...The city shall forward the monitoring reports annually to the federal and state agencies with expertise regarding the particular fish or wildlife identified in the HMP along with the following:	Please update this code to state that state agencies shall also receive a notice of these monitoring reports as applicable.
16.56.100 C. 1.	Fish Bearing (F) – 100 feet buffer width in feet. Non-fish Bearing perennial (Np) – 100 feet buffer width in feet. Non-fish Bearing seasonal (Ns) – 100 feet buffer width in feet.	We are encouraged to see the proposed increase in stream buffer widths for stream types Np and Ns, which enable the city to protect and restore a higher level of riparian function than its CAO currently provides. The increase of all buffers to 100 feet aligns with our minimum recommendation necessary for 95% pollution removal target for most pollutants. However, the proposed buffers fall short of WDFW's full Volume 2: Management Recommendations that are based on the best available science. WDFW recommends that riparian management zones follow Site Potential Tree Height at age 200 (SPTH₂₀₀, where it exceeds 100 feet). WDFW encourages the City of Sumner to use SPTH₂₀₀ values indicated in the SPTH₂₀₀ GIS mapping tool for all stream buffers with deviations from this BAS detailed with a reasoned justification. As a possible solution, we encourage the City to indicate that SPTH₂₀₀ could be used as an alternative buffer width in its development standards and if used, this option could potentially be incentivized to reach full riparian functions in the future.
16.56.100 D.	Functionally Disconnected Buffer Area. The director may minimally reduce the required buffer due to intervening structures., pursuant to SMC 16.46.150 (N).	This code currently references SMC 16.46.150 (N) which is the buffer requirements for wetlands. This reference should be removed since wetlands and fish and wildlife habitat conservation areas are different critical areas that may but do not always interact. In addition to this removal, buffers should be minimal amount possible and follow a similar process as outlined in SMC 16.56.100 G.

Page 5

16.56.100 G. 3.	The impervious surface of the reduced portion of the buffer shall not exceed 10 percent unless the following measures are taken:	This code is proposed to be removed however, we encourage the City to consider not removing this code or the sub-code contained. This code limits the amount of impervious surface that could be added to a reduced buffer location thereby limiting the impacts that development would have on critical areas on site.
-----------------	--	---

Thank you for taking the time to consider our recommendations for your CAO to better reflect the best available science for fish and wildlife habitat and ecosystems. We value the relationship we have with your jurisdiction and the opportunity to work collaboratively with you throughout this periodic update cycle. If you have any questions or need our technical assistance or resources at any time during this process, please don't hesitate to contact me at 360-280-6622 or Elliott.Winter@dfw.wa.gov.

Sincerely,



Elliott Winter
Assistant Regional Habitat Program Manager
1111 Washington St. SE
Olympia, WA 98501

Cc: Gwen Lentes, Regional Habitat Program Manager (Gwendolen.Lentes@dfw.wa.gov)
Jessica Bryant, Regional Land Use Planner (Jessica.Bryant@dfw.wa.gov)
Kara Whittaker, LUCP Section Manager (Kara.Whittaker@dfw.wa.gov)
Marian Berejikian, Environmental Planner (Marian.Berejikian@dfw.wa.gov)
Miles Penk, Area Habitat Biologist (Miles.Penk@dfw.wa.gov)
Jennifer Eberly, Habitat Biologist (Jennifer.Eberly@dfw.wa.gov)

Letter 8

From: [Rigler, Genevieve](#)
To: [Ann Siegenthaler](#)
Subject: WSDOT Comment for Sumner Comprehensive Plan & DEIS
Date: Tuesday, April 30, 2024 11:16:29 PM

****EXTERNAL EMAIL****

Good evening, Ann,

WSDOT has reviewed Sumner's Comprehensive Plan and DEIS. Among other positive attributes of the plans, the Comprehensive Plan History gave unique insight into the development of Sumner. Adding context for vision casting is valuable for agency partners, such as us, and community members.

Our only comment is related to the EIS Scoping comment we submitted last June requesting Sumner's "...EIS provide thorough analysis and documentation of the 'estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions' (RCW 36.70a.070(6)(a)(ii))". We recognize the RCW language leaves this to jurisdiction interpretation and we'd appreciate understanding how that was addressed from Sumner's perspective.

Kind regards,
Genevieve

Genevieve Rigler

Transportation Planning Specialist

WSDOT Olympic Region | Multimodal Planning | 360-704-3203

8-1

Letter 9

From: [JIM BLAIS](#)
To: [Ann Siegenthaler](#)
Subject: Comp Plan Comment Letter CAVA
Date: Tuesday, April 30, 2024 4:40:10 PM
Attachments: [SKM_C250i24043004370.pdf](#)

****EXTERNAL EMAIL****

Ann,

Please find the attached comment letter from CAVA Materials on the Draft Comprehensive Plan. Thank you for your consideration.

Thank you,

Jimmy Blais

Merlino Properties
5050 1st Ave. S., Suite 102
Seattle, WA 98134
Cell 206-255-5153
JBlais@gmccinc.com

April 30th, 2024

City of Sumner Community Development Department
Attn: Ann Siegenthaler
1104 Maple Street Suite 250
Sumner, WA 98390

Subject: City of Sumner Draft Comprehensive Plan and EIS

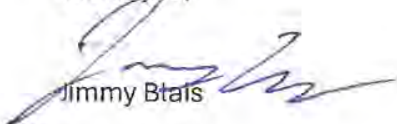
Dear Ms. Siegenthaler,

I am writing to you on behalf of Cava Materials, LLC in order to provide comments on the Sumner 2024 Comprehensive Plan Update and Draft Environmental Impact Statement. Cava Materials owns a ~200-acre sand and gravel mine located along East Valley Highway East, just south of Forest Canyon Road. The pit has been in operation since 1978 and continues to provide valuable mineral resources to the surrounding community. At the current production rates, it is estimated that there are approximately 5 years of useful mineral extraction left at the mine site. As such, we are in the early stages of planning for the future of the property.

9-1

Initial designs for the site have yielded upwards of 1,500 residential units, in various product types, from 3 story multifamily buildings to single family homes. The vision for the site aligns well with the currently proposed Alternative 2, within the 2024 Draft Comprehensive Plan. Cava supports the zoning change associated with this alternative and would be happy to work with the City to find ways to reduce and/or mitigate any potential negative impacts from such a development. I appreciate your consideration of Alternative 2 and look forward to helping the City achieve its housing goals under the 2024 Comprehensive Plan.

Thank you,



Jimmy Blais

Director
Cava Materials, LLC
5050 1st Avenue South
Suite 102
Seattle, WA 98134

Letter 10

From: [Randall Adams](#)
To: [Ann Siegenthaler](#)
Subject: 2024 Comp Plan citizen input before 3-27-24 @ 5:00 PM
Date: Wednesday, March 27, 2024 12:06:02 AM
Attachments: [Comp Plan Comments.docx](#)

****EXTERNAL EMAIL****

Anne,

Please forward my comments to the Planning Commission for their review.

Thank you kindly,

Randall Adams 15013 63rd St Ct E, Sumner WA 9890

Randall Adams; 15013 63rd St Ct E, Sumner WA 98390
Remarks concerning the 2024 Comp Plan Volume 1

10-1

Pg 15: Sumner the Vision:

KEEP IN: "Today and into the future, Sumner is bound together by its community pride, respect for neighbors, agricultural and small town heritage, support for small businesses as well as industry, and concern for the environment" **Keep our proud agricultural history!**

REMOVE: "In embracing our heritage while also looking forward, we set the standard of excellence for a progressive small city"; Define what this means/vague platitude. Certainly not progressive in protecting Senior citizens from utility rate hikes

KEEP: "This environment reflects our our agricultural small town heritage; Agricultural heritage is to be celebrated, not removed!"

Page 16: Community Layout

REMOVE all of this: "The community recognizes the central role that the downtown transit station plays in providing alternate modes of transportation for Sumner residents and workers and for the region. Neighborhoods are connected to the transit station and each other through an efficient transit network"; This advertisement brought to you by Sound Transit, no thank you!

KEEP: "and exemplifies our small town character" Be proud of our great small town, do not try to hide from it!

HOW DO YOU DO THIS? "Sumner retains its small town atmosphere and "walkability" by taking appropriate steps to improve the street system and to reduce commuter traffic through town. Not on Valley Avenue, just ask the Mayor!

REMOVE: "Sumner neighborhoods are linked by a network of sidewalks, trails, bicycle routes and a small-scale inter-city transit system." This is a 1 yr trial continued for 1yr, not a long term commitment!

Page 17: Residential Character

KEEP: "In 2050, Sumner's housing is predominately owner-occupied, and the community enjoys" Previously stated owner single family and owner-occupied multifamily housing

??? "Where renter-occupied multifamily is found, the developments are well-designed with attractive features, and well managed and maintained. Sure we hope so, yet how can you say this, it is happening in the future

??? "Such developments provide safe connections to schools and services, attractive amenities, and provide outdoor green spaces and recreation spaces for residents." If this is so, why do we need more parks for them?

??? "In 2050, Sumner continues to be a place where we and our children can afford to live and work, and where older residents can continue to age in place. Yet we are told the home values will be higher than nearby communities. No help for Seniors here!

KEEP IN: A higher density of housing that is typically owner-occupied and small-lot single family homes in a more traditional neighborhood pattern is concentrated in the downtown area, where it reflects the overall small town character of Sumner: Previously stated owner single family and owner-occupied multifamily housing. Apartments are not owner occupied!

KEEP IN: "City monthly operating expenses, and, therefore, individual taxes shall not increase to the point that living in Sumner is beyond the financial resources of our people. However, because there is not always a direct relationship between cost and quality, we realize that if the market determines that homes and other real estate is worth more in Sumner than other areas, we cannot control this factor. But we can control our homeowners' costs for City government expenses" **Actually do what you say!**

PG 19: History & Culture

KEEP IN: "The Sumner Historical Society finds support from a community aware"; Community supports & is aware, Not the City!

10-1
continuedPG 26: Governance

??? “New development contributes its fair share towards improvements in proportion to its impacts on the community.”
Then why do we have to have tax breaks for apartment developers, including downtown?

PG 23: Stewardship

KEEP IN!: “The settlers of the Sumner valley left us is filled with many beautiful and valuable resources” We get to enjoy this wonderful town because of the amazing settlers of this area, like Kincaid, Wolery, Ryan & more! How dare you remove them!

PG 24: Introduction

KEEP IN: These policies are not all inclusive with regard to governance of a historic growing community, but attempt to address the concerns expressed during the vision process as they relate most directly to planning and implementing a desired future for the community. Keep our historic community pride included!

REMOVE: “The policies in this chapter are not exhaustive, but attempt to address the role of City government in the community and the role of government in maintaining permitting and enforcement measures that support residents, employees, and business owners”; The history of Sumner is far more important than patting City Government on its back. If true, doesn’t need to be said!

PG 26: Governance & Permit Process: Introduction

KEEP IN: “These policies are not all inclusive with regard to governance of a historic growing community, but attempt to address the concerns expressed during the vision process as they relate most directly to planning and implementing a desired future for the community”. Keep our historic community pride included!

REMOVE, SAME AS ABOVE: The policies in this chapter are not exhaustive, but attempt to address the role of City government in the community and the role of government in maintaining permitting and enforcement measures that support residents, employees, and business owners. Again, history of Sumner is more important than patting City Government on the back!

PG 26: Goal, Policies and Objectives

??? Promote creative, progressive, and innovative solutions to the problems and issues that face the City. Removed? The City shall strive for progressive and innovative solutions that involve partnerships and collaboration with affected parties. Still waiting for the City to collaborate or partnership with citizens trying to Save the Ryan House!

PG 28:

KEEP IN: 6.1: Working with the Communications Director, provide a regular newsletter to the general public and work with local newspapers and other regularly published periodicals to provide information about policies and regulations;
Shouldn’t this be job #1 for the Communication Dept?

KEEP IN: 6.3:--Use other methods of communication, such as focus groups, advisory committees, the City’s website, e-media, surveys and consultations to inform the business and development community about regulations, plans and programs to get feedback. Sound like great goals and efforts to utilize!

PG 32:

KEEP IN 1.6: Preserve the single-family residential scale and historic Maintain a small-scale residential character along residential streetscapes through various means such as floor area ratio, small lots, and setback requirements! Keep yellow, remove Red!

PG 33:

REMOVE: 2.3.2: “Together with Pierce Transit and other agencies explore the feasibility of a transit system for Sumner that is cost effective and is based on a network of transit stops and a transit system in transit linkages connecting the neighborhoods to each other and districts consistent with the Community Linkages Map, connecting to and to the commuter rail stations, and

neighborhoods. 2.3.3. In establishing transit stops and linkages, give priority to improvements located within walking distance of neighborhood centers and in neighborhoods most in need of transit options” **City has not committed to this beyond 2024!**

10-1
continued

PG 36:

REMOVE: 3.2.1. Where feasible, create transit linkages from all neighborhoods in Sumner to the transit hub.

3.2.2. Prioritize the establishment of a transit service along Main Street between East Sumner and the Town Center.

WE have not committed to future transit service in town past 2024! Surprise to the City Council!

KEEP YELLOW HIGHLIGHTED: **Continue** Apply a form-based code and/or design review process for new and expanded uses in the Town Center. Any future amendments to the Sumner design guidelines **shall** should include consultation with **Sumner Downtown Association** the downtown business association(s), Chamber of Commerce, **Sumner Historical Society** historic preservation organizations, other civic groups, and citizens residents. [Policy revised since Planning Commission previous review.]
Sumner Historical Society (SHS) is an invaluable resource and the City should welcome them with open arms & appreciation!

ADD IN: 3.4: Within the Town Center area, promote the core area as the historic “downtown.” This is generally the area one block north and south of Main Street, within the Historic District and Station District & **Ryan House as the** boundaries:
Do not remove the Ryan House from our plans moving forward!

PG 38:

REMOVE: 3.19. The height in the Historic Subdistrict should be 3-4 stories to protect and preserve the small town character and scale of Main Street and reduce conflicts with adjacent residential uses; **No thank you, do not want appts on Main Street!**

PG 40:

KEEP IN: 5.8. **Expand Heritage Park to a full block.** Maintain Reuben A. Knoblauch Heritage Park as a key open space in the downtown and support activities and events that complement downtown businesses and residences. **That is what you’re doing**

REMOVE: 5.9. **Acquire and improve small parcels of land for developing parks and open spaces in the Town Center. WHY, stated earlier “Such developments provide safe connections...and provide outdoor green spaces and recreation spaces for residents”**

PG 44:

KEEP IN: 1.1.11 X.X.X Family support services for children, youth, families, seniors and special needs populations.
X.X.X. Programs that promote healthy behaviors, advocacy and self-care practices while enabling citizens to have choices
Note: Policy and sub policies deleted since they are all covered in 1.1 **Stated better here than in 1.1**

PG 45: GREAT IDEA!! 1.2.7. **Advocate** Fund for the presence of school resource officers in our schools.

PG 52: GREAT IDEA!! Like Enumclaw does! 1.10. **Recruit restaurants, cafés, microbreweries, public facilities and other similar uses, which serve as gathering spots within the community and encourage evening activity in commercial area.**

PG 56:

6.6: LIKE THE RYAN HOUSE! In conjunction with interested parties, improve the visual appearance of downtown through public and private measures for beautification, facade improvements, and **preservation of historic properties**, design strategies, maintenance, and streetscape improvements. **TOGETHER WE ALL CAN SAVE THE RYAN HOUSE & IT’S HISTORY!**

DELETE: 6.13. **Create 350-500 new housing units in the Town Center in close proximity to the train station and existing businesses**
No thank you, unless they are along Traffic Ave

PG 57: DELETE: 6.20. **Reduce the parking requirement for multi-family developments within the Town Center to facilitate development that accommodates the transit rider, anticipates lower car ownership in this area because of transit, and changing**

trends and services related to transit and transportation such as on-demand services and autonomous vehicles.

All multi-family developments should be responsible for the parking they create, wherever they are

10-1
continued

PG 59: Land Use

Reject: The Land Use Element establishes the growth patterns and uses that the community anticipates will be needed to accommodate projected growth over the planning period (to 2044). Pierce County has adopted housing, employment, and population growth targets for Sumner for 2020-2044 as follows: • 1,985 housing units • 5,313 jobs • 4,904 residents

What are the ramifications if Sumner does not meet these goals, policies and objectives? Just say NO! Works for drugs, why not the drug of money from the state/county that we are addicted to?

PG 71: Keep In: Buffer areas can also be configured within a PMUD to minimize conflicts between uses such as agriculture and large-lot single-family or, between more intense uses such as industrial, depending on the neighborhood.

PG: 72 9.1 Table: Reject OPTION B

Low Density Residential-1 (LDR-1) 2.9 – 10.0 ~~5.0~~ du/acre*

Low Density Residential-2 (LDR-2) 5.1- 13.0 ~~6.5~~ du/acre*

Low Density Residential-3 (LDR-3) 7.0- 20.0 ~~10.0~~ du/acre*

Medium Density (MDR) 8.1-15 17 [OPTION A] OR 22 [OPTION B] du/acre*

PG 72: Reject: Town Center Plan Subarea Sub-Districts Unlimited if height, open space, setbacks, and parking are met.

PG 80: Goals, Policies and Objectives

Keep In: 1.1 Preserve and maintain the historic, cultural, scientific, or educational integrity of known resources to the extent feasible, including properties listed on the National or State Register of Historic Places, if feasible. Plan and design development on sites having historic, cultural, or archeological resources in a manner that prevents impacts to the resource and provides educational benefits to the public, where appropriate. [Policy revised since Planning Commission previous review]

THIS DEFINES THE RYAN HOUSE, AND YES, IT IS FEASIBLE!

PG 81: 1.1.1: Through the permitting and environmental review process, consider and avoid document how impacts to archaeological, historic, and cultural sites and resources were considered and how impacts were avoided or how avoidance is infeasible. [Policy revised] **Walking away from 1.5M w/400k+ additionally found = RYAN HOUSE IS FEASIBLE!**

1.1.3: For demolition or construction projects subject to SEPA environmental review on sites located in Town Center, with structures older than 45 years old, or with structures identified by the State Department of Archeology and Historic Preservation (DAHP) as potentially eligible for listing, require a project review by the applicant to request a consultation with DAHP. [Policy revised since Planning Commission previous review.] **HAS THE CITY DONE THIS WITH THE RYAN HOUSE?**

1.3.:KEEP IN: Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition. [Policy revised since Planning Commission previous review.] **Continue to work with the SHS!**

KEEP IN: X.X Continue to support the Sumner Historical Society by providing the use of the Ryan House. [Policy revised since Planning Commission previous review. Entire policy proposed to be deleted] **Continue to work with the SHS!**

KEEP IN: 1.3.1.: Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals. [Policy revised since Planning Commission previous review. Entire policy proposed to be deleted] **What do you have against our amazing history!**

KEEP IN: 1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others. **Continue to work with SHS. Maybe actually work with them and work towards a mutually agreeable relationship**

KEEP IN: 1.3.3.: Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups. [Policy revised since Planning Commission previous review] **What about our amazing history are you trying to not include in our story as we move forward! Bonney Lake does this!**

10-1
continued

KEEP IN: 1.4.5. Nominate properties for listing in the Washington State and National Register of Historic Places. [Policy revised since Planning Commission previous review.] **Oh that's right, must remove State because that might include the RYAN HOUSE!**

KEEP IN: 1.4.6. Develop Encourage the creation of a local historic preservation plan, including conducting surveys of cultural resources, and prepare preparing nomination documents for city-owned properties, and interested property owners, and assisting with listings in the Washington Heritage Register State and National Register of Historic Places. [Policy revised since Planning Commission previous review.] **Again, anything that might include the RYAN HOUSE must go. Shame on you!**

KEEP IN: 1.6. Actively seek Identify state and federal grants and other funding sources to support implement the historic preservation in Sumner. program such as developing a local historic preservation plan; conducting surveys of cultural resources; preparing nomination documents for Washington State and National Historic Places Registers; performing public education activities including presentations to citizens, articles in the city newsletter, school presentations, and booths at city events festivals **Actively keep funds sought/obtained! The RYAN HOUSE has been used as a field trip for elementary students for decades!**

PG 82: KEEP IN: 1.4.3. Maintain a historic preservation program, that creates a the local historic preservation commission, and pursue maintain Sumner's designation as a Certified Local Government for historic preservation purposes. **Give the city credit w/o doing the work for the designation!**

PG 83: KEEP IN: 1.4.5. Nominate properties for listing in the Washington State and National Register of Historic Places. [Policy revised since Planning Commission previous review.] **OOPS, RYAN HOUSE WOULD BE INCLUDED IN THIS! CITY SAYS NO CAN DO!**

KEEP IN: 1.4.6. Develop Encourage the creation of a local historic preservation plan, including conducting surveys of cultural resources, and prepare preparing nomination documents for city-owned properties, and interested property owners, and assisting with listings in the Washington Heritage Register State and National Register of Historic Places. [Policy revised since Planning Commission previous review.] **AGAIN, RYAN HOUSE COULD BE INCLUDED IN STATE REGISTER, CAN'T HAVE THAT!**

KEEP IN: 1.5. Encourage private and public owners of historic sites to provide public access and educational opportunities in a manner consistent with long term protection of the resource. **YES, THAT INCLUDE THE CITY AND THE RYAN HOUSE!**

KEEP IN: 1.6.: Actively seek Identify state and federal grants and other funding sources to support implement the historic preservation in Sumner. program such as developing a local historic preservation plan; conducting surveys of cultural resources; preparing nomination documents for Washington State and National Historic Places Registers; performing public education activities including presentations to citizens, articles in the city newsletter, school presentations, and booths at city events festivals. **ALL ABOUT THE HISTORIC PRESERVATION OF SUMNER AS LONG AS THAT DOES NOT INCLUDE THE RYAN HOUSE**

KEEP IT! PG 85: X.X Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center. Note: Policy to be deleted, since the City Council determined (09/2023) that due to the structure's very poor condition, there is no feasible means to preserving it. **AFTER WALKING AWAY FROM 1.5M IN GRANTS? X.X Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others. Note: Moved to general policies. NO, THEY TOO WERE A PART OF THE RYAN HOUSE & HAD A MOU W/CITY!**

KEEP IT: PG 89: X.X. Where appropriate, utilize a planned mixed use development overlay zone or detailed subarea plan, to ensure buffers and other measures to reduce impacts to agricultural lands of long-term commercial significance from conflicts with development prior to annexation. **Seems like a desirable policy to have!**

HOUSING PG 107: 3.2. Reduce reliance on automobiles by promoting Promote higher density and infill developments that are located near major transportation links such as the Sumner Commuter Transit Station, and by supporting a network of transit stops connecting neighborhoods to the station. **The city has not committed to transit stops beyond 2024, and were reluctant then.**

PG 108:DELETE ALL: 4. Provide for a variety of housing types and densities in the Town Center Plan area in close proximity to the train station. 4.1. Promote the construction of housing stock in the Town Center by at least 500-1000 dwelling units by 2035.

- 4.2. Adopt greater height limit, 5-6 stories, for development at higher density in West Sumner and west of the White River to promote re-development of the area for transit-oriented development.
- 4.3. Adopt greater height limits, 4-5 stories, east of the BNSF Railroad with a transition area to low density single-family residential at a maximum of 3 stories as appropriate. Note: Policy revised to “low density” since last Planning Commission review.
- 4.4. Maintain the Town Center will contain “transition areas” that will be at reduced height (maximum 3 stories) to create more compatible transition between traditionally single-family low density residential zones and areas with increased height.
- 4.5. Encourage land assembly allowing for feasible and attractive housing or mixed housing/commercial developments. Waive permit fees associated with lot consolidation such as lot line adjustments. Facilitate matching compatible owners that can work jointly to consolidate and sell/develop.
- 4.6. Prohibit garden style apartments in the Town Center that would promote surface parking.
- 4.7. In order to promote redevelopment to desired densities, prohibit new single-family residential development and limit expansion of existing single family. 4.8. OPTION A: Adopt a Maintain the Multi-family Tax Exemption allowance per RCW 84.14 that would and create other substantial incentives for re-development in the Town Center by providing property tax relief for qualified multifamily and affordable housing developments for 12 years. OR OPTION B: Require all multifamily housing developments in Town Center to include a minimum percentage of affordable units. NOTE: The revisions above and below regarding MFTE are included for Commissioner consideration. One option is creating tax credit programs and development standards to incentivize affordable housing; another option is to require a certain number of affordable units.

10-1
continued

NO THANK YOU TO ALL OF #4'S, WANT TO KEEP SUMNER AS SUMNER. ALSO, NO TAX CREDITS, CITIZENS WILL BE PAYING FOR IT!

PG 119: Goals, Policies & Objectives:

DELETE IT: 1. Provide an efficient and safe multimodal transportation system to improve mobility for all residents, employees, and visitors of Sumner while **maintaining the small town quality of life within the city and** balancing the city Sumner's quality of life, needs related to growth and supporting the economic vitality of the city consistent with the Regional Transportation Plan.

The RTP needs to be DOA. Do not see adjacent towns doing anything for Sumner

DELETE IT: 1.1. Provide a multimodal transportation system that is compatible with State and regional growth plans, plans of adjacent jurisdictions, and with public transit providers. **Meet the mobility needs of the people that live, work, or visit Sumner**

There is a reason Pierce Transit got out of Sumner, it is a waste of money, a black hole!

DELETE IT 1.4. The transportation system must provide improved access and circulation to support the economic development of the city. The system should be Design the transportation system to provide adequate access to the industrial and commercial areas while reducing freight conflicts in protecting residential areas from intrusion of auto and freight traffic. **NO TO MUST PROVIDE**

KEEP IT! PG 120: **X.X. Include public review of transportation improvements proposed in public or private land development projects. The public is most often concerned about the potential transportation impacts...The City will review the public's comments and issues related to transportation impacts based on the goals, policies, and criteria set forth in the Transportation Plan, the city's Comprehensive Plan, and other applicable requirements such as the State Environmental Policy Act (SEPA).**

This actually is easy to read/understand and should be kept!

PG 121: 3. The City of Sumner will provide a transportation system that is compatible with State and regional plans, plans of adjacent jurisdictions, and with public transit providers. Coordinate the planning and implementation of the Sumner Transportation Plan with the Regional Metropolitan Transportation Plan (MTP) and State and local agency plans

NO THANK YOU TO THE RMTP, WE DO NOT WANT A CITY FINANCED TRANSPORTATION SYSTEM

KEEP IT: PG 128: **“The City recognizes that special events such as fairs, parades, athletic events, and large meetings can burden the transportation system beyond its ordinary capacity. The City also recognizes that such events can expand the culture and quality of life of the community. The City will seek to provide for such events by making appropriate provision such as bus transportation, traffic control, and temporary street closures. The City will notify affected businesses through mailings and the Sumner Promotions Association of Street Closures for special events. The City may assess some or all of the costs of such provisions will be assessed to the promoters or organizers of such events”**

Letter 11

Ann Siegenthaler

From: Randall Adams <radams15013@yahoo.com>
Sent: Thursday, April 18, 2024 4:49 PM
To: Derek Barry; Ann Siegenthaler
Subject: Parks Plan & Comp Plan information
Attachments: 2024 04 08 Findings and Conclusions Signed (1).pdf; Income & Expenses Ryan House.pdf; WA Trust Letter.pdf; 4-18-24 Parks comments.docx

****EXTERNAL EMAIL****

Derek & Ann,

Please make available to the committee the following documents that should help them understand why citizens sued the city, the judge's approval of the agreement between the city and Nancy Ryan Dressel, clarity on funds raised and estimates of expenses per city dispersed information and why projects like this are often done in more than one Phase....like it being done with our new Utility Department complex on 29th St E north of downtown. Also, my own comments are added if I can not be there tonight to read them onto the record.

11-1

Thank you kindly,

Randall Adams

Let me start by again thanking the Committee Members for your efforts and time spent representing the interests of the citizens of Sumner. It is very much appreciated as only your time is on a volunteer basis. I hope to help add some clarity to you why we have been opposing removing of the Ryan House. I attached a few pdf's in an email earlier today for you to read, including the court Findings of Fact and Conclusions, my compilation of the city published income and costs related to the Ryan House, and the letter from the Washington Trust For Historic Preservation to help you have a more rounded view of what is now required for the Ryan House, what actual cost estimates and income levels looked like and the Letter from Chris Moore from the Washington Trust for Historic Preservation in going over how projects such as the Ryan House are often done. I am sure some of the current projects you are currently overseeing will be using the more than 1 Phase, which is what he highlights in his letter to the city is often done.

11-2

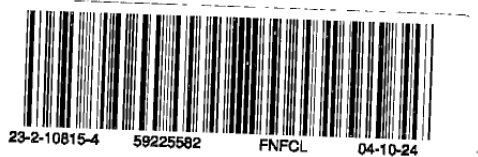
The agreed to Findings of Fact and Conclusions that are a result of the Superior Court case that states the city did not follow their own Comp Plan in moving so quickly to demolish the Ryan House. Even more important, is that there wasn't proper notice given for the actions taken and that a new Comp Plan would be needed that would include mandatory public engagement. The Judge is saying in the compilation of the plan is when public engagement should be allowed, not after preliminary decisions have already been made.

In the pdf going over the financial disclosures made by the city, it shows the stated income obtained by the city, the bump by WJE from 936k up to 1,459M as they allowed 523k for contingency funds because they were not allowed to finish their estimates and complete floor plan documents. Then, on page 6 the estimates of costs show more than enough funds to complete phase 1 of the project, though 336k is added for WJE design expense. On page 7, an additional 290k design costs are deducted from funds available. Which if these 2 figures are correct? This suggests 626k for design expenses on what is suggested to be a 2.2M project! On page 8, it shows AKANA for interior upgrades range from 274k up to 714k. This all shows with is the 523k contingency funds for WJE plus the 440k range for AKANA adds up to 963K of added costs on unknown expenses....not including the double dip in design costs, which could be an accounting error and would reduce the cost/income difference by 300k more. Then, add the additional 400k that the Heritage Capital Projects have available that Nick Bierman found and add the 310K you show to demo +, there was more than 2.2M available.

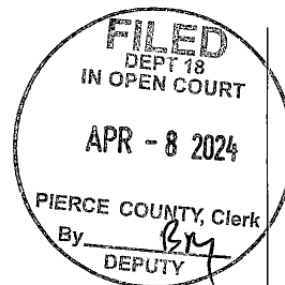
11-3

If costs go higher, that is where the Phase Approach works as it allows for more funds to be found as we move forward. This is exactly what the attached letter from the Washington Trust for Historic Preservation states, that if costs are higher, then we go to new sources of funds the next year to finish the project. It is also what is happening right now with the new Utility Department complex north of downtown and can be used with the Ryan House.

One additional thing to remember. This project is to make the Ryan House more than it has ever been, adding a large kitchen for hosting events with and even ADA restrooms, which could be outside and save more money. Please take the first step in starting a city & community effort together to Save the Ryan House and give the city true bookends for historic downtown to market itself with in our efforts to bring even more folks here to shop/eat.



11-4



4/10/2024

11:05 0126

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR PIERCE COUNTY

SAVE OUR SUMNER COMMITTEE;
and NANCY RYAN DRESSEL,

Petitioners,

v.

CITY OF SUMNER and DREW
McCARTY,

Respondents.

NO. 23-2-10815-4

STIPULATED PROPOSED
FINDINGS OF FACT AND
CONCLUSIONS OF LAW

FINDINGS OF FACT

1. This case involves the City of Sumner's approval of a demolition permit issued for the demolition of the historic Ryan House (permit number BLDR-2023-0400.) The permit was issued by Allison Judge, Development Services Specialist for the City of Sumner.

2. In 1926, heirs of Lucy V. Ryan donated 1228 Main Street to the City of Sumner, the location of the historic Ryan House.

3. The Ryan House is on the National Register of Historic Places. The Ryan House was built as a one-room cedar pioneer cabin in the 1860s. It is believed to be one of the oldest structures in Sumner. The house was an early location for a small post office with Lucy Ryan as the postmaster. George Ryan was the first mayor of Sumner.

PARTIES' STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - I

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11-4
continued

4/10/2024 11:05 0127

4. The city's Comprehensive Plan and the Town Center Subarea Plan include numerous provisions to preserve and enhance the Ryan House and public access to it:

- "[P]reserve . . . the historic . . . cultural resources of Sumner."¹
- "[C]ontinue to support the Sumner Historical Society by providing the use of the Ryan House."²
- "[I]mprove the Ryan House and public access to the museum and consider other public uses such as converting to a visitor's center."³
- "Recognize the heart and historic meaning of Downtown."⁴
- "Improve the Ryan House."⁵
- "Make improvements to Ryan House."⁶

5. The Ryan House was enlarged and eventually deeded to the city in 1926. It has been owned by the city ever since and used as the town's library and museum.

6. The conveyance deed (Deed) outlines the grantors' wishes for the Ryan House to include ensuring the City uses it "for the use of the public forever as and for a public park and site for a public library."

7. Petitioner Nancy Ryan Dressel is a direct descendent of the original owners of the Ryan House and of the Ryans who deeded the property to the city in 1926. She seeks to assure that

¹ Comprehensive Plan, The Historic and Cultural Resources Sub-Element, Goals, Policies, and Objectives (GPO) 1.

² *Id.*, GPO 1.3.1.

³ *Id.*, GPO 3.3.

⁴ Town Center Plan, Goal TC 3.

⁵ Town Center Plan, Policy TC 3.3.

⁶ *Id.*, Parks and Recreation Element, Implementation Project I-9.

PARTIES' STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 2

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11-4
continued

4/10/2024 11:05 0128

1 her family's historic property is preserved and enhanced by the city as called for in the city's
2 Comprehensive Plan.

3 8. Petitioner Save Our Sumner Committee seeks to assure that the city abides by the
4 goals, policies, and objectives in its Comprehensive Plan and its Downtown Sumner subarea plan to
5 "preserve" the Ryan House for use by the public.

6 9. For years, Sumner acted consistently with its Comprehensive Plan and took steps to
7 use, protect and restore the Ryan House. The city's efforts were summarized in a staff presentation
8 to the Council on January 31, 2022. Highlights from the presentation include:

- 10 • The city's receipt of a \$100,000 grant in 2018 for restoration feasibility and design
11 studies.
- 12 • Ryan House renovation incorporated into the city's "Main Street Vision," part of
13 the Comprehensive Planning process.
- 14 • Architectural Resource Group (commissioned by the city) completes studies in 2019
15 and finds Ryan House in "good, strong shape;" "design study outlines ways to
16 improve accessibility;" "quite unique, especially original cedar cabin;" "huge
17 opportunity."
- 18 • City Council accepts \$25,000 grant for design and cost estimates studies in 2020.
- 19 • Planning efforts include the city's Parks Department, the city's Forestry and Parks
20 Commission, the Sumner Historical Society, and the public.
- 21 • Ryan House lauded as "authentic and unique" (like Pike Place Market); "economic
22 benefits;" "community connections;" and "common ground."
- 23
- 24
- 25
- 26

PARTIES' STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 3

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11-4
continued

4/10/2024 11:05 0129

- 1 • City Council adopts new Comprehensive Plan: “Improve the Ryan House and public
- 2 access to the museum [in the Ryan House] and consider other public uses such as
- 3 converting to a visitor center.”
- 4
- 5 • A million-dollar cost estimate for preservation/restoration.
- 6
- 7 10. In 2022, the City hired an architecture/engineering firm, Wiss, Janney, Elstner
- 8 Association Inc. (“WJE”), specializing in historic structures to perform a conditional assessment
- 9 and prepare construction documents.
- 10
- 11 11. WJE’s initial assessments that the house required additional work prompted the
- 12 City in Spring 2023 to seek an additional \$750,000 in grant funding to cover the gap, which was
- 13 recommended for funding in 2024.
- 14
- 15 12. WJE’s June, 2023 assessment found structural failures making the load carrying
- 16 capacity of the attic floor and the roof and ceiling completely compromised.
- 17
- 18 13. WJE’s estimated restoration and repair costs exceeded the City’s available grant
- 19 funding.
- 20
- 21 14. City staff presented Council with four options to consider in the City of Sumner
- 22 Finance and Personnel Committee meeting on August 15, 2023, the City Council Study Session
- 23 on September 11, 2023, and then again at the Regular City Council meeting on September 18,
- 24 2023.
- 25
- 26 15. Option 1 was the complete rehabilitation of the Ryan House at a minimum cost of
- 27 \$2.2 million, \$1.1 million of which was secured through grant funding and \$1.1 million was
- 28 unfunded.
- 29
- 30 16. Option 2 was the rehabilitation of a portion of the building and demolishing the
- 31 structurally compromised portions at a cost of \$1.26 million, which was unfunded.

PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 4Bricklin & Newman, LLP
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11-4
continued

4/10/2024 11:05 0130

17. Option 3 was to demolish the entire house and develop the space as an active public park at an estimated cost of \$600,000, which was unfunded because the grant funds could not be used for demolition or park construction.

18. Option 4 was to demolish the entire house and to restore the site to an open grassy area at a cost of \$100,000, which was unfunded.

19. On September 11, 2023, the Council held a Study Session on the Ryan House. In a shift that was unexpected by most of the public, City Staff recommended Option number 4.

20. During that Study Session, staff and city council members acknowledged that the public would be surprised by this shift. Staff acknowledged that “the last they [the public] heard was this vision of rehabilitation.” Sept. 11 TR at 36:09. *See also id.* at 19:30 (staff describing the “beautiful vision to do a full rehabilitation”). Councilmember Reed noted that “this will be a big surprise for a lot of people.” *Id.* at 39:11.

21. Seven days later, following some public comment during the intervening week on the proposed resolution, the Council adopted Resolution 1663 that directed City Staff to apply for and process a demolition permit to demolish the Ryan House. AR 526.

22. City engineer Drew McCarty filed an application for the demolition permit the very next day. AR 935–936. She also prepared an environmental checklist. AR 559–574. On October 9, 2023, a city planner, Ryan Windish, filed a “SEPA Notice of Consistency,” asserting that the demolition met all the criteria for a planned action. AR 931–932. On October 16, 2023, Allison Judge issued the demolition permit. AR 937–938.

23. As a result, years of planning for preservation of the Ryan House were displaced with a permit for its demolition.

24. As part of its required periodic update pursuant to the Growth Management Act, in February 2024 the city commenced its process for reviewing and amending its Comprehensive

PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 5

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11-4 continued

1 Plan. Among the proposed amendments are certain amendments to the Historic and Cultural
2 Resources Element which would eliminate specific mandates about the preservation of and
3 improvements to the Ryan House.

CONCLUSIONS OF LAW

4
5
6 1. The land use decision challenged here is the issuance of a demolition permit. A
7 demolition permit is a type of “land use decision,” as that term is defined in the Land Use Petition
8 Act. RCW 36.70C.020(2). Judicial review of land use decisions is exclusively pursuant to LUPA.
9 RCW 36.70C.030(1). This Court has jurisdiction over challenges to this land use permit under both
10 the State Environmental Policy Act and the Growth Management Act.

11 2. LUPA sets the standards of review this Court must apply to the challenged permit.
12 See RCW 36.70C.130. Review is appellate review on the city’s administrative record. RCW
13 36.70C.120. The Court may rescind the permit if any of the following is true:
14

- 15 ...
16 (b) The land use decision is an erroneous interpretation of the law, after allowing
17 for such deference as is due the construction of a law by a local jurisdiction
18 with expertise;
19 (c) The land use decision is not supported by evidence that is substantial when
20 viewed in light of the whole record before the court;
21 (d) The land use decision is a clearly erroneous application of the law to the
22 facts;
23 ...

24 RCW 36.70C.130(1).

25 3. Under the first standard, questions of law are interpreted *de novo*. RCW
26 36.70C.130(1)(b); *Families of Manito v. City of Spokane*, 172 Wn. App 727, 736 (2013); *Cingular
Wireless, LLC v. Thurston County*, 131 Wn. App. 756, 768 (2006).

PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 6

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11-4
continued

4/10/2024 11:05 0132

4. Factual determinations are reviewed for “substantial evidence,” requiring a sufficient quantum to persuade a fair-minded person of the truth or correctness of the finding. RCW 36.70C.130(1)(c); *Thornton Creek Legal Def. Fund v. City of Seattle*, 113 Wn. App. 34, 61 (2002).

5. The application of fact to law is reviewed under the “clearly erroneous” standard. RCW 36.70C.130(1)(c). A decision is clearly erroneous when the Court is left with a definite and firm conviction that a mistake was committed even if some evidence supports the decision. *Norway Hill*, 87 Wn.2d 267, 274 (1976).

6. The Court finds that it has jurisdiction under the Growth Management Act and whether the issuance of a demolition permit was consistent with provisions in the City’s Comprehensive Plan.

7. The Comprehensive Plan amendment process requires “early and continuous” public involvement, not just during preparation of the original comprehensive plan, but also whenever amendments are being considered. Public participation is one of the GMA’s mandatory planning goals. RCW 36.70A.020(11). Proposed amendments are to be “broad[ly] disseminated, notice must be “effective,” and the process must allow for “open discussion.” The agency must not just give “consideration” to public comment; it must also provide a “response” to public comment. RCW 36.70A.140 (emphasis supplied).

8. Sumner has a detailed public participation plan for proposed comprehensive plan amendments. The process includes ample public notice and public participation. It mandates notice to the Department of Commerce and precludes final action until after that agency’s comments are considered. The notice requirements assure the public receives ample notice early in the process and throughout the process. The required notice includes publication once a week for two consecutive weeks, on the same day of the week, using two electronic methods, established by the

PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 7

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11-4
continued

4/10/2024 11:05 0133

1 director, and posting at public information centers and on the city's official website. SMC
2 18.56.070.

3 9. The City's comprehensive plan contains specific provisions about preservation and
4 restoration of the Ryan House. The GMA precludes the city from pursuing activities that do not
5 conform with its Comprehensive Plan. The permit authorizing demolition of the Ryan House is
6 revoked.
7

8 10. Sumner has already begun the process of its periodic Comprehensive Plan update.
9 That process, as explained above, requires mandatory public engagement. The City must first
10 provide the public with notice and an opportunity for public comment and update it Comprehensive
11 Plan before processing SEPA and a demolition permit.
12

13 11. The Court finds that it has jurisdiction over SEPA and whether the City's Planned
14 Action Ordinance was followed or appropriate.

15 12. A shortened alternative to the standard SEPA process exists. If certain conditions are
16 met, an agency may evaluate environmental impacts when adopting a comprehensive plan or subarea
17 and then skip environmental review for individual projects (so-called "planned actions"). Among other
18 conditions, to qualify as a "planned action," the project must be identified as a planned action in the
19 city's planned action ordinance; it must have had its environmental impacts analyzed in an earlier EIS;
20 and the project must be consistent with the comprehensive plan. RCW 43.21C.440(1); WAC 197-11-
21 164(1)(f).
22

23 13. The statute defines a planned action by reference to seven conjunctive requirements.
24 RCW 43.21C.440(1)(a)–(g). Three are relevant here. Subparagraph (1)(a) requires that the project
25 is described as a "planned action" in the city's planned action ordinance. Subparagraph (1)(c)
26 requires that the project's impacts were adequately addressed in an EIS for the comprehensive plan

PARTIES' STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 8

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11-4
continued

4/10/2024 11:05 0134

1 or subarea plan. Subparagraph (1)(g) requires that the project is consistent with the comprehensive
2 plan or subarea plan. RCW 43.21C.440(1).

3 14. To implement the planned action process, a county or city must adopt a planned
4 action ordinance that “define[s] the types of development included in the planned action.” RCW
5 43.21C.440(2). The planned action ordinance may include geographic and temporal limits. *Id.*
6
7 Thereafter, the county or city implements the planned action ordinance during the review of
8 individual projects by making a determination that the project is consistent with the planned action
9 ordinance. RCW 43.21C.440(3).

10 15. Sumner adopted its planned action ordinance in 2018. AR 575. It mirrors SEPA’s
11 requirements. Among other things, to qualify as a planned action, a project must be consistent with
12 the SEIS for the applicable subarea plan (the Town Center Plan); its environmental impacts must
13 have been adequately addressed in that SEIS; and the project must comply with all local
14 regulations. AR 579 (Sumner Ord. 2668, §III.E (1)(b), (e), & (g)).

16 16. The City’s Comprehensive Plan contains both specific provisions about restoration
17 and preservation of the Ryan House, and general provisions encouraging new parks and the
18 provision of green space. The plan mentions nothing about demolition of the Ryan House. The
19 Court finds that the specific provisions govern over the general.

20 17. SEPA’s “planned action” process cannot be used for projects that are not consistent
21 with the City’s comprehensive plan. Because of the inconsistency between the City’s current
22 Comprehensive Plan and the demolition permit, the City’s use of the planned action process as part
23 of its demolition permit process violated SEPA.

25 18. Because the city failed to comply with SEPA before approving the demolition permit,
26 the demolition permit is rescinded for this reason, too, and the matter is remanded to the City to follow

PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 9

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11-4
continued

proper SEPA process and the Comprehensive Plan amendment process before making any decision about the demolition of the Ryan House.

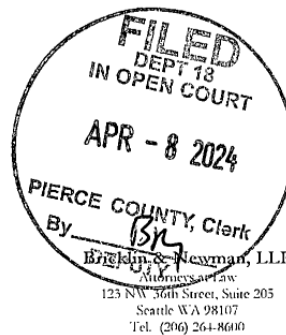
19. The GMA requires the City to “[1] perform its activities and [2] make capital budget decisions in conformity with its comprehensive plan.” RCW 36.70A.120. The specific provisions in the City’s current Comprehensive Plan related to the restoration of the Ryan House are not consistent with issuance of a demolition permit. The demolition permit (BLDR 2023-0400) is revoked for this reason, too, and the matter is remanded to the City.

20. The Court finds that the city’s public safety concerns are adequately addressed in the interim by the fencing the city has installed around the Ryan House.

21. Until and unless the comprehensive plan is amended to eliminate the specific provisions about preservation and restoration of the Ryan House, following compliance with the public notice and engagement provisions outlined in the GMA, SEPA, and city regulations, the City may not issue a permit for demolition of the Ryan House and may not use SEPA’s planned action process for the demolition.

Dated this 8th day of April, 2024.

THE HONORABLE STANLEY J. RUMBAUGH



PARTIES’ STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 10

11-4
continued

4/10/2024 11:05 0136

1 Presented by:
2 BRICKLIN & NEWMAN, LLP
3
4 By: s/David A. Bricklin
5 David A. Bricklin, WSBA No. 7583
6 123 NW 36th Street, Suite 205
7 Seattle, WA 98107
8 bricklin@bnd-law.com
9 Attorneys for Petitioner
10 Save Our Sumner and Nancy Ryan Dressel
11

12 AGREED BY:
13 CITY OF SUMNER
14

15 By: 
16 Andrea Marquez, WSBA No. 45670
17 City Attorney
18 City of Sumner
19 1104 Maple St.
20 Sumner, WA 98390
21 (253) 299-5612
22
23
24
25
26

PARTIES' STIPULATED FINDINGS OF FACT
AND CONCLUSIONS OF LAW - 11

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11-4
continued

February 2, 2024

City of Sumner Washington
 ATTN: Carmen Palmer, Communications Director
 1104 Maple Street, Sumner WA 98390
carmenp@sumnerwa.gov

Dear Ms. Palmer,

I'm writing to let you know that the Washington Trust for Historic Preservation is including the Ryan House in our listing of the state's Most Endangered Historic Places. Inclusion in our Most Endangered List is not intended to lay blame or point fingers. We recognize the city's efforts to date toward rehabilitation and were happy to work with city staff last year to help secure state grant funds. Rather, our hope in highlighting the Ryan House as an Endangered Property is to encourage the City of Sumner to reconsider the current course of action and engage in exploration of alternatives to demolition. To that end, we are happy to work with city officials, convene stakeholder meetings, gather community input, and work through city concerns.

We were encouraged by the City of Sumner's initial commitment to rehabilitating this historic property and continuing its role as a meaningful resource for use and enjoyment by future generations of Sumner Residents. We were impressed by the thought, effort, and fundraising that were undertaken. It came as a surprise when the City changed course and began pursuing demolition.

Changing costs and scopes of work are standard for most rehabilitation projects. Even with the increased cost from the latest estimates presented by Wiss, Janney, Elstner Associates, Inc., the city nonetheless had secured a majority of the estimated needed funding. Preservation projects like this are often separated into phases, value engineered, and used as a vehicle for future fundraising. As such, the quick pivot in changing course from dedicated rehabilitation to demolition felt rushed. We do appreciate the safety concerns the property poses. But again, with significant funding having been secured for the project, stabilizing the structure from a safety standpoint could have been implemented as an initial course of action, with planning and consideration made for future rehabilitation phases.

The Ryan House is a rare remaining example of nineteenth century residential architecture. Along with many in the community, we believe a full vetting of other options should be pursued before moving forward with demolition. Once the house is gone, it is gone forever, taking with it a tangible piece of Sumner's heritage. We

February 2, 2024
City of Sumner
Page 2

11-4
continued

appreciate the city's past stewardship of the Ryan House and look forward to a dialogue focused on future preservation.

Sincerely,



Chris Moore
Executive Director
Washington Trust for Historic Preservation

9/22/23, 1:41 PM

Ryan House | Sumner Connects

①

11-4
continued**Carmen Palmer**

Communications Director

**Phone** 253-299-5503**Email** carmenp@sumnerwa.gov

Funding

11-4
continued

Pierce County Lodging Tax

- 2019 - \$100,000 used for Feasibility & Design Studies
- 2020 - \$25,000 used for cost estimate & exterior design
- 2023 - \$400,000 for construction (not used, to be returned)
- 2024 - recommended \$750,000 for construction (not used, to be returned)

Port of Tacoma Community Fund - \$7,500 for construction (not used, to be returned)

City of Sumner Lodging Tax - \$125,000 used for structural assessment, final design

State of Washington Heritage Capital Projects - 2023-2025 \$304,000 for construction (not used, to be returned)

The house did not qualify for national heritage grants because it's listing is on the National Register for Local Significance. Only properties listed at National Significance qualified for Federal funding.

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TOTAL \$1,711,500
 + 2018 PCLT GRANT 100,000
 + 2023 SUMNER LTAC 40,000
 \$1,851,500 TOTAL AVAILABLE FUND
 WJE ESTIMATE 1,459,228
 \$392,272 TO PAY COSTS INCURRED TO DATE (ABATEMENT DESIGN)

(2)

Ryan House Rehabilitation

11-4
continued

Sumner, WA

SCHEMATIC DESIGN - REV. 1

OCMI JOB #: 221440.000 | 22 June 2023

DETAILED PROJECT SUMMARY

ELEMENT	TOTAL COST	GFA	\$/SF AREA
01. HOME REHABILITATION	\$935,711	4,200	\$222.79

TOTAL NET DIRECT COST	\$935,711
-----------------------	-----------

GENERAL MARKUPS

DESIGN CONTINGENCY	15.00%	\$140,357
ESCALATION TO MIDPOINT 11/2023	2.08%	\$22,418
GENERAL CONDITIONS/REQUIREMENTS	20.00%	\$219,697
CONTRACTOR OVERHEAD AND PROFIT	8.00%	\$105,455
INSURANCE	2.50%	\$35,591

TOTAL CONSTRUCTION COST	\$1,459,228
-------------------------	-------------

\$1,459,228 TOTAL COST
 935,711 HOME REHABILITATION

 \$ 523,517 CONTINGENCY FUNDS

(3)

11-4
continuedRyan House Rehabilitation
HOME REHABILITATION
Sumner, WA

SCHEMATIC DESIGN - REV. 1

OCMI JOB #: 221440.000 | 22 June 2023

BUILDING SUMMARY

ELEMENT		TOTAL COST	\$/SF AREA
A. SUBSTRUCTURE		\$146,628	\$34.91
B. SHELL		\$487,033	\$115.96
C. INTERIORS		\$5,566	\$1.33
D. SERVICES			
E. EQUIPMENT AND FURNISHINGS			
F. SPECIAL CONSTRUCTION AND DEMOLITION		\$254,818	\$60.67
G. BUILDING SITEWORK		\$41,666	\$9.92
NET DIRECT BUILDING COST		\$935,711	\$222.79
DESIGN CONTINGENCY	15.00%	\$140,357	\$33.42
SUBTOTAL		\$1,076,068	\$256.21
ESCALATION TO MIDPOINT 11/2023	2.08%	\$22,418	\$5.34
SUBTOTAL		\$1,098,486	\$261.54
GENERAL CONDITIONS/REQUIREMENTS	20.00%	\$219,697	\$52.31
SUBTOTAL		\$1,318,183	\$313.85
CONTRACTOR OVERHEAD AND PROFIT	8.00%	\$105,455	\$25.11
SUBTOTAL		\$1,423,638	\$338.96
INSURANCE	2.50%	\$35,591	\$8.47
TOTAL BUILDING COST		\$1,459,228	\$347.44

GROSS FLOOR AREA: 4,200 SF

$\$1,459,228 / 935,711 \text{ EST.} = 55.95\% \text{ CONTINGENCY}$
 TOTAL COST $(\$523,517) \text{ FUNDS ABOVE ESTIMATE}$

(4)

Ryan House Rehabilitation

11-4
continued

Sumner, WA

SCHEMATIC DESIGN - REV. 1

OCMI JOB #: 221440.000 | 22 June 2023

PROJECT SUMMARY

ELEMENT	TOTAL COST	GFA	\$/SF AREA
01. HOME REHABILITATION	\$1,459,228	4,200	\$347.44

TOTAL CONSTRUCTION COST	\$1,459,228
-------------------------	-------------

ALTERNATES	TOTAL COST	GFA	\$/SF AREA
01. ALT. ADD - KITCHEN RESTORATION	\$304,791	504	\$604.74
02. ALT 1A: WOOD SHINGLES	\$42,379	3,300	\$12.84
03. ALT 1B: SYNTHETIC WOOD SHINGLES	\$37,426	3,300	\$11.34
04. ALT 1C: STANDING SEAM ROOFING	\$15,537	440	\$35.31

Ryan House Rehabilitation

11-4
continued

Sumner, WA

SCHEMATIC DESIGN - REV. 1

OCMI JOB #: 221840-000 | 22 June 2023

COST ESTIMATE**INTRODUCTORY NOTES**

This estimate is based on verbal direction from the client and the following items, received May 3 through June 19, 2023:

General	G001 through G003 (3 sheets)
Architectural	A101D through A602 (16 sheets)
Structural	S101 through S702 (15 sheets)
Specifications and Reports	The Ryan House - Condition Assessment and Structural Review, prepared by WJE, dated May 1, 2023
	Ryan House Feasibility - Kitchen As-Built and New Layout (2 sheets)

The following items are excluded from this estimate:

- Professional fees.
- Building permits and fees.
- Inspections and tests.
- Furniture, fixtures & equipment, except as noted.
- Installation of owner furnished equipment.
- Construction change order contingency.
- Overtime.
- Hazardous material abatement/removal.
- Items referenced as NOT INCLUDED or NIC in estimate.

The midpoint of construction of November 2023 is based on:

- Construction start date of September 2023
- Estimated construction duration of 04 months
- This estimate is based on a Design-Bid-Build delivery method.
- This estimate is based on prevailing wage labor rates.
- This estimate is based on a detailed measurement of quantities. We have made allowances for items that were not clearly defined in the drawings. The client should verify these allowances.
- This estimate is based on a minimum of four competitive bids and a stable bidding market.
- This estimate should be updated if more definitive information becomes available, or if there is any change in scope.
- We strongly advise the client to review this estimate in detail. If any interpretations in this estimate appear to differ from those intended by the design documents, they should be addressed immediately.

(6)
11-4
continued

OPTION I - FULL HOUSE REHABILITATION

RYAN HOUSE COST OVERVIEW				
PHASE	ITEM	COST		NOTES
Design	WJE - Phase 1 - Exterior	\$ 99,900.00	Contracted	Contracted February 2023
Design	WJE - Phase 1 (additional structural scope)	\$ 48,053.00	Estimated	2023
Construction	Phase 1	\$ 823,196.00	Estimated	Estimated June 2023
Construction	Kitchen	\$ 304,791.00	Estimated	Estimated May 2023
Design	WJE - Phase 2 - Interior	\$ 158,000.00	Estimated	Estimated January 2023
Construction	Phase 2 - Interior	\$ 507,650.00	Estimated	From AKANA Estimate 2021. Took out \$100k for the kitchen, added 10% escalation
Design	WJE - Phase 3 - Landscape	\$ 30,000.00	Estimated	Estimated January 2023 Change to an allowance of \$30,000 (WAS 44,900)
Construction	Phase 3 - Landscaping	\$ 100,000.00	Estimated	MIG Estimate from 2021, added 10% escalation (\$536,800) Change to an allowance of \$100,000 (WAS 536,800)
Construction	Construction Contingency	\$ 147,179.40	Estimated	15% contingency of Phase 1 + Phase 2 construction
Design \$ 335,953.00			WJE	
Construction \$ 1,882,816.40			Phase 1 + Phase 2 + Phase 3	
Project Total \$ 2,218,769.40			Project \$ needed to date	

USE BY		GRANT FUNDING		NOTES
	GRANT	AMOUNT	AWARDED	
2023	Sumner Lodging Tax	\$ 125,000.00	Yes	WJE Phase 1 + Abatement
2023	LTAC	\$ 400,000.00	Not Calculated	Unsure if we will get money back - Structural + Exterior Upgrades
2023	Port of Tacoma	\$ 7,500.00	Yes	ADA upgrades
2024	State Heritage Grant	\$ 304,000.00	Yes	Interior Upgrades
2024	LTAC	\$ 750,000.00	Yes	

11-4
continued

Additional Summer Lodging Tax	\$ 40,000.00	Pending	
Planning & Design	\$ 290,000.00	— ? WJ 2?	335,953 in COSTS ABOVE
Construction	\$ 1,061,500.00		
Total Project Grant Funds	\$ 1,351,500.00		
Total Available Grant Funds	\$ 1,117,485.00		
City Funding Needed	\$ 1,101,284.40		

125,000 — WJE + ABATEMENT — SPENT
 400,000 FUNDED
 7,500
 304,000
 750,000
 40,000

 1,626,500
 100,000 PCLT GRANT
 125,000 PCLT GRANT
 + 2018
 + 2019

 1,851,500 TOTAL AVAILABLE BEFORE COSTS
 DEDUCTED IE ABATEMENT + PCLT GRANT + WJE +

11-4
continued

AKANA PG. 2 SUMMARY

	ADA	\$ 5,000.00	\$ 8,000.00	\$ 10,000.00	Use	Add ramps, cost of material is unknown. Depends on material chosen and final requirements from building permit. Variable would be requirements for full accessibility and not just minor improvements (e.g. ramps, doorways, hardware, egress/ingress, door pressure, signage, railings, etc.)
Part 4	Interior					
	Mechanical, Electrical, Plumbing	\$ 20,000.00	\$ 30,000.00	\$ 50,000.00	Preservation/Use	Update to code, replace boiler, add AC new ducts, fire suppression, recommend a full investigation behind the walls prior to full design. We believe even to preserve the house a updated HVAC and electrical system should be considered to ensure proper ventilation and prevent fire hazardous.
	Kitchen	\$ 35,000.00	\$ 55,000.00	\$ 100,000.00	Use	Depends on finishes and appliances, final design, ADA. Given observed condition, all elements will need to be removed and replaced to some degree. However, a full gut job is not the intent. We don't find it appropriate to assume residential remodel rates or commercial/public.
	Bathroom	\$ 25,000.00	\$ 45,000.00	\$ 45,000.00	Use	Depends on finishes, final design, ADA improvements required. Need more design.
	Finishes & fixtures	\$ 20,000.00	\$ 30,000.00	\$ 30,000.00	Use	Depends on sourcing and historically accurate needs, includes strip and restain interior woodwork throughout, stair railing replace to meet current codes, wainscotting, shelving update in the library.
	Floors	\$8,000	\$ 20,000.00	\$35,000.00	Use	Repair, refinish, clean; depends on other improvements, full replacement on first floor was not estimated, cleaning of the second floor is contemplated, old carpets removed and solid flooring installed. (variable, full replacement)
	Repairs	\$ 12,000.00	\$ 20,000.00	\$30,000.00	Use	Includes fireplace, plaster, paint and/or wall paper; addressing lath and plaster and/or drywall throughout (old bedrooms), if required repairing lath and plaster on the main level may cost more.
	Cleaning	\$ 1,500.00	\$ 2,500.00	\$ 2,500.00	Use	Address doors. (variable includes new fire place and full new drvwall.) General cleaning, readying for use, does not include removing or organizing files and items stored in the second floor.
	Estimate Subtotal	\$ 229,500.00	\$ 390,500.00	\$ 561,500.00		
Part 5	Permits and Contingency					
	Permits*	\$ 10,000.00	\$ 35,000.00	\$ 50,000.00	Required	*fire, building (variable, full building, city recommend to coordinate with the building department)
	Contingency (15%)	\$ 34,425.00	\$ 58,575.00	\$ 152,875.00	Risk	(need to add A/E, variable 25% A/E and continued volatile supply and labor market, time, unknowns)
	Rehabilitation Estimate*	\$ 273,925.00	\$ 484,075.00	\$ 714,375.00		Variable column is to alert that there is several areas of uncertainty, unable to be estimated by Akana.

9
11-4
continued



		Estimate			Priority Category	Notes
		Low	High	Variable		
Part 1	Demolition					
	Salvage, haul and waste	\$ 10,000.00	\$ 20,000.00	\$ 20,000.00	Preservation	*removing the cabin and rebuilding, depends on what material is salvageable
	Hazardous Material Testing	\$ -	\$ -	\$ 10,000.00	Preservation	ARG is confident there is no concerns. So not factored into the estimate. Variable signals that testing and remediation is generally recommended by contractors.
Part 2	Structural and Foundation					
	Reinforcement	\$ 10,000.00	\$ 20,000.00	\$ 50,000.00	Preservation	*need more analysis to determine if there is water intrusion or settling repair needs * roof appears to be sagging this is cause an engineer to further investigate to understand true need and cost. This could go as high as \$50,000 depending on the actual conclusion and structural needs.
Part 3	Exterior					
	Roof	\$ 25,000.00	\$ 35,000.00	\$ 55,000.00	Preservation	Remove dormers, high assumes new headers, unknown condition of underlayment or if decking needs to be replaced. Replace composite with cedar shingles. Replace flashing. (variable includes removing dormers and tearing down kitchen, full roof replacement with new underlayment.)
	Joist	\$ 8,000.00	\$ 20,000.00	\$ 20,000.00	Preservation	May need to replace joist. Ceiling is sagging, won't know for sure until it is fully opened and we have more structural review.
	Siding, Trim, Gutters	\$ 15,000.00	\$ 25,000.00	\$ 36,000.00	Preservation	Several areas that will have to be replaced, depends on how well it cleans and if there are other issues behind the replaced siding, etc. Material matching might be an issue. (\$12 a sqft installed) (Variable full replacement, during site observation there appears to be reusable parts with a good cleaning)
	Paint	\$ 5,000.00	\$ 8,000.00	\$ 8,000.00	Preservation	Recommendation is pressure wash and repaint, tied to the siding approach.
	Windows	\$ 20,000.00	\$ 30,000.00	\$ 30,000.00	Preservation	Reglass and repair/clean vs. full replacement with wood (replacement approximately \$700 per installed window), restore and replace glass approximately \$300 per window.
	Doors	\$ 5,000.00	\$ 10,000.00	\$ 10,000.00	Preservation	All exterior doors and frames will need to be repaired/replaced due to weather damage, does depend on products selected. (\$1500 per installed door average)
	Decks and porches	\$ 5,000.00	\$ 12,000.00	\$ 20,000.00	Use	Replace rotting boards and supports, pressure wash, refinish or repaint. Depends on choice of material (wood or synthetic). Wood costs unknown, suitable material to match unknown. Address roof, trim and skirt, stairs and handrails. (variable is continued high pricing and full replacement, no reuse).

11-4
continued

27 of 39 50%

OPTION OVERVIEW

	STATE	COUNTY	BALANCE	TOTAL PROJECT COST	CONSTRUCTION RISK LEVEL	FINANCE RISK LEVEL	MAINTENANCE COST
1	\$304,000	\$798,000	\$1.1 Million (City/County)	\$2.2 Million			
2	X	\$0 to \$798,000	\$463,000 to \$1.26 Million (City/County/State)	\$1.26 Million	MEDIUM	LOW	MEDIUM
3	X	X	\$600,000 (City only)	\$600,000	MEDIUM	LOW	LOW
4	X	X	\$100,000 (City only)	\$100,000	LOW	LOW	LOW

Notes:
 1. If any existing grants are returned – They cannot be used for any other Summer project
 2. Cost includes basic park development only, upgraded development is an additional \$400,000

Page 27 of 28

OPTION #3

11-4
continued

Funding						Construction Risk level	Financial Risk Level	Maintenance Cost
Options	State	County	City	Total Project Cost	Cost to the City			
1 - Rehabilitate Ryan House	x	x	x	\$ 2,218,769.40	\$ 1,101,284.40	High	High	High
2 - Demo Kitchen + Cabin & Rehabilitate Farmhouse	N/A	???	x	\$ 1,260,964.24	\$67,000 to 1.26 Million	High	Medium	Medium
3 - Demo Ryan House & Park Development	N/A	N/A	x	\$ 598,181.33	\$ 598,181.33	Medium	Low	Low
4 - Demo Ryan House & Convert to Open Park	N/A	N/A	x	\$ 101,381.34	\$ 101,381.34	Low	Low	Low

Letter 12

Ann Siegenthaler

From: hsammiecat@aol.com
Sent: Thursday, March 28, 2024 9:40 PM
To: Ann Siegenthaler
Subject: Armstrong,P-Written Comment Deadline 4-30-24 as posted by City

****EXTERNAL EMAIL****

Dear Ann Siegenthaler,

I am confused as to why we must submit, in writing, potential comments and/or questions to items the City Council has not ever had yet presented or discussed. How do we know who or what will be said in these meetings? You have posted that the Sumner 2024 Comprehensive Plan Public Comment will be from March 1, 2024 to April 30, 2024. Why do you need these comments and/or questions thirty plus days in advance and again before we have a clue what will be said by the Sumner City Council and the City employees on hand?

1. I also noticed that in the description of public participation, you have listed Committee meetings and study sessions are open to the PUBLIC TO LISTEN BUT DON'T CONTAIN COMMENT PERIODS.

2. Ask questions and share ideas early, don't wait for the last meeting. Council meetings aren't a forum for questions and answer anyway. The best option for that is to ask questions of staff and/or council ahead of time. AGAIN, WE HAVE NOT HEARD WHAT YOUR ARE PLANNING TO SAY IN THE MEETING, HOW MAY WE RESPOND TO YOU THEN WHEN IT IS TOO LATE?

3. Stay in touch. This is laughable. You have plans for us to listen ONLY TO YOU with no regard for what your constituents say or feel about your personal plan for OUR City.

4. Speak up! This really is deceptive. You are only able to speak if the item you want to speak about was not included in the agenda and ONLY UNDER NEW BUSINESS. ITEMS UNDER UNFINISHED BUSINESS DO NOT INCLUDE A COMMENT PERIOD BECAUSE THEY ALREADY HAD A PUBLIC HEARING AT A PREVIOUSLY SCHEDULED OFFICE MEETING.

Once again, all 4 items are an ignore button to us. The public does not have a voice or a say in our City of Sumner government. We are your constituents that voted you in office based on your campaign only to be ignored. We need Council Members that listen and act, not ignore our voice or our vote or be intimidated by demanding city employees. As for the city employees your hired, new employees may replace them easily as well.

The Cheney Foundation decided they wanted to have a space for income producing property in Gig Harbor as well as two waterfront properties that the City of Gig Harbor would allow two custom homes to be build for the small token property that would be donated to the City of Gig Harbor as long as the Cheney group was allow to cut every tree (as a developer that that time was allowed to do) to put 103 apartments on this very small heavily treed triangle lot in downtown Gig Harbor. No parking would be available for these apartments or guest parking.

The City of Gig Harbor are vigilant protectors of trees and water front, but when a potential large development of apartments were planned, the City Council/Board of Gig Harbor voted to accept the Cheney group offer and allow this catastrophe. The traffic study was paralyzing for transportation as well as no parking availability. The public banded together and selected a new group to run for office to take the compromising City Council/Board of Gig Harbor that had voted for the Cheney group project. They ran a strong campaign so EVERYONE KNEW WHAT WAS GOING ON IN THE SMALL TOWN OF GIG HARBOR. I am sure you can imagine the outcome. Those that voted for the Cheney group were voted out of office and the new City Council/Board Members of Gig Harbor were victorious. The moment the vote was over, the Cheney group and carpetbaggers packed up and left town.

12-1
cont

This could easily happen in Sumner. Easily.

The City of Sumner needs the land under The Ryan House for the "Town Center" project. How many Merchants of Sumner know about your plan to demolish the historical buildings that line Main Street, that house their businesses and bring so many people to the City of Sumner to experience this historically amazing town? The Sip and Strolls will not be the same facing the back side of apartments and duplexes down Main Street. Maybe the City of Sumner Merchants will be helped briefly by the City Economic Committee, for a short period of time, but when will the merchants have to start paying much higher rents that new buildings with high interest rates will demand, where will they go? Who will drive to Historical Sumner to stroll along Main Street among the Transitional Apartments or duplexes? Sumner will not be the weekend destination city of the Sip and Strolls, The Rhubarb Pie Contest, The Daffodil Parade, Santa's Parade, etc., and shop the amazingly beautiful shops currently on Main Street and NOT A BIG BOX STORE in site?

Your biggest tax contributors are your car dealerships in town. They advertise through various mediums everyday, every hour of every month for people to come to Sumner and to buy a car or truck. They are your biggest city of Sumner advertisers and tax payers. They have many, many employees that usually live in the area and spend their earnings here for a home, groceries, restaurants, shopping, attending ball games, attending the parades and living a good life. They are your biggest advertisers and biggest tax payers. For the City of Sumner to build apartments without garages or a place to park a car, just is not smart as a city.

12-2

I met so many people from Seattle, Auburn, Burien, Federal Way, just to name a few places that our new neighbors came from who I met while on one of the Sip and Strolls. These new Sumner citizens were so excited to be in a safe town, with a feel of caring neighbors and a great place to raise your kids, to play catch in the front yard with your dog and to be able to play outside with neighborhood kids instead of hovering inside living through social media place in hand and afraid to go outside to interact with people. Sumner is the good life.

For some lame reason, the Berk Consulting Group has been hired by the City of Sumner. They are the ones responsible for turning Main Street in Auburn into a desolate and dark area with no sense of neighbors or a good life. Only tall apartments with very dark shadows that 2 - 3 story apartments provide over a small width of a downtown Auburn street. No life. It feels like a city in a movie with no one on the street, like you're the last person on earth. We don't need to live our life like "shut-ins!" I recently met a very well known third generation store keeper fro Auburn that finally was able to get out of Auburn. They could not sell or lease the several properties they owned downtown amongst the sea of apartments. It was the saddest place to be. They had made a nice living and life there before these apartments were built downtown. She said no one was shopping these areas. So many businesses went out of business. I won't even mention the drug use around the train station and throughout Auburn. The train stations seem to be the attraction for the Berk Consulting Group. I see

12-3

that Sound Transit is a client of Berk Consulting Group. I wonder how much of the proposed Sumner plan is actually what Sound Transit wants. Just a thought. The Berk plan failed in Auburn.

In Burien, the Berk Consulting Group made a plan for many, many apartments around the town center with a very large fountain. It looks pretty, but this large fountain supplies water for non residents and this town center area continues to be very unsafe for anyone to be outside. The Berk plan failed Burien.

Don't take my word for it, do your own research. If this is how the City Council of Sumner and the administrative employees plan to turn our precious Sumner into these failed Berk plans, shame on you!

The City of Sumner has already spent over \$ 60,000 in attorney fees to fight "SOS and Nancy Ryan Dressel" to save The Ryan House, which the City of Sumner lost the case to currently demolish The Ryan House. This is temporary if the "Town Center" plan that Berk Consulting Group and the City Council are allowed to proceed with this plan, The Ryan House is just the tip of the ice berg. While in court with the Seattle attorney hired by the City of Sumner, proudly pointed out that The Ryan House was an old house, but so were several properties on Main Street in Sumner and they ALL will be demolished for the "Town Center," so what is the big deal about The Ryan House, a lot of old buildings are in Sumner. Yep, I am paraphrasing as this was a lengthy exchange with the Seattle attorney and the Judge.

We need to stand and be counted as a NO for demolition of The Ryan House and historic properties on Main Street in Sumner so the Berk Consulting Group may not ruin our town and The Ryan House by his plan to build the cold tall apartments and duplexes on our Main Street. Give us our town back. Your time here is over!

Respectfully,

Phyllis Armstrong

12-3
cont

12-4

Letter 13

From: [Nicholas Biermann](#)
To: [Ann Siegenthaler](#)
Subject: Public input period dates for Comprehensive Plan
Date: Thursday, March 14, 2024 9:59:04 AM

****EXTERNAL EMAIL****

Good morning, Ms Siegenthaler.

I am looking at the public notices given by the City of Sumner for updating the City's comprehensive plan. The notices are on the City's website at: <https://sumnerwa.gov/public-notices/>

Can you help me understand why the public comment period for the individual portions of the plan posted on March 12 is much shorter than the 60-day period initially posted in the first comprehensive plan notice given on March 1?

Initially, the public comment period was slated to close on April 30, 2024. But now it seems that public comment will only be accepted through March 27, 2024? Am I reading this correctly?

Any clarification you can provide here on the length of the public input period would be greatly appreciated.

Thank you,

Nick Biermann

13-1

Letter 14

From: [Nicholas Biermann](#)
 To: [Ann Siegenthaler](#)
 Subject: Public comments on Sumner Comprehensive Plan
 Date: Wednesday, March 27, 2024 4:58:59 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler,

The following are my comments for the City of Sumner Planning Commissioners regarding the proposed amendments to the City's Comprehensive Plan. These comments are submitted to provide my input as a resident of Sumner during the public comment period. I encourage the Planning Commission to take these statements into account and continue to revise the current version of the Plan accordingly.

Specifically,

In Section 1.3 of Chapter 11 regarding Cultural and Historic Resources, the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out ALL of the lines that contain the words Sumner Historical Society.

Is this revision necessary? What is the motivation behind this? I would much rather the City of Sumner renew its commitment to working with the volunteers of the Sumner Historical Society to preserve and promote the history of Sumner instead of disavowing with the stroke of the pen any past-or future--contributions of the Sumner Historical Society. I will also state for the record that the Comprehensive Plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time. I urge the Planning Commission to retain the original wording in Section 1.3 of the City's Comprehensive Plan so that it states:

1.3. Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition.

Furthermore, I also urge the Planning Commission to use similar wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

[DO NOT DELETE THIS STATEMENT]

1.3.2. Partner with the Sumner Historical Society and work with historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

[PLEASE DO NOT DELETE THIS STATEMENT]

I will personally note here that in regards to 1.3.3 above, the Sumner Historical Society is the perfect partner organization to help document and preserve the history of Sumner and facilitate partnerships with schools, the senior center, and other groups. Why do you want to leave the Sumner Historical Society out of this process?

Additionally, I respectfully ask that the Planning Commission keep this specific reference to

14-1

14-2

the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House....

The more general statement “Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area.” is too broad and not specific enough. I maintain that the Comprehensive Plan should include a *specific reference* to the Ryan House as part of the historic downtown character of Sumner. In fact, the Ryan House can be specifically mentioned as a building that can be restored for future community use to make history accessible to the public.

14-3
cont

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Once again, I urge the Planning Commission to retain the specific inclusion of the Sumner Historical Society as part of the City's Comprehensive Plan going forward. The Sumner Historical Society is still present and active in the community, and any attempt to categorically remove the Sumner Historical Society from the City's Plan is capricious and ill-conceived.

Thank you for your time.

Sincerely and respectfully,

Nick Biermann
Parker Road East

Letter 15

From: [Tina Burnett](#)
To: [Ann Siegenthaler](#)
Subject: Input on Sumner Comprehensive Plan
Date: Wednesday, March 27, 2024 9:55:21 AM
Attachments: [Ryan house comp plan.docx](#)

****EXTERNAL EMAIL****

Good morning -

Please refer to the attached Word document containing my review of the Sumner City Comprehensive Plan draft. I have included the current draft's language, my requested re-wording or removal of language as well as comments supporting those requests.

When I lived in NE Tacoma, I would often come to Sumner to shop and dine here in the downtown area and visit the Windmill nursery. Sumner has the charm of history and a lovely small town. When I moved back to this area from after my husband's death, I was so happy to find the perfect house in Sumner for myself and my wheelchair bound brother. Sumner reminds me of the Whitefish Montana of my childhood, where my family is from. Please don't turn Sumner into a boring, commercial area, with no attraction for people in surrounding areas. Please preserve the charm and historic nature of Sumner that draws shoppers and visitors from the surrounding areas. Don't turn it into the dull and empty streets of Auburn, that drives away. Don't turn it into just a suburb of Puyallup. If people need or want large commercial shopping areas, they will go to South Hill, not Sumner. It's the history and charm of Sumner that draws visitors, and their dollars, to the area. We have already lost too much after the fire and the destruction of the historical Waterfall that gave "Heritage Park" its name. The new park is an uninviting concrete mess that goes largely unused. I would also ask that you give consideration to those living in the historic downtown area, when allowing developers to build huge apartment complexes, regarding parking for that new housing that could add up to 1000 more cars to the area.

The comments I have included add context to the requested changes throughout the document. I anticipate and expect my input will be carefully considered during finalization of the City's Comprehensive Plan.

I would be happy to answer any questions the City Council may have

15-1

regarding my input.

Tina Burnett
228 Sumner Ave
Sumner

Wording Changes and Comments Related to Sumner Comprehensive Plan Draft (Input Provided By: Tina Burnett)

1.3 [Page 31]

1.3. Design Guidelines

~~In concert with the Sumner citizens and business community, Maintain design guidelines and a design code, as appropriate, and/or a form-based code that which~~ address streetscape, landscape, and building design to ensure high quality and compatible development. Materials and methods of construction should be of high quality, be specific to the region, ~~exhibit continuity of history and culture~~, be compatible with the climate., ~~protect historic and archaeological resources, and promote the community's character and identity~~ The design should reflect the historic context of Sumner, respect the historic character and scale of nearby development, and promote an attractive, pedestrian-scale streetscape.

1.3 Design Guidelines:

Do Not Remove: *"In concert with the Sumner citizens and business community ..."* With the deletion of this portion, the City would be the sole decision-maker without input from the residents and businesses.

Do Not Remove: *"...protect historic and archaeological resources, and promote the community's character and identity."* Sumner's history lies in the *existing* resources, the new language is vague and implies that future designs can "reflect the historic context of Sumner" replacing physical artifacts.

3.3 [Page 36]

3. Reinforce the Town Center Plan area as the downtown as the town center and commercial and cultural center of Sumner.

~~Continue~~ Apply a form-based code and/or design review process for new and expanded uses in the Town Center. Any future amendments to the Sumner design guidelines ~~shall~~ should include consultation with ~~Sumner Downtown Association~~ the downtown business association(s), Chamber of Commerce, Sumner Historical Society historic preservation organizations, other civic groups, and ~~citizens~~ residents. [Policy revised since Planning Commission previous review.]

Return Wording to Read: "...**shall** include consultation with the downtown business association(s), Chamber of Commerce, **Sumner Historical Society**, other civic groups, and residents."

Comment: The change to this portion of the paragraph removes a necessary component in maintaining the historic significance of Sumner. The Sumner Historical Society continues to exist and is the appropriate organization with expertise to participate in decisions conveying Sumner's history. The draft language changing "shall" to "should" removes any requirement to consult a specific organization and allows the City to be the sole decision-maker for amendments and designs.

5.8 [Page 40]

5. Provide for open space and recreation and protect sensitive areas from degradation.

- 5.8. ~~Expand Heritage Park to a full block. Maintain~~ Reuben A. Knoblauch Heritage Park as a key open space in the downtown and support activities and events that complement downtown businesses and residences.

Remove: "**Heritage**" from the park's name to read: "Maintain Reuben A. Knoblauch Park..."

Comment: *By including "Heritage" in the name is misleading and ultimately incorrect. Mr. Knoblauch does not represent the full "heritage" of Sumner. A waterfall feature with plaques honoring Sumner's founding families was part of the original park. The waterfall was removed with no official plans to restore it. The family names on the waterfall represented Sumner's true heritage. To date there are no official plans to restore the waterfall. Unless there is recognition of the original families, this park should not contain the word "Heritage" in its name.*

6.6 [Page 56]

6. Promote downtown as the town's cultural, historic and activity center of the entire community.

- 6.6. In conjunction with interested parties, improve the visual appearance of downtown through public and private measures for beautification, facade improvements, and **preservation of historic properties**, design strategies, maintenance, and streetscape improvements.

Comment: Note that "...*preservation of historic properties*..." aligns with The Ryan House preservation, *not demolition*, and is the direction given under this section. Ryan House is a physical artifact and represents history within Sumner's downtown. Demolition does not fall under the purview of Comprehensive Plan's goals. In fact, "*maintenance*" is stated in the language of this paragraph – this *has not taken place with respect to The Ryan House* despite being included in the existing Comprehensive Plan.

6.13 [Page 56]

- 6.13. Create 350-500 new housing units in the Town Center in **close proximity** to the train station and existing businesses.

Correction: Please remove "...*in close proximity*..." from this sentence. Reword it to "...**close to the train station**..." Use of the modifier "close" in the familiar expression "close proximity" is redundant.

1.3 [Page 81]**Goals, Policies, and Objectives**

1. Identify, preserve, protect, and enhance restore areas of Sumner with historical, cultural, educational, or scientific values, the historic and prehistoric cultural resources of Sumner.

- 1.3. Work with ~~the Sumner Historical Society and other~~ community groups to promote historic and cultural education and recognition. *[Policy revised since Planning Commission previous review.]*

Do Not Remove: "Continue to support the Sumner Historical Society by providing the use of the Ryan House." The Ryan House and Sumner Historical Society are intertwined in preserving the history of Sumner. The Sumner Historical Society provides documentation outlining the city's past and The Ryan House is an artifact of the founding of Sumner.

1.4.1 [Page 82]

- 1.4. Coordinate with community organizations, property owners, and local ~~citizens~~ residents to protect, acquire, and/or restore key historic properties.
- 1.4.1.  Promote the preservation and revitalization of significant lands, historic sites and structures, and historic trees through a combination of techniques such as landmark programs, incentives, and local government historic preservation programs.

Comment: This section is particularly applicable to The Ryan House. The City of Sumner is committing to "preservation" of "...significant lands, historic sites and structures..." and goes on to reference the type of resources available to support this "preservation" statement. The City has held the role of stewardship since the early 1900s but has not implemented necessary preservation.

1.4.3 [Page 82]

- 1.4.3. Maintain  ~~a historic preservation program, that creates a the local historic preservation commission, and pursue~~ maintain Sumner's designation as a Certified Local Government

Do Not Remove "...a historic preservation program, that creates a local historic preservation commission..." With the rewording in the draft Comprehensive Plan, the City has removed an implementation method.

3.3.XX [Page 85]

3.3. Enliven and refresh Downtown historic downtown by allowing adaptive reuse of buildings and new construction that respects acknowledges the historic character of the area.

~~X.X Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center.~~

Note: Policy to be deleted, since the City Council determined (09/2023) that due to the structure's very poor condition, there is no feasible means to preserving it.

~~X.X Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.~~

Note: Moved to general policies.

Do Not Remove "Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center."

Comment: The "Note" currently provided below the deletion is void due to the revocation of the City Council's **demolition permit**. Concerned citizens have reached out to the City Council requesting discussing funding options and preservation of the structure.

3.3.XX [Page 85]

~~X.X Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.~~

Do not remove "*Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.*"

Comment: The Sumner Historical Society exists to provide documentation of Sumner's history. Inclusion of this section recognizes partnering with the City and preservation as well as educational opportunities the Sumner Historical Society exists to provide to the public. Thus, it must remain in the Comprehensive Plan.

Letter 16

From: [Laurie Carter](#)
To: [Ann Siegenthaler](#)
Subject: Sumner Zoning Code – Historic & Cultural Preservation Regulations
Date: Tuesday, March 26, 2024 5:51:36 PM
Attachments: [image.png](#)
[image.png](#)

****EXTERNAL EMAIL****

My comments below:

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- 3.2. Ensure that the streets Encourage in the historic downtown utilize incorporation of street furniture and features, such as streetlights and benches, that are compatible with the historic character of the area. *[Policy revised since Planning Commission previous review.]*
- 3.3. Enliven and refresh Downtown historic downtown by allowing adaptive reuse of buildings and new construction that respects acknowledges the historic character of the area.
- ~~X-X Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center.~~
- Note: Policy to be deleted, since the City Council determined (09/2023) that due to the structure's very poor condition, there is no feasible means to preserving it.*
- ~~X-X Partner with the Sumner Historical Society and others to provide access to historic documentation; to landowners, citizens, and others.~~
- Note: Moved to general policies.*
- 3.4. Provide ongoing support and expansion of update walking tours that highlights public art, architecture, history, trees, and other icons of the historic downtown.
- Note: Sumner has policies in the Community Character chapter in the Comprehensive Plan that promote beautification, events, and economic support of the Downtown Core.*

16-1

I feel the above indicates that the City intends to demolish all the beautiful, charming buildings of Sumner. That is the draw to your City! Why not wait for the study to come back that was just approved by the Council to see what the consulting firm comes up with that is the economic draw (part of the Lodging Tax). The March 25, 2024 budget Council Study Session indicated tourism tax was higher than expected.

Recently there was a presentation before the Council for grants. Sumner Main Street Association gave a presentation of all the wonderful things they do. History is part of their purpose. Will their presence now be absent from downtown? Here is their purpose:

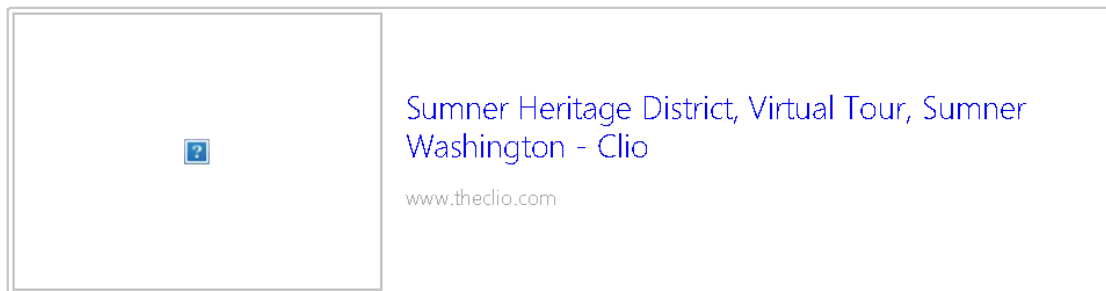
<https://www.sumnermainstreet.com/about-sumner-main-street/>

About Sumner Main Steet Association - Downtown Sumner - Washington

SMSA works to stimulate economic growth & revitalization, enhance beautification, nurture historic preservation & ensure the vitality of



The new section to Title 18 (possibly 18.60) in regards to consultation required for demolition or construction of any building in Town Center older than 45 years old. That would be most of the buildings in Town Center. The City has removed the beautiful picture of the Ryan House as well as streamlined the history page and the walking tour is shown as "under construction" on the City website, but the Sumner Historical Society still has it at: <https://www.theclio.com/tour/1879>



Ryan House is a museum; and before that the library. It has not been a single family home since 1925. It is less than 4,000 square feet. Please don't demolish Ryan House. Let's find a way to fundraise and get the grants that were turned back reissued and contractors with historic preservation credentials. Please. We have the Washington Trust For Historic Preservation working with us. Let's meet in the middle, find common ground and work through this together.

A plaque does not suffice. The charm of the old historic buildings is the draw. The attached proposed projects for Town Center aren't inviting. Why not have a design code to make the buildings look old? And lower profile like the existing buildings in Town Center? When catastrophic fires happen and buildings must be replaced, think fit in to existing neighborhood rather than the newer designs of East Sumner. Leave modern colors and angled buildings to the eastside. Please don't go the direction of my hometown, Auburn.

Researching Washington State Department of Archeology and Historic Preservation (DHAP) web page, RCWs and WAC seem to indicate the fact Ryan House is on the National Register of Historic Places is a factor and their is also indication that a local historical Society will have input. "THE 28-DAY TIMELINE MIRRORS SUMNER'S CODE THAT REQUIRES THE CITY TO DETERMINE A COMPLETE PERMIT APPLICATION WITHIN 28 DAYS." But when I research the DHAP website, it indicates their timeframe is 30 days, and if no response in 30 days, follow-up with them.

And as a nearly 30 year federal government employee, I do not believe 28 days is a reasonable time for a response from the National Park Service (NPS) about Ryan House status on the National Register of Historic Places. That is a consideration when using State and Federal agencies; different timelines than the fast track 28 days Sumner uses for permit processing mentioned above and in the proposed change to Title 18. Which takes precedence? What action will the City take if the State or Federal government do not respond within 28 days?

16-1
Cont

https://en.m.wikipedia.org/wiki/Ryan_House

<https://npgallery.nps.gov/AssetDetail/NRIS/76001900>

In Chapter 11, Historic and Cultural Resources, Section 3.3, the update before the planning commission suggests removing this line

"Improve the Ryan House and public access to the Ryan House"

and replacing it with

"Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area."

Please retain the wording "Improve the Ryan House and public access to the Ryan House" as part of any plan to enliven and refresh historic downtown.

Similarly, in Chapter 11 Historic and Cultural Resources, section 1.3, the proposed updates literally cross off the Sumner Historical Society in every line that is mentioned.

Please consider specific references to the Sumner Historical Society be retained in Sections 1.3 and 1.3.2. Have a specific agreement with the Sumner Historical Society that improves the uses and access to the Ryan House Museum. Create a consortium with other valley museums like Meeker Mansion and White River Valley Museum.

16-2

In particular, please retain the original wording that stated in section 1.3:

1.3 "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

I suggest that sections 1.3.1, 1.3.2, and 1.3.3 remain in the place and not be crossed off. All of these activities are essential to preserving and promoting the local history of Sumner.

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

- 1.3. Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition. *[Policy revised since Planning Commission previous review.]*

~~XX. Continue to support the Sumner Historical Society by providing the use of the Ryan House. *[Policy revised since Planning Commission previous review. Entire policy proposed to be deleted]*~~

- 1.3.1. ~~Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals. *[Policy revised since Planning Commission previous review. Entire policy proposed to be deleted]*~~
- 1.3.2. ~~Partner with the Sumner Historical Society. Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others. *[Policy revised since Planning Commission previous review.]*~~
- 1.3.3. ~~Encourage the collection and preservation of oral histories of the community through partnerships with schools, the senior center, and other groups. *[Policy revised since Planning Commission previous review.]*~~

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- 1.3.4. Promote public awareness and understanding of prehistory and the history of tribes in the Sumner area.

The Pierce County website has a description of Sumner, and it reads, in part:

Sumner has retained its small town charm even though it is now a city of 9,000 residents. The historic Downtown Sumner is home to a variety of shops and businesses and hosts many community events including the Daffodil Parade, Wine Walks and Music Off Main.

<https://www.piercecountywa.gov/669/Sumner>

Let's keep it that way. Historic Downtown Sumner.

I live in Bonney Lake but I am in Sumner to shop and/or dine at least once a week. I have lived in the Sumner area since the mid-1980s. I worked in Sumner, too.

Thank you for your consideration. You have a hard job to do, as do all City staff. Thank you for your service.

Laurie Carter

16-2
Cont



with us and see where were going as a community into

16-3

By **City of Sumner**, 7 months ago



AROUND TOWN

Riverfront Apartments

The project takes place on the vacant lot north of the library and will include the construction of a 6 story mixed use development on an approximately 1.07 acre site in Sumner's Town Center Station District. The development will include 127 residential apartment units, 1,515 sf of commercial space, structured [...]

By **City of Sumner**, 7 months ago



CITY OF
SUMNER
WASHINGTON

MENU 



16-3
continued



Planning Ahead

The City is always looking ahead to plan for the future. This affects zoning, housing, transportation, businesses, environmental impacts...nearly every aspect of life. While we can't offer you a crystal ball, we can encourage you to look ahead with us and see where we're going as a community into the [...]

By **City of Sumner**, 7 months ago

Letter 17

From: [Nancy Dressel](#)
 To: [Ann Siegenthaler](#)
 Subject: Dressel,N-Save the Ryan House
 Date: Wednesday, March 27, 2024 2:56:10 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Additionally, I respectfully ask that the Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House....

Instead of replacing this statement with the more general "Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area."

Any reference to "enliven and refresh historic downtown" and "adaptive reuse of buildings" should include a specific reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use.

17-1

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society being intentionally deleted from the city's plan going forward? Please reconsider this drastic and unnecessary change. Instead, I urge the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner's History and make our history accessible to the public.

Thank you for your considerations,

Nancy Ryan Dressel

Great great granddaughter of George and Lucy Ryan

17-1
Cont

Letter 18

From: [Tod Dressel](#)
 To: [Ann Siegenthaler](#)
 Subject: Tear down of historic Ryan house in Sumner
 Date: Wednesday, March 27, 2024 2:55:26 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

Although I don't live in Sumner, my wife Nancy Ryan was born and raised there. I have spent a great amount of time there. I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Additionally, I respectfully ask that the Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House.... Instead of replacing this statement with the more general "Enliven and

18-1

refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area.”

Any reference to “enliven and refresh historic downtown” and “adaptive reuse of buildings” should include a specific reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use.

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society being intentionally deleted from the city’s plan going forward? Please reconsider this drastic and unnecessary change. Instead, I urge the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner’s History and make our history accessible to the public.

18-1
Cont

Letter 19

From: [Melody Adams-Forsstrom](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House + Sumner Historical Society - Include in Comprehensive Plan
Date: Monday, March 25, 2024 7:27:22 PM

****EXTERNAL EMAIL****

To: City of Sumner and all whom it may concern:

The comprehensive plan needs to include, **"Improve the Ryan House and public access to the Ryan House"** as part of any plan to enliven and refresh historic downtown Sumner.

Please retain the original wording that stated in section 1.3:

1.3 "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

There is no reason to cross off the Sumner Historical Society. The comprehensive plan needs to include the Sumner Historical Society and other community groups.

I recommend specifically that sections 1.3.1, 1.3.2, and 1.3.3 of the comprehensive plan, remain in place and not be crossed off. All of these activities are essential to preserving and promoting the local history of Sumner.

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society, Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Kind Regards,

Melody Adams-Forsstrom

19-1

Letter 20

From: [Deanne and Kim Foster](#)
To: [Ann Siegenthaler](#)
Subject: Sumner Comprehensive Plan Amendments
Date: Friday, March 22, 2024 2:08:12 PM
Attachments: [image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)
[image.png](#)

****EXTERNAL EMAIL****

Dear Ms. Siegenthaler:

Could you provide some clarification on the following items regarding the Planning Commission and City Council consideration of the proposed amendments to the City of Sumner's Comprehensive Plan.

I received a series of emails from the City on March 12, 2024, advising that the Comprehensive Plan Amendments would be considered by the Planning Commission at a meeting on April 4, 2024. The notices advised that written comments would be accepted through March 27, 2024:

Notice Of Application And Public Hearing

Notice is hereby given that the City of Sumner PLANNING COMMISSION WILL HOLD A PUBLIC HEARING on an update to the Sumner Comprehensive Plan, related Plans, and citywide zoning regulations as described below. Written comments are due March 27, 2024, by 5:00 pm to anssi@sumnerwa.gov or comment at the public hearing.

I note that the notices say that the Applications for the Comprehensive Plan Amendments were deemed complete on February 14, 2024. I found that interesting because I would have thought that they would have been deemed complete after the January 2023 closing date.

Can you explain why there was a 30-day 'lag' between the completed application date and the date that notices went out to the public via email? Given the sweeping scope of the proposed changes, that will dramatically change the character of Sumner, I am not confident that the requirements of RCW 36.70A.140 are being met with such an abbreviated comment/public participation period. The statute demands that the public hearing only take place after "effective notice" to the public.

I am also confused by a companion notice that is dated March 1, 2024 that is titled:

20-1

Notice of Availability of Draft Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement
Notice of Planning Commission Public Hearing
Sumner 2024 Comprehensive Plan Update

In this notice, it advises that comments will be accepted through April 30, 2024. I note this notice is also posted in the lobby of City Hall.



This notice seems to be in direct conflict with the first set of notices above. This notice could cause a member of the public to miss the City-imposed March 27, 2024 deadline for comment. Worse yet, the Planning Commission would not have the benefit of comments submitted after the April 4, 2024 meeting.

How can the Planning Commission make a decision on these sweeping changes at an April 4, 2024, meeting when the comment period for the changes - and including comments on the Draft EIS - is open until April 30?

I also have some questions specific to the Draft EIS:

I note in your May 18, 2023 EIS Scoping information that there is nothing specific cited to the potential changes allowing demolition of Ryan House, flooding the downtown core with low-income apartments, or enticing developers to construct low-income apartments through tax incentive zones. In fact, the accompanying Staff Memorandum, as affecting the status of Ryan House, specifically states:

I. Historic and Cultural Resources • Policies for protecting historic/cultural resources, supporting cultural events.

The February 16, 2023 Staff Memorandum also provides guidance via the Sumner Municipal Code on criteria for adopting amendments, to wit:

Exhibit 1 - Comprehensive Plan Amendment Criteria

Per SMC 18.56.147(N), Comprehensive Plan Amendments must be substantial compliance with the following criteria:

- 1. An amendment is necessary to resolve inconsistencies between the Sumner comprehensive plan and other city plans or ordinances; or to resolve inconsistencies between the Sumner comprehensive plan and other jurisdictions' plans or ordinances.**
- 2. Conditions have so changed since the adoption of the Sumner comprehensive plan that**

20-1
Cont

20-2

the existing goals, policies, objectives, and/or map classifications are inappropriate.

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

4. The proposed amendment is consistent with chapter 36.70A RCW, the county-wide planning policies for Pierce County, and the applicable multicounty planning policies.

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

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

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

20-2
Cont

I note that at the September 7, 2024 Planning Commission Agenda Package that the City was then proposing the following amendments and language (Note the purple enhancements are the City's):



Can you advise when these policies - that were disclosed to the public via the September 7, 2024 Planning Commission meeting - were diametrically changed to eliminate reference to preserving and improving Ryan House, its status on the National Registry of Historic Places, support of the Sumner Historical Society, and restoration of key historic properties?

Given the scope of the sudden changes from the above-stated goals and policies that had been communicated to the public, was a new application for Comprehensive Plan Amendments submitted? Is that the application referenced in the series of emailed Public Notices as being deemed complete on February 14, 2024?

Date of Application: 02/09/24

Date of Complete Application: 02/14/24

If this 'new' application is predicated on the complete reversal of the goals and policies that were previously being proposed by the City as late as September 7, 2024, how can this new

round not be outside the January 2023 amendment 'cut-off' date? These changes should have been part of the January 2023 submissions. Up until at least September 7, 2023, the public would have thought that the intent was to preserve Ryan House and the historical character of the community. If a member of the public saw what was taking place at least through September 7, 2023, they would see that Ryan House was still being preserved and would have no reason to participate. The City's sudden reversal denied the public nine months of effective participation in the process. This results in an extremely truncated public awareness/participation schedule outside the requirements of RCW 36.70A.140. Shouldn't the City have withdrawn its previous application for Comprehensive Plan Amendments and submitted a new one so the public could effectively participate?

20-2
Cont

Did the sudden wholesale change in the City's stated goals and policies regarding Ryan House and preserving the "historic and community character of Sumner" result in any changes to the scoping of the EIS process? Was the public made aware of any said changes in the EIS scoping?

Can you advise what third party consultants were engaged to assist or perform functions regarding the drafting of the proposed Comprehensive Plan amendment and the EIS.

Were the consultants preparing the EIS advised mid-process that the goals and policies of the Comprehensive Plan were suddenly being changed to eliminate reference to preserving and improving Ryan House, its status on the National Registry of Historic Places, support of the Sumner Historical Society, and restoration of key historic properties?

20-3

How can any changes in goals and policies referencing Ryan House have been properly considered in the amendment process when a judgment is just now being entered finding the city violated the requirements of GMA and SEPA when issuing the demolition permit? Wouldn't that significantly affect the 'context' in which these proposed amendments were being reviewed under?

I appreciate any light you can shed on this.

Kim Foster

Letter 21

From: [Deanne and Kim Foster](#)
To: [Ann Siegenthaler](#)
Subject: City of Sumner - Comprehensive Plan - Planning Commission Comments
Date: Wednesday, March 27, 2024 2:57:02 PM
Attachments: [Kim Foster - Ryan House - Planning Commission Comments.pdf](#)

****EXTERNAL EMAIL****

Dear Ms. Siegenthaler -

Please include the attached comments in the record for the Planning Commission meeting.

Thank you!

Kim Foster
(206) 356-4936

Kim E. Foster
Attorney at Law
4810 Pt. Fosdick Dr., #303
Gig Harbor, Washington 98335
(206) 356-4936

March 27, 2024

Attn: Ann Seigenthaler, Senior Planner

Honorable Kathy Hayden, Mayor
Planning Commission Members
City of Sumner
1104 Maple Street
Sumner, Washington 98390

Re: City of Sumner – Proposed Comprehensive Plan Updates

Dear Mayor Hayden, Members of the City of Sumner Planning Commission:

I am a 'land-use' lawyer employed by a Bellevue-based real estate investment and development company. These comments are not being submitted on behalf of my employer and are submitted on my and my family's behalf only. I was born and raised in Sumner. I graduated from Sumner High School in 1973. My family has a long legacy in Sumner. My father, Everett Foster, served as Mayor in the 1960s and 1970s. I am submitting these comments on the proposed changes to the city's Comprehensive Plan and downtown Sub Area Plan.

Through my employment, I am familiar with the Washington State Growth Management Act, the State Environmental Policy Act, and various comprehensive plans in several jurisdictions in Washington.

As a preface to my specific comments, I would encourage you to reflect on who you are representing. The issues presented by the statutes and regulations are complex. It is easy to 'go along with' what a couple of staff members and very expensive paid consultants are recommending and forget that you are there to carry out the wishes of the people of Sumner. There is nothing that the citizens of Sumner are demanding for the future of their town that cannot be accomplished by staff, consultants, and city leaders.

To further preface, I note the language in a February 16, 2023 Memo from Ann Siegenthaler, Senior Planner, to the Commission that says:

The amendments that will be presented to the Commission and Council are proposed by staff, working with a consultant. Most of the amendments are recommended by the City's consultant, who has

21-1

extensive experience updating Comprehensive Plans and regulations, as necessary to meet State and other legal mandates. The City has hired the firm of BERK Consulting to assist in the major updates...

[\[8db84586335c4fa0aa2b5ca79b1231f4 DocketStaffMemo 022123.pdf \(amazonaws.com\)\]](#)

This begs the question, prior to hiring a consultant, was there any vetting process to see if the consultant – and ‘staff’ – shared the same values and visions for Sumner that the citizens do? Did you explore other communities where similar policies were adopted based on ‘staff’ and ‘consultant’ recommendations? I would suggest Main Street Auburn as a good start. Talk to the retailers there.

I bring this up as I have observed a massive citizen backlash against the recommendations of ‘staff’ on the issues of preserving Ryan House and including filing legal actions against the city. I am hearing the same objections to proposals that would transform the Main Street environment into an ‘apartment canyon’ with incentives being given to low-income apartment developers.

As set forth in the city’s Comprehensive Plan website, and as demanded by the Washington State Growth Management Act and State Environmental Policy Act, the process for amending Comprehensive Plans should be very public-oriented – involving the public at all levels.

The city published a Draft Public Participation Plan on its website dated February 23, 2023.

[Microsoft Word - 1-CompPlan_PPP_FinDRAFT_022323 \(amazonaws.com\)](#)

On September 19, 2023, I sent a letter to the city advising that Resolution 1663 to suddenly demolish Ryan House was not in compliance with the city’s Comprehensive Plan and public notice requirements of RCW 36.70A.020, RCW 36.70A.035, and RCW 36.70A.140 among others. The letter was ignored, and the city subsequently issued a demolition permit for the house.

The issuance of the demolition permit was appealed to Pierce County Superior Court under the Washington State Land Use Petition Act. On March 13, 2024, a hearing was held wherein Judge Stanley Rumbaugh found that the city did, in fact, violate the provisions of its own Comprehensive Plan and the required public notice provisions. It is important to note that the formal written judgment will be entered on April 26, 2024.

One of Judge Rumbaugh’s points in finding the city violated its own procedures and state regulations was that the public had been lead to believe that Ryan House was to be preserved and restored as a prominent feature of Main Street – the city describing it as the ‘Anchor of Main Street’. This public perception was allowed to persist until the city abruptly, and with only ‘cryptic’ notice to the public, reversed course and voted to demolish the Ryan House within a span of about two weeks.

I see the same thing happening with regard to the proposed Comprehensive Plan amendments that essentially ‘erase’ Ryan House as an element of the Historical and Cultural Resources section of the Plan. Note that these changes deleting Ryan House are occurring while the Pierce County Superior Court judgment against the city hasn’t even been entered. A member of the public would have every

21-1
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21-1

justification to believe that a court judgment is about to be entered revoking the demolition permit and, pursuant to Judge Rumbaugh's ruling that the city would have to then go back and start the process affecting Ryan House over. It would be shockingly speculative for a member of the public to assume that the city had already proposed amendments to allow it to demolish Ryan House when the judgment in the LUPA action hasn't even been entered.

The public should have the benefit of the entire process as it applies to Ryan House restarted from the beginning – not just a 'band aid' correction for the city to quickly forge ahead with demolition despite Judge Rumbaugh's ruling.

I would note that the procedures to amend the Comprehensive Plan, as outlined on the city's website, began in January of 2023. Here is the information provided by the city on the "Lifecycle" of the amendment process:

21-1
Cont

Lifecycle



If you look at the clear language on the City's webpage, you will find this:

*Review of Plan Elements: The Planning Commission completed its review of the first 7 elements (chapters) of the Comprehensive Plan (Comp Plan). [Prior to June 2023] Staff made **minor edits** to these chapters to reflect the Commission's comments, and brought those back to the Commission at their June 1st meeting. The draft documents are posted in the Documents Library column to the right. [emphasis mine]*

A member of the public, seeing that, would assume that Ryan House was not going to be affected, so no further participation required. Going from “preservation” of Ryan House to total elimination is not a “minor edit”.

Also included on the website is this:

For the 2024 review, most of the policies have been carried forward unchanged or with minor updates as a “clean up” of outdated terms and text. However, some of the updated 2024 policies consist of substantive revisions or entirely new policies, as needed to reflect new State and County requirements.

Again, an extremely deceptive description as it applies to the significant changes on Ryan House.

If you look at the Planning Commission agenda as late as September 7, 2023 meeting, you will see that there are no changes for Ryan House that would change the status from restoration to allowing demolition. Anyone following the process would have confidence that Ryan House was still in the preservation/restoration mode.

It should be noted that the ‘staff’ claim that demolition was discussed at an August 25, 2023 Budget and Finance Committee meeting. Some staff claim that demolition was openly discussed even prior to that. Why didn't they tell the Planning Commission, as it was publishing an agenda 10 days later informing the public that Ryan House was being preserved, that, in fact, staff was pushing for demolition?

I think that's a problem for the city when nine months into the Comp Plan amendment process the city is still telling the public that Ryan House's status is unchanged. Then suddenly it is 'out'. That critically impacts the public's ability to meaningfully participate in the process – when they are being told one thing while the city is actively on a course to do the opposite.

You will note from the city's website that a member of the public would see that between April and November of 2023, the Planning Commission is to evaluate the proposed amendments. This, the Planning Commission, in fact did. At the September 7 Planning Commission meeting the amendments to the Cultural and Historic Resources section of the Comprehensive Plan were discussed. The public found this in the agenda package:

1.1 Preserve and maintain the historic, cultural, scientific, or educational integrity of known resources, including properties listed on the National or State Register of Historic Places, Plan and design development on sites having historic, cultural, or archeological resources in a manner that prevents impacts to the resource and provides educational benefits to the public, where appropriate.

Ryan House is listed on the National Registry of Historic Places so a member of the public, reading these proposed changes, would have confidence that Ryan House would be protected.

The proposals go on to state:

21-1
Cont

- 1.3 Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition.
 - 1.3.1 Continue to support the Sumner Historical Society.
- 1.4 Coordinate with community organizations, property owners, and local ~~citizens~~ residents to protect, acquire, and/or restore key historic properties.
 - 1.4.1 Promote the preservation and revitalization of significant lands, historic sites and structures, and historic trees through a combination of techniques such as landmark programs, incentives, and local government historic preservation programs.
- 3.4 Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center.

As of September 7, 2023, a member of the public interested in the preservation of and enhancement of Ryan House would justifiably believe Ryan House was being maintained as a listed component of the Comprehensive Plan.

I have checked the published Agendas of each of the listed Planning Commission meetings between September 7, 2023, and March 1, 2024 and I can find nothing that would give notice to the public that the above-proposed changes to the Comprehensive Plan eliminating Ryan House were being contemplated.

21-1
Cont

The first notice that I see is a "Notice of Decision" that the city sent out on March 12, 2024. It reads as follows:

Notice of Decision:

Notice of Application and Public Hearing

Notice is hereby given that the City of Sumner PLANNING COMMISSION WILL HOLD A PUBLIC HEARING on an update to Sumner Zoning Code Title 18 – Historic & Cultural Preservation Regulations as described below. Written comments are due by March 27, 2024 by 5:00 pm to annsi@sumnerwa.gov or comment at the public hearing. The public has the right to review the contents of the official file for the proposal, provide written comments, participate in the public hearings/meetings, and request a copy of the final decision.

21-2

Proposal Name: 2024 Sumner Comprehensive Plan Amendments – Historic & Cultural Preservation Regulations

Proposal Description: The City of Sumner is updating its Comprehensive Plan to meet the requirements of the Washington State Growth Management Act and other regional policies. As part of this update, the City will amend its Zoning Regulations with new provisions for historic/cultural preservation.

Proposed regulations include:

- ***Add a requirement that applicants proposing a building demolition or significant new construction in the Town Center Plan area, on sites with structures more than 45 years old, must request a consultation with the State Department of Archeology and Historic Preservation (DAHP).***
- ***Add a requirement that DAHP's recommended mitigation measures (if received in a timely fashion) must be considered and implemented only if appropriate to the site/project.***
- ***Require Inadvertent Human Remains Discovery Language to be included in permits; require provisions in permits to immediately stop work and notify appropriate agencies if artifacts are uncovered during site work.***

More detailed information on proposed policy and code changes is contained in the Draft 2024 Comprehensive Plan documents for the Environment Element, located on the City's website at: <https://connects.sumnerwa.gov/planning-summers-future>

Location / Parcel(s) #: City-wide

Permit Application #: CIA-2024-0002

Applicant/Rep: City of Sumner

Hearing Date and Time: April 4, 2024 at 6:00pm

SEPA Environmental Review: The Comprehensive Plan Draft Environmental Impact Statement (DEIS), evaluating potential impacts of proposed policy and regulation changes, was issued on March 1, 2024.

Hearing Location / Zoom Virtual Meeting Link: The public is welcome to attend this meeting in-person at Sumner City Hall Council Chambers 1104 Maple Street, or virtually by using the meeting access link below.

Other Required Approvals: City Council, Puget Sound Regional Council, Dept of Commerce, other agencies.

Staff Contact: Direct questions to: Ann Siegenthaler, Community Development Department, 253-299-5520 or annsi@sumnerwa.gov

Date of Application: 02/15/24

Date of Complete Application: 02/22/24

Published/Posted/Mailed: March 12, 2024

21-2
Cont

Note that the notice states that the “Date of Completed Application” is February 22, 2024, but the “Notice of Decision” doesn’t go out until March 12, 2024. Why the delay?

This presents several problems for compliance under RCW 36.70A.

First of all, the notice is clearly erroneous on its face that it is a “Notice of Decision” leaving the public with a mistaken impression that a ‘decision’ has already been made so why bother commenting. The city will claim that they issued a ‘correction’ to the notice but the ‘bell had already been rung’ that a decision had been made.

Second, if you look at the “Proposal Description” language in the notice, it not only has zero reference to Ryan House – easily the biggest and most egregious change in the proposed amendments - but it actually buttresses the public’s justifiable belief that Ryan House is to be preserved by providing the proposed language about enhanced scrutiny for structures “more than 45 years old.”

The notice also fails given the fact that these are sweeping changes being proposed and the public was only given fourteen days notice to learn about the proposed changes and submit written comment.

RCW 36.70A.140 provides:

*The procedures shall provide for broad dissemination of proposals and alternatives, **opportunity for written comments, public meetings after effective notice, provision for open discussion**, [emphasis added] communication programs, information services, and consideration of and response to public comments.*

Fourteen days is not ‘effective notice’ in a process that, by the city’s own plans, is supposed to take at least a year. The public was denied the opportunity for “open discussion” of these amendments because these amendments, as they apply to Ryan House, were never on a public meeting agenda.

It should also be noted that a conflicting notice has been posted by the city – again causing confusion - that will limit public participation in the amendment process. On March 1, 2024, the city issued a Notice of Availability of Draft Comprehensive Plan, Zoning Code Amendments, and Draft Environmental Impact Statement Notice of Planning Commission Public Hearing.

This notice specifically provides for a 60-day window for public comment closing on April 30, 2024 – NOT the March 27, 2024, deadline in the aforementioned March 12, 2024, notice. How can the city expect the public to stay informed and participate in the face of these conflicting and misleading notices?

21-2
Cont



**Notice of Availability of
Draft Comprehensive Plan, Zoning Code Amendments, and
Draft Environmental Impact Statement
Notice of Planning Commission Public Hearing
*Sumner 2024 Comprehensive Plan Update***

Pursuant to WAC 197-11-230 and WAC 197-11-455 the City of Sumner is issuing its integrated Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement (Volume II) for a 60-day public comment period. Draft Zoning Code Amendments are appended to the documents. A public hearing before the Planning Commission is scheduled to invite oral public comment.

Date of Issuance: March 1, 2024

Lead Agency: City of Sumner

Agency File Number: SEPA-2023-0003

Contact: Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390
(253) 299-5520
annsi@sumnerwa.gov

Description of Proposal

The City of Sumner is required to update its Comprehensive Plan by December 31, 2024 to meet the requirements of the Washington State Growth Management Act and other regional policies. As part of the update, the City will amend all its plan elements and related plans and necessary implementing development regulations, including the Transportation Management Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

The Comprehensive Plan Draft Environmental Impact Statement (Draft EIS) includes environmental analysis of three plan alternatives and identification of impacts and mitigation measures. The EIS alternatives consider a range of approaches to distributing Sumner's growth.

Location of Proposal

City of Sumner and Potential Annexation Areas within the Urban Growth Area.

Public Comment Period

Agencies, affected tribes, and members of the public are invited to comment on the proposed contents of the Draft EIS and the integrated Draft Plan. **Comments will be accepted from 5:00 pm PST on March 1, 2024 through 5:00 pm PST on April 30, 2024.** All comments must be submitted in writing by this date.

It is important to note that the "Date of Completed Application" for these proposed amendments is shown as February 22, 2024. Then conflicting public notice dates go out on March 1 and March 12, 2024.

21-2
Cont

Assuming the March 1 date as the earliest date – per the language in the notice – that a member of the public would have knowledge of the drastic changes in the proposed amendments regarding Ryan House, the “Lifecycle” process outlined on the city’s website and as set forth above should commence at that point. The public has, effectively, been closed out on at least nine months of the process.

As it stands now, the public is being limited on its public participation before seeing responses to the March 1 notice from agencies and tribes. Public participation is also being limited by requiring comments to be submitted even before the comments and/or determination on the draft EIS are complete.

I also note that one of the comments from the Planning Commission is that the city’s obsession with the elimination of Ryan House is predicated largely on the statement that ‘it is going to be too costly to renovate’.

That should be recognized as a ‘red-herring’.

In fact, no one actually knows what restoration of Ryan House would cost because the city refused to authorize the funding to prepare bona fide construction documents from which a bid could be prepared. The city also never sought alternative methods and materials or, to the best of my knowledge, consulted an actual contractor for realistic numbers. The statement that ‘it is going to cost too much’ is based on a consultant’s opinion – and has enormous amounts included for ‘contingencies.’

21-3

This is a wood-framed farmhouse. It has limited mechanical, electrical, and plumbing systems. Consider that, even using the city’s ‘estimates’, they opine that the cost of restoration would be about \$2.2 million. That is almost \$1000/sq. ft. for the renovation of a wood-framed farmhouse! You can buy a brand-new custom home, including land, land development costs, fancy bathrooms and kitchens in Sumner for less! Yet no one questions that number.

The City Administrator admits that there is no ‘number’ on which costs can be discussed. In an email he wrote,

“Please note that the final report is not complete. At that point we were out of funding to finish the structural assessment with design at about 60%. It was the question of approving further funding just for the assessment that prompted the discussion with council on where this project was going.”

It should not go unnoticed that instead of spending taxpayer funds on obtaining construction drawings the city elected, instead, to spend those funds hiring lawyers to defend the demolition permit.

Even if the city’s preliminary estimate of \$2.2 million is accepted, the city had about \$1.7 million already secured in grants. Grants that they have willingly sent back precluding any private effort to help fund any perceived shortfall.

<https://connects.sumnerwa.gov/4797/widgets/15087/documents/27801>

The city has argued that the grants had to be returned because they weren't used in time. That is in direct conflict with the opinion of Chris Moore, Executive Director of the Washington Trust for Historic Preservation. Mr. Moore has written a letter to the city stating that these grants are typically extended and/or augmented as work on historic structures proceeds. He also suggests a staged approach to the renovation. Here is a link to his letter:

<https://connects.sumnerwa.gov/4797/widgets/15087/documents/51220>

The other 'red-herring' in the discussion on cost is what, exactly, was included in the anticipated 'scope' of the project.

Preserving and restoring Ryan House, as required by the Comprehensive Plan, could have been accomplished in phases – stabilize, weatherize, and secure – then look at additional funding based on desired future uses. The 'opinion budget' includes major augmentation to the house – not just preservation and restoration.

The bottom line is that there is no reliable 'cost' identified for the preservation and restoration of Ryan House. Only an opinion. The Washington State Growth Management Act demands that cities provide capital funding for the elements of their Comprehensive Plans. Clearly, the city has failed to do that as it has allowed Ryan House to deteriorate under its ownership. The city should not now be allowed to shirk those financial responsibilities by simply writing Ryan House out of the plan. The city has elected to spend millions of dollars on other parks and recreation assets.

I would recommend that the Planning Commission 'right the ship' and simply stop the current amendment process as it relates to Ryan House. The Planning Commission should demand that staff refile the proposed amendments affecting the status of Ryan House to the 2025 cycle to be processed openly and transparently and in compliance with the Washington State Growth Management Act, State Environmental Policy Act, and provisions of the Sumner Municipal Code.

In closing, I would also strongly recommend that you focus your attention less on the wishes of a handful of 'staff' and the 'consultant' and more on the wishes of the citizens.

Sincerely,

Kim Foster

21-3
continued

Letter 22

From: [Barbara Fox](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House
Date: Sunday, March 24, 2024 12:41:32 PM

****EXTERNAL EMAIL****

I am a descendant of the Woolerys who were among those pioneers-including the Ryans-who settled in what is now the town of Sumner. I grew up hearing about these pioneers and while I was in high school, I did an essay on my great grandmother, Dora Woolery. I have always been proud to be part of the line of the Woolerys.

I want to remind you of the huge undertaking that went on to save the Meeker Mansion in the 1970's. The Ryan House is older than the Meeker Mansion and not nearly as large. If it was possible to save the Meeker Mansion, I believe that the Ryan House can be saved also.

If a project like saving and restoring a house like the Meeker Mansion can be taken on by the citizens of the city of Puyallup, can't the home of George Ryan be given the same undertaking by the citizens of the city of Sumner?

Barbara Fox
PH: 253-256-8247

22-1

Letter 23

From: [WILLARD FOX](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House & Pioneer Water Fall
Date: Sunday, March 24, 2024 12:50:26 PM

****EXTERNAL EMAIL****

My name is Beverly Woolery Fox. My great grandfather was Abraham Woolery. He and his brothers and family came on the 1853 wagon train. We were raised to be proud of our pioneer history. We have the "Told By The Pioneers" books. We took them to school for history projects. We made regular trips to "our" cemetery to visit the family graves. So what could anyone be thinking to consider demolishing the Ryan House? And why did "our" Pioneer Water Fall disappeared? Show us. Why could it not be displayed on a wall. Maybe at the Ryan House?

Beverly Fox
PH. 253-845-7520

23-1

Letter 24

From: [MELISSA FOX](#)
To: [Ann Siegenthaler](#)
Subject: Input on Sumner Comprehensive Plan
Date: Monday, March 25, 2024 11:39:07 AM
Attachments: [Sumner Comp Plan - Fox Input.docx](#)

****EXTERNAL EMAIL****

Good morning -

Please refer to the attached Word document containing my review of the Sumner City Comprehensive Plan draft. This is submitted on behalf of my family, the Woolerys, and their enduring connection to the heritage and founding of Sumner. I have included the current draft's language, my requested re-wording or removal of language as well as comments supporting those requests.

The comments I have included add context to the requested changes throughout the document. I anticipate and expect my input will be carefully considered during finalization of the City's Comprehensive Plan.

I would be happy to answer any questions the City Council may have regarding my input.

Regards,

Melissa E. Fox

253-548-1550 (home)

253-273-9899 (cell)

dreamscapesdesign@comcast.net

24-1

Wording Changes and Comments Related to Sumner Comprehensive Plan Draft (Input Provided By: Melissa Fox)

1.3 [Page 31]

1.3. Design Guidelines

~~In concert with the Sumner citizens and business community, Maintain design guidelines and a design code, as appropriate, and/or a form-based code that which~~ address streetscape, landscape, and building design to ensure high quality and compatible development. Materials and methods of construction should be of high quality, be specific to the region, ~~exhibit continuity of history and culture~~, be compatible with the climate., ~~protect historic and archaeological resources, and promote the community's character and identity~~ The design should reflect the historic context of Sumner, respect the historic character and scale of nearby development, and promote an attractive, pedestrian-scale streetscape.

24-1
Cont

1.3 Design Guidelines:

Do Not Remove: *"In concert with the Sumner citizens and business community ..."* With the deletion of this portion, the City would be the sole decision-maker without input from the residents and businesses.

Do Not Remove: *"...protect historic and archaeological resources, and promote the community's character and identity."* Sumner's history lies in the *existing* resources, the new language is vague and implies that future designs can "reflect the historic context of Sumner" replacing physical artifacts.

3.3 [Page 36]

3. Reinforce the Town Center Plan area as the downtown as the town center and commercial and cultural center of Sumner.

~~Continue~~ Apply a form-based code and/or design review process for new and expanded uses in the Town Center. Any future amendments to the Sumner design guidelines ~~shall~~ should include consultation with ~~Sumner Downtown Association~~ the downtown business association(s), Chamber of Commerce, Sumner Historical Society historic preservation organizations, other civic groups, and ~~citizens~~ residents. *[Policy revised since Planning Commission previous review.]*

24-1
Cont

Return Wording to Read: "...**shall** include consultation with the downtown business association(s), Chamber of Commerce, **Sumner Historical Society**, other civic groups, and residents."

Comment: The change to this portion of the paragraph removes a necessary component in maintaining the historic significance of Sumner. The Sumner Historical Society continues to exist and is the appropriate organization with expertise to participate in decisions conveying Sumner's history. The draft language changing "shall" to "should" removes any requirement to consult a specific organization and allows the City to be the sole decision-maker for amendments and designs.

5.8 [Page 40]

5. Provide for open space and recreation and protect sensitive areas from degradation.

5.8. ~~Expand Heritage Park to a full block. Maintain~~ Reuben A. Knoblauch Heritage Park as a key open space in the downtown and support activities and events that complement downtown businesses and residences.

24-1
Cont

Remove: "**Heritage**" from the park's name to read: "Maintain Reuben A. Knoblauch Park..."

Comment: *By including "Heritage" in the name is misleading and ultimately incorrect. Mr. Knoblauch does not represent the full "heritage" of Sumner. A waterfall feature with plaques honoring Sumner's founding families was part of the original park. The waterfall was removed with no official plans to restore it. The family names on the waterfall represented Sumner's true heritage. To date there are no official plans to restore the waterfall. Unless there is recognition of the original families, this park should not contain the word "Heritage" in its name.*

6.6 [Page 56]

6. Promote downtown as the town's cultural, historic and activity center of the entire community.

- 6.6. In conjunction with interested parties, improve the visual appearance of downtown through public and private measures for beautification, facade improvements, and preservation of historic properties, design strategies, maintenance, and streetscape improvements.

Comment: Note that "...preservation of historic properties..." aligns with The Ryan House preservation, not demolition, and is the direction given under this section. Ryan House is a physical artifact and represents history within Sumner's downtown. Demolition does not fall under the purview of Comprehensive Plan's goals. In fact, "maintenance" is stated in the language of this paragraph – this has not taken place with respect to The Ryan House despite being included in the existing Comprehensive Plan.

6.13 [Page 56]

- 6.13. Create 350-500 new housing units in the Town Center in close proximity to the train station and existing businesses.

Correction: Please remove "...in close proximity..." from this sentence. Reword it to "...close to the train station..." Use of the modifier "close" in the familiar expression "close proximity" is redundant.

24-1
Cont

1.3 [Page 81]**Goals, Policies, and Objectives**

1. Identify, preserve, protect, and enhance restore areas of Sumner with historical, cultural, educational, or scientific values, the historic and prehistoric cultural resources of Sumner.

- 1.3. Work with ~~the Sumner Historical Society and other~~ community groups to promote historic and cultural education and recognition. *[Policy revised since Planning Commission previous review.]*

Do Not Remove: "Continue to support the Sumner Historical Society by providing the use of the Ryan House." The Ryan House and Sumner Historical Society are intertwined in preserving the history of Sumner. The Sumner Historical Society provides documentation outlining the city's past and The Ryan House is an artifact of the founding of Sumner.

24-1
Cont

1.4.1 [Page 82]

- 1.4. Coordinate with community organizations, property owners, and local ~~citizens~~ residents to protect, acquire, and/or restore key historic properties.
- 1.4.1.  Promote the preservation and revitalization of significant lands, historic sites and structures, and historic trees through a combination of techniques such as landmark programs, incentives, and local government historic preservation programs.

24-1
Cont

Comment: This section is particularly applicable to The Ryan House. The City of Sumner is committing to "preservation" of "...significant lands, historic sites and structures..." and goes on to reference the type of resources available to support this "preservation" statement. The City has held the role of stewardship since the early 1900s but has not implemented necessary preservation.

1.4.3 [Page 82]

- 1.4.3. Maintain  ~~a historic preservation program, that creates a the local historic preservation commission, and pursue maintain Sumner's~~ designation as a Certified Local Government

Do Not Remove "...a historic preservation program, that creates a local historic preservation commission..." With the rewording in the draft Comprehensive Plan, the City has removed an implementation method.

3.3.XX [Page 85]

3.3. Enliven and refresh Downtown historic downtown by allowing adaptive reuse of buildings and new construction that respects acknowledges the historic character of the area.

~~X.X Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center.~~

Note: Policy to be deleted, since the City Council determined (09/2023) that due to the structure's very poor condition, there is no feasible means to preserving it.

~~X.X Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.~~

Note: Moved to general policies.

Do Not Remove "Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center."

Comment: The "Note" currently provided below the deletion is void due to the revocation of the City Council's **demolition permit**. Concerned citizens have reached out to the City Council requesting discussing funding options and preservation of the structure.

24-1
Cont

3.3.XX [Page 85]

~~X.X Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.~~

Do not remove "*Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.*"

Comment: The Sumner Historical Society exists to provide documentation of Sumner's history. Inclusion of this section recognizes partnering with the City and preservation as well as educational opportunities the Sumner Historical Society exists to provide to the public. Thus, it must remain in the Comprehensive Plan.

24-1
Cont

Letter 25

From: [rosegiffin55](#)
To: [Ann Siegenthaler](#)
Subject: Saving Ryan House
Date: Tuesday, March 26, 2024 3:33:13 PM

****EXTERNAL EMAIL****

I am a concerned citizen for Sumner. I grew up in Sumner, my father grew up in Sumner & also my grandfather.

It has come to my attention that you are updating the comprehension plan which will not include public input on the demolition of the Ryan House.

Why isn't Ryan House mentioned as a Historic asset? The Ryan family built Sumner. Are you actually going to erase this part of Sumner history?

It looks to me that the city is intent on changing the character of Sumner by allowing the building of massive apartments to replace Historic buildings on Main Street. And I do believe you are setting tax incentive zones to entice apartment developers which would receive huge tax subsidies for new apartments built.

I see that saving Ryan House should be made a priority to save the foundation of our Sumners history. A history that can be shared with our children & their children & on and on. This is an absolute disappointment & uncharacteristic of what a City council should be approving. City councils should work with the citizens of Sumner to find a way to keep history from being destroyed! Make it a priority to include NOT to demolish the Ryan House in your comprehension plan.

Thank you for your time,
Rose Atkinson Giffin

Sent from Samsung Galaxy smartphone.

25-1

Letter 26

From: [Amanda Henderson](#)
To: [Ann Siegenthaler](#)
Subject: RYAN HOUSE
Date: Wednesday, March 27, 2024 2:44:06 PM

****EXTERNAL EMAIL****

I am a 15 year old attending at sumner high school. The city of Sumner has a significant amount of history, and the ryan house is a big part of that. If there needs to be more help making the ryan house sustainable in order for it to be able to have it be open for tours, Sumner High School honors society (which I am a part of) would be happy to earn hours doing so.

26-1

Letter 27

From: [Amanda](#)
To: [Ann Siegenthaler](#)
Subject: Plan Public Comment
Date: Wednesday, March 27, 2024 4:59:47 PM

****EXTERNAL EMAIL****

Good evening Ann and other city planners,

As a citizen of Sumner, I would like to have all mentions of Summer Historical Society and the Ryan House remain in the plan and we should focus on restoring it to its former glory. The Ryan House and the SHS are a very important part of Sumner's history that should remain and be a main focus in the plan as it was in years past.

Thank you for your time,
Amanda Henderson
Sent from my iPhone

27-1

Letter 28

From: [Rogue Ronin](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House Public Comment
Date: Wednesday, March 27, 2024 2:50:24 PM

****EXTERNAL EMAIL****

Dear Ann Siegenthaler and Planning Commission,

I'm writing this to provide my input as part of the Public Comment Period on the proposed updates to the City of Sumner's Comprehensive Plan:

In Chapter 11 Section 1.1, the proposed revision removes specific references to the Sumner Historical Society by crossing out any lines that contain the words Sumner Historical Society. For what purpose? I strongly urge the Planning Commission to retain the original wording in Section 1.3 of the planning document. There are many ways you can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

I also respectfully ask that the Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed Comprehensive Plan:

3.3 - Improve the Ryan House and public access to the Ryan House

Rather than replacing it with the more generic "Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area." A new building that "looks old" is not historic. This proposal would effectively eliminate "historic downtown".

Also, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1 - Encourage local activities which promote the community and region's history such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2 - Partner with the Sumner Historical Society's work with historical societies, historic preservation agencies and others to provide access to historic documentations such as maps, photos, and newspapers for landowners, citizens, residents, and others.

1.3.3 - Encourage the collection and preservation of oral histories of the community through partnerships with schools, the senior center, and other groups.

The Ryan house was built in 1865, making it the oldest structure in Sumner. Once history is demolished, it's gone forever. No more field trips for school kids. No more tourists coming to see the Ryan House and visiting all of the cool little shops downtown. I'll reference Mr. Yoder from the council meeting 3/18/24, Port Townsend

28-1

is the coolest little old town around. No one wants to visit Sumner with all of it's tearing down and removing pieces of history.

After the judges ruling, a spokesperson for the City of Sumner mentioned the Public Comment period. "This is an opportunity to comment on how we honor and celebrate Sumner's history and culture as a whole." My comment: You're destroying Sumner's history and culture. Sumner is at a crossroads. Either we embrace our history and founders (Ryans, Kincaids, Wollerys, Thompsons, Parkers, Orton, Knutsen, Van Leirop, Ota, Arima, Asahara, Matlack, Foster, Clerget, and many others), culture (including agricultural), or we start making our way to becoming Little Seattle. Filled with 3+ story overpriced apartments, citizens who have no clue about the rich history of where they live, and mindless zombies wandering to and from the train and bus stations.

In another quote by the same spokesperson, "The house (Ryan House) can only be saved if the city receives funding to effectively repair significant structural issues..." What has the city done? What has the Planning Commission done? There has been 1 (ONE) bid on repair costs. Mr. Biermann already researched potential grants and funding the city can apply for to start the repair process. Has the city applied for them? Has the city or planning commission contacted any contractors to get a second or third bid? Is there any chance for reconciliation between the city, citizens, and Ryan House, or is the city's agenda going to win out. So far, from what I've seen at every single council meeting and/or planning session, the city is uninterested in entertaining any thought of saving the Ryan House. That is very sad and concerning. A city council that just does whatever "staff recommends" without any thought of what the citizens who actually live here want, need, or care about. I pray the commission takes these comments to heart, and does what is right by the founders, the city, and it's citizens. Thank you.

Casey Henderson
162nd Ave E.

28-1
Cont

Letter 29

From: [Laura Hendrix](#)
 To: [Ann Siegenthaler](#); [Ryan Windish](#)
 Cc: [Barbara Bitetto](#); [Curt Brown](#); [Pat Clerget](#); [Pat Cole](#); [Andy Elfers](#); [Carla Bowman](#); [Earle Stuard](#)
 Subject: Comp Plan Comments - Save the Ryan House
 Date: Wednesday, March 27, 2024 4:03:24 PM

****EXTERNAL EMAIL****

Dear Ms. Siegenthaler, Mr. Windish, City of Sumner Planning Commission and City of Sumner City Council Members,

Please accept this email as my written comments to be included and considered as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. As a long time resident of Sumner, I appreciate you taking the time to hear my concerns and forwarding my comments to the Planning Commissioners.

My comments are as follows:

Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by removing any lines that contain the words Sumner Historical Society.

Why do you need to remove this volunteer organization who only supports the historical relevance of the City of Sumner? I strongly encourage the Planning Commission to retain the original wording in this section to include the Sumner Historical Society in the Comp Plan Updates. The Sumner Historical Society is a valued volunteer based organization within our community that helps to preserve, respect and educate our current and future residents about the history of our wonderful community. We need them to stay involved in planning efforts so that we do not forget our past.

Section 1.3 of the planning document. **The Comp Plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.**

Section 1.3 Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition. **Please continue to support historic and cultural education in my hometown.**

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

Section 1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals. **My two children in the Sumner Bonney Lake School District want to have the experience of visiting the Ryan House Museum just as I did as a Maple Lawn Elementary student. Please do not take this opportunity away from my family and all of the other families in the school district.**

Section 1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others. **The City of Sumner needs to rebuild their relationship with the Sumner Historical Society in order to work together in partnership to better our community and preserve important elements of our history.**

Section 1.3.3. Encourage the collection and preservation of oral histories of the community,

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through partnerships with schools, the senior center, and other groups. **The Sumner Historical Society could lead this collection of oral and written history so that our stories are available for future generations of Sumner Residents.**

Ask that the City of Sumner and Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

Section 3.3. Improve the Ryan House and public access to the Ryan House....Instead of replacing this statement with “Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area.” Any reference to “enliven and refresh historic downtown” and “adaptive reuse of buildings” MUST include the reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use. We all know that the Ryan House is a valued part of our community's heritage and MUST be saved for future generations. **PLEASE DO NOT REMOVE THE RYAN HOUSE FROM THE CITY OF SUMNER'S COMPREHENSIVE PLAN UPDATES - AS A CITIZEN OF THIS SMALL TOWN WHERE I WAS BORN AND RAISED - I AM ADAMANT THAT THE RYAN HOUSE REMAIN AS A PUBLICLY OWNED MUSEUM JUST AS LUCY RYAN HAD ALWAYS INTENDED IN THE DEED. PLEASE CONTINUE TO IMPROVE THE RYAN HOUSE AND PUBLIC ACCESS TO THE RYAN HOUSE. MY LITTLE GIRLS AND I DON'T WANT THE RYAN HOUSE DEMOLISHED FOR ANOTHER PARK - WE WANT THE RYAN HOUSE TO REMAIN STANDING AND WE RESIDENTS OF SUMNER WILL LOCATE AND APPLY FOR THE GRANTS TO FUND THE RESTORATION WORK NEEDED FOR THE RYAN HOUSE MUSEUM! PLEASE LISTEN TO YOUR COMMUNITY MEMBERS - OUR VOICES MATTER AND OUR HISTORY MATTERS.**

29-1
Cont

In Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update again removes the Sumner Historical Society. The following line was completely removed:

Section 3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society consistently removed from the city's plan going forward? This is an unnecessary change. I encourage the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner's History and make our history accessible to the public.

Please, Planning Commissioners, do not make the mistake of erasing the Ryan House from our history. When she is gone, she is gone - and we will all suffer from regret. She needs some work, but together we can find the grants and funding to restore the Ryan House and then work together in partnership to preserve her for generations to come. As a successful grants writer - I am willing and able to seek out and apply for historic preservation grants in order to fund the improvements needed to Save the Ryan House - entirely pro bono. As a long time professional property manager - I am also willing and able to serve as the project manager to locate local contractors in engineering, structural, mechanical, plumbing, electrical (and more) and lead the building plans, permitting and construction - entirely pro bono. I have professional experience in community driven and grant funded development projects from concept, to plans/permitting and construction and am ready to help. Please contact me as soon as possible and I will be happy to explain my ideas and design a project timeline to Save the Ryan House. I am willing to donate my time and expertise in leading this effort - with your support I know we can do this together as a community.

Even though we are a small town - the City of Sumner and the Sumner/Puyallup Valley has the people with the appropriate capabilities (engineers, architects, interior designers, planners, grant writers, building code officials, structural contractors, plumbers, electricians and others) to take on the project of improving the Ryan House for the public benefit. Right now, we just need the City of Sumner's Planning Commission, Staff, City Council and Mayor to hear us, believe us and give us a chance to Save the Ryan House.

Thank you,
Laura Hendrix

Downtown Sumner Resident
PO Box 244
Sumner, WA 98390

29-1
Cont

Letter 30

From: [Lissa Hendrix](#)
To: [Ann Siegenthaler](#)
Subject: Save the Ryan House
Date: Wednesday, March 27, 2024 4:54:54 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Additionally, I respectfully ask that the Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House.... Instead of replacing this statement with the more general "Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area."

30-1

Any reference to “enliven and refresh historic downtown” and “adaptive reuse of buildings” should include a specific reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use.

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society being intentionally deleted from the city's plan going forward? Please reconsider this drastic and unnecessary change. Instead, I urge the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner's History and make our history accessible to the public.

Thank you for hearing these words and understanding the importance of the Ryan House to the entire Sumner community.

Signed a Sumner Puyallup Valley resident since 1968

Lissa Hendrix

30-1
Cont

Letter 31

From: [Chris Hill](#)
To: [Ann Siegenthaler](#)
Subject: Hill, C-Comprehensive Plan Changes and the Ryan House; CPA-2024-0001
Date: Wednesday, March 27, 2024 4:41:36 PM

****EXTERNAL EMAIL****

City of Sumner Leaders and Staff,

My name is Chris and my wife and I have owned our 1918 Craftsman house near Loyalty Park in Sumner since 2017. I am originally from Tulsa Oklahoma, but my wife was born in Sumner and raised in the greater Puyallup/Sumner area and she insisted that we settle in historic and charming Sumner. We have enjoyed the character and hometown feel of Sumner and appreciate the City's efforts to preserve that small-town feel yet move Sumner forward as a community.

Upon reviewing the 2024 Comprehensive Plan Changes, I have noticed several references to maintain and preserve the historic and cultural resources of the community. However, that same plan update also strikes the inclusion of preserving the Ryan House located at Sumner and Main St in the heart of the community. Despite several references throughout the comprehensive plan update to preserve the historic character of Sumner, the current plan removes the preservation of one of the most important remaining historic structures in downtown Sumner. The Ryan House has historic value serving both as a library and museum and is actually listed on the National Register of Historic places. I do not understand how the City states that they value the historic character of the City, but yet have seemingly abandoned one of the oldest true historic structures in Sumner.

How many communities in our area are fortunate to have structures that predate Washington statehood (1889)? How many communities in the area have the historic charm and hometown feel of Sumner? The City of Sumner has a chance to preserve its history by saving the Ryan House from demolition and coming up with a plan for restoration of the structure and inclusion of the property into the City's park system with the remaining grounds. There is federal financial support for preserving historic structures and I believe the citizens of Sumner would be interested in saving the Ryan House and including it as a downtown centerpiece to Sumner's commitment to preserving its history.

Please consider keeping the language of previous Comprehensive Plans that call for the preservation and maintenance of the Ryan House as part of the City's Comprehensive Plan moving forward. The inclusion of the Ryan House preservation in the plan launches funding opportunities to honor structures like the Ryan House. I am confident that there is support in the community to keep the Ryan House and I believe there are multiple unexplored options to save the Ryan House, preserve the City's history, and keep Sumner moving forward.

Thank you for your consideration,

Chris Hill

Park St
Sumner, WA

31-1

Letter 32

Gary Lien
4319 E Valley Hwy E
Sumner, WA 98390-9512

April 26, 2024

Community Development

Attn: Ann Siegenthaler, Senior Planner

City of Sumner

1104 Maple Street

Sumner, WA 98390

RE: Critical Areas Ordinance Revisions

Dear Ms. Siegenthaler:

Thank you for taking time to discuss my concerns about the buffer recommendations for fish bearing streams. The current buffer for the stream on my property is 100 feet. I have now read the Staff Report and Section 16.56.100 of the Fish and Wildlife Habitat Conservation Areas.

32-1

I want to support and make sure that the existing buffer of 100 feet for fish bearing streams is maintained in the Critical Areas Ordinance Revisions. As noted in the WDFW's recommendation, this 100 foot buffer is similar to the current buffer for fish bearing streams. I am writing to make sure this buffer is maintained and is not otherwise expanded. Any expansion would have an unnecessary negative impact on the value and usefulness of my property.

Thank you for your efforts in regard to the recommendations on this topic to the Planning Commission.

Sincerely,

Gary Lien

Letter 33

From: dld.loseth@usa.com
To: [Ann Siegenthaler](#)
Subject: City of Sumner WA Draft Comprehensive Plan, Summer 2024
Date: Tuesday, March 26, 2024 10:34:34 AM
Attachments: [DLoseth comp 2024.pdf](#)

****EXTERNAL EMAIL****

City of sumner WA
Draft Comprehensive Plan, Summer 2024

Sixteen comments on ten pages of the plan, please see the attachment with index and comments

Submitted via email to Senior Planner Ann Siegenthaler

Thank you

Dale Loseth
510 Kincaid Avenue
Sumner WA 98390
253-863-2623

33-1

March 26, 2024

Dale Loseth
510 Kincaid Avenue
Sumner WA 98390
253-863-2623
drl@losethusa.com

City of sumner WA
Draft Comprehensive Plan, Summer 2024
Sixteen comments on ten pages of the plan

Submitted via email to Senior Planner Ann Siegenthaler
annsi@sumnerwa.gov

History and Culture (page 19)

Stewardship (page 23)

2.2 (page 33)

3.3 and 3.4 (page 36)

Historic and Cultural Resources,
Introduction and 1.1.1 and 1.1.3 (page 80)

1.3 and 1.3.2 and 1.3.3 (page 81)

1.4.3 (page 82)

1.4.6 and 1.7 (page 83)

Figure 11.2 (page 84)

Deletion and Entry after 3.3 (page 85)

Sumner's visual, cultural and environmental connection to Mt. Rainier is celebrated in the arts and events. The Sumner Historical Society finds support from a community aware. The community supports organizations that help further awareness of Sumner's history and heritage. History and heritage are also maintained through established landmark and historic programs that preserve the character of buildings in the downtown. The City will have an active Historic Preservation Board that also helps promote the preservation of the historic downtown as the heart of and collective memory of the community. The City, in partnership with the downtown business association and others, promotes events such as parades and festivals that strengthen the sense of community and place that is Sumner.

Revise to: Obtain approval from the City Council for a Historic Preservation Board that, in partnership with the Sumner Historical Society and the Sumner Main street Association, will help promote..... (page 19)

33-1
continued

19

Communicate regularly and determine if we are achieving the vision we desire.

Stewardship

The ~~settlers of the~~ Sumner valley ~~left us~~ is filled with many beautiful and valuable resources. The rivers, streams, open spaces, historic buildings, parks, hillsides, watersheds, and downtown are all vital to the physical and mental well-being of our community. We use our skills, resources, and determination to preserve these as best we can as stewards for the future.

Revise to:historic buildings, including the Ryan House,.....(page 23)

Figure 6-1. Urban Village Concept



Add Local
museum to this
list (page 33)

33-1
continued

- 2.2. Neighborhood Centers. Identify neighborhood centers for residential neighborhoods as a durable focal point for the neighborhood. This may be a singly important building or a multiple-block area that provides an important "community amenity" to the neighborhood. Examples of a community amenity are:

- Park or recreation facility, or community recreation center such as the YMCA;
- Library, City Hall, or other civic/cultural center;
- Schools;
- Commercial services (neighborhood commercial zones);
- Commuter transit station.

- 3.3. Continue Apply a form-based code and/or design review process for new and expanded uses in the Town Center. Any future amendments to the Sumner design guidelines ~~shall~~ should include consultation with ~~Sumner Downtown Association~~ the downtown business association(s), Chamber of Commerce, Sumner Historical Society historic preservation organizations, other civic groups, and ~~citizens~~ residents. *[Policy revised since Planning Commission previous review.]*
- 3.4. Within the Town Center area, promote the core area as the historic "downtown." This is generally the area one block north and south of Main Street, within the Historic District and Station District boundaries.

Sumner Historical Society needs
to stay in (page 36)

List the other historic
presevation organizations
(page 36)

Several historic buildings have been surveyed and placed on the National Register of Historic Places. While there are a number of locally significant buildings within city limits, as of 2022, only three historic buildings have been surveyed and placed on the National Register of Historic Buildings. Without adequate planning and controls Adequate planning during a project is important, in order to avoid, where feasible or practical, development that could has the potential to disturb historic and cultural resources. In 2008, the City adopted the historic preservation ordinance that provides the ability for property owners to voluntarily place their properties on the Sumner Historic Register.

[NOTE: Several policies have been revised by staff since Planning Commission previous review, see notes]

The commission for this 2008 ordinance has never met
or produced any historic register (page 80)

- 1.1. Preserve and maintain the historic, cultural, scientific, or educational integrity of known resources to the extent feasible, including properties listed on the National or State Register of Historic Places, if feasible. Plan and design development on sites having historic, cultural, or archeological resources in a manner that prevents impacts to the resource and provides educational benefits to the public, where appropriate. [Policy revised since Planning Commission previous review.]

- 1.1.1. Through the permitting and environmental review process, consider and avoid document how impacts to archaeological, historic, and cultural sites and resources were considered and how impacts were avoided or how avoidance is infeasible. [Policy revised since Planning Commission previous review.]

leave consider
and avoid in
(page 80)

33-1
continued

- 1.1.3. For demolition or construction projects subject to SEPA environmental review on sites located in Town Center, with structures older than 45 years old, or with structures identified by the State Department of Archeology and Historic Preservation (DAHP) as potentially eligible for listing, require a project review by the applicant to request a consultation with DAHP. [Policy revised since Planning Commission previous review.]

Note: Current code does not require them to consult with DAHP. Consultation would help inform project developers and reviewers of resources present and possible ways to protect them. Proposed regulations will specify a more detailed process for this review.

Revise to: Obtain approval from the City Council for a Historic Preservation review process that, in partnership with the Sumner Historical Society and the Sumner Main Street Association, will require the applicant..... (page 80)

Sumner Historical Society and Ryan House needs to stay in (page 81)

- 1.3. Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition. [Policy revised since Planning Commission previous review.]

~~X-X Continue to support the Sumner Historical Society by providing the use of the Ryan House. [Policy revised since Planning Commission previous review. Entire policy proposed to be deleted]~~

- 1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals. [Policy revised since Planning Commission previous review. Entire policy proposed to be deleted]

- 1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others. [Policy revised since Planning Commission previous review.]

- 1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups. [Policy revised since Planning Commission previous review.]

Sumner Historical Society needs to stay in, SHS have most of the photos, maps, abstracts and Sumner's newspapers (page 81)

81

Leave in and add Sumner Historical Society as a partner (page 81)

Add the Pierce County Register of Historic Places, Landmarks and Historic Preservation Commission (page 83)

33-1
continued

structures, landscapes, plant gathering areas, etc.
structures, landscapes, plant gathering areas, etc.

- 1.4.5. ~~Nominate properties for listing in the Washington State and National Register of Historic Places. [Policy revised since Planning Commission previous review.]~~
- 1.4.6. ~~Develop~~ Encourage the creation of a local historic preservation plan, including conducting surveys of cultural resources, and ~~prepare~~ preparing nomination documents for city-owned properties, and interested property owners, and assisting with listings in the Washington Heritage Register ~~State~~ and National Register of Historic Places. [Policy revised since Planning Commission previous review.]
- 1.5. ~~Encourage private and public owners of historic sites to provide public access and educational opportunities in a manner consistent with long term protection of the resource. [Policy revised since Planning Commission previous review.]~~
- 1.6. ~~Actively seek~~ Identify state and federal grants and other funding sources to support ~~implement the historic preservation in Sumner program such as developing a local historic preservation plan; conducting surveys of cultural resources; preparing nomination documents for Washington State and National Historic Places Registers; performing public education activities including presentations to citizens, articles in the city newsletter, school presentations, and booths at city events festivals.~~
- 1.7. ~~Encourage private property owners with eligible properties to voluntarily seek Register listing. Maintain a voluntary nomination program for single-family residential properties. [Policy revised since Planning Commission previous review.]~~
- Note: Sumner does not have or maintain a program like this.
- 1.8. Protect or adapt significant historic sites prone to floods, extreme snow events, and other hazards worsened by climate change through building retrofits, green infrastructure, and other strategies.

on page 80 is a statement that this program exists

Leave in, on page 80, the comp plan states that this program is maintained by the 2008 historic preservation ordinance (page 83)

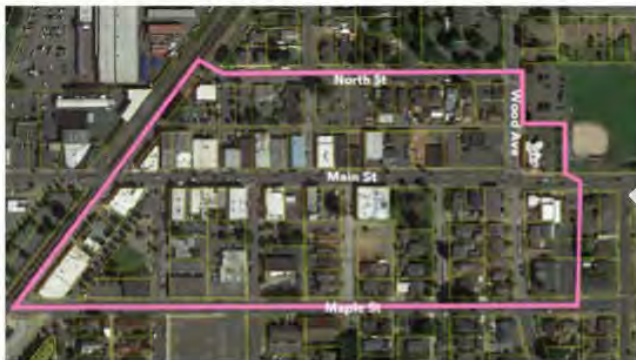
83

- 1.4. Coordinate with community organizations, property owners, and local ~~citizens~~ residents to protect, acquire, and/or restore key historic properties.
- 1.4.1. Promote the preservation and revitalization of significant lands, historic sites and structures, and historic trees through a combination of techniques such as landmark programs, incentives, and local government historic preservation programs.
- 1.4.2. Implement design guidelines that protect and promote the historic and community character of Sumner.
- 1.4.3. Maintain a historic preservation program, that creates a the local historic preservation commission, and pursue maintain Sumner's designation as a Certified Local Government for historic preservation purposes. *[Policy revised since Planning Commission previous review.]*

33-1
continued

Leave in, on page 80, the comp plan states that this program is maintained by the 2008 historic preservation ordinance (page 82)

Figure 11-2. Historic Downtown Sumner



this does not match the SMSA boundry that includes Traffic/Fryar Avenue (page 84)

- 3.1. Ensure ~~Downtown's~~ the historic character of the historic downtown is retained as new businesses and buildings are established, such as through design standards, historic preservation ordinances, or other means.

~~XX Analyze and consider a historic overlay zone in the Downtown area as a tool for preserving the character of Main Street.~~

33-1
continued

- 3.2. ~~Ensure that the streets~~ Encourage in the historic downtown ~~utilize incorporation of street furniture and features, such as streetlights and benches, that are compatible with the historic character of the area.~~ [Policy revised since Planning Commission previous review.]
- 3.3. Enliven and refresh ~~Downtown historic downtown~~ by allowing adaptive reuse of buildings and new construction that ~~respects acknowledges~~ the historic character of the area.

~~XX Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center.~~

Note: Policy to be deleted, since the City Council determined (09/2023) that due to the structure's very poor condition, there is no feasible means to preserving it.

~~XX Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.~~

Note: Moved to general policies.

- 3.4. ~~Provide ongoing support and expansion of Update~~ walking tours that highlights public art, architecture, history, trees, and other icons of the historic downtown.

Note: Sumner has policies in the Community Character chapter in the Comprehensive Plan that promote beautification, events, and economic support of the Downtown Core.

Cannot find
general policies
(page 85)

Needs to be left in, the condition is still
being determined (page 85)

Letter 34

From: [Morrison, Blake](#)
To: [Ann Siegenthaler](#)
Subject: Public Comments for the 2024 Sumner Comprehensive Plan Amendments – Historic & Cultural Preservation Regulations
Date: Monday, March 25, 2024 2:19:58 PM

****EXTERNAL EMAIL****

In the section on Historic and Cultural Resources, the latest version of the comprehensive plan removes the following statement: "Improve the Ryan House and public access to the Ryan House museum and consider other compatible public uses such as converting it to a visitor center."

34-1

I strongly oppose the removal of the Ryan House from the plan, as it constitutes a pivotal element of our town's Historic Downtown. If anything, the city should intensify its efforts to renovate the home and utilize it as a venue for both public and private events. The historical significance and prime location of this iconic home make it an invaluable asset from a planning perspective.

For far too long, the city has allowed the house to remain underutilized, to the extent that many residents believed it to be privately owned. This neglect must change drastically. The Ryan House has the potential to become a central hub of our community, a place to showcase our town's historical artifacts, offering opportunities for gatherings, picnics, leisurely chats over coffee, or simply enjoying the shade on the wraparound porch on a warm summer day. Additionally, incorporating a small stage on the lawn would allow for intimate concerts and performances, while encouraging both public and private events would generate revenue and attract new visitors to the heart of our town.

It is deeply disheartening that the council has voted to demolish the house with such little regard for the desires of the community. I never imagined that the city would fail so spectacularly in protecting this invaluable asset, which was generously given to us for FREE. Instead of demolition, I urge the city to continue the renovation of the Ryan House, adopting a phased approach until additional funding can be secured. The house is 150 years old, so what are a few extra years of construction if it means preserving this magnificent piece of our town's history?

The Ryan House boasts an unparalleled LOCATION on Main Street and holds a rich history, being the oldest home in Sumner, the residence of our first mayor, and the site where the first Platt of Sumner was drawn. It served as an early post office and later as a public library for 50 years. The significance of this landmark cannot be overstated.

Let us not allow financial constraints or fear to lead to the loss of this significant city asset. I implore the city to retain the Ryan House in the Comprehensive Plan and to foster collaboration between the city and the community to strengthen our historical ties and capitalize on the possibilities it offers.

Sincerely,

Blake Morrison

Letter 35

From: [Morrison, Blake](#)
To: [Ann Siegenthaler](#)
Subject: Public Comments -ADU - 2024 Comprehensive Plan Update
Date: Wednesday, March 27, 2024 11:46:16 AM
Attachments: [Corner Lot examples - ADU.pdf](#)

****EXTERNAL EMAIL****

In general, I support the changes outlined in section 18.12.030 concerning Accessory Uses. However, I oppose the regulations that reduce the height of Accessory Dwelling Units (ADUs) located within 15-30 feet of the rear property line. Particularly in our lower density zones, where backyards tend to be shallow, such restrictions limit space for taller ADUs, especially with a 15-foot setback requirement. I suggest significantly reducing the rear setback requirements to be the same as side yards. Regarding height restrictions, I believe the maximum allowable height for an ADU should be based on a height that can accommodate an ADU over a garage.

35-1

Additionally, there should be specific considerations for corner lots concerning ADUs. Corner lots, with their dual street frontages, present excellent opportunities for ADUs. However, they currently face more restrictions due to the minimum street frontage setback in the backyard. The minimum rear yard setback for ADUs on corner lots requires tailored rules, as their rear yard often borders the side yard of the adjacent property. It's illogical for a corner lot to have a minimum 15-foot setback in the rear when, in reality, its rear yard functions as a side yard.. I propose that, for corner lots within lower density zones, the side yard setback should apply to the rear lot line, matching the setback of the neighboring property. To clarify this proposal, I am attaching a diagram for better understanding.

Regards,
Blake Morrison

Morrison, Blake

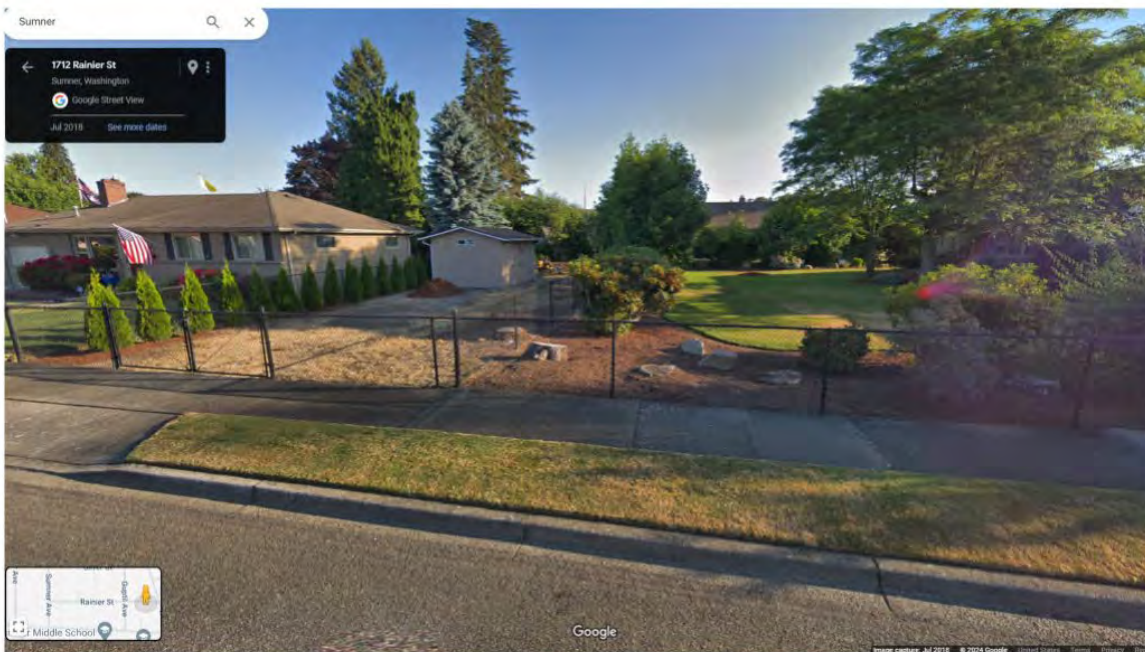
Here are a few examples of corner lots where the rear lot line aligns with the neighboring side yard. If the neighboring home can be built 5-7.5 feet away from the corner lot's property line, shouldn't the corner lot be allowed to build an ADU at equal or greater distance from the shared lot line?

35-1
Cont

401 Sumner Ave (below)



404 Wood Ave (below)



502 Boyd Ave (below)



1620 Maple St (below)



Letter 36

From: [Hawa Abdi Morrison](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House Comments
Date: Wednesday, March 27, 2024 12:47:38 PM

****EXTERNAL EMAIL****

Hi,

I am writing to express my deep concern regarding the proposed removal of the Ryan House from the Historic and Cultural Resources section of the Comprehensive Plan. The significance of the Ryan House to our town's heritage cannot be overstated.

I strongly oppose its exclusion and urge the city council, planning commission and comp plan to prioritize its restoration, recognizing its potential as a venue for community events. The Ryan House's historical significance, coupled with its prime location, makes it a valuable asset that should not be overlooked.

The decision to demolish the Ryan House not only disregards the desires of the community but also squanders an opportunity to preserve our town's history for future generations. Instead of demolition, I would like the comprehensive plan to continue prioritizing the renovation efforts and seek a phased approach to ensure its long-term preservation.

The Ryan House holds a special place in the hearts of Sumner residents and serves as a reminder of our town's rich history and heritage. Its inclusion in the Comprehensive Plan is vital to safeguarding its future and honoring the contributions of the Ryan family to our community.

I urge you to reconsider the decision to remove the Ryan House from the plan and to work collaboratively with the community to ensure its preservation.

Sincerely,

Hawa Abdi

Sumner resident

36-1

Letter 37

From: [S.PARRICK](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House
Date: Wednesday, March 27, 2024 1:36:56 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan.
My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

Section 1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

I encourage the Planning Commissioners to consider keeping the Ryan House in Sumner's Comprehensive Plan.

Thank you,
Lea Ann Parrick

37-1

Letter 38

From: [Amie Rang](#)
 To: [Ann Siegenthaler](#)
 Subject: Written Comments for Historic & Cultural Preservation
 Date: Wednesday, March 27, 2024 10:56:17 AM

****EXTERNAL EMAIL****

I am submitting these written comments for your consideration regarding the Sumner Comprehensive Plan Amendments - Historic & Cultural Preservation Regulations.

As a lifelong resident of Sumner, I am encouraging the city to prioritize preserving Sumner's history. Sumner has a unique and interesting history and seems to be at a crossroads between its focus on industrial growth and historic preservation. It makes me sad to see how short-sighted this plan is. As a member of a family that has lived in Sumner for generations, my view is long-term. My children enjoy cherries from trees that were planted by my grandfather and my great-grandfather. We have walnuts from a tree planted by my parents in honor of my brother's 12th birthday. If the focus of city planning is on growth and industrialization Sumner loses its soul. What makes Sumner a unique and valuable place to live is the way that it has been able to preserve its unique charm and history. Over the last several administrations we have seen that commitment wane and I no longer see any political will with the exception of Mr. Brown to value and preserve this amazing unique culture that Sumner has created. We have all of the modern conveniences as well as a community pharmacy, independent shops, well-maintained parks, and walkable sidewalks. We have transportation that takes people easily to the city, and many great restaurants. Growth and change are a given, but how we do that makes all the difference in what our city becomes. I feel very strongly that our city government seems to have lost its way. Unfortunately, we all pay the price for this. A balance is possible, but it will take work and dedication by our city staff and city council and as I have been attending more meetings I see this sorely lacking.

I want Sumner to be a place where I want to continue to live. I want it to be a place that my children want to live. That my grandchildren can grow up in and benefit from the community systems in place. Such a big part of that is honoring and preserving the town's history. Wiping out agricultural lands, packing town with apartments without planning for traffic and parking, demolishing the Ryan house, and not valuing the decades of work the Sumner Historical Society has done to preserve our history is such a loss for our community. The Historical Society has served this community well for over 40 years. It has hosted daffodil teas, field trips, Boy Scouts and Girl Scouts and Rainbow Girls projects and meetings, passed out tens of thousands of candies at Halloween festivals, celebrated rhubarb, supported other community groups through volunteer hours and donations, gave countless tours of the Ryan House, researched and explored the histories of homes and buildings in our communities for their new owners and so much more. I benefited from this as a child at Maple Lawn when I got to experience a free field trip to the Ryan House and both of my children also enjoyed field trips to the house. The benefit to the children in our community is tremendous. As a past PTA President, I can assure you that there is not a great deal of funding for field trips. The PTA would often have to cover the cost of transportation for field trips and due to limited funds, not every class can take an off-campus field trip. The Ryan House is a free walking field trip for students at both Daffodil Elementary and Maple Lawn Elementary. There is no cost for transportation or for the tour and it appeals to all ages and can be tailored to any grade. Often on weekends families with young children would come and tour the house. Many from Sumner, but also many from out of town or the surrounding area. The idea that the Historical Society was not doing anything with the house and that it was not accessible and used by the public is erroneous and I can not imagine how this information began to circulate. Unfortunately, this information has been pushed very strongly by the city and is even promoted on its website.

When I joined the Historical Society Board John Galley from the city attended our board meetings. It wasn't always easy to get work on the house done, but it gave us an open line of communication, an opportunity to ask questions and make requests for repairs. John was always respectful and polite. Sometimes requests were completed, sometimes not. When John retired, the board was surprised when no one attended the meetings in his place and reached out to the city to request that someone from the city join the board meetings to open this line of communication and involvement in what was happening at the Ryan House. The response was that there was no one available to attend. Apparently, there are very few city staff members who live in Sumner and the new city administrator has a family and is not able to spend one hour on a Saturday, once a month at a board meeting. We

suggested another city staffer or maybe a city council member would attend. This has been common in the past and we have had (and do have) several past city council members on our board including Leroy Goff, Mike Connor and Ed Hannus (I'm sure there were others, this is just during my time on the board). We made no progress. Communication with the city became much more difficult. What we were told verbally was not matching with actions being taken by the city and I can only speak for myself, but it became very clear that the city no longer viewed the Historical Society as a partner but as an adversary. Without taking time to participate or learn about what we were doing or understanding what we had done for the community, we became a stumbling block to the city's plans. I now see things on the city website like, "By 2019 the house was rarely open to the public". That is simply not true. You can say it. You can be audacious enough to post it on your city website, but that does not make it true. In fact, the Historical Society had been trying to work with the city to determine if it might be possible to have a city intern spend part of their time in the summer at the museum to increase our open hours. We were also planning guest speakers and events for the evenings at the museum to bring in new community members to the house. Publishing on your website that the Historical Society was a "tenant" using the space "rent free" instead of a partner serving the city at no cost and the city desire to "get it back in service as a museum" when it was never out of service as a museum is frustrating. During Covid we were closed down just the same way city hall was. The whole premise that the Historical Society was extremely "reluctant to vacate the space"...of course! We are a small non-profit historical society and the city said we had to get everything out in a short period of time with no funding and excessive storage costs why wouldn't we be hesitant? We are a small group of volunteers and had to figure out how to get everything packed safely and securely and locate and fund heated storage to preserve items. Why wouldn't we try to look for ways that items could be moved within the home during the planned remodel? Why wouldn't we ask questions or try to find options?

38-1
continued

I am grateful for this opportunity to provide input. I know that not everyone in Sumner is interested in preserving its history. Just like everyone is not interested in parks or libraries or schools or city government, but our history is a valuable resource and should be preserved for the benefit of everyone. Having the Ryan House, even if it is just the primary house, and the Sumner Historical Society as a part of Sumner's Comprehensive Plan Amendments - Historic & Cultural Preservation Regulations is important and I hope you will do right by the city and include them in the comprehensive planning.

Sincerely,
Amie L. Rang

Letter 39

From: [Adeline Rang](#)
To: [Ann Siegenthaler](#)
Subject: Feedback
Date: Wednesday, March 27, 2024 4:59:58 PM

****EXTERNAL EMAIL****

To whom It May Concern,
Please ensure a future for the Ryan House in your planning document and protect the history of our city. I can't stress to you enough how important this is.
Sincerely,
Adeline Rang

39-1

Letter 40

From: [Gary Rang](#)
To: [Ann Siegenthaler](#)
Subject: Ryan house
Date: Wednesday, March 27, 2024 5:08:01 PM

****EXTERNAL EMAIL****

Sent from my iPhone

Dear City of Sumner,

I am writing to express my strong support for the preservation of the historic Ryan House and to urge you to include the Sumner Historical Society in your revisions to the Sumner Comprehensive Plan. The Ryan House is not just a building; it is a piece of Sumner's history and identity that deserves to be protected and celebrated.

Preserving the Ryan House is important for several reasons. First and foremost, it is a tangible link to Sumner's past, reminding us of the people and events that have shaped our community. It serves as a valuable educational resource, allowing residents and visitors alike to learn about Sumner's history and heritage. Additionally, preserving historic buildings like the Ryan House can have economic benefits, attracting tourists and enhancing property values.

By including the Sumner Historical Society in your revisions to the Comprehensive Plan, you can ensure that the voices of those who care deeply about Sumner's history are heard. The Historical Society has a wealth of knowledge and expertise that can be invaluable in making decisions about the preservation of historic buildings like the Ryan House.

In conclusion, I urge you to prioritize the preservation of the Ryan House and to work closely with the Sumner Historical Society in your efforts. By doing so, you will not only be preserving a piece of Sumner's past but also ensuring that it remains a vibrant and thriving community for future generations to enjoy.

Sincerely,

Gary Rang

40-1

Letter 41

From: [marissa_ryan](#)
 To: [Ann Siegenthaler](#)
 Subject: For Sumner's sake! Listen to the people!
 Date: Wednesday, March 27, 2024 3:45:36 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

41-1

I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Additionally, I respectfully ask that the Planning Commission keep this specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House....

Instead of replacing this statement with the more general "Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area."

Any reference to "enliven and refresh historic downtown" and "adaptive reuse of buildings" should include a specific reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use.

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society being intentionally deleted from the city's plan going forward? Please reconsider this drastic and unnecessary change. Instead, I urge the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner's History and make our history accessible to the public.

Regards, Marissa Ryan

Letter 42

From: [Leland Schmidt](#)
To: [Ann Siegenthaler](#)
Subject: Friends of SAVE THE RYAN HOUSE Sumner's Historical Roots
Date: Wednesday, March 27, 2024 4:39:45 PM

****EXTERNAL EMAIL****

Dear Senior Planner Ann Siegenthaler and City of Sumner Planning Commissioners,

42-1

Here is my submission on SAVING THE RYAN HOUSE!

If we were to benchmark other cities and how they handle historical landmarks. You would all be hero's.

Public input is far more important the meeting unfavorable decisions to the history and the future of the wonderful town of Sumner.

I am writing to provide my input as part of the public comment period on the proposed updates to the City of Sumner's Comprehensive Plan. My specific comments are included below:

In Section 1.1 of the Cultural and Historic Resources Chapter (Chapter 11), the proposed revision before the Planning Commission removes specific references to the Sumner Historical Society by literally crossing out any lines that contain the words Sumner Historical Society. Why is this? I strongly urge the Planning Commission to retain the original wording in section 1.3 of the planning document. I assert here that the plan can specifically mention the Sumner Historical Society and also make room for other community groups at the same time.

1.3. "Work with the Sumner Historical Society and other community groups to promote historic and cultural education and recognition."

Furthermore, please keep this wording below for subsections 1.3.1, 1.3.2, and 1.3.3:

1.3.1. Encourage local activities which promote the community and region's history, such as presentations to citizens, articles in the city newsletter, school presentations, and booths at city events and festivals.

1.3.2. Partner with the Sumner Historical Society Work with historical societies, historic preservation agencies and others to provide access to historic documentations, such as maps, photos, and newspapers, for landowners, citizens, residents, and others.

1.3.3. Encourage the collection and preservation of oral histories of the community, through partnerships with schools, the senior center, and other groups.

Additionally, I respectfully ask that the Planning Commission keep this

specific reference to the Ryan House in Section 3.3 of the proposed updates to the Comprehensive Plan:

3.3. Improve the Ryan House and public access to the Ryan House....

Instead of replacing this statement with the more general “Enliven and refresh historic downtown by allowing adaptive reuse of buildings and new construction that acknowledges the historic character of the area.”

Any reference to “enliven and refresh historic downtown” and “adaptive reuse of buildings” should include a specific reference to the Ryan House as part of the historic downtown character and also in terms of buildings that can be restored for future community use.

Similarly, also in Chapter 11 Historic and Cultural Resources, section 3.3, the proposed update literally crosses off the Sumner Historical Society. The following line was completely removed:

3.3. Partner with the Sumner Historical Society and others to provide access to historic documentation, to landowners, citizens, and others.

Why is the Sumner Historical Society being intentionally deleted from the city's plan going forward? Please reconsider this drastic and unnecessary change. Instead, I urge the City of Sumner to renew its commitment to this long-term partnership with the Sumner Historical Society to preserve Sumner's History and make our history accessible to the public.

Leland Schmidt Co-chair
Friends of SAVE THE RYANS HOUSE
206-707-2791

Letter 43

From: [Wendy Shinstine](#)
To: [Ann Siegenthaler](#)
Subject: Ryan House
Date: Wednesday, March 27, 2024 1:52:19 PM

****EXTERNAL EMAIL****

Hello Ann,

I am sure you are overwhelmed with Ryan House love emails, so I will keep this brief.

I grew up in Sumner at the Orton estate on Riverside Rd. History and the Sumner community has been important to me since I was just a child.

My mother, Gayle Shinstine - would bring me weekly to the Ryan House for children's library and we would talk about how lovely it was to be in the Ryan home.

My father, Douglas Shinstine was a General Contractor in the valley and beyond for 50 years... His company had built the current library along with schools, banks, churches, hospitals etc...

It is sincerely heartbreaking and unthinkable that the Ryan House should come to demise. My parents and I are wondering how the lack of maintenance could possibly have come to the point of demolition.

The Orton Estate which my father restored was also slated for destruction... It was definitely worthy of restoration and still enjoys a family today.

Sumner has parks ... PLEASE do not demolish the history of Sumner. Please look at saving the original home of the Ryan family as it was. If the additions are failing - remove those portions - but please keep and restore the original.

I promise you will see more volunteer efforts than even pre-covid.

Please don't hesitate to call if you have any questions or if I can give any service.

Wendy Shinstine
360 298 5950

43-1

Letter 44

From: [Suzanne Swarthout](#)
To: [Ann Siegenthaler](#)
Subject: Saving Ryan House
Date: Monday, March 25, 2024 8:03:02 AM

****EXTERNAL EMAIL****

To the City of Sumner:

I have been a resident of Sumner since the 1960's and there are things that have made Sumner a place that I have wanted to remain. Sumner's historical buildings are part of the reason that Sumner has the community atmosphere that makes people want to live here. Please keep the Ryan House and keep Sumner the Sumner we know and I love to live in. And not just the Ryan House! Please do not tear down the existing buildings on Main Street to put up apartments!

Listen to the citizens Save our City Buildings!!

Suzanne Swarthout

44-1

F. Best Available Science Memo



Memorandum

DATE: August 12, 2024
 TO: Ann Siegenthaler, Senior Planner
 FROM: Claire Hoffman, PWS
 SUBJECT: Critical Areas Regulations Update - Stream Buffers
 CC: Stefanie Hindmarch, Matilda Evoy-Mount
 PROJECT NUMBER: 5538030008
 PROJECT NAME: Sumner Comprehensive Plan Update

Washington State Growth Management Act (GMA) requires all cities and counties to periodically review their regulations that protect critical areas and update them as needed. All critical areas must be designated, and their functions and values protected using the best available scientific information – known as best available science (BAS). Jurisdictions must also “give special consideration to conservation and protection measures necessary to preserve or enhance anadromous fisheries”. Fish and Wildlife Habitat Conservation Area, including stream buffers are addressed in Sumner Municipal Code SMC 16.56. The City has considered BAS and anadromous fisheries in their critical areas code update.

This letter is in response to Washington Department of Fish and Wildlife (WDFW) letter “WDFW Comments on the City of Sumner 2024 Draft Environmental Impact Statement” dated April 29, 2024.

Critical Areas Code Updates

The last substantial review of Sumner’s regulations to reflect BAS was in 2015, and some portions of Sumner’s critical areas code have not been updated since 1992. The City conducted a review of all parts of their code to better protect critical area and made a number of important changes. Such as:

- Adding a partial exemption to ensure all applicants with critical areas reach out to the city
- Clarification on variances/reasonable use, and non-conforming uses for all types of critical areas
- Additional requirements for buffer reductions for streams and wetlands
- Adding requirements for mitigation monitoring and maintenance
- Stream buffer expansion.

Existing Conditions of Type F - Riparian management zones (RMZs)

The City considered WDFW’s recommendations for using the site potential tree height at age 200 (SPTH200) method for riparian protection. The city used WDFW’s data to map SPTH200 for fish bearing streams (Type F) and non-fish bearing streams (Type N) streams in the city and compared them to existing development and existing buffers.

All Sumner Type F streams currently have a 100-foot buffer. Most of Sumner’s Type F streams are in the White (Stuck) River Valley floor and are in areas with a recommended RMZ of 100 to 105 feet with a few (two) areas of 225 feet. The valley floor is highly altered and already constrained by



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existing development; therefore, these streams would not benefit from a larger buffer. Other types of protection for stream basins are provided either through the White River habitat restoration project (described below), wetland protections, stormwater regulations, and drinking water protections. Thus, for Type F streams the City did not see an on-the ground benefit. Below summarizes the findings from the City's evaluation of existing riparian habitats and protections for Type F streams:

- Sotain Creek/Milwaukee Ditch, a Type F stream, is located in the west of the city, draining to the White River along SR 167.
 - WDFW mapping shows a RMZ of 100 or 105 feet, and two areas of 225 feet along Sotain Creek/Milwaukee Ditch.
 - There are a few associated riparian wetlands.
- Sotain Creek is highly constricted and channelized by existing industrial development, railroad embankment and SR167, and most areas have buffers clipped to less than 100 feet because of these impervious surfaces.
- Salmon Creek, a Type F stream, starts in the southeast corner of the city near Sumner-Tapps Highway E and flows north to the White River (where its confluence is within a 200-foot shoreline buffer). The eastern hillside that drains to Salmon Creek is owned and protected by the City of Sumner and other agencies as watersheds for drinking water, so no development would occur in this area.
 - It is in an area mapped as Red Alder and has an RMZ of 100 feet.
 - There are associated riverine wetlands along the stream with buffers of 60 to 225 feet depending on rating.
- The southern most portion of the stream, south of 60th St E south to SR 410, would have a RMZ of 215 feet per WDFW mapping. This 600 foot stream reach enters a detention pond then is culverted east under Sumner-Tapps Highway E. The portion east of the highway appears to be ditched and constrained on all sides by development, the freeway, and roads.
- The White (Stuck) River, a Type S stream, is regulated under the Shoreline Management Act and buffers are regulated through the Sumner shoreline master program, rather than the critical areas code. It has buffers mostly of 100-200 feet with 50-foot buffers in the downtown area.
 - Along the east side of the White River, an area of approximately 200 acres in the Manufacturing Industrial Center has been set aside by the City for the White River habitat restoration project (<https://connects.sumnerwa.gov/white-river-restoration-project>). Tributaries to the White River in this area are Type F.
 - The Dieringer Flume/Tailrace Canal is within the White River habitat restoration project area. It is typed "unknown" but salmonids can enter from the White River during high flows.
 - Stewart Road Creek (Type F) is a short tributary to the White River that was relocated recently as part of the reconstruction of Stewart Road. The southern portion of the tributary is part of the White River habitat restoration project area.

Existing Conditions of Type N - Riparian management zones (RMZs)



Parametrix

June 21, 2024

Page 3

WDFW recommends RMZs of 194 to 231-foot for Type N streams in the Sumner area. Type N streams in Sumner are located on the eastern and western forested slopes and are the upper reaches of the Type F streams flowing to the White River. They are often within ravines (which are also landslide or erosion hazard areas with development restrictions). Some have associated wetlands, which have buffers of 60 to 225 feet. All of these stream segments are tributaries to Sumner's major salmonid habitats, such as Salmon Creek and the White River. As tributaries, these streams are crucial to the entire stream system and have an important role in protecting water quality (reducing high water temperatures and pollutants).

- Type N streams on the east side of Sumner that flow to Salmon Creek are in areas protected by drinking water protections.
- Type N streams in northeast Sumner and in the urban growth area could benefit from larger buffers/RMZs if they are not already protected by wetland buffers, or landslide or erosion hazard areas.
- Type N streams on the west side of Sumner are limited to an area west of west Valley Highway. This area has a mapped NWI wetland and stream, which has been modified by existing development. This area could also benefit from larger buffers if they are not already protected by wetland buffers, or landslide or erosion hazard areas.

These Type N streams in Sumner currently have buffer widths of 25-50 feet. The City proposes increasing these buffers to 100 feet. This would make tributary buffers align with Type F stream buffers.

RMZ and SPTH₂₀₀ Methodology

There are a number of challenges with switching from using a buffer to the SPTH₂₀₀ method. Review conducted by others (Pierce County 2024¹) also show gaps and inconsistencies in the data. Data underlying the WDFW tool is not accurate to the parcel level which it is proposed to be used, creating uncertainty around the boundaries of one RMZ to another. Sumner has limited staff capacity to manage and determine varied buffers along a stream per WDFW recommendations. Having a set buffer (rather than one that varies, per WDFW recommendation) along a stream together with critical area reports required of development applications to identify local conditions provides consistency and clarity for the City and applicants.

Recommendations

The purpose of RMZs/buffers is to protect riparian function to meet the needs of fish and wildlife. RMZs/buffers are valued for providing shade, pollution removal, bank integrity, and nutrient input.

WDFW's policy is to protect full riparian function to meet the needs of fish and wildlife. They acknowledge that the minimum distance needed to provide habitat functions is 100 feet. (e.g. a 100 foot buffer would remove 95% or more of phosphorus, sediment and most pesticides from surface water runoff and 80% of surface water runoff containing excess nitrogen).

BAS indicates that Type N tributaries to Type F streams should have the same protective buffers as Type F as they have an important role in protecting water quality (reducing high water temperatures

¹ Pierce County. 2024. Critical Areas Comprehensive Plan Staff report – Draft Document. Available at: <https://www.piercecountywa.gov/7949/Critical-Areas-Ordinance-Updates>.





June 21, 2024
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and pollutants) and other function along the stream system. Given that Type N streams are extensions or tributaries to Type F streams that have a 100-foot buffer, having a consistent treatment in the code is recommended. Additionally, having a consistent buffer makes site design and permitting more straightforward for the City and applicants.

	Type F - Fish	Type Np - Non-fish perennial / Streams without fish	Type Ns – Non-fish seasonal / Intermittent streams
Current Buffer	100 feet	50 feet	25 feet
Recommended Buffer	100 feet	100 feet	100 feet
Percent Increase	0 percent	100 percent	300 percent

Sumner recognizes the value of all streams for protecting salmonids, including Type N streams in providing protection to downstream anadromous fish. WDFW's BAS states that the first 100 feet of the riparian area provides the most benefit to stream and habitat protection. As described above, due to existing development, an increase in buffer for Type F streams would have little benefit to increasing protections. Type N streams in some areas would benefit from an increase in the buffer if they were not otherwise protected by wetland buffers and/or erosion or landslide hazard areas. In consultation with the City of Sumner staff, Parametrix recommends increasing stream buffers to 100 feet for all streams. This would not change the buffers for fish bearing streams (Type F) but would substantially increase buffers for non-fish bearing streams (Type Np and Ns).



City of Sumner

Draft Environmental Impact Statement

2024 Comprehensive Plan Periodic Update
(Volume II)

March 2024



Consultant Team

BERK Consulting

Parametrix

Transpo Group



1104 MAPLE STREET, SUMNER WA 98390

DATE: March 1, 2024

SUBJECT: Draft Environmental Impact Statement (EIS)
Sumner Comprehensive Plan Update for 2024

Dear Reader:

The City of Sumner is updating its Comprehensive Plan in 2024 to plan for the city's growth through the year 2044. The updated plan will address requirements of the Growth Management Act (GMA), Puget Sound Regional Council (PSRC) VISION 2050 plan, and Pierce County Countywide Planning Policies (CPPs). This includes accommodating population, housing, and employment growth targets allocated by Pierce County. As part of the Comprehensive Plan update, the City proposes to update related plans and codes, such as the Capital Facilities Plan, Transportation Plan (TMP), and zoning and other development regulations in the Sumner Municipal Code (SMC). The City has prepared an integrated Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement (Draft EIS, Volume II). WAC 197-11-210 et seq. authorizes counties and cities planning under GMA to integrate the requirements of State Environmental Policy Act (SEPA) and GMA.

Three growth alternatives are examined in the Draft EIS:

Alternative 1 (No Action): Carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). This is a required alternative under the State Environmental Policy Act (SEPA).

Alternative 2: Updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing, and on the Cava Mine site when mining activities are complete. Housing policies emphasize incentives for affordability, support for religious organizations building affordable housing, greater diversity of allowed housing types, and expanded opportunities for middle housing citywide.

Alternative 3: Updates the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC). Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Housing policies emphasize mandatory affordability in Town Center and East Sumner, support for religious organizations building affordable housing, greater diversity of allowed housing types, and expanded opportunities for middle housing citywide (even more so than Alternative 2).

For each alternative, the Draft EIS programmatically addresses: Land Use, Population and Employment (Socioeconomics), Aesthetics, Housing, Public Services and Utilities, Transportation, and Natural Environment. The Draft EIS compares the alternatives and provides mitigation measures for identified impacts.

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that:
 - Offers more affordable housing opportunities and places to retain and grow businesses.
 - Promotes a healthy environment and climate resilience strategies and avoids displacement of overburdened households and businesses.
- Approval of a Comprehensive Plan including a vision, goals, and policies that fulfills Sumner's vision and meets state and regional requirements.
- Identification of transportation investments to be included in the TMP that improve mobility and resilience.
- Approval of development regulations that implement the Comprehensive Plan goals and land use plan, including providing for quality housing choices, and integrating the best available science to protect critical areas.

Affected agencies, tribes, and members of the public are invited to comment on this Draft EIS. Please see the Draft EIS Fact Sheet for the comment period and how to submit your comments. A Final EIS will be prepared following the comment period and will include responses to comments.

If you have questions, please contact: Ann Siegenthaler, Senior Planner, City of Sumner (253) 299-5520, annsi@sumnerwa.gov.

For more information, please see the project website: connects.sumnerwa.gov/planning-sumners-future.

Sincerely,



Ryan Windish, Community Development Director and SEPA Responsible Official

Fact Sheet

Project Title

Sumner Comprehensive Plan Update 2024

Proposed Action and Alternatives

The City of Sumner is updating its Comprehensive Plan to plan for the city's growth through the year 2044. The updated plan will address requirements of the Growth Management Act (GMA), Puget Sound Regional Council (PSRC) VISION 2050 plan, and Pierce County Countywide Planning Policies (CPPs). This includes accommodating population, housing, and employment growth targets allocated by Pierce County. As part of the Comprehensive Plan update, the City also proposes to update:

- Capital Facilities Plan
- Transportation Plan
- Zoning and other development regulations in the Sumner Municipal Code (SMC)

Three alternatives are analyzed in this Draft Environmental Impact Statement:

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the assigned Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Both alternatives include a new Climate Change element and an updated CAO to include best available science.

Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044, meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies

Exhibit 1: Action Alternatives Housing Policies

Topic	Alternative 2	Alternative 3
Cava Gravel Mine Site	Plans for some housing growth on the site, when mining activities complete.	Does not plan for housing growth on the site.
Town Center and East Sumner	Affordability incentives	Mandatory affordability
LDR zones	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots
MDR and HDR zones	Small apartments allowed (up to 3 stories) Maximum density raised to 22 du/a in MDR	Small apartments allowed (up to 3 stories) Maximum density raised to 17 du/a in MDR
Religious organizations affordable housing	Policies supporting religious organizations building affordable apartment housing	Policies and incentives supporting religious organizations building affordable apartment housing
Other	Other updates in alignment with state housing law	Other updates in alignment with state housing law

Proponent and Lead Agency

City of Sumner

Location

Sumner city limits and urban growth area

Tentative Date of Implementation

The 2024 Comprehensive Plan periodic update and Final EIS are expected to be adopted by December 31, 2024.

Responsible Official

Ryan Windish, AICP

Community Development Director
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390
(253) 299-5524 | ryanw@sumnerwa.gov

Contact Person

Ann Siegenthaler

Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390
(253) 299-5520 | annsi@sumnerwa.gov

Required Approvals

All Comprehensive Plan amendments and implementing regulations require a 60-day review by the State of Washington Department of Commerce and other state agencies. The Puget Sound Regional Council (PSRC) will also conduct a comprehensive plan review and transportation certification review for consistency with VISION 2050.

The Sumner Planning Commission will review the draft Comprehensive Plan update and all related plan and regulatory updates. The Planning Commission's recommendations will be forwarded to the City Council who will deliberate and determine approval.

Principal EIS Authors and Contributors

Under the direction of the Sumner Community Development Department, the consultant team prepared the DEIS as follows:

- [BERK Consulting](#): prime consultant, alternatives, land use, population and employment, housing, aesthetics, public services and utilities (general government, police, fire/EMS, schools, parks)

- [Parametrix](#): public services and utilities (water, sewer, stormwater, power and natural gas, telecommunications), natural environment (earth, water resources, plants and animals).
- [Transpo Group](#): transportation

Draft EIS Date of Issuance

March 1, 2024

Draft EIS Comment Period

The City of Sumner is requesting comments from members of the public, agencies, tribes, and all interested parties on the DEIS from March 1, 2024 to April 30, 2024 utilizing a 60-day comment period. Comments are due by **5 pm on April 30, 2024.**

All written comments should be directed to:

Ann Siegenthaler

Senior Planner

City of Sumner Community Development Department

1104 Maple Street, Suite 250

Sumner, WA 98390

(253) 299-5520 | annsi@sumnerwa.gov

Comment submittal by email is preferred. Please include in the subject line "Sumner Comprehensive Plan DEIS Comments."

Public Meeting

Consistent with SMC 18.56.110 a public hearing is planned for April 4, 2024, with the Sumner Planning Commission. Participants may join in person or via a virtual link to a Zoom webinar. See the City's web page <https://connects.sumnerwa.gov/planning-sumners-future> for more information, including log-in information to access the public hearing.

Date of Final Action

The City plans to adopt the Comprehensive Plan before December 31, 2024.

Prior Environmental Review

The City has previously issued SEPA documents for its Comprehensive Plan including but not limited to:

- Sumner Comprehensive Plan Supplemental EIS (issued: February 2015)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Reas Ordinance Update, and East Sumner Neighborhood Planned Action
- Sumner Comprehensive Plan Supplemental EIS (issued: November 2020)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Zoning Amendments, East Sumner Neighborhood Planned Action

Location of Background Data

You may review the City of Sumner's website for more information at connects.sumnerwa.gov/planning-sumners-future. If you desire clarification or have questions, please contact Ann Siegenthaler at (253) 299-5520 or annsi@sumnerwa.gov.

Availability of Draft EIS

The Draft EIS is posted on the City of Sumner's website at connects.sumnerwa.gov/planning-sumners-future. Contact the staff person above if you are unable to access the documents online; alternate formats may be available at cost.

Notice of the Availability of the Draft EIS was sent to agencies and reviewers listed in the Distribution List below, and to the general public via City emails and City website.

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1 Summary

1.1 Introduction

The City of Sumner is updating its Comprehensive Plan in accordance with the requirements of the state Growth Management Act (GMA). This Draft EIS (DEIS) identifies environmental impacts that are likely to occur with the growth alternatives proposed in the Draft Comprehensive Plan and mitigation to address these impacts.

The proposed update to the City's Comprehensive Plan will plan for growth of at least an additional 1,985 housing units and 5,313 additional jobs by 2044, per the growth targets adopted by Pierce County. This non-project DEIS includes the development of three plan alternatives, environmental analysis of those alternatives, and identification of potential impacts and mitigation measures.

The proposal evaluated in this DEIS includes Sumner's Comprehensive Plan Update for the time period 2024-2044.

1.2 Project Purpose, Desired Outcomes, and Exclusions

This DEIS provides a qualitative and quantitative analysis of environmental impacts associated with the City of Sumner 2024-2044 Comprehensive Plan Update. The purpose of the DEIS is to inform and assist the public and City of Sumner decision-makers in considering future growth throughout the city.

The update to Sumner's Comprehensive Plan will meet state and regional requirements and align with community and City Council vision and priorities.

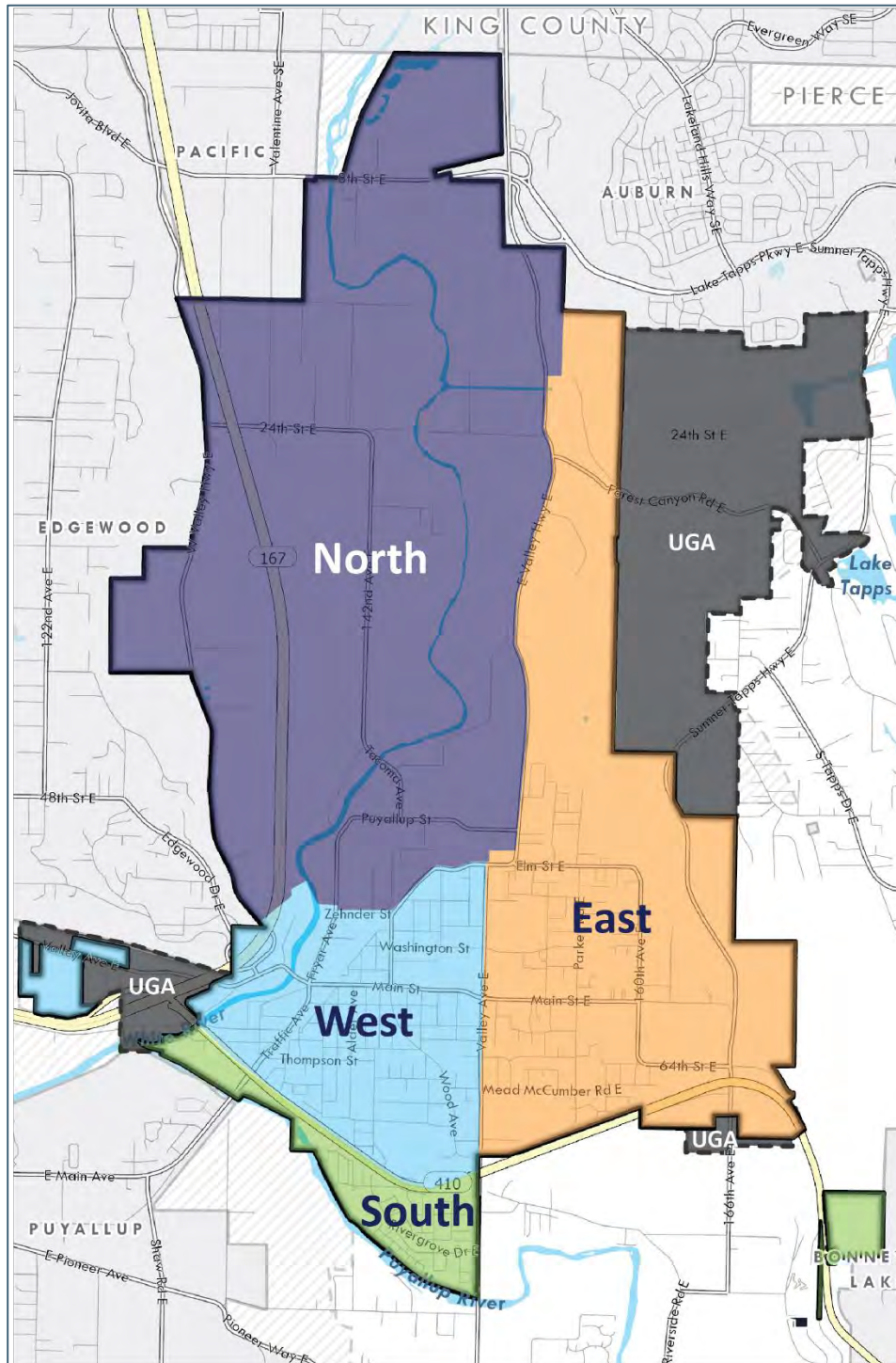
1.3 Study Area

The study area is the City of Sumner. The DEIS also examines potential impacts to the unincorporated Urban Growth Area (UGA) where relevant.

For the purposes of environmental analysis, the DEIS discusses current conditions and potential impacts by "portion" of the City, as defined in Exhibit 1-1: Portions for DEIS Analysis. Exhibit 1-1. These portions are only used for structuring the analysis; they are not adopted subareas. This structure, where applicable, ensures the DEIS discussion is comprehensive and considers all areas of the city. The city and UGA are divided into the following portions for discussion:

- **Citywide.** The entire area within Sumner city limits.
- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.
 - The area to the west of Sumner surrounding the interchange of SR 410 and SR 167.
 - The area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps.
 - The area to the south at the east end of the city encompassing approximately fourteen parcels.

Exhibit 1-1: Portions for DEIS Analysis



Source: Sumner 2024; BERK 2024

1.4 SEPA Process and Public Involvement

1.4.1 Environmental Review Process

Process

The State Environmental Policy Act (SEPA) is in the Revised Code of Washington (RCW) [Chapter 43.21C](#) and is a Washington State law that helps agency decision-makers, applicants, and the public understand how a proposal would affect the environment. The EIS process is a tool to inform decision-makers and the public of the affected environment, potential impacts, reasonable alternatives, as well as mitigation measures that would avoid or minimize adverse impacts or enhance environmental quality.

An EIS is required for both project and non-project actions that have the potential to cause significant impacts to the environment. This document is a non-project DEIS that analyzes the proposals and alternatives across the study area. The City of Sumner has determined that this periodic update to the City's Comprehensive Plan would likely have a significant adverse impact on the environment and is required to prepare an EIS (RCW 43.21C.030).

The DEIS describes:

- Existing conditions in the study area
- Proposed alternatives (i.e., new growth strategies)
- Potential significant, unavoidable, and adverse impacts
- Mitigation measures to reduce or eliminate adverse impacts

The EIS process includes the following steps:

1. Initial research; issuing a Determination of Significance; and scoping the contents of the EIS with feedback from agencies, tribes, and the public
2. Preparing a DEIS with a comment period
3. Responding to comments and developing a Preferred Alternative
4. Issuing a Final EIS (FEIS) to inform decision-making

Community involvement is an important part of the EIS process. Community members have the opportunity to review and provide comments during two stages of the process:

- **Scoping:** Scoping is the first step in the EIS process. Scoping for this EIS was held between May 18, 2023 through June 8, 2023. The City proposed the topics and alternatives to be studied in the EIS. During this period, members of the public had the opportunity to learn more about the Comprehensive Plan Periodic Update and the draft growth alternatives and provide comments. Comments received are used to refine the topics and alternatives in the DEIS. More information on scoping can be found in Section 1.4.2.
- **DEIS:** The DEIS reviews the alternatives for environmental impacts. The purpose of this analysis is to estimate the nature, severity, and duration of impacts that might occur and compare impacts between the different alternatives. The DEIS is available for the public to review and comment. Comments received will help refine the EIS.

The City is expected to complete the Final EIS and the Comprehensive Plan Periodic Update by the end of 2024.

Non-Project EIS

This document is a non-project EIS that analyzes the proposals and alternatives broadly across the study area. SEPA identifies that a non-project EIS is more flexible than a project EIS and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs ([WAC 197-11-442](#)). A non-project EIS does not provide site-specific detailed analysis. Additional environmental review will occur as other project or non-project actions are proposed in the city in the future. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

Integrated Plan and EIS

GMA jurisdictions are authorized, but not required, to combine SEPA and GMA processes and/or to integrate documents per WAC 197-11-210 et seq. The goal is to ensure that environmental analysis under SEPA occurs concurrently with, and as an integral part of, the planning and decision-making process under GMA. The City has elected to integrate SEPA and GMA in both the process and the document. Integration of the environmental analysis with the planning process informs the preparation of GMA comprehensive plan amendments and facilitates coordination of public involvement activities. The information contained in this DEIS will assist the City in refining a preferred alternative, related comprehensive plan amendments, and implementing regulations.

The integrated Comprehensive Plan/Draft EIS document is structured as shown below. This DEIS comprises Volume II of the integrated document. See Chapter 2 for additional description of how the Draft Plan and DEIS have been developed in an integrated manner.

Exhibit 1-2. Sumner Integrated SEPA/GMA Plan and EIS

Volume	Contents
Volume I: Sumner Comprehensive Plan—A Policy Document	- Summarizes the key issues identified in Volume II. - Contains all policies and plans.
Volume II: Environmental Impact Statement	- Contains all inventories required by GMA and SEPA in the “Affected Environment” discussions. - Analyzes the proposal and alternatives. - Summarizes the comprehensive plan policies and adopted regulations that serve as mitigation measures.

Source: BERK Consulting 2023

Prior Environmental Review

The City has previously issued SEPA documents for its Comprehensive Plan including but not limited to the following:

- Sumner Comprehensive Plan Supplemental EIS (issued: February 2015)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Capital Facility and Transportation Plan Update, Development Regulations and Critical Reas Ordinance Update, and East Sumner Neighborhood Planned Action
- Sumner Comprehensive Plan Supplemental EIS (issued: November 2020)
 - Prepared for: Draft Sumner Comprehensive Plan Update, East Sumner Neighborhood Plan Update, Zoning Amendments, East Sumner Neighborhood Planned Action

1.4.2 Scoping

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The following topics were proposed for review in the EIS at the time of scoping:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics (land use, population, and employment)
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping for this DEIS began on May 18, 2023, and ended on June 8, 2023 (21-day scoping period). A correspondence list consisting of state and local agencies, Tribes, and other parties of interest was notified by email or mail at the beginning of the scoping period. Two comments were received from agencies regarding transportation and energy; the comments were considered in the development of the Draft Comprehensive Plan and DEIS; no other comments were received from other interested parties. See Appendix A.

1.5 Summary of Description of Alternatives

The alternatives describe three different policy directions that the City could take in planning through 2044. These alternatives are analyzed in this DEIS for their potential environmental impacts. Environmental analysis involves studying each alternative and identifying potential impacts on the different elements of the environment studied. These alternatives are described in greater detail in Chapter 2.

The alternatives include one No Action Alternative, in which the City does not make any policy changes, and two Action Alternatives, in which the City does make policy changes. Because the No Action Alternative does not include any policy changes, it does not respond to, or comply with, recent changes in state law. Action Alternatives allow the City to understand the impacts, benefits, and implications of different growth scenarios and compare them to the No Action Alternative.

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the assigned Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Both alternatives include a new Climate Change element and an updated CAO to include best available science.

Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044, meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies.

The alternatives in this DEIS are based on the following legal frameworks, policies, and options:

- **Consistency with regional policy guidance.** The Pierce County Countywide Planning Policies (CPPs) include housing, job, and population growth targets for cities across the County, including Sumner. The adopted growth targets for Sumner for 2020-2044 include 1,985 housing units, 5,313 jobs, and 4,904 residents. The County set these targets using projections from the Washington State Office of Financial Management, guidance from the Washington State Department of Commerce, Puget Sound Regional Council's VISION 2050, and calculated capacity for new development.
- **Consistency with state law.** Changes to the Growth Management Act have been made in recent years that the City must respond to in order to be consistent with state law. The Action Alternatives update the Comprehensive Plan for new requirements to plan for housing at all income bands, middle housing and accessory dwelling units (ADUs), and climate change resilience and emissions reduction. The Action Alternatives also include updates to the Critical Areas Ordinance (CAO) for best available science.

- **Flexibility in meeting housing requirements.** The Action Alternatives provide two different approaches to meeting the adopted housing targets for each income band. Each alternative includes a different combination of policies to achieve the required capacity. The Action Alternatives also plan for additional housing above the overall housing target, in recognition that many new housing units have been permitted or are in the pipeline since 2020 that will not be affordable to lower income bands and therefore not provide capacity for these needs. See Exhibit 1-3.

Exhibit 1-3. Action Alternatives Housing Policies

Topic	Alternative 2	Alternative 3
Cava Gravel Mine Site	Plans for some housing growth on the site, when mining activities complete.	Does not plan for housing growth on the site.
Town Center and East Sumner	Affordability incentives	Mandatory affordability
LDR zones	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable	Two units per residential lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots
MDR and HDR zones	Small apartments allowed (up to 3 stories) Maximum density raised to 22 du/a in MDR	Small apartments allowed (up to 3 stories) Maximum density raised to 17 du/a in MDR
Religious organizations affordable housing	Policies supporting religious organizations building affordable apartment housing	Policies and incentives supporting religious organizations building affordable apartment housing
Other	Other updates in alignment with state housing law	Other updates in alignment with state housing law

Source: BERK Consulting, 2023.

1.6 Additional Analysis

The City conducted additional analysis in support of the Comprehensive Plan Periodic Update process and DEIS. The following are included as appendices to this DEIS:

- **Appendix A: Scoping Information.** This appendix includes the scoping notice and comments received during scoping.
- **Appendix B: Supporting Analysis for HB 1220 Requirements.** This appendix documents the analysis and assumptions used to address the requirements of House Bill (HB) 1220 relating to housing.
- **Appendix C: Climate Analysis Findings.** This appendix documents the analysis used to define climate change policies, using guidance from the State Department of Commerce.
- **Appendix D: Public Participation Summary.** This documents the public participation completed as part of the plan update thus far.

1.6.1 Commenting on the Draft EIS

This DEIS identifies environmental conditions, potential impacts, and measures to reduce or mitigate any adverse impacts that could result from the City of Sumner 2024-2044 Comprehensive Plan Periodic Update.

Public and agency comments are invited on this DEIS. Written and verbal comments are invited during the 60-day public comment period following issuance of this DEIS. Public comments will be considered and addressed in the Final EIS. See the Fact Sheet at the beginning of this DEIS for the dates of the public comment period and public meetings.

1.6.2 Final EIS

The City of Sumner intends to issue a Final EIS (FEIS) in late 2024. The FEIS will include responses to public comments received during the DEIS public comment period. The FEIS will study a Preferred Alternative that is within the range of growth studied in the DEIS alternatives. Following the EIS process, the City will develop specific edits to the Comprehensive Plan Land Use Map and Comprehensive Plan that will be the subject of public meetings and public hearings held by the Sumner City Council.

1.7 Summary of Key Findings, Impacts, and Potential Mitigation Measures

One of the essential roles of this DEIS is to identify potential impacts associated with a proposal and alternatives and identify appropriate mitigation measures. The following sections describe how the DEIS analyzed each element of the environment, what impacts have been identified, how the alternatives are different from one another, and what measures are proposed to mitigate impacts. The information and analysis in this DEIS will guide City of Sumner decision-makers in selecting the appropriate Preferred Alternative for the FEIS.

Exhibit 1-4 summarizes the environmental analysis conducted for this DEIS. The Alternatives are described in greater detail in Chapter 2 and specific environmental topics are discussed in greater detail in Chapters 3-9. Where potential impacts have been identified, mitigation is provided in the following forms:

- **Incorporated Plan Features:** Components of the alternatives that self-mitigate (such as design standards that address height and bulk)
- **Regulations and Commitments:** Regulations and commitments that the City must adhere to (such as its Shoreline Master Program)
- **Other Potential Mitigation Measures:** Any additional mitigation measures that the City could consider applying through policies or other strategies

The remaining impacts, if any, following mitigation are also described in the Unavoidable Adverse Impacts section. The reader is encouraged to read through the summary in Exhibit 1-4 to find areas of interest and read the more-detailed analysis in the following chapters.

Exhibit 1-4: Summary of Impacts and Mitigation Measures

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
2020-2044 Growth	1,985 new housing units, 5,313 new jobs, and 4,904 new residents	3,000 new housing units, 5,313 new jobs, and 6,700 new residents	3,000 new housing units, 5,313 new jobs, and 6,700 new residents
<i>(Chapter 1: Summary and Chapter 2: Alternatives do not include impacts analysis and mitigation)</i>			
3. Land Use	Impacts		
	- Can accommodate the job growth target and overall housing target Cannot accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner - Generally consistent with Growth Management Act Planning Goals, but does not meet new requirements (including planning for housing at all income levels, planning for climate change, and updating critical areas regulations for best available science) - Somewhat consistent with the Pierce CPPs and PSRC VISION 2050 goals but does not include updates for consistency with new areas of emphasis Significant adverse impacts to capacity to accommodate growth targets and plans and policies that could only be mitigated through features of Alternatives 2 and 3	- Can accommodate the job growth target and overall housing target - Can accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner. More housing growth and density throughout the city than Alternative 1, so potentially more residents near industrial and commercial uses. More density abutting the Sumner-Pacific MIC than other alternatives (Cava Mine site designation change from low density to medium density) but still a residential use like the current designation. - Consistent with Growth Management Act Planning Goals and new requirements - Consistent with the Pierce CPPs and PSRC VISION 2050 goals including new areas of emphasis No significant unavoidable adverse impacts	- Can accommodate the job growth target and overall housing target - Can accommodate housing targets by income band - Areas of potential land use incompatibility primarily where residential designations abut the Sumner-Pacific MIC and west of East Sumner. More housing growth and density throughout the city than Alternative 1, so potentially more residents near industrial and commercial uses. - Consistent with Growth Management Act Planning Goals and new requirements - Consistent with PSRC VISION 2050 including new areas of emphasis - Consistent with the Pierce CPPs and PSRC VISION 2050 goals including new areas of emphasis No significant unavoidable adverse impacts

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	Mitigation Measures		
	- Pierce County's Buildable Lands Program ensures ongoing review and monitoring of vacant and underutilized land capacity - Sumner's design review process includes landscaping and screening requirements for some uses - Conditional use review in some zoning districts is an opportunity for site-specific mitigation - Height, setback, and yard requirements can mitigate compatibility issues - Sumner-Pacific MIC includes a goal on preventing industrial activity from adversely impacting adjacent uses and neighborhoods - The adopted Comprehensive Plan aligns with previous Pierce County CPPs, VISION 2050, and the GMA, which had many policies and requirements that still apply	- Same as Alternative 1 - Alternatives 2 and 3 include a revised policy to encourage industries and industrial processes that are sustainable, environmentally and socially responsible, and contribute to the local community	Same as Alternative 2
4. Population & Employment	Citywide Impacts		
	- All alternatives including Alternative 1 add population growth in areas of high air or noise pollution - All alternatives including Alternative 1 meet overall population and employment targets - All alternatives including Alternative 1 are expected to meet the MIC criteria for at least 20,000 jobs	Greater displacement impacts than Alternative 1 due to more growth Greater impacts than Alternatives 1 and 3 to population growth in areas of high air or noise pollution due to redesignation of Cava Mine site to moderate density from low density No significant unavoidable adverse impacts (impacts can be mitigated)	Greater displacement impacts than Alternative 1 due to more growth No significant unavoidable adverse impacts (impacts can be mitigated)

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	- All alternatives including Alternative 1 expect some economic displacement as a result of growth - Lower impacts than Alternatives 2 and 3 due to less population growth No significant unavoidable adverse impacts (impacts can be mitigated)		
	Mitigation Measures - The adopted Comprehensive Plan's Environment element contains multiple goals and policies aimed at protecting air quality and reducing noise impacts. - The Sumner zoning code (Title 18) establishes zoning and development regulations that govern allowed uses and site development standards. - The Sumner SEPA code (Title 16) establishes a framework for analyzing environmental impacts of development projects. - The City enforces the noise ordinance in the Sumner Municipal Code (SMC 18.14). - The County has adopted designated growth targets for the city. - The Cities of Sumner and Pacific have committed to accommodating significant shares of regional employment growth in the MIC. - PSRC's Centers Criteria guides planning and growth for MICs. - The Economic Development Element includes goals and policies to promote a strong and diverse economy.	- Same as Alternative 1. - Alternatives 2 and 3 include a revised policy to require new developments that generate noise impacts to submit analysis of impacts and mitigation - Alternatives 2 and 3 include a new Climate element and revised Transportation policies to reduce vehicle miles traveled. - Alternatives 2 and 3 include a revised goal to plan for a variety of land uses and prevent adverse impacts between neighboring uses. - Alternatives 2 and 3 include a revised goal on supporting local and women- and minority-owned businesses and to incorporate goals and policies from the MIC Subarea plan, which promote business retention and mix of businesses of all sizes.	Same as Alternative 2.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ The City could address growth in air or noise pollution areas through transit-oriented development, land use buffers, enhanced vegetated screening, or roadside barriers for sound. ▪ The noise from the train horns could be mitigated with implementation of quiet zones within the west portion of the city. ▪ The City could study creating a program to identify and preserve commercial spaces that are suitable for small businesses.		
5. Aesthetics	No significant unavoidable adverse impacts (impacts can be mitigated)	Citywide Impacts ▪ Similar to Alternative 1, but housing growth is higher, and growth occurs throughout the city as middle housing ▪ Allows two housing units per residential lot, and two ADUs per lot, per state requirements, which is likely to increase the density of housing in lower density areas ▪ Modifies MDR and HDR zones to allow low-rise apartments, which has potential for view, shadow, and bulk/scale transition impacts ▪ Allows apartment housing to be developed on church properties, which has potential for view, shadow, and bulk/scale transition impacts ▪ Changes land use designation of Cava Mine site to MDR from LDR, which could result in greater view, shadow, and bulk/scale transition impacts than the other alternatives	▪ Same as Alternative 2, except for Cava Mine site impacts No significant unavoidable adverse impacts (impacts can be mitigated)

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	No significant unavoidable adverse impacts (impacts can be mitigated)		
	Mitigation Measures		
	- Sumner's adopted Comprehensive Plan has policies that aim to preserve views. - The Sumner SEPA code (Title 16) establishes a framework for analyzing environmental impacts of development projects, including views. - Conditional use review in some zoning districts provides an opportunity for site-specific mitigation. - Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues. - Sumner's adopted Comprehensive Plan has existing policies and regulations to mitigate impacts on urban form, community character, and lighting. - Sumner's zoning and development regulations govern uses, building and site design, and land use compatibility. - Sumner could consider requiring areas with higher building heights to have upper-story setbacks to minimize shadow, view, height, and bulk impacts. - Sumner could consider requiring additional landscaping on major streets to screen development.	- Same as Alternative 1. - Alternatives 2 and 3 limit ADU regulation changes to those required by state law. ADUs would still be required to be the same or lower height than the principal unit. - Alternatives 2 and 3 do not propose height increases to any zones, except those required for ADUs. - Alternatives 2 and 3 require new housing units on church property to meet the same requirements as senior apartments.	Same as Alternative 2.
6. Housing	Citywide Impacts		
	1,985 housing units above 2020 conditions	3,000 housing units above 2020 conditions	3,000 housing units above 2020 conditions

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ Does not meet requirement for planning for and accommodating housing at all income levels ▪ Does not address racially disparate impacts, displacement, displacement risk, and exclusion in housing (as required by GMA) ▪ Inconsistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters ▪ Does not meet middle housing and accessory dwelling unit (ADU) requirements (HB 1110, HB 1337) ▪ Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) Significant adverse impacts to meeting state requirements that could only be mitigated through features of Alternatives 2 and 3	▪ Addresses requirement for planning for and accommodating housing at all income levels ▪ Addresses racially disparate impacts, displacement, displacement risk, and exclusion in housing ▪ Consistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters ▪ Meets middle housing requirements (HB 1110, HB 1337) ▪ Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) No significant unavoidable adverse impacts (displacement impacts can be mitigated through plan features)	▪ Addresses requirement for planning for and accommodating housing at all income levels ▪ Addresses racially disparate impacts, displacement, displacement risk, and exclusion in housing ▪ Consistent with state guidance on spacing and occupancy for permanent supportive housing, transitional housing, emergency housing, and emergency shelters ▪ Meets middle housing requirements (HB 1110, HB 1337) ▪ Some displacement impacts as a result of growth, particularly in the East Portion and West Portion (which includes Town Center) No significant unavoidable adverse impacts (displacement impacts can be mitigated through plan features)
Mitigation Measures			
	▪ The City's adopted comprehensive plan includes some policies related to housing affordability and availability. ▪ The Housing Action Plan identifies strategies to address housing needs. ▪ Pierce County has some existing programs to assist residents with energy and housing costs. ▪ The City could consider additional anti-displacement strategies.	▪ Same as Alternative 1 ▪ Alternatives 2 and 3 include anti-displacement and housing affordability policies, and adequate capacity to meet housing needs by income band.	▪ Same as Alternative 2.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
7. Public Services	Citywide Impacts		
	Growth under all alternatives will increase the demand for public services, including city facilities, police, fire and emergency medical services, schools, parks, and utilities.	Similar to Alternative 1, but Alternatives 2 and 3 add more housing growth, which results in greater demand for public services.	Similar to Alternative 1, but Alternatives 2 and 3 add more housing growth, which results in greater demand for public services.
	No significant unavoidable adverse impacts (impacts can be mitigated)	No significant unavoidable adverse impacts (impacts can be mitigated)	No significant unavoidable adverse impacts (impacts can be mitigated)
	Mitigation Measures		
	- Under all alternatives, the City is planning to construct new public works shops totaling 83,050 square feet, which is adequate square footage to meet the adopted level of service. - All alternatives propose retaining the existing City Hall and Public Works Shops in public land use designation. - The East Pierce Fire and Rescue Capital Facilities Plan outlines future projects to improve service. - The Sumner-Bonney Lake and Dieringer School Districts have capital facilities plans that outline future projects to address capacity issues. - The City of Sumner implements school impact fees in permits for new development. - Sumner has adopted a park impact fee. - Public sanitary sewer system operations in Washington are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington.	- Same as Alternative 1. - Alternatives 2 and 3 include an update of the Capital Facilities Plan, which identifies future needs and funding sources. - Alternatives 2 and 3 include a new Climate Change Resiliency element, which includes some hazard mitigation policies that could better prepare the city for emergencies, and energy conservation and efficiency policies. - Alternatives 2 and 3 include new comprehensive plan policies that address regional sewer, water, and utility planning and emergency response, and strategies that balance cost, benefits, health and safety, and promote affordability and equity. - Alternatives 2 and 3 include revised comprehensive plan policies, including supporting proactive water conservation efforts throughout the City and septic system policies based on best practices.	Same as Alternative 2.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ The City manages its sewer system under SMC Title 13, Public Services. ▪ The City has adopted the 2020 Sanitary Sewer Comprehensive Plan. ▪ The Capital Facilities Element of the adopted Comprehensive Plan contains policies relating to level of service for the City's sanitary sewer, water, and stormwater. ▪ The 2023-2024 City of Sumner Biennial Budget includes long-term goals relating to wastewater treatment and water planning. ▪ The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years. ▪ Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater. ▪ The City is required to comply with the National Pollution Discharge Elimination System (NPDES permit program). ▪ The City has adopted the 2020 Water System Plan. ▪ The Capital Facilities Element of the Comprehensive Plan and the Capital Facilities Plan contain policies relating to water system level of service. ▪ All alternatives retain existing buffers along rivers, streams, and wetlands. ▪ Pierce County Hazard Mitigation Plan includes Sumner-specific strategies to expand flood storage capacity and limit	▪ Alternatives 2 and 3 include new and revised comprehensive plan policies to encourage low-impact development, upgrade systems to address flooding, and retain flood storage capacity. ▪ Alternatives 2 and 3 update critical areas regulations for the latest best available science, which could better protect structures from flooding through updated stream buffers. ▪ Alternatives 2 and 3 include a new policy to facilitate the conversion from natural gas to alternative technologies and energy sources and support advancement of telecommunications in the City.	

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	new homes and businesses from being sited in flood hazard areas. ▪ Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls. ▪ The City has adopted stormwater standards requiring 25-year storage with the 2-year predevelopment release rate. ▪ All alternatives retain goals, policies, and implementing regulations that support the development and implementation of stormwater management techniques such as low impact development (LID). ▪ The City applies stormwater standards including in the 2019 Ecology Stormwater Management Manual for Western Washington, and the 2012 Puget Sound Partnership Low Impact Development Technical Guidance for Puget Sound. ▪ Sumner implements floodplain regulations required by the National Flood Insurance Program through its Shoreline Master Program and critical areas regulations. ▪ The City reviews impacts on the Endangered Species Act on a permit by permit basis. ▪ The White River Restoration Project is a major flood protection project that will restore floodplain habitat, replace the Stewart Road Bridge, and improve flood protection in the Lower White River reach.		

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ The City should continue to implement the Washington State Energy Code. ▪ The adopted Comprehensive Plan includes some policies around energy conservation and efficiency. ▪ The City should integrate the updated 2024 Parks and Trails plan when approved. ▪ The City could implement recommendations of the Sanitary Sewer Plan to correct deficiencies. ▪ The City could identify additional improvements to the sewer system for the 20-year planning period. ▪ The City could partner with the City of Bonney Lake if another sewer plant expansion becomes necessary. ▪ The City could implement an aggressive water conservation program. ▪ The City could expand watershed protection by acquiring additional land around the existing watershed. ▪ The City could choose to fund more public education and outreach to water conservation programs, public education on water quality, and education and outreach to promote renewable energy technologies. ▪ The City could conduct an update to the Stormwater Comprehensive Plan or ensure development demonstrates compliance with standards set in Ecology's 2019 Stormwater Manual as adopted by the City. ▪ The City could implement stronger code and design incentives for LID.		

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ The City could choose to fund more public education on water quality for residents and businesses. ▪ The City should provide annual updated population, employment, and development projections to Puget Sound Energy. ▪ The City could coordinate the cooperate with other jurisdictions in the implementation of multijurisdictional electric utility facility additions and improvements.		
8. Transportation	Citywide Impacts ▪ Under all alternatives, the pedestrian LOS analysis shows most of the future pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors with missing sidewalk (Elm Street and 160th Avenue E). ▪ Under all alternatives, bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. ▪ Alternative 1 results in an estimated 12,544 vehicle trips and 30,015 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT). ▪ Most intersections operate at LOS D or better during the weekday PM peak hour under Alternative 1, but eight intersections are forecast to degrade	▪ Pedestrian and bicycle impacts similar to Alternative 1 ▪ Alternative 2 results in an estimated 13,626 vehicle trips and 31,122 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT) ▪ Intersection operations are similar to Alternative 1. Alternative 2 would have increases in delay due to additional growth but the intersections not meeting the LOS D standard would be the same. Planned improvements <u>can</u> meet established levels of service for all modes. Significant unavoidable adverse impact due to increase in traffic congestion like for Alternative 1.	▪ Pedestrian and bicycle impacts similar to Alternative 1 ▪ Alternative 3 results in an estimated 13,542 vehicle trips and 30,907 VMT for weekday PM peak hours (existing conditions are 10,071 vehicle trips and 23,682 VMT) ▪ Intersection operations are similar to Alternative 2. Planned improvements <u>can</u> meet established levels of service for all modes. Significant unavoidable adverse impact due to increase in traffic congestion like for Alternative 1.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	below LOS D during the weekday PM peak hour. If making improvements like for Alternatives 2 and 3, impacts can be mitigated. Significant unavoidable adverse impact due to increase in traffic congestion.		
	Mitigation Measures		
	▪ 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. ▪ SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to reflect multimodal transportation impact fees. ▪ The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places. ▪ The City collects impact fees for trails (see Section 3.10). ▪ The City policies indicate commitment to pursue expansion of the Pierce Transit benefit district. If transit service is implemented within Sumner, the City will develop a transit LOS standard.	▪ Same as Alternative 1. ▪ Alternatives 2 and 3 include updates to the vehicle LOS policy. ▪ Alternatives 2 and 3 includes new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Comprehensive Plan Land Use Element. ▪ The Transportation Plan update provides a comprehensive list of improvement projects and programs to meet the existing forecast transportation needs of the City.	▪ Same as Alternative 2.
9. Natural Environment	Citywide Impacts		
	▪ Most of the city is within seismic and volcanic lahar areas, so growth under all	▪ Similar to Alternative 1, but more growth under Alternative 2 is likely to	▪ Similar to Alternative 1, but more growth under Alternative 3 is likely to

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	alternatives would expose new development to these hazards. - Under all alternatives, construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs. Susceptibility to landslide and erosion primarily affect growth in the East Portion and West Portion, under all alternatives. - Growth under all alternatives may impact water quality in rivers and streams, due to increased traffic volumes and reduction in vegetation coverage, particularly in the North Portion and East Portion. - Growth under all alternatives will affect plants and animals due to development impacts to habitat. This includes removal of trees, shrubs, and other vegetation. Disturbance of vegetation can also lead to establishment of non-native and invasive plants. - Development of vacant and larger low density properties can lead to habitat loss, fragmentation, and reduced habitat connectivity under all alternatives. - Increased impervious surface cover under all alternatives can reduce the quality of aquatic habitat. - All alternatives include some amount of growth in Wildland Urban Interface (WUI) intermix areas, which could expose more people to wildfire hazards. This is particularly true in the East Portion.	result in greater impacts citywide relating to earth, plants and animals, water quality, and vulnerability to wildfire Increased density on the Cava Mine site would create the potential for increased development in an area with steep slopes at risk of landslide and erosion, greater impervious surface and habitat impacts, and greater vulnerability to wildfire. Significant impacts to tree canopy are likely due to development on this site. Seismic and volcanic hazards create significant unavoidable adverse impacts. Tree canopy impacts under Alternative 2 are also significant and unavoidable. Other impacts can be mitigated.	result in greater impacts citywide relating to earth, plants and animals, water quality, and vulnerability to wildfire Seismic and volcanic hazards create significant unavoidable adverse impacts. Other impacts can be mitigated.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	Similar to other areas in Pierce County and the Puget Sound, seismic and volcanic hazards poses an increased risk to structures and the people living or working therethrough building codes, critical area regulations, and other programs can reduce potential risks. There are no significant unavoidable adverse impacts related to other geologically hazardous areas.		
	Mitigation Measures		
	▪ The City has adopted the International Building Code. ▪ The City’s critical areas regulations provide restrictions and regulations on certain types of development and provide notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas. ▪ Critical areas regulations also provide provisions for the protection of critical aquifer recharge areas, wetlands, streams, and fish and wildlife habitat conservation areas. ▪ SMC 16.05 provides regulations relating to the control of erosion and sedimentation pollution from construction. ▪ The 2020-2025 Pierce County Hazard Mitigation Plan includes an addendum for Sumner-specific strategies, which address a range of hazards including geologic hazards and fire mitigation.	▪ Same as Alternative 1. ▪ Alternatives 2 and 3 include updates to critical areas regulations based on best available science, which could better protect water resources and protect plants and animals than existing code. ▪ Alternatives 2 and 3 add new comprehensive plan policies and policy updates related to the environment and climate change, including policies to better protect vegetated stream and wetland buffers, to restore ecosystems, and to support tree planting and enhancing urban tree canopy. ▪ Alternatives 2 and 3 include climate resilience policies relating to wildfire risk mitigation.	▪ Same as Alternative 2.

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	▪ 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. ▪ The City's stormwater management regulations (SMC 13.48) include water quality protections. ▪ The City has Development Specification and Standard Details. ▪ The adopted Comprehensive Plan incorporates goals and policies that protect water quality. ▪ The City updated the Shoreline Master Program in 2020, which regulates development within shoreline areas and includes protections for surface water bodies. ▪ Federal and state regulations to protect water quality apply in Sumner, including the Safe Drinking Water Act, which requires water quality reporting, and the EPA's Phase II regulations for stormwater management. ▪ On the Cava mine site, a reclamation plan would be developed, likely including plans for final slopes, drainage patterns, site hydrology, removal of mining-related structures, contamination, and water management. ▪ Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River. ▪ The City complies with the National Flood Insurance Biological opinion, to		

Element of the Environment (Chapter)	Alternative 1: No Action	Alternative 2	Alternative 3
	meet the requirements of the Endangered Species Act. ▪ The City has stormwater regulations that implement the National Pollutant Discharge Elimination System (NPDES) permit requirements. ▪ SMC 18.41 requires maintaining at least 10% of a development site as landscaping. ▪ Sumner's Forestry and Parks Commission advises the City on issues related to urban forestry. ▪ SMC 12.42 includes regulations for planting, preservation, and maintenance of trees on City-owned lands and public right-of-way. ▪ The City should implement a plan to manage the forested hillsides in the public watershed for climate resiliency and controlled fuel load. ▪ The City could conduct a Tree Canopy Assessment to better understand canopy loss and identify strategies to address canopy loss. ▪ The City could consider development of a tree ordinance designed to protect, enhance, or replace trees located on private property. ▪ The City would apply the Wildland Urban Interface Code as part of its building code adoption and/or incorporate the defensible space guidelines into its landscaping code.		

1.8 Significant Unavoidable Adverse Impacts

Based on the full analysis presented in Chapters 3-9 of this DEIS, implementation of the alternatives would result in the following significant unavoidable adverse impacts for the following elements of the environment:

- **Land Use:** Alternative 1 would have significant unavoidable adverse impacts because it does not provide enough capacity to accommodate housing needs for all income bands and it does not update the Comprehensive Plan and development regulations for consistency with regional and state requirements.
- **Housing:** Alternative 1 would have significant unavoidable adverse impacts because it does not provide enough capacity to accommodate housing needs for all income bands and it does not address other housing requirements for accessory dwelling units (ADUs) and middle housing.
- **Transportation:** All alternatives would have the significant unavoidable adverse impact of increased traffic.
- **Natural Environment:** All alternatives would have significant unavoidable adverse impacts because most of Sumner is within seismic and volcanic hazard areas and growth will increase the population exposed to these hazards. Implementing building codes and critical areas regulations will reduce potential risks. Implementation and updates to the Hazard Mitigation Plan will direct early notification of earthquakes and volcanic eruptions. Alternative 2 also has significant unavoidable adverse impacts to tree canopy due to development on the Cava Mine site, which has some forested areas remaining on and near the site.

1.9 Significant Areas of Controversy and Uncertainty, and Issues to Be Resolved

The key issues facing decision makers include:

- Creation of a growth concept carried forward in plans and regulations that:
 - Offers more affordable housing opportunities and places to retain and grow businesses.
 - Promotes a healthy environment and climate resilience strategies and avoids displacement of overburdened households and businesses.
- Approval of a Comprehensive Plan including a vision, goals, and policies that fulfills Sumner's vision and meets state and regional requirements.
- Identification of transportation investments to be included in the Transportation Plan that improve mobility and resilience.
- Approval of development regulations that implement the Comprehensive Plan goals and land use plan, resulting in quality housing choices, and integrating the best available science to protect critical areas.

2 Alternatives

2.1 Summary of Alternatives

This Chapter describes the proposal and alternatives evaluated in this Draft Environmental Impact Statement (DEIS).

The alternatives are different scenarios for growth in Sumner through 2044. The alternatives serve as a basis for environmental analysis for each element of the environment studied.

Three alternatives are analyzed in this DEIS. While they all anticipate the same amount and general distribution of job growth, the housing growth, types, and affordability vary across the alternatives. They also vary in how they do or do not update the comprehensive plan for consistency with regional plans, state requirements, and other frameworks. The three alternatives include:

- **Alternative 1 (No Action).** Alternative 1 carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Alternative 1 plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Alternative 1, however, does not provide enough capacity to meet housing targets for each income band, as is now required by state law.

Alternative 1 is also inconsistent with other state requirements and regional plans, including requirements to plan for climate change and for Critical Areas Ordinances (CAOs) to include the best available science.

- **Alternatives 2 and 3 (Action Alternatives).** Alternatives 2 and 3 update the Comprehensive Plan and development regulations to address changes in state law and align with regional plans and policies. Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as “middle housing.” Alternative 2 plans for some housing growth on the current Cava gravel mine site, when the site transitions from mineral extraction to residential uses in the future. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Both alternatives plan for the same amount of new housing (3,000 units), jobs (5,313), and population growth (6,700) from 2020-2044 meeting the Pierce County job target and exceeding the housing and population targets. Alternatives 2 and 3 include policies that create adequate capacity to accommodate housing targets for each income band. They achieve this each with a different mix of housing and land use policies (see details in *Alternatives* below).

Both alternatives include a new Climate Change element and an updated CAO to include best available science.

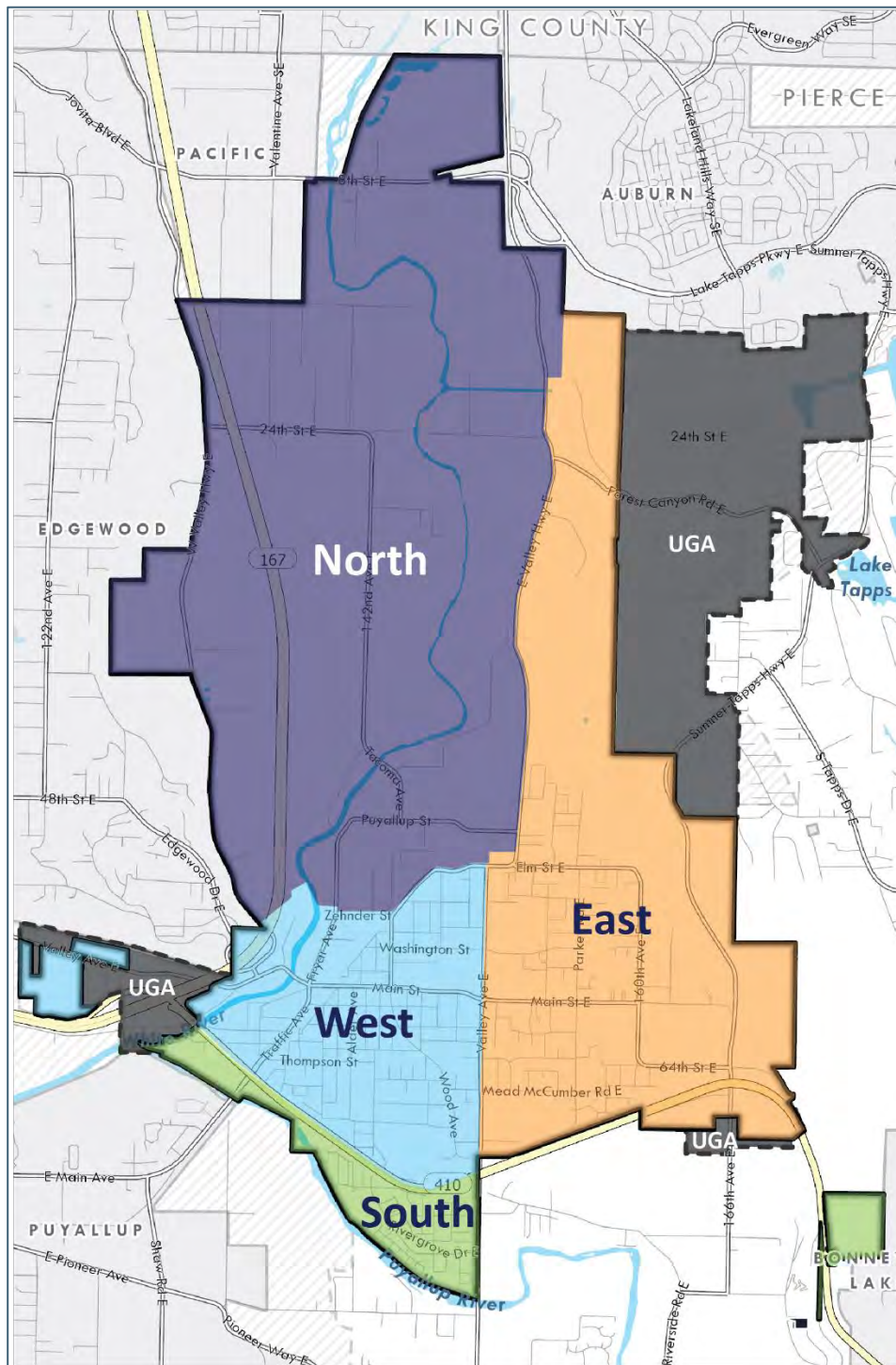
2.2 Description of the Study Area

The study area is the City of Sumner. The DEIS also examines potential impacts to the unincorporated Urban Growth Area (UGA) where relevant.

For the purposes of environmental analysis, the DEIS discusses current conditions and potential impacts by “portion” of the City, as defined in Exhibit 2-12-1. These portions are only used for structuring the analysis; they are not adopted subareas. This structure, where applicable, ensures the DEIS discussion is comprehensive and considers all areas of the city. The city and UGA are divided into the following portions for discussion:

- **Citywide.** The entire area within Sumner city limits.
- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.
 - The area to the west of Sumner surrounding the interchange of SR 410 and SR 167.
 - The area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps.
 - The area to the south at the east end of the city encompassing approximately fourteen parcels.

Exhibit 2-1: Areas for Analysis



Source: Sumner 2023; BERK 2023

2.3 Objectives

The primary objectives of the alternatives for analysis in this Draft Environmental Impact Statement (DEIS) are to:

- Meet the Sumner Vision Statement and Values as amended based on community input.
- Comply with Comprehensive Plan periodic review requirements to meet state laws including recent changes to the Growth Management Act (GMA) regarding housing, climate change, and other updates.
- Align with the regional growth strategy in the Puget Sound Regional Council (PSRC) VISION 2050 and centers requirements.
- Demonstrate housing and job capacity to accommodate growth targets through 2044 consistent with Countywide Planning Policies.
- Update policies that are inconsistent, outdated, duplicative, or unclear.

2.3.1 Growth Management Act (GMA)

The GMA, adopted in 1990, provides a framework for land use planning in Washington State and requires many jurisdictions, including Sumner, to create a comprehensive plan for the next 20 years of expected growth. Required comprehensive plan elements include land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change. The GMA also requires cities and counties to coordinate their planning efforts.

The Washington State Legislature has made major changes to the GMA in recent years. Key changes that Sumner will have to respond to in its Comprehensive Plan in order to maintain compliance include:

HB 1220 (2021 legislative session)

- Identify sufficient capacity of land to meet the housing needs of all income bands.
- Make adequate provisions for housing to meet housing needs of all income bands, including a review of potential barriers to housing development.
- Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
- Identify areas that may be of higher risk of displacement and establish antidisplacement policies.

HB 1110 (2023 legislative session)

- Allow two or more units per lot in all residential zones.

HB 1337 (2023 legislative session)

- Allow two Accessory Dwelling Units (ADUs) per lot in zones that allow single-family homes.
- Remove owner-occupancy and other prohibitive requirements for ADUs.

HB 1181 (2023 legislative session)

- Revise the Transportation element to include policies for greenhouse gas emissions and per capita vehicle miles traveled.
- Add a Climate Change and Resiliency Element to the comprehensive plan.

2.3.2 VISION 2050

Puget Sound Regional Council (PSRC) is a regional body for King, Pierce, Snohomish, and Kitsap counties that coordinates decisions about regional growth, transportation, and economic development planning. VISION 2050 includes multicounty planning policies (MPPs) and a strategy to plan for regional growth through 2050.

2.3.3 Pierce County CPPs

Per the GMA's requirement for counties and cities to coordinate, Pierce County has a set of Countywide Planning Policies (CPPs) that local Comprehensive Plans should be consistent with. The CPPs have been ratified by the City of Sumner and other cities.

The CPPs also include Pierce County's allocations of the countywide growth targets (as projected by the Washington Office of Financial Management) to the cities and unincorporated areas. The growth targets (2020-2044) for Sumner are 1,985 housing units, 5,313 jobs, and 4,904 residents. The housing target is broken down further by income band.

2.4 SEPA Process

2.4.1 Purpose of the EIS

An Environmental Impact Statement (EIS) is a document that provides environmental information about a proposal before a decision is made. An EIS is required, under the State Environmental Policy Act (SEPA), where the proposal is likely to have a significant environmental impact. An EIS provides an opportunity for the public, tribes, and government agencies to comment on proposals. In an EIS, multiple alternative scenarios relating to the proposal, or "alternatives", are evaluated. An EIS considers existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

Environmental Review Process

The EIS process consists of a scoping period, DEIS, and FEIS.

- **Scoping:** The scoping period is when the City proposes the topics and alternatives to be studied in the EIS. This includes a scoping comment period. Comments received are used to refine the topics and alternatives for analysis in the DEIS.
- **DEIS:** The Draft EIS (DEIS) reviews the alternatives for impacts. A public comment period opens upon the publication of the DEIS.

- **FEIS:** The Final EIS (FEIS) analyzes the Preferred Alternative for environmental impacts and refines the DEIS analysis based on public comments from the DEIS comment period. The FEIS informs the Comprehensive Plan Periodic Update.

2.4.2 Scoping

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The following topics were proposed for review in the EIS at the time of scoping:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics (land use, population, and employment)
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping for this DEIS began on May 18, 2023, and ended on June 8, 2023 (21-day scoping period). A correspondence list consisting of state and local agencies, Tribes, and other parties of interest was notified by email or mail at the beginning of the scoping period. Two comments were received from state agencies and no other comments were received from other interested parties.

2.4.3 Integrated Plan and EIS

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

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

- *Public participation.* Both SEPA and GMA recognize public participation and governmental agency coordination as critical to the planning process.
- *Documents.* Both SEPA and GMA require preparation of documents for the public participation and decision-making process, but they each have specific guidelines on the information and analysis that must or should be included.
- *Existing conditions.* Both SEPA and GMA require collection and analysis of information regarding existing conditions.
- *Goals, objectives, and policies.* Planning goals, objectives, and policies play an important role in the development of a GMA comprehensive plan and the SEPA evaluation of plan alternatives. SEPA mitigation measures can also contribute to policy amendments in the GMA documents.

- *Impact analysis.* GMA requires collection and analysis of data for critical areas and comprehensive plan topics (e.g., land use, transportation, utilities, capital facilities). SEPA requires analysis of significant adverse impacts on elements of the natural and built environment that are identified during scoping.
- *Mitigation.* GMA requires strategies to reduce the impacts of growth on the natural and built environment. The same strategies should satisfy SEPA requirements for identifying ways to mitigate the significant adverse impacts identified during environmental review.

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

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

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

The integrated Comprehensive Plan/Draft EIS document is structured as shown below. This DEIS comprises Volume II of the integrated document.

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

Volume	Contents
Volume I: Sumner Comprehensive Plan—A Policy Document	▪ Summarizes the key issues identified in Volume II. ▪ Contains all policies and plans.
Volume II: Environmental Impact Statement	▪ Contains all inventories required by GMA and SEPA in the “Affected Environment” discussions. ▪ Analyzes the proposal and alternatives. ▪ Summarizes the comprehensive plan policies and adopted regulations that serve as mitigation measures.

Source: BERK Consulting, 2024

2.5 Alternatives

The alternatives describe three different policy directions that the City could take in planning through 2044. These alternatives are analyzed in this DEIS for their potential environmental impacts.

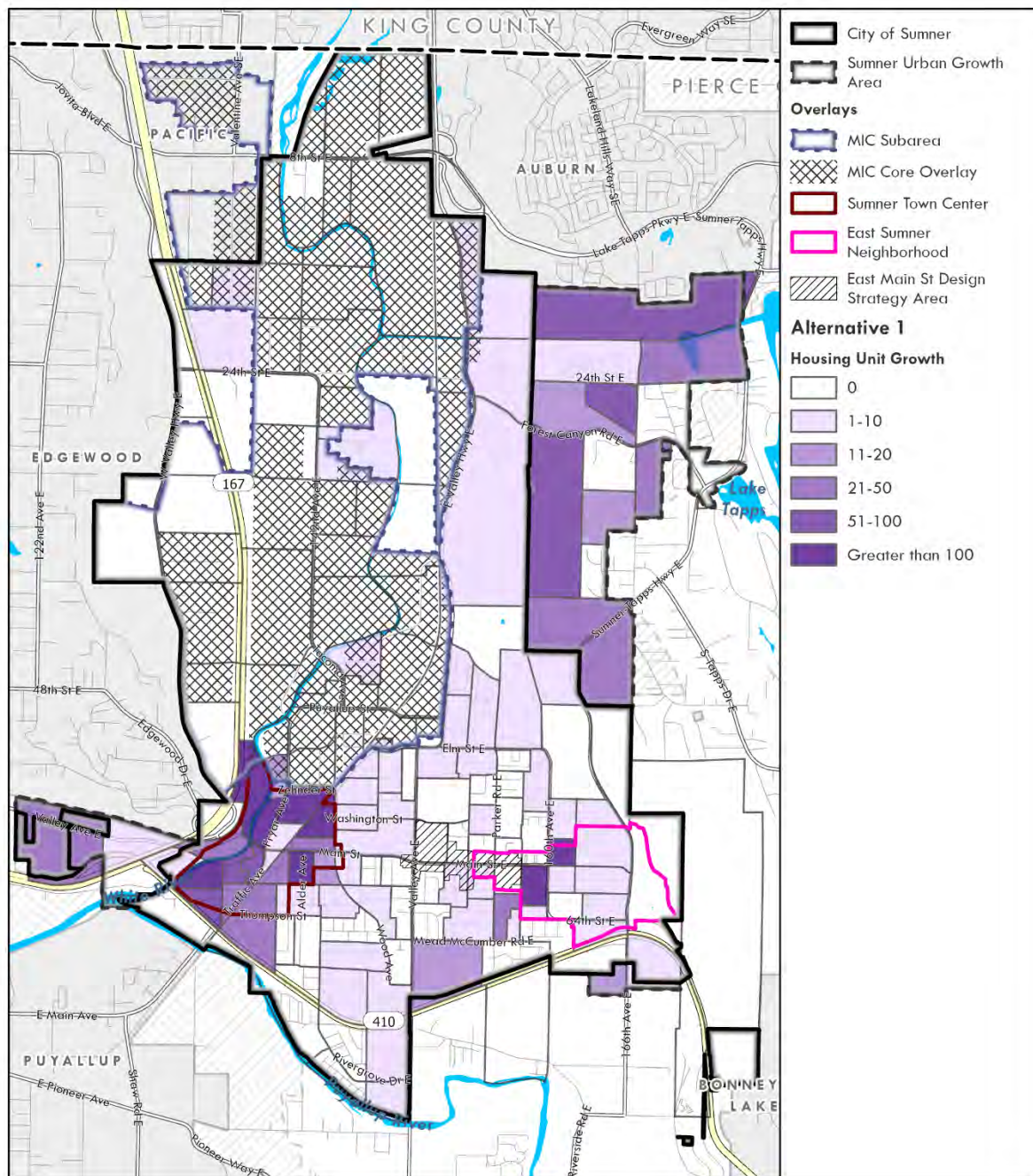
2.5.1 Alternative 1 (No Action)

The State Environmental Policy Act (SEPA) requires the EIS to consider a No Action Alternative. Under Alternative 1, the City continues forward its existing policies with no major changes.

Growth and Targets

Alternative 1 plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. Housing growth is focused mostly in Town Center and East Sumner, and job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Exhibit 2-3: Alternative 1 Housing Growth



CITY OF SUMNER

Future Housing Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

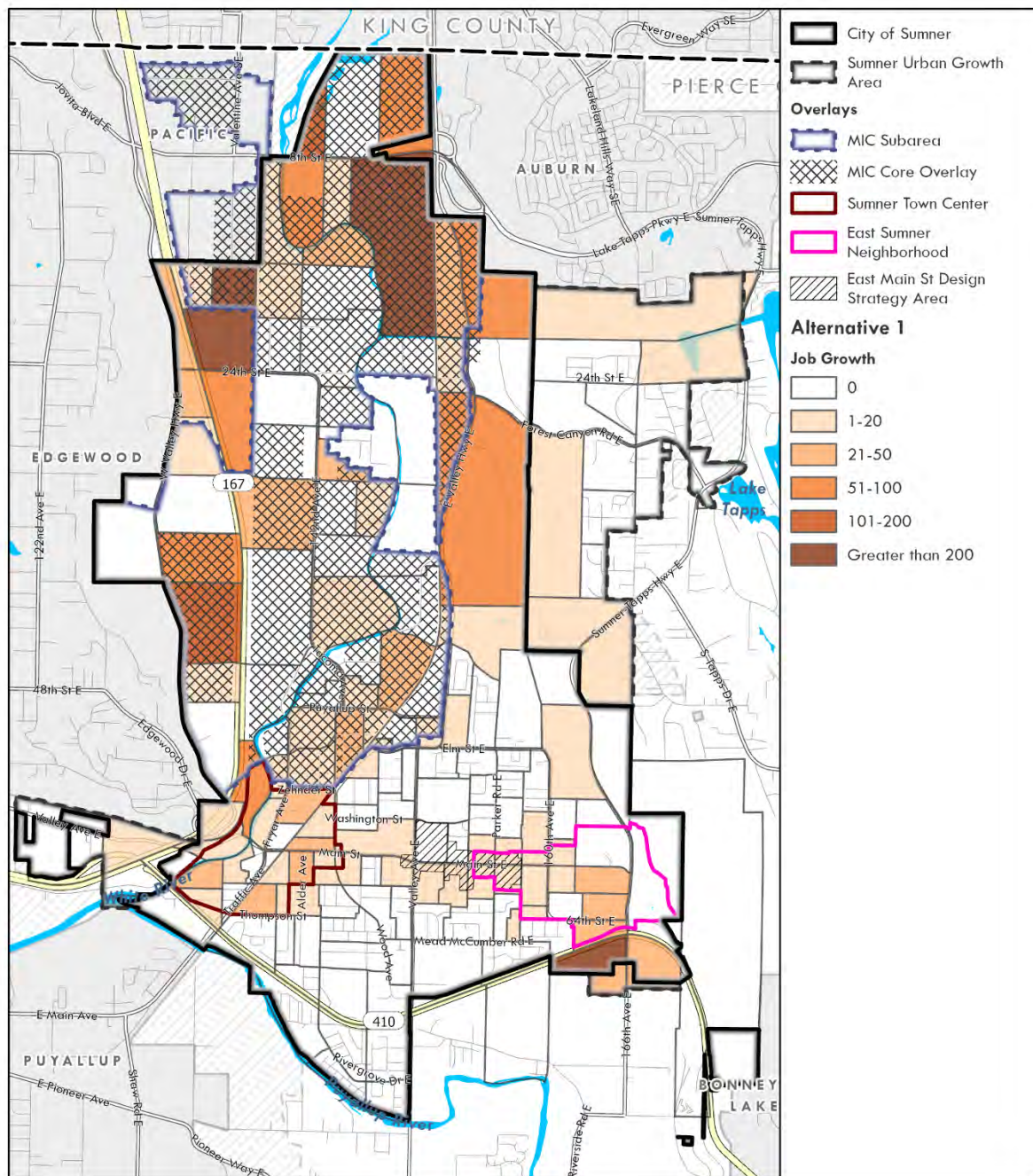
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-4: Alternative 1 Job Growth



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

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Map Date: February 2024

Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 1 carries forward existing land use and housing policies and regulations. It does not include updated policies and regulations to improve housing affordability and capacity for housing at all income levels, as is now required under the GMA.

Climate Change

Alternative 1 does not include new comprehensive plan policies to address climate change, as is now required under GMA.

Transportation

Alternative 1 carries forward existing transportation policies with no updates.

CAO Update

Alternative 1 maintains the existing City CAO and does not update it for the latest best available science, as required by the GMA.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 1 does not update plans and regulations for consistency with updates to GMA, VISION 2050, or the Pierce County CPPs.

2.5.2 Alternative 2

Under Alternative 2, the city revises its policies, particularly its housing and land use approach, in order to meet new state requirements.

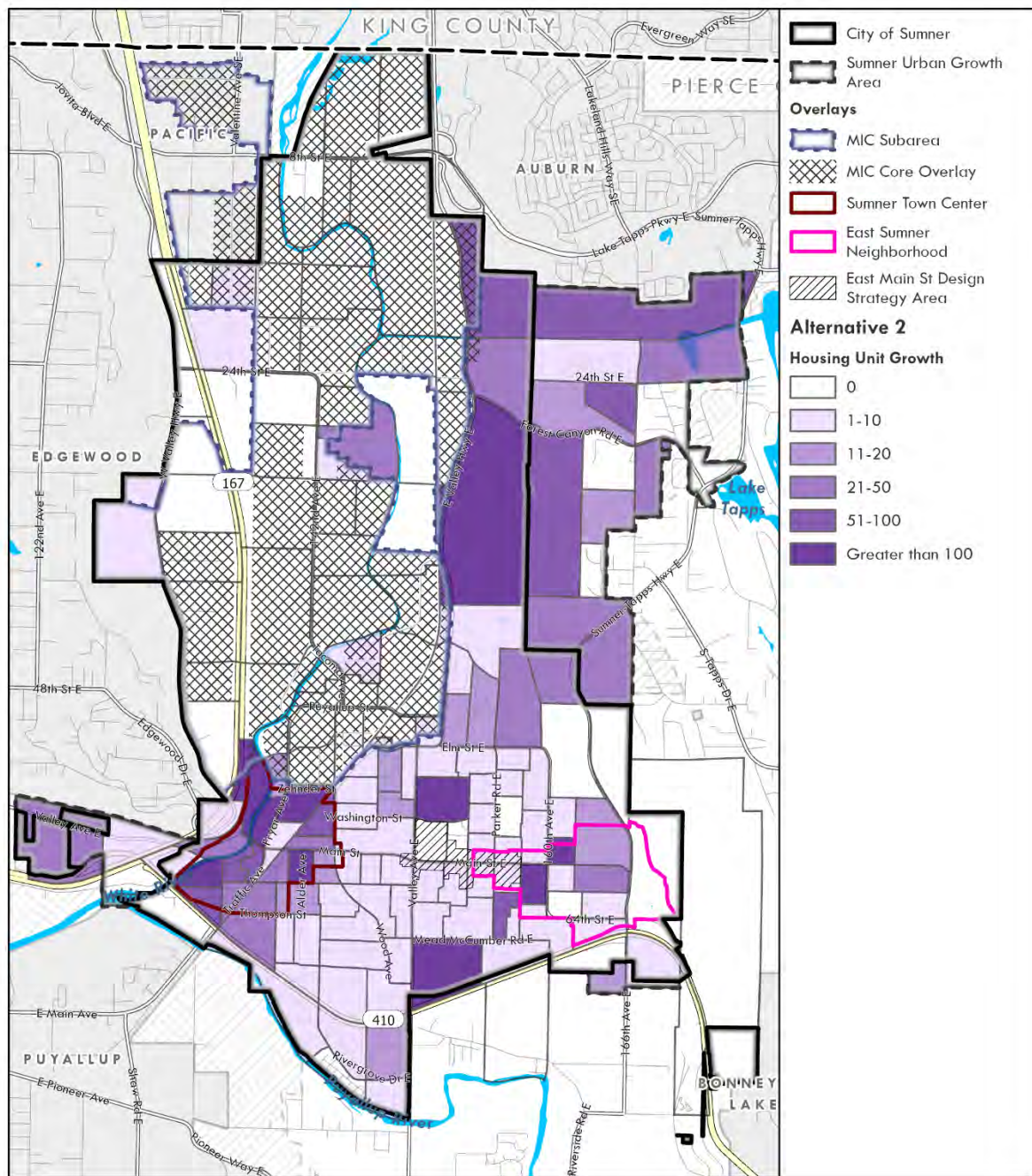
Growth and Targets

Alternative 2, like Alternative 3, plans for growth of 3,000 units, 5,313 jobs, and 6,700 residents. Job growth amount and distribution is also consistent with Alternative 1. Planned growth under Alternative 2 meets the Pierce County job target and exceeds the housing and population targets. The planned housing growth under Alternatives 2 and 3 reflects the need to accommodate housing affordability targets for 2020-2044, considering that some development has already occurred since 2020 or is in the pipeline. The resulting growth number is similar to the 2020 Sumner Comprehensive Plan Supplemental DEIS. This was an amount of growth studied in prior City plans in 2018 and 2020 and accounts for prior adopted plans and ordinances for centers in Town Center, East Sumner, and the Manufacturing Industrial Center.

Housing growth in Alternative 2 is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Alternative 2 also plans for some housing growth on

the current Cava gravel mine site. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

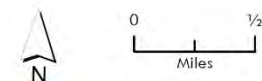
Exhibit 2-5: Alternative 2 Housing Growth



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

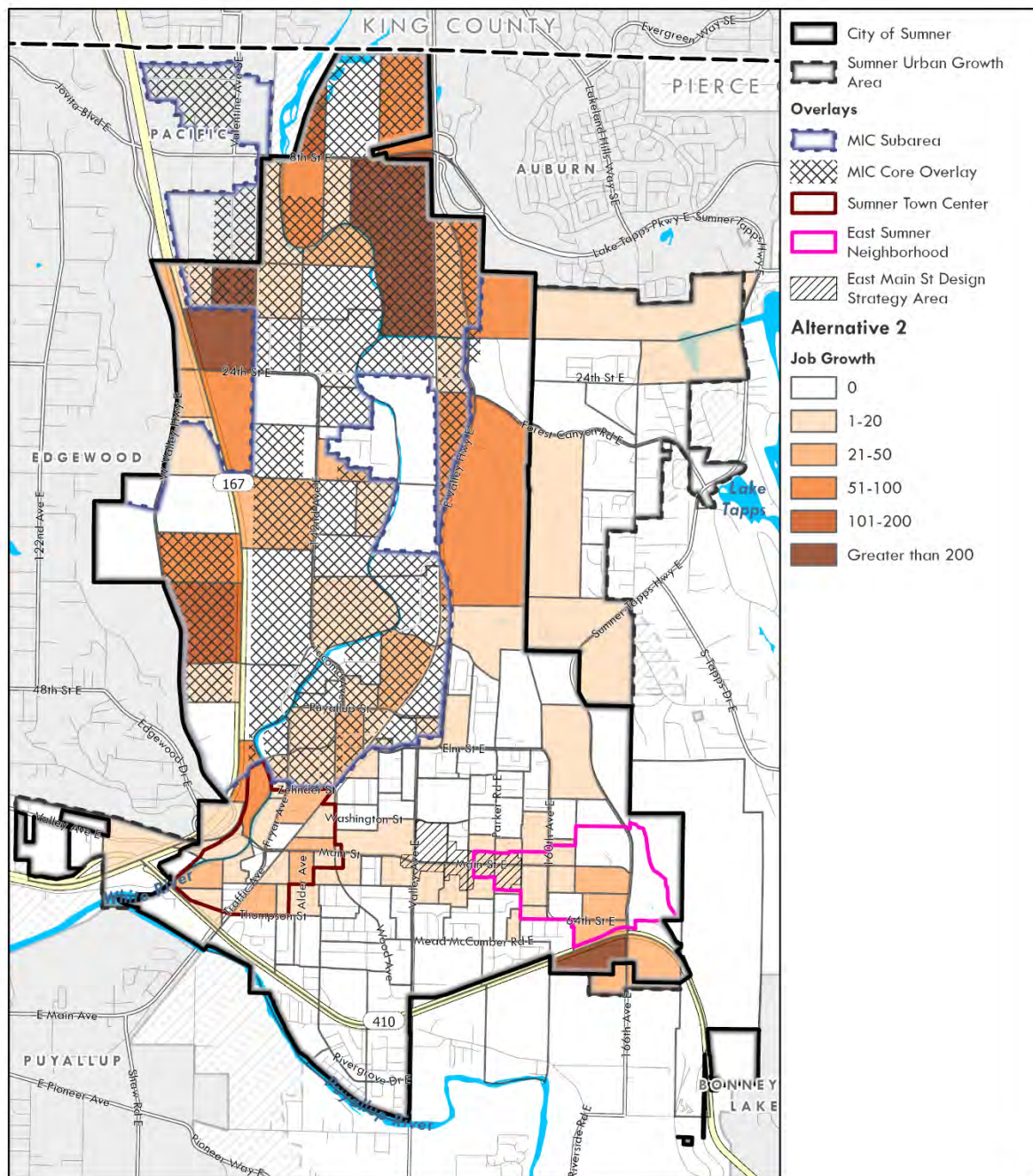


Map Date: February 2024

Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-6: Alternative 2 Job Growth



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



Map Date: February 2024

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Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 2 includes new policies that increase housing capacity for all income levels and improve affordability:

- Affordability incentives in Town Center and East Sumner.
- Two units per residential lot allowed citywide. This would allow duplexes in all Low Density Residential (LDR) designations.
- Two accessory dwelling units (ADUs) per lot allowed citywide, in any combination of detached and attached.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12, where one unit is dedicated affordable.
- Multiplexes / small apartments allowed in all Medium Density Residential (MDR) and High Density Residential (HDR) areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 22 dwelling units an acre).
- Reclamation of the Cava gravel mine and rezone to MDR.
- Policies supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies and policies to remove barriers to middle housing, multifamily housing, and ADUs.

This combination of policy changes creates adequate capacity to accommodate housing targets for all income bands, as allocated by Pierce County.

Climate Change

Alternative 2, like Alternative 3, includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled.

CAO Update

Alternative 2, like Alternative 3, includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 2, like Alternative 3, includes updates for consistency with the regional and state planning frameworks.

2.5.3 Alternative 3

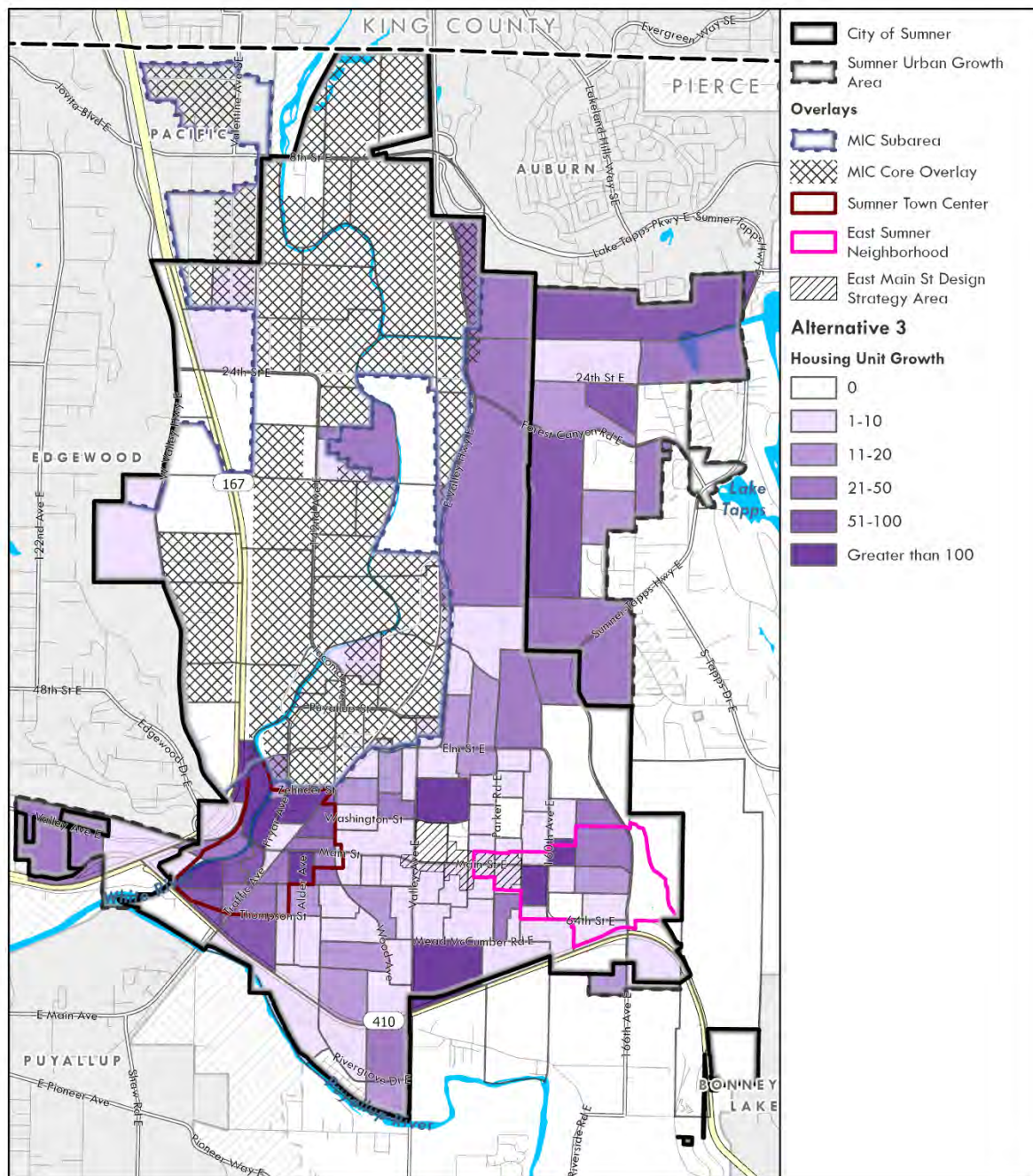
Under Alternative 2, the city revises its policies, particularly its housing and land use approach, in order to meet new state requirements.

Growth and Targets

Alternative 3, like Alternative 2, plans for growth of 3,000 units, 5,313 jobs, and 6,700 residents. Job growth amount and distribution is also consistent with Alternative 1. Planned growth under Alternative 3 meets the Pierce County job target and exceeds the housing and population targets. The planned housing growth under Alternatives 2 and 3 reflects the need to accommodate housing affordability targets for 2020-2044, considering that some development has already occurred since 2020 or is in the pipeline. The resulting growth number is similar to the 2020 Sumner Comprehensive Plan Supplemental DEIS. This was an amount of growth studied in prior City plans in 2018 and 2020 and accounts for prior adopted plans and ordinances for centers in Town Center, East Sumner, and the Manufacturing Industrial Center.

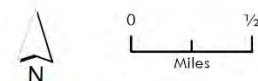
Housing growth in Alternative 3 is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Exhibit 2-7: Alternative 3 Housing Growth



CITY OF SUMNER

Future Housing Growth



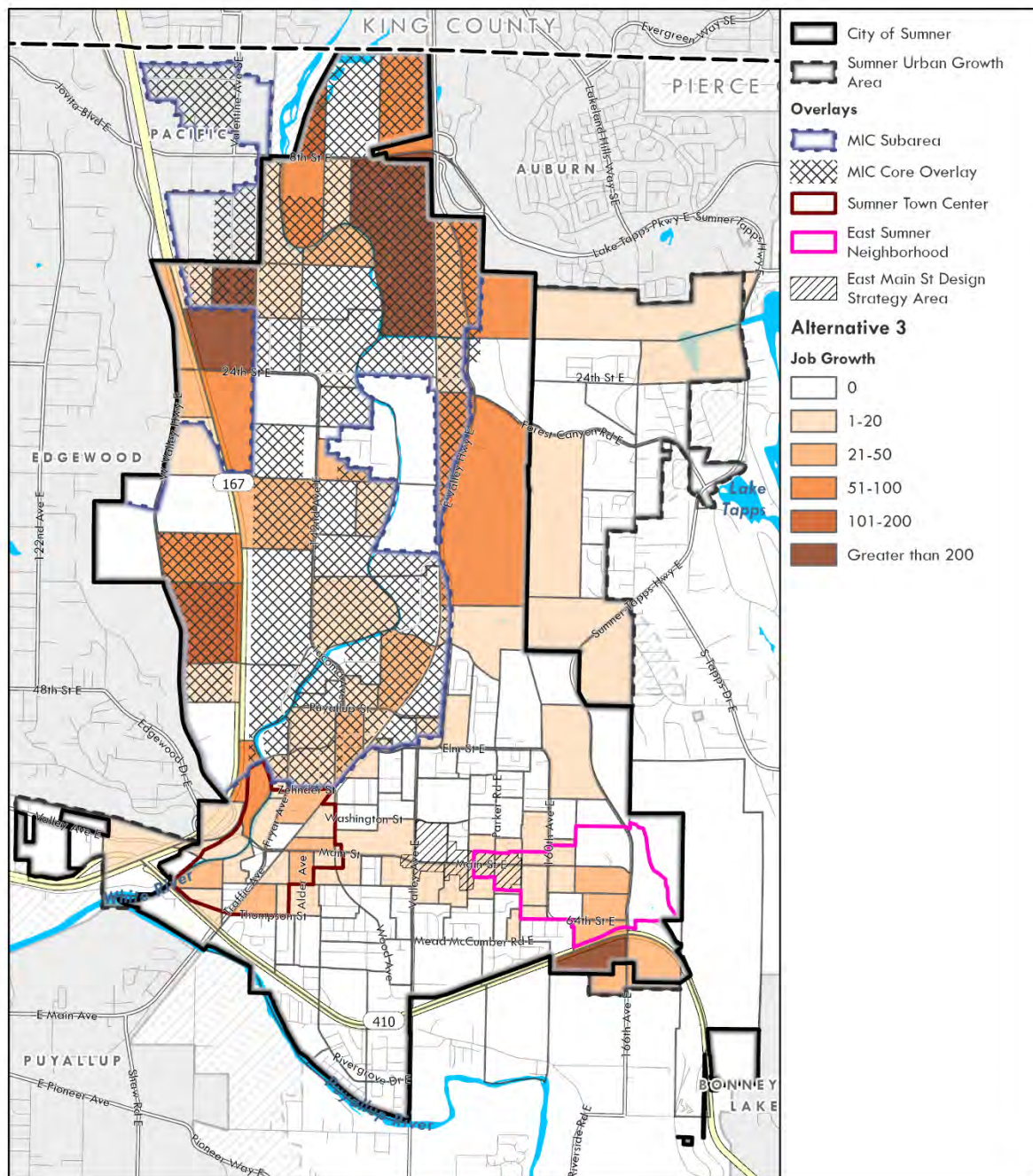
Map Date: February 2024

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Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 2-8: Alternative 3 Job Growth



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



Map Date: February 2024

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Source: City of Sumner 2023; BERK 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Housing Capacity and Affordability

Alternative 3 includes new policies that increase housing capacity for all income levels and improve affordability:

- Mandatory affordability in Town Center and East Sumner (20% of units).
- Two units per residential lot allowed citywide. This would allow duplexes in all LDR designations.
- Two ADUs per lot allowed citywide, in any combination of detached and attached. Incentives provided for ADUs such as fee waivers.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12.
- Multiplexes / small apartments allowed in all MDR and HDR areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 17 dwelling units an acre).
- Policies and incentives, such as fee waivers, supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies and policies to remove barriers to middle housing, multifamily housing, and ADUs.
- This combination of policy changes creates adequate capacity to accommodate housing targets for all income bands, as allocated by Pierce County.

Climate Change

Alternative 3, like Alternative 2, includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled.

CAO Update

Alternative 3, like Alternative 2, includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

Alternative 3, like Alternative 2, includes updates for consistency with the regional and state planning frameworks.

2.5.4 Comparison of Alternatives

Topic	Alternative 1	Alternative 2	Alternative 3
Housing Growth (2020-2044)	2,000 units Focused in Town Center and East Sumner Does not meet housing targets by income band	3,000 units Focused in Town Center and East Sumner, with moderate density added citywide; greater growth on Cava mine site with increased density. Meets housing targets by income band	3,000 units Focused in Town Center and East Sumner, with gentle density added citywide, some growth on the Cava gravel mine site at current LDR density Meets housing targets by income band
Employment Growth (2020-2044)	5,300 jobs Most job growth in the MIC.	5,300 jobs Most job growth in the MIC.	5,300 jobs Most job growth in the MIC.
Population Growth (2020-2044)	4,900 residents	6,700 residents	6,700 residents
Housing Capacity / Affordability Strategies	No changes to existing.	Affordability incentives in Town Center and East Sumner Two units per residential lot allowed citywide Two ADUs per lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots where one unit dedicated affordable Small apartments (up to 3 stories) and multiplexes allowed in all MDR and HDR Maximum density raised in MDR (22 dua) Cava mine reclamation and rezone to MDR Policies supporting religious organizations building affordable apartment housing Other updates in alignment with state housing law	Mandatory affordability in Town Center and East Sumner Two units per residential lot allowed citywide Two ADUs per lot allowed citywide Density bonus for larger LDR 8.5 and 12 lots Small apartments (up to 3 stories) and multiplexes allowed in all MDR and HDR Maximum density raised in MDR (17 dua) Policies and incentives supporting religious organizations building affordable apartment housing Other updates in alignment with state housing law

Topic	Alternative 1	Alternative 2	Alternative 3
New Climate Change Element	No.	Yes.	Yes.
Transportation Policies	No updates.	Updated to address emissions and vehicle miles traveled.	Updated to address emissions and vehicle miles traveled.
CAO Update	No.	Yes.	Yes.
Consistency with GMA, VISION 2050, and Pierce County CPPs	No, no updates for consistency with the regulatory framework.	Yes.	Yes.

2.6 Benefits and Disadvantages of Delaying the Proposed Action

If the proposal is delayed, Sumner's growth would be guided by the current Comprehensive Plan, zoning code, and other adopted regulations. This would allow for growth at the minimum targets for jobs and housing, and with lower infrastructure and service demand, but would not be consistent with regional planning, including the Pierce County Countywide Planning Policies and VISION 2050 regarding planning for affordable housing, climate change, and other newer policies. The City would also not be consistent with GMA, due to changes since the last periodic update, including requirements related to planning for housing at all income levels. Infrastructure investments would also follow existing plans instead of being aligned with the city's expected share of county growth. These inconsistencies could hinder the City's ability to attain state and federal grants and loans for infrastructure.

3 Land Use

3.1 Introduction

This section examines land use changes proposed by the alternatives and addresses potential impacts associated with land capacity, land use compatibility, and consistency with regional plans and policies.

3.2 Affected Environment

3.2.1 Plans, Policies, and Regulations

Growth Management Act

Sumner's Comprehensive Plan and development regulations must be consistent with the provisions in the GMA. Adopted in 1990, the GMA directs coordinated regional and countywide planning to inform city and county comprehensive plans and development regulations. The GMA is primarily codified in Chapter 36.70A RCW but has been amended and added to in other parts of the RCW and Washington Administrative Code (WAC). In 2021, GMA goals and element requirements for housing and land use were amended (see Chapter 6: Housing). These and other amendments between 1995 and 2022 are described in the Washington State Department of Commerce (Commerce) summary of amendments. A new requirement was also added in 2023 for a climate change and resiliency element.

Key provisions of the GMA include:

- Planning Goals
- Land Designations: Urban, Resource, and Rural Lands
- Consistency with Multicounty Planning Policies (MPPs)
- Buildable Lands Program
- Consistency with Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The 15 Planning Goals help guide the development and adoption of local comprehensive plans and development regulations. They include:

- **(1) Urban growth.** Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.

- **(2) Reduce Sprawl.** Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
- **(3) Transportation.** Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
- **(4) Housing.** Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.
- **(5) Economic Development.** Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
- **(6) Property Rights.** Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
- **(7) Permits.** Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
- **(8) Natural Resource Industries.** Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
- **(9) Open Space and Recreation.** Retain open space and green space, enhance recreational opportunities, enhance fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
- **(10) Environment.** Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
- **(11) Citizen Participation and Coordination.** Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
- **(12) Public Facilities and Services.** Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
- **(13) Historic Preservation.** Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
- **(14) Climate Change and Resiliency.** Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies under RCW 36.70A.210 and Chapter 47.80 RCW adapt to and mitigate the effects of a changing climate; support reductions in greenhouse gas emissions and per capita vehicle miles traveled; prepare for climate impact scenarios; foster resiliency to

climate impacts and natural hazards; protect and enhance environmental, economic, and human health and safety; and advance environmental justice.

- **(15) Shorelines.** For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Required elements of the comprehensive plan under GMA include land use, housing, capital facilities, utilities, transportation, economic development, parks and recreation, and climate change and resiliency. Jurisdictions may choose to include other elements in addition. City development regulations must also be consistent with the comprehensive plan. The comprehensive plan must comply with the requirements of the GMA in order to be eligible for grants and loans from some state programs.

VISION 2050

VISION 2050 is the multi-county-level planning document for King, Kitsap, Pierce, and Snohomish Counties. Puget Sound Regional Council (PSRC) adopted VISION 2050 in October 2020 and the plan is endorsed by over 100 member cities, counties, ports, transportation agencies, and Tribal governments in the region. VISION 2050 contains multicounty planning policies (MPPs), as required by GMA, and a regional growth strategy through 2050. About 216 MPPs are included in the document, organized by topic area goals including Regional Collaboration, Regional Growth Strategy, Environment, Climate Change, Development Patterns, Housing, Economy, Transportation, and Public Services.

VISION 2050 calls for focusing housing and job growth within regional growth centers and near high capacity transit. Sumner is designated as a "High Capacity Transit Community" in VISION 2050 and the Sumner-Pacific Manufacturing Industrial Center is identified as an industrial employment center.

Countywide Planning Policies

The GMA requires counties and cities to collaborate on countywide planning policies (CPPs) to coordinate planning and ensure consistency between county and city comprehensive plans (RCW 36.70A.210). The Pierce County CPPs were adopted in May 2022 and are consistent with the MPPs and Regional Growth Strategy in VISION 2050. The CPPs address:

- Affordable housing
- Agricultural lands
- Economic development and employment
- Education
- Fiscal impact
- Historic, archeological, and cultural preservation
- Natural resources
- Open space and protection of environmentally sensitive lands
- Siting of public capital facilities of a countywide or statewide nature
- Transportation facilities and strategies
- Urban growth areas

▪ Amendments and transition

The updated CPPs include a new emphasis on social equity and inclusion, healthy communities, climate change, interjurisdictional coordination, and displacement of residents and businesses. The Sumner-Pacific Manufacturing Industrial Center (MIC) is considered a Regional Manufacturing Industrial Center in the CPPs, which aligns with Puget Sound Regional Council's designation. Sumner Town Center is designated as a Countywide Growth Center.

The Countywide Planning Policies Appendix A allocates population, housing, and employment growth targets for the 2020-2044 period. The County adopted revised housing targets by income band in June 2023. See Exhibit 3-1 and Exhibit 3-2 for the final Pierce County adopted targets allocated to Sumner.

Exhibit 3-1: 2044 Growth Targets - Sumner

	2020	2020-2044 Growth	2044 Total
Housing	4,492	1,985	6,477
Population	10,621	4,904	15,525
Employment	18,106	5,313	23,419

Source: Pierce County Countywide Planning Policies Appendix A 2022, Pierce County Ordinance 2023-22s 2023.

Exhibit 3-2: Pierce County Adopted Housing Affordability Targets - Sumner

	Total	0-30% AMI Non- PSH*	0-30% AMI PSH*	30-50% AMI	50-80% AMI	80-100% AMI	100- 120% AMI	>120% AMI	Emergency housing needs (beds)
Allocation (2020-2044)	1,985	256	347	368	291	125	114	484	121

Source: Pierce County Ordinance No. 2023-22s

*PSH refers to Permanent Supportive Housing, which is defined in RCW 36.70A.030(16) as "non-time-limited housing for persons with disabling conditions who have experienced homelessness or risk of homelessness and are offered voluntary supportive services aimed at assisting the client in maintaining the terms of their lease agreement."

Pierce County has yet to adopt targets for each unincorporated urban growth area for 2044. However, if the County were to adopt targets allocating the same percentage of growth as was previously adopted for 2030 (1.5% of the unincorporated county housing unit growth and 0.4% of the unincorporated county job growth), 484 new housing units and 82 new jobs from 2020-2044 could be expected in the Sumner UGA.

Sumner Comprehensive Plan

The adopted Sumner Comprehensive Plan includes a multi-page Vision Statement for Sumner in 2035. The statement is excerpted below:

In 2035 Sumner shows strongly its unique "small town" characteristics and appeal even in the face of a changing world. Through ongoing cooperation and communication between citizens, business, industry, schools, and local government, an environment exists which reflects the community's pride in itself. This environment embodies our agricultural heritage, our desire for open space, our promotion of quality education, our community interaction, and our readiness for the future.

In order to maintain this environment our community upholds responsible commitments in planning for sustainability with our physical layout, the character of our residential districts, our growth patterns, the maintenance of our parks and recreational commitments, our continued economic development, and responsible governance.

Residential uses are intended to fit a range of needs:

City plans support a diversity of lot sizes and variety of housing types to meet the varied needs and lifestyles found in Sumner.

Economic development consists of small businesses and industrial enterprises:

In 2035, small businesses are supported and nurtured throughout the community. Essential business services are found within walking distance of most neighborhoods.... Planned industrial and commercial areas are encouraged and should utilize landscaping and other forms of buffering to ensure compatibility with surrounding neighborhoods and limit noise, lighting, and traffic. Employment in manufacturing is promoted and encouraged over warehouse distribution for quality jobs and reduced truck traffic. The north end has become a burgeoning manufacturing and industrial center of regional significance.

The City desires to create a multimodal network connecting jobs and housing:

Through adequate planning for both jobs and housing, we strive to have a large portion of the work force living in the City and using something other than automobiles for transportation.

The Town Center emphasizes mixed uses:

... there are areas of "mixed-use", predominately around the train station, where a mix of housing and businesses creates a vibrant and diverse living environment. Sumner has found a balance between parking for riders in and outside the City to gain access to a regional transit system while maintaining the City's small town atmosphere and character.

Other areas of the city also include mixed uses and pedestrian amenities:

Downtown and the main commercial core of the City are enhanced with pedestrian amenities, landscape, streetscape, and other improvements which complement the efforts of Downtown businesses to create a coherent theme. These improvements play a major role in linking

Downtown with West Sumner and East Main Street and help create a unified and seamless whole.

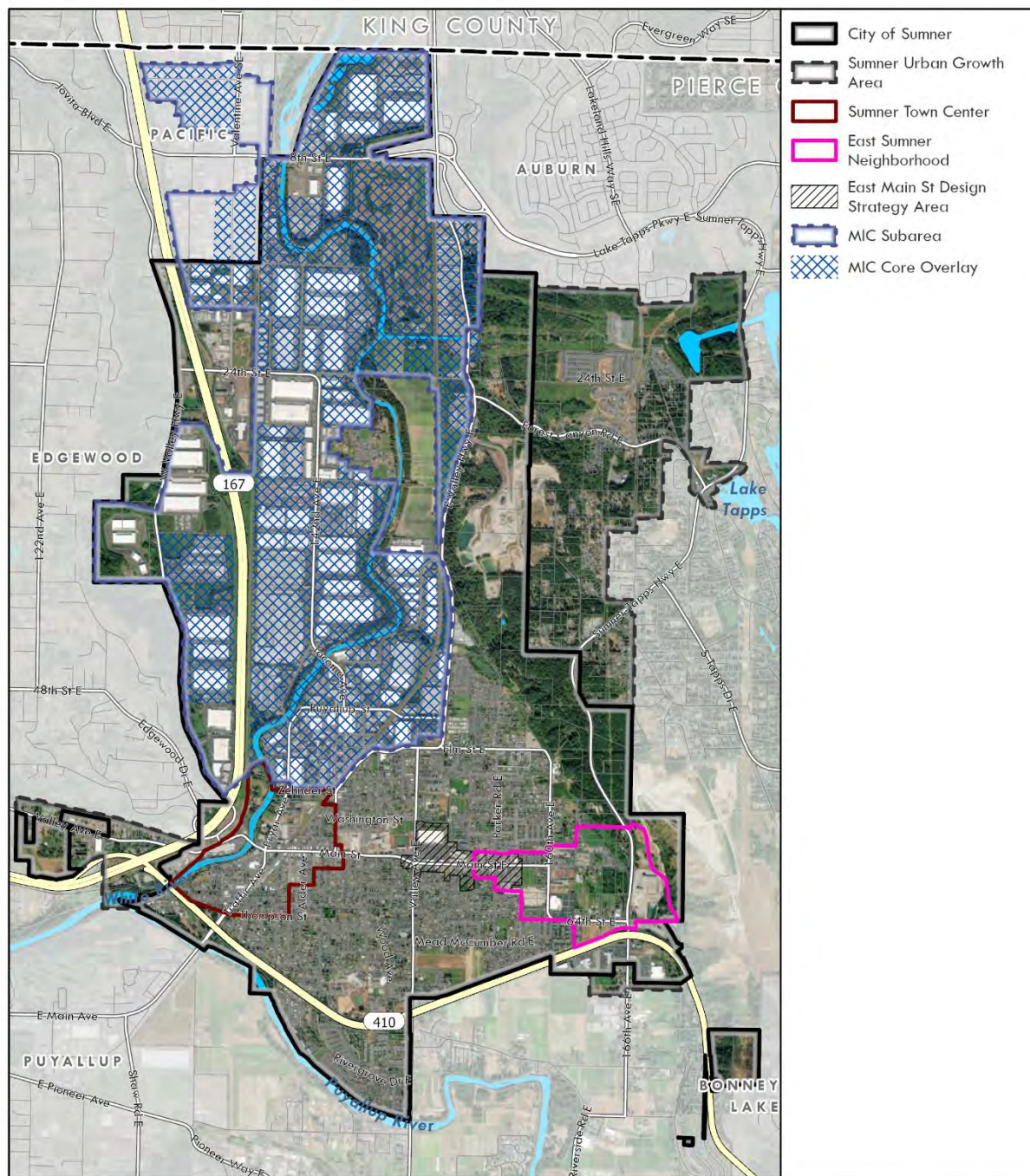
Revisions to the Vision Statement are proposed in the Draft 2024 Comprehensive Plan. These revisions emphasize embracing Sumner's heritage while looking forward to the future; the role of the downtown transit station; access to home ownership and high quality housing; safe connections to schools, services, and amenities; environmental justice; support of incubator businesses; and public participation,

The adopted plan includes the following elements:

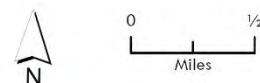
- Land Use
 - Land Use Sub-Element
 - Historic and Cultural Resource Sub-Element
 - Essential Public Capital Facilities Sub-Element
 - Commuter Rail/ Regional Transit Sub-Element
 - Permit Process Sub-Element
 - Plan Monitoring and Amendment Sub-Element
 - Governance Sub-Element
 - Land Use Designations
- Economic Development
- Community Character
- Parks and Open Space
- Environment
- Housing
- Transportation
- Capital Facilities and Public Services
- Utilities
- Family and Human Services
- Shoreline Master Program

The Comprehensive Plan was last amended in 2020, with a minor update to land use descriptions in 2022.

Exhibit 3-3: Vicinity Map



CITY OF SUMNER Vicinity Map



Map Date: January 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner 2023, BERK 2023.

Subarea and Neighborhood Plans

Town Center Plan

The Sumner Town Center Plan was adopted in 2018 and presents a vision, strategies, goals, and policies for Sumner's 197-acre Town Center. The Town Center Plan is a transit oriented subarea plan that supports the Sumner Comprehensive Plan.

The Town Center vision is described as:

Sumner, a city of excellence reinforcing its role as classic, small town Americana that goes beyond nostalgia.

Sumner, a community that retains/strengthens a fully functional, full life cycle, "everyday" downtown.

Sumner, a community that provides housing for all life stages and recognizes the value of a transit station for convenience of residents.

In addition to the vision, strategies, goals, and policies, the Town Center Plan established a form-based code for Town Center, which has been adopted into the Zoning code.

Sumner-Pacific Manufacturing Industrial Center Plan

The Sumner-Pacific Manufacturing Industrial Center (MIC) Plan was adopted in 2018 and articulates a vision for the Sumner-Pacific MIC's future and goals and policies to guide investments. The plan supports business retention and growth, strengthens existing neighborhood assets, expands transportation choices, and improves environmental conditions. The Subarea Plan is aligned with the regional plans and policies in effect at the time of adoption. This includes the Pierce County Countywide Planning Policies and Puget Sound Regional Council's VISION 2040 (the precursor to VISION 2050).

The Sumner-Pacific MIC is an important regional warehousing, transportation, distribution, and logistics hub that spans portions of Sumner and Pacific. Sumner-Pacific MIC is designated a Regional Manufacturing/Industrial Center by PSRC and is therefore an area expected to see a greater proportion of future employment growth than other areas of Sumner.

Three overarching goals and their supporting policies are included in the MIC Subarea Plan:

SPMIC-1: Land within the SPMIC is preserved for industrial use and remains available to support a broad range of industrial job opportunities.

SPMIC-2: New growth in the SPMIC complements the existing character and development pattern.

SPMIC-3: Industrial activity in the SPMIC does not adversely impact adjacent uses and neighborhoods.

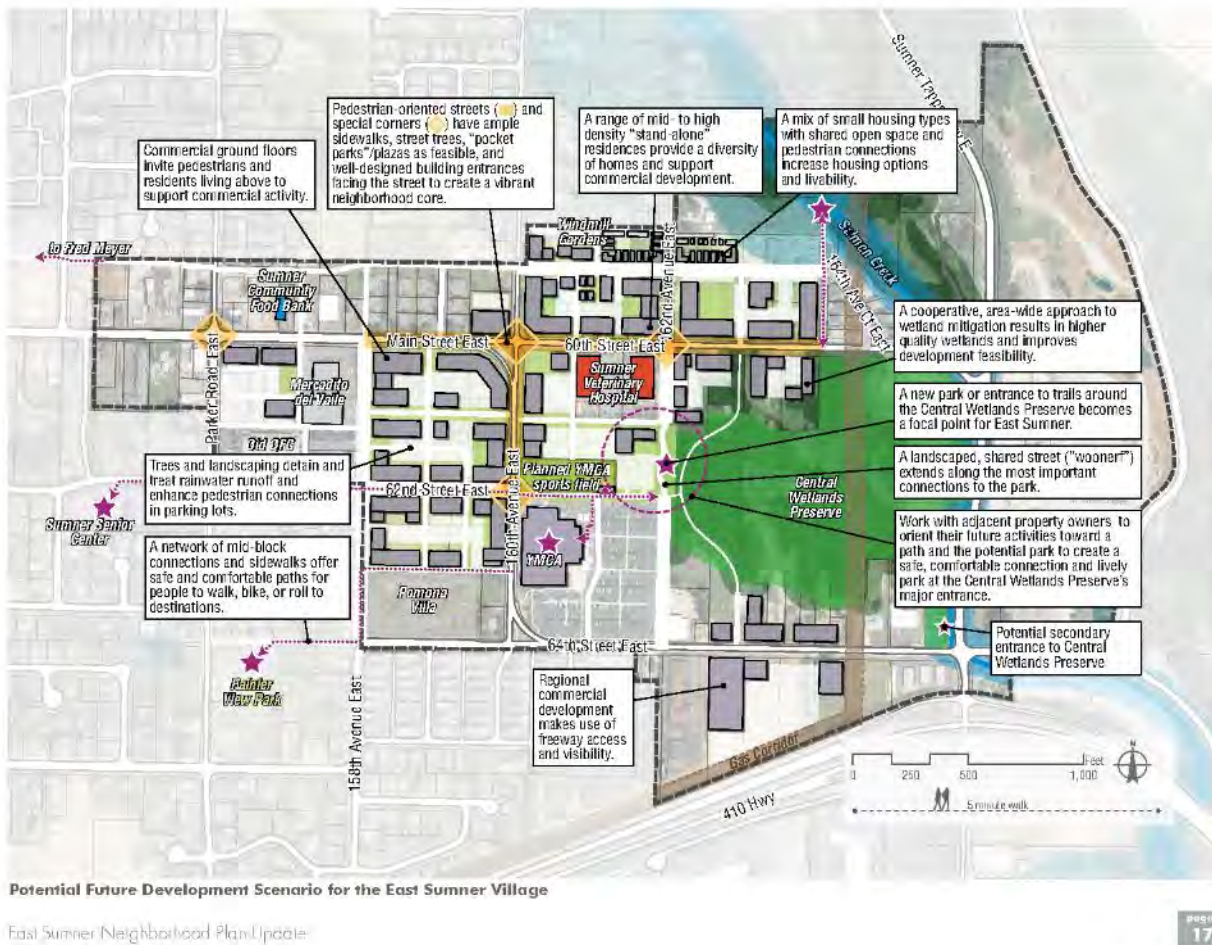
East Sumner Neighborhood Plan

Updated from prior plans created over two decades, the 2020 East Sumner Neighborhood Plan area comprises approximately 174 acres in the eastern portion of Sumner. The area is bordered by 160th Avenue East, 64th Street East, Main/60th Street East, Sumner-Tapps Highway East, and State Route 410. Salmon Creek cuts through the eastern portion.

The Plan includes goals and objectives under four categories: Mobility and Circulation, Ecological Viability, Economic Growth, and Community Livability. A concept for the development of East Sumner is also included, which focuses on encouraging:

- A range of commercial development
- Minimizing and mitigating wetland impacts
- Retaining open space and incorporating the central wetlands area as a major open space amenity
- Medium-to-high density multifamily housing
- Pedestrian-oriented development along 160th Avenue East and 60th Street East
- Improved multimodal circulation
- “Small town feel” through retaining open space and natural areas and applying design guidelines to high-density development

Exhibit 3-4: East Sumner Neighborhood Plan: Potential Future Development Scenario



Source: East Sumner Neighborhood Plan 2020

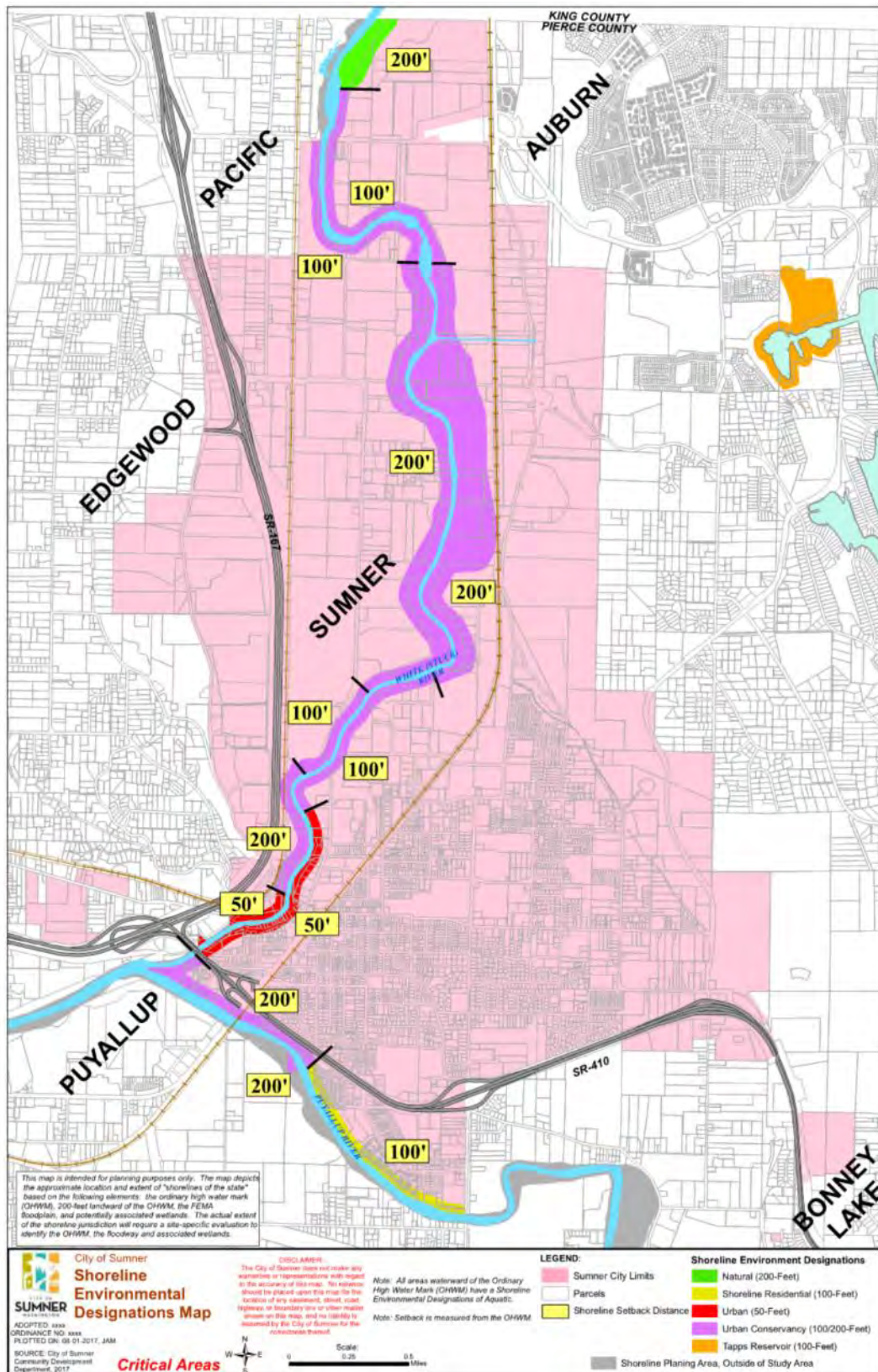
Sumner Shoreline Master Program

The Sumner Shoreline Master Program (SMP) was updated in 2019 and became effective in 2020. The SMP is a requirement of the Shoreline Management Act (SMA) that establishes goals, policies, and regulations to guide future development along Sumner's shorelines. The SMP establishes six shoreline environment designations, including:

- Natural
- Urban Conservancy
- Shoreline Residential
- Urban
- Tapps Reservoir
- Aquatic

Designations along the White (Stuck) River are predominantly Urban Conservancy (100/200-foot buffer), but also include an area of Urban (50-foot buffer) near the Town Center and an area of Natural (200-foot buffer) at the north end of the city (Exhibit 3-5). Along the Puyallup River, designations include Shoreline Residential (100-foot buffer), and Urban Conservancy (100/200-foot buffer).

Exhibit 3-5: Sumner Shoreline Designations



Source: City of Sumner 2020.

Sumner Zoning Code

The Sumner Zoning Code (SMC Title 1) establishes various residential, commercial, industrial, and mixed use districts (Town Center) with different intents and densities (Exhibit 3-6).

Exhibit 3-6: Zoning Districts and Densities

Abbreviation	District	Minimum Lot Size (sq. feet)	Maximum Density (du/ac)
RES	Resource Protection	871,200	-
RP	Residential-Protection	871,200	1 du / 20 ac
LDR-4	Low Density Residential	4,000	10.9
LDR-6	Low Density Residential	6,000	7.3
LDR-7.2	Low Density Residential	7,200	6.1
LDR-8.5	Low Density Residential	8,500	5.1
LDR-12	Low Density Residential	12,000	3.6
MDR	Medium-density Multifamily Residential	5,000	15
HDR	High-density Multifamily Residential	5,000	25
NC	Neighborhood Commercial	4,500	25
GC	General Commercial	5,000	25
IC	Interchange Commercial	5,000	N/A
M-1	Light Manufacturing	10,000	N/A
M-2	Heavy Manufacturing	6,000	N/A
Town Center	Station District, River District, West Sumner District, Historic Central Business District	Form-based code: see Town Center Code	Form-based code: see Town Center Code

Source: Sumner Municipal Code Title 18, 2023.

The Sumner Zoning Code also includes several overlay districts, which apply unique land use, density or design standards. Overlay districts include:

- **Cluster Overlay.** The purpose is “to manage and preserve valuable resources and environmentally sensitive lands...yet allow for development where appropriate. Structures are to be concentrated on a portion of the site with the remaining reserved as a conservation easement.” (SMC 18.28.010)
- **East Sumner Urban Village Overlay.** The intent is for this district “to be a neighborhood oriented area with a mix of residential, commercial, and civic uses that serve the neighborhood and the larger region with goods and services.” (SMC 18.30.010)
- **Manufacturing/Industrial Core Overlay.** The intent is “to apply additional restrictions on uses that may be incompatible with current manufacturing and industrial uses and the intensification of these uses in the future” (SMC 18.18.010)

- **Interchange Commercial Truck Parking Overlay Area.** Truck-related parking is permitted in this area. (SMC 18.42.046)
- **Innovation District and Enterprise Area (IDEA).** This overlay may be applied in any commercial or industrial zone. The intent is to encourage innovative, small incubator, and research and development start up businesses; encourage infill and live-work uses; and provide affordable housing and workspaces, while minimizing impacts on residential neighborhoods. (SMC 18.22.010)

Pierce County Comprehensive Plan and Shoreline Master Program

The Pierce County Comprehensive Plan and SMP apply to the unincorporated Sumner Urban Growth Area (UGA) which is adjacent to city limits. The last periodic update of the Pierce County Comprehensive Plan was in 2015. There have been several amendments since the latest update of the plan became effective July 1, 2023. Future land use in the UGA is detailed below under Future Land Use.

The County's SMP was adopted in 2015 with updates in 2018. Two areas within Sumner's UGA include shoreline designations. This includes a portion of the UGA east of the southeast end of Sumner, at the SR 410 and SR 167 interchange, which is designated High Intensity (0- or 50-foot buffer) and Shoreline Residential (75-foot buffer). A portion of the UGA to the east of the city along Lake Tapps is designated as Conservancy (100-foot buffer), Shoreline Residential (50-foot buffer), and High Intensity (0- or 50-foot buffer).

3.2.2 Land Use Patterns

Existing Land Use

Citywide

There are a range of existing land uses in Sumner. The residential core is centered around Main Street and Valley Avenue. Commercial areas are concentrated in the Town Center and around East Main Street. Industrial uses are primarily located in the north portion of the city in the Sumner-Pacific MIC and on larger parcels between West Valley Highway and East Valley Highway along the White River, SR 167 and 142nd Avenue East. Open space resources include the Sumner watershed along Sumner-Tapps Highway East, wetlands along streams, and city parks and school properties. There are also active gravel mine sites in Sumner, including the Corliss gravel mine on the southeast side of the city extending out of city limits and the Cava gravel mine off East Valley Highway East and 29th Street East.

Per Pierce County Assessor records, industrial uses make up the greatest acreage of any use category at 1,156 acres (Exhibit 3-7). Single-family residential is the second largest use at 747 acres. Resource production and extraction uses, primarily due to active mines in the city, make up approximately 354 acres. There are no large-scale commercial agricultural lands within city limits. Commercial uses currently make up approximately 440 acres.

Exhibit 3-7: Current Uses

Current Use	Acres
Single Family Residential	747
Multifamily Residential	196
Public	169
Transportation, Communication, and Utilities	283
Resource Production and Extraction*	354
Commercial	440
Industrial	1,156

Source: Pierce County Assessor, 2023; BERK 2023.

Notes: Approximately 255 acres are gravel mining operations.

Per the 2022 Pierce County Buildable Lands Report and updates using city permit data through 2023, there are an estimated 320 acres of vacant land and 603 acres of underutilized land in Sumner (Exhibit 3-8). Zones with large amounts of vacant land include LDR-12 and M1. These are also the zones with the largest amount of underutilized acreage.

As detailed in Pierce County's 2022 Buildable Lands Report methodology, parcels are considered underutilized where:

Residential

- The parcel's current use is single-family or mobile home and the improvement value is less than \$500,000; or
- The parcel's current use is multifamily or mobile home park and the improvement value is less than \$1,500,000; or
- In a mixed-use/residential zone, the ratio of assumed housing build-out to existing housing units is greater than or equal to 2.5.

Commercial or Industrial

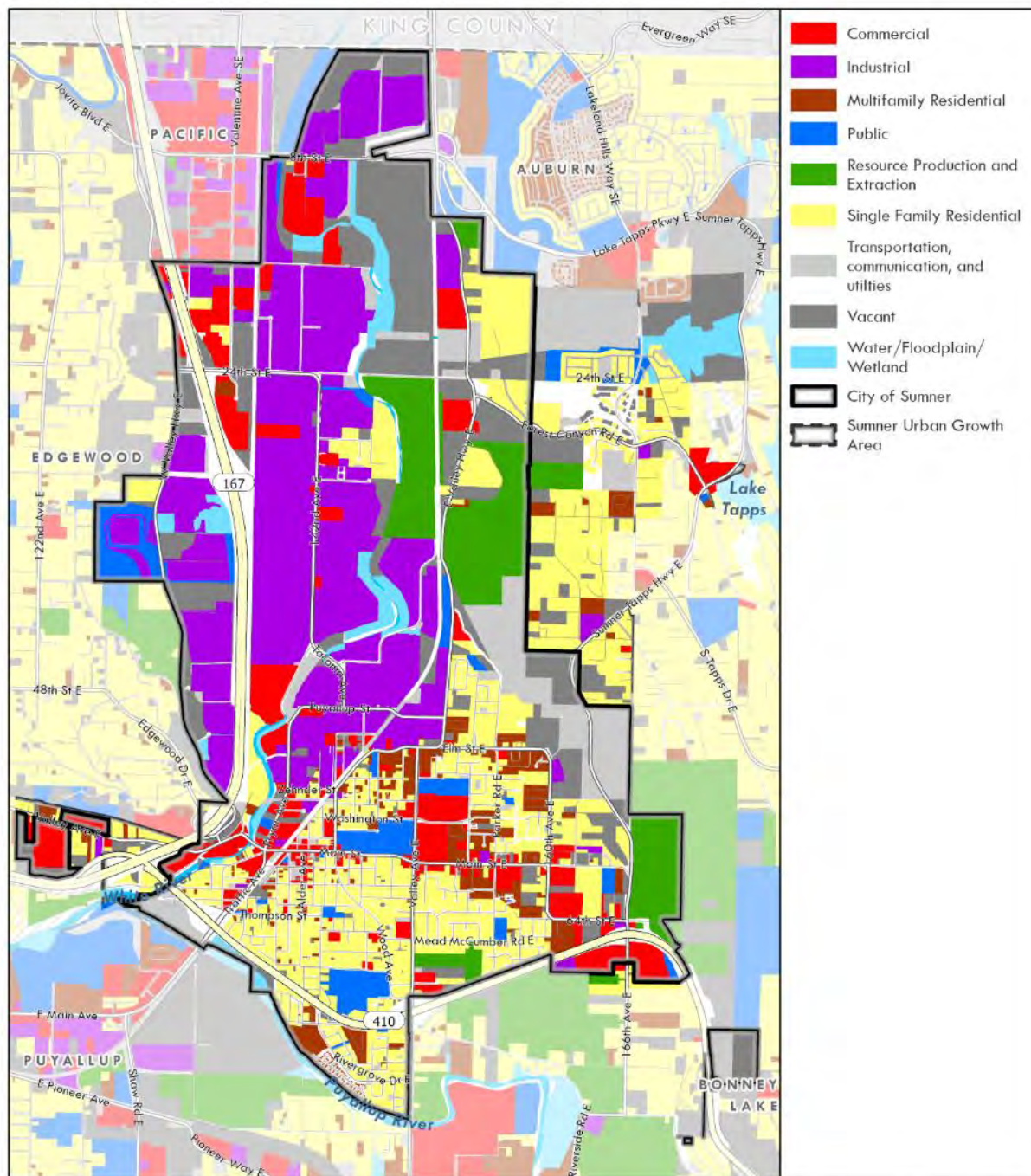
- In a commercial/industrial zone that prohibits residential units, there is an existing single-family housing unit (excluding parcels that are within platted subdivisions); or
- In a commercial/industrial/mixed-use zone with a non-residential current use, the parcel has an improvement value of less than \$1,500,000; or
- The ratio of assumed future job build-out to estimated existing jobs is greater than or equal to 5.

Exhibit 3-8: Estimated Vacant and Underutilized Acreage (2020 Pierce County Data, Updated for 2023 with City Permit Data)

Zone	Vacant	Underutilized
LDR-4	0	0
LDR-6	4	24
LDR-12	91	108
LDR-72	1	12
LDR-85	15	81
MDR	10	18
HDR	2	8
NC	18	7
GC	11	50
CBD	0	1
TC-3	0	1
TC-4	1	13
TC-5	1	7
TC-6	6	44
M1	129	199
M2	5	16
IC	25	15
RES	0	0
Total	320	603

Source: Pierce County Buildable Lands Report, 2020; City of Sumner Permit Data 2020-2023; BERK 2023

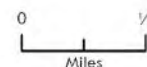
Exhibit 3-9: Current Land Use Map



CITY OF SUMNER

Current Land Use

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: October 2023

Source: Pierce County, 2023; BERK 2023.

For purposes of the EIS analysis only, the city has been organized into sections with characteristics discussed below (as detailed in Chapter 2: Alternatives). The quadrants generally are:

- **North Portion.** The area northwest of East Valley Highway East and the south boundary of the MIC. This portion is mostly the MIC.
- **East Portion.** The area east of Valley Avenue and East Valley Highway East between, including the East Sumner neighborhood, and the commercial area south of SR-410. This does not include the small, disconnected portion of the city to the southeast (which is part of the City watershed).
- **South Portion.** All areas of the city south of SR-410, except for the area to the southeast of the city immediately south of Auto Lane.
- **West Portion.** The area northwest of SR-410 and Valley Avenue, and south of the MIC boundary, including the Town Center
- **Sumner UGA.** The three unincorporated areas in the Sumner UGA.

See Chapter 2: Alternatives for a map of the areas for analysis.

North Portion

The North portion of the city includes the Sumner-Pacific MIC, which is primarily comprised of industrial uses, with some commercial uses as well. A small area of single-family housing is present on the eastern edge of the North Portion. Along the White River, an area of approximately 200 acres in the MIC (including most of the former golf course) has been set aside by the City of Sumner for the White River habitat restoration project, which will preclude development of those acres.

East Portion

The East portion of the city includes the East Sumner neighborhood, which is located along Main Street East and 60th Street East. East Sumner has a variety of businesses and higher density residential uses along major roads.

The northern “leg” of the East Portion, along East Valley Highway, has primarily small-scale commercial/industrial uses, and undeveloped steep slopes along the hillside. There are two gravel mines in the East Portion: one (aka Corliss site) is immediately east of the East Sumner neighborhood and the other is the Cava gravel mine to the north off of East Valley Highway East. Both are shown in

Exhibit 3-9 as resource production and extraction. Other areas of the East Portion primarily include single-family, multifamily, and commercial uses.

South Portion

The South Portion, south of SR 410, contains single-family and multifamily uses, as well as some vacant land and communications/utilities/transportation uses.

West Portion

The West Portion contains the Sumner Town Center, which includes commercial and some small areas of industrial uses and multifamily. Outside of the Town Center, the small area along SR 167 is mostly comprised of a few single-family dwellings and some industrial uses.

Sumner UGA

The Sumner unincorporated Urban Growth Area (UGA) includes three main areas (see Exhibit 3-3):

- An area to the west of Sumner surrounding the interchange of SR 410 and SR 167
- An area to the northeast, extending from near 43rd Street East to Auburn and near Lake Tapps
- An area to the south at the east end of the city encompassing approximately fourteen parcels.

According to Pierce County 2023 Assessor data, the area to the west includes single-family residential, vacant, industrial, commercial, and multifamily residential land. The area to the northeast includes a mix of single family residential, multifamily residential, vacant, resource production and extraction (part of the Cava mine site), and industrial uses. The area to the south contains single-family residential, commercial, and resource production and extraction (agriculture).

Vicinity

In the areas immediately surrounding Sumner, the following current uses are found (per Pierce County Assessor data):

- Pacific and Auburn areas: heavy commercial, industrial, single family and multifamily residential, and vacant

- Lake Tapps vicinity: single-family residential, some commercial and vacant land
- South along SR 162 (Orting Highway): primarily agriculture and scattered housing
- Southwest near Puyallup (Traffic Avenue vicinity): vacant land, commercial, industrial, single family and multifamily residential, and agriculture
- West in Edgewood: primarily large-lot, single-family residential, with some vacant land and agriculture.

Permitted and Pipeline Projects

Permitted projects and projects in the preapplication stage between 2020 and 2023 are shown in Exhibit 3-10, Exhibit 3-11, and Exhibit 3-12. These are projects that were proposed, approved, or under construction between 2020 and 2023. Projects include a mix of commercial, industrial, mixed use, and residential projects. There may be other projects in the pipeline in the UGA.

Exhibit 3-10: Commercial/Industrial Projects

Name / Address	Description	Square Footage
2003 136th Ave E	Commercial building with mezzanine and office	25,050
3490 West Valley Hwy E	Industrial building	24,721
3123 142nd Ave E	Industrial building	79,679
14495 Stewart Rd	Warehouse	268,070
14585 Stewart Rd	Industrial building	441,316
14545 Stewart Rd	Warehouse	292,072
1510 Puyallup St	Warehouse	193,948
2518 East Valley Hwy E	Solid waste processing facility	10,134
2800 136th Ave Ct E	Truck sales/service/parts/office	61,090
13607 24th St E	Heavy timber machinery repair shop	24,916
Former Sumner Golf Course / Steward Rd SE and Sumner Link Trail	Industrial facility	1,000,000
5019 East Valley Hwy E	Adult family care	15,000

Exhibit 3-11: Mixed Use Projects

Name / Address	Description	Housing Units / Jobs
Kincaid Ave Mixed Use / 809 Kincaid Ave	Mixed Use	180 / ~23 jobs
Riverfront Mixed Use / 1228 Fryar Ave	Mixed Use	127 / 0 jobs
Nemeth / 15802 Main St E	Mixed Use	105 / ~7 jobs

Exhibit 3-12: Residential Projects

Name / Address	Description	Housing Units
Tarragon / 6216 160th Ave E	Mixed Use	216
East Sumner Apartments / 16009 60th ST E	Multifamily	162
6211 Parker Rd E	Multifamily	49
157 th Ave Ct E	Single-family units	46
1644 Gault St	Single-family units	9
1525 45th St E	Single-family units	5
14814 74 th Ct E	Single-family units	3
16521 60 th St E	Single-family units	2
1313 Academy St	Single-family units	2
5619 160 th Ave E	Single-family units	2
404 Wood Ave	Single-family unit	1

Current Zoning**Citywide**

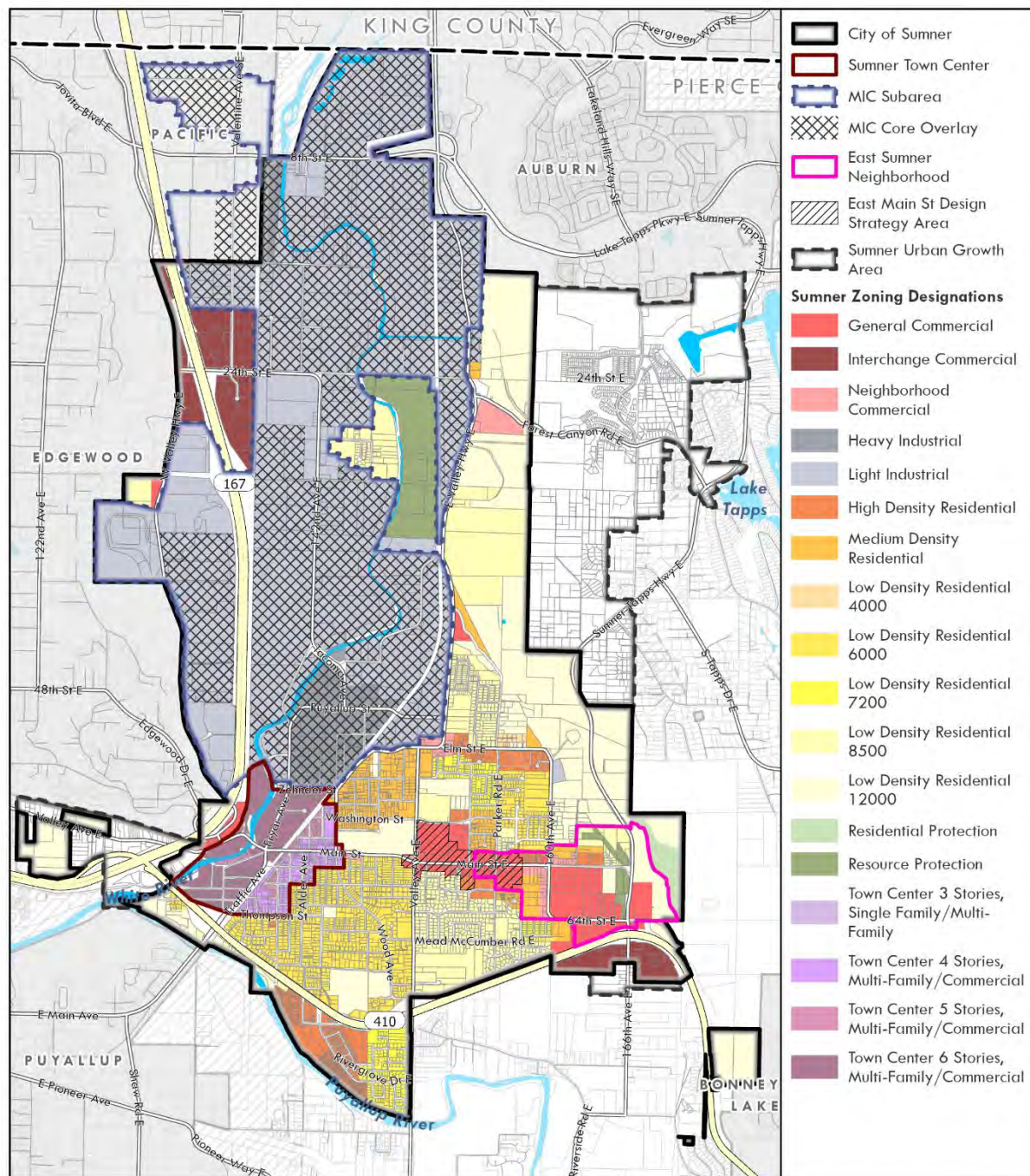
Almost half of the city is zoned for industrial uses (47.7 percent) and 10.6 % is zoned for commercial uses. Low density residential also makes up a large proportion of the zoning at 34.0 percent. Medium and high density residential zones are a much smaller proportion at 2.8% and 2.6% respectively. Resource protection zoning makes up 2.3% of the total, a district that is generally intended for mining activities but currently is used only for publicly-owned natural habitat areas. See Exhibit 3-13 and Exhibit 3-14.

Exhibit 3-13: Acreage by Zone Type

Zone Type	Acres	Percent
Low Density Residential	1418	34.0%
Medium Density Residential	117	2.8%
High Density Residential	109	2.6%
Commercial/Mixed Use	440	10.6%
Industrial	1985	47.7%
Resource Protection	97	2.3%
Total	4165	

Source: Pierce County Buildable Lands Report 2020; BERK 2023.

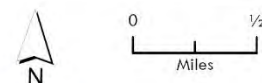
Exhibit 3-14: Zoning Map



CITY OF SUMNER

Zoning

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner 2023; BERK 2023.

North Portion

The North Portion of the city is mostly comprised of the Sumner-Pacific MIC, which is zoned predominantly Light Industrial with some areas of Heavy Industrial. Areas of the North Portion outside of the MIC are zoned Light Industrial, Interchange Commercial, Low Density Residential, and Resource Protection.

East Portion

In the East Sumner neighborhood, zoning is predominantly General Commercial and Medium Density Residential. Outside of the East Sumner neighborhood in the East Portion are mostly Low Density Residential, with some areas of Medium and High Density Residential, Neighborhood Commercial, and General Commercial. In the area immediately south of East Sumner and south of 410, there is also Interchange Commercial zoning.

South Portion

The South Portion is zoned entirely residential. Approximately half of the area is zoned Low Density Residential, and the remainder is High Density Residential.

West Portion

The West Portion includes the Town Center, which is zoned for mixed residential and commercial zoning from up to three to six stories. Outside of Town Center, the West Portion includes mostly Low Density Residential zoning with some areas of Medium Density Residential and General Commercial.

Sumner UGA

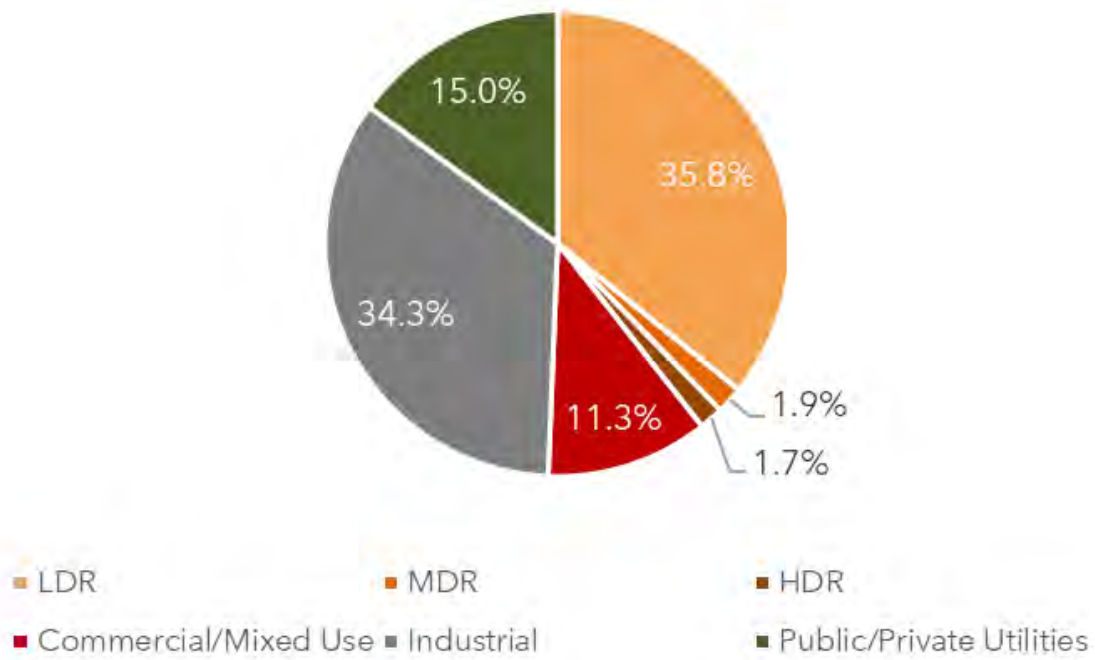
Unincorporated UGA zoning is determined by Pierce County. The portion of the UGA to the east of the City (towards Lake Tapps) is zoned Moderate Density Single Family, with a small area of Public Institutional zoning where there is Puget Sound Energy utilities infrastructure. The portion of the UGA to the south off of 166th Avenue East is zoned Community Center. The portion of the UGA to the west is zoned Employment Center and Moderate Density Single Family.

Future Land Use

Citywide

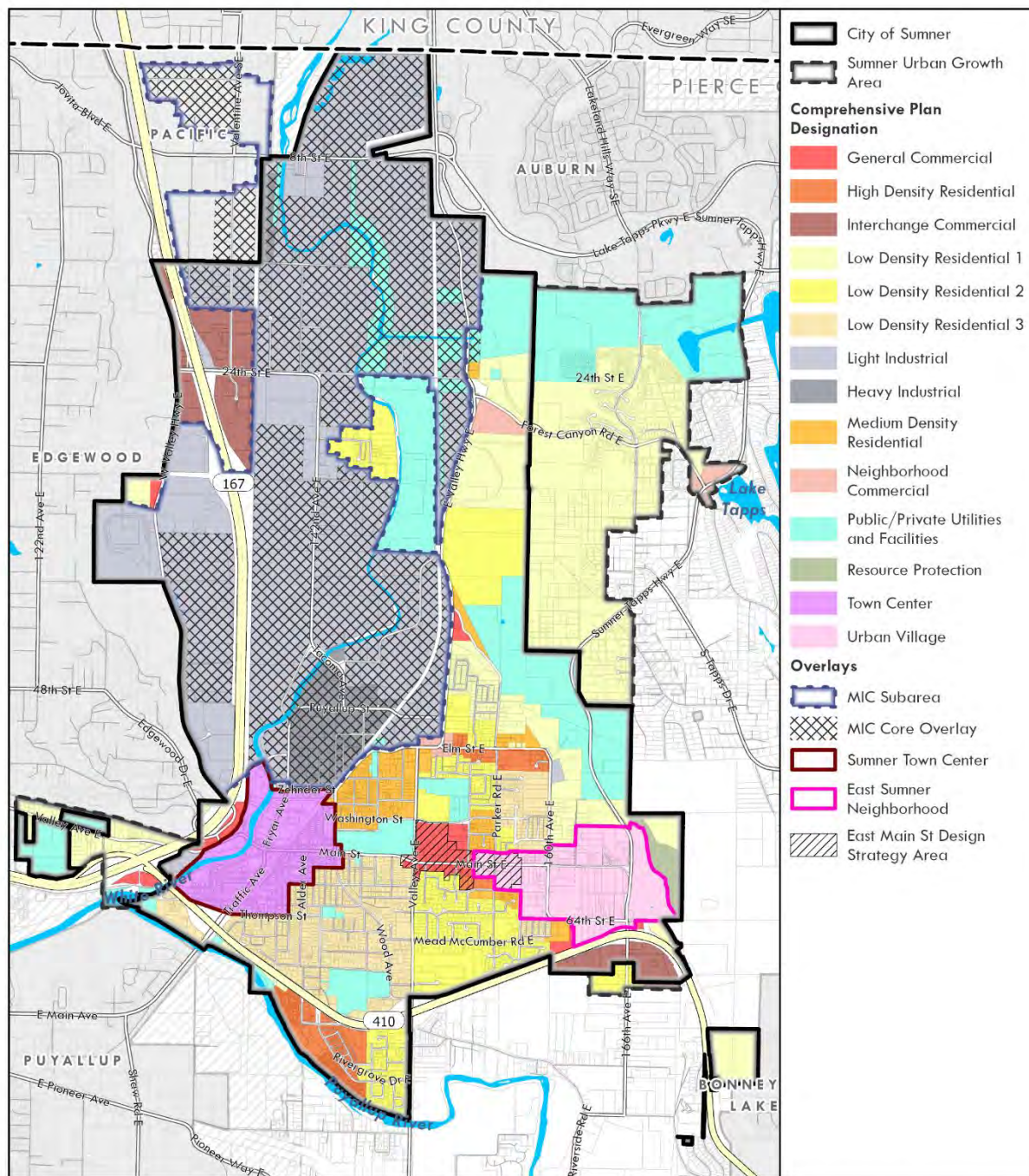
Future land use, as adopted in the Comprehensive Plan, designates 34.3% of the city to industrial uses, 11.3% to commercial and mixed uses, 35.8% to low density residential, and a combined 3.6% to medium and high density residential (Exhibit 3-15). See Exhibit 3-16 for the Future Land Use Map.

Exhibit 3-15: Future Land Use - Acres



Source: City of Sumner 2023; BERK 2023

Exhibit 3-16: Future Land Use as Adopted in Comprehensive Plan



CITY OF SUMNER

Comprehensive Plan Map

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner 2023; BERK 2023.

North Portion

The North Portion of the city is mostly comprised of the Sumner-Pacific MIC. Future land use for the MIC is mostly Light Industrial, with some areas of Heavy Industrial and Public/Private Utilities and Facilities. Other areas of the North Portion outside of the MIC include Interchange Commercial, Low Density Residential, and Public/Private Utilities future land uses (e.g. schools, City facilities, parks). There is also a small area to the west of SR 167 and north of 24th Street that is designated General Commercial.

East Portion

In the East Sumner neighborhood, the future land use designation is Urban Village. Other areas within the East Portion include designations for Low Density Residential predominantly, with some areas of Medium and High Density Residential, General Commercial, and Neighborhood Commercial. There are also areas designated for Public/Private Utilities and Facilities. The area immediately south of East Sumner, south of SR 410, is designated Interchange Commercial.

South Portion

The South Portion is designated for Low Density Residential and High Density Residential, with a small area designated for Public/Private Utilities and Facilities.

West Portion

The West Portion includes the Town Center, which has a Town Center future land use designation. The Town Center Plan anticipates high density multifamily, commercial, and mixed use development. It prohibits new single family development. Outside of the Town Center, the West Portion includes mostly Low Density Residential designations, with an area of Medium Density Residential to the northeast of Town Center and several areas designated as Public/Private Utilities and Facilities. There are also small areas of General Commercial and Light Industrial near SR 167.

Sumner UGA

Sumner's Comprehensive Plan Map includes designations for the Sumner UGA. The portion of the UGA to the east includes Low Density Residential and Public/Private Utilities and Facilities designations, with a small area of Neighborhood Commercial near Lake Tapps. The UGA portion south of the city along 166th Avenue East is designated Low Density Residential. The portion to the west includes Low Density Residential and General Commercial designations.

3.3 Impacts

3.3.1 Thresholds of Significance

Impacts of the alternatives on land use are considered significant if they would:

- Fail to include enough housing and job capacity to accommodate assigned growth targets

- Change land use patterns or development intensities in a way that reduces land use compatibility
- Be inconsistent with regional plans and policies, including the Growth Management Act, Pierce County Countywide Planning Policies, and/or VISION 2050

3.3.2 Impacts Common to All Alternatives

Under all alternatives, growth is expected to result in new development and redevelopment in Sumner. The distribution of future growth and the rate at which it occurs would be influenced by the City's implementation of its Comprehensive Plan policies and regulations and by the decisions of individual property owners. Impacts associated with housing and employment growth could include the conversion of vacant land for new residential, industrial, or commercial uses and infill development or redevelopment on existing sites.

All alternatives assume the same amount and distribution of job growth. However, the amount and distribution of housing growth varies, with Alternatives 2 and 3 having the most housing growth (see Exhibit 3-17. See Chapter 6: Housing and Chapter 4: Population and Employment for growth distribution maps. All alternatives assume the same amount of job and housing growth in the unincorporated UGA (Exhibit 3-18).

Exhibit 3-17: Alternatives Job and Housing Growth: City

	2020-2044 Growth Target	2020-2023 Growth and Pipeline	2023-2044 Growth		
			Alt 1	Alt 2	Alt 3
Jobs	5,313	3,656	1,657	1,657	1,657
Housing	1,985	900	1,085	2,100	2,100

Source: Pierce County CPPs 2022; Pierce County Ord. 2023-22s; BERK 2023

Exhibit 3-18: Estimated Job and Housing Growth (All Alternatives): UGA

	Estimated Growth and Target 2020- 2044
Jobs	82
Housing	484

Source: Pierce County CPPs 2022; Pierce County Ord. 2023-22s; BERK 2023

Notes: This estimate is based on the share of unincorporated county growth allocated to the Sumner unincorporated UGA for 2030. Pierce County has yet to release UGA-specific targets for 2044.

Land Capacity

All alternatives have enough land capacity under current zoning and regulations to accommodate the City's 2020-2044 job growth target of 5,313 jobs. Approximately 3,656 jobs have been created since 2020 or will be created through permitted and pipeline projects, leaving a remaining target of 1,657.

All alternatives also have enough capacity to accommodate the overall 2020-2044 housing target of 1,985 units. Approximately 900 units have already been permitted since 2020 or are in the pipeline, leaving a remaining target of 1,085. However, as discussed in Chapter 6: Housing, housing capacity in Alternative 1 does not meet housing targets by income band. Much of the city's housing capacity under Alternative 1 is in the Low Density Residential zones and Town Center zones, areas which are not expected to produce housing affordable to incomes less than 100% Area Median Income without significant policy support and changes to allowed housing types. Alternatives 2 and 3 do meet the housing targets by income band through proposed changes to allowed housing types and densities, and affordability strategies. See Chapter 6: Housing for more detail on housing affordability and the income band housing targets.

Exhibit 3-19: Alternatives and Growth Targets

	2020-2044 Growth Target	2020-2023 Estimated Growth + Pipeline	2023-2044 Target Remaining	Alt 1 Capacity	Alt 2 Capacity	Alt 3 Capacity
Jobs	5,313	3,656	1,657	4,884	4,884	4,884
Housing	1,985	900	1,085	2,557*	5,325*	4,025*

Source: Pierce County CPPs 2022; Pierce County Buildable Lands Report 2020; City of Sumner 2020-2023 Permit Data; BERK 2023

* While all alternatives have enough capacity to meet the overall housing target, Alternative 1 does not meet housing targets by income band. See Chapter 6: Housing for more details.

Note: Population targets are discussed in Chapter 4: Population and Employment.

Land Use Compatibility

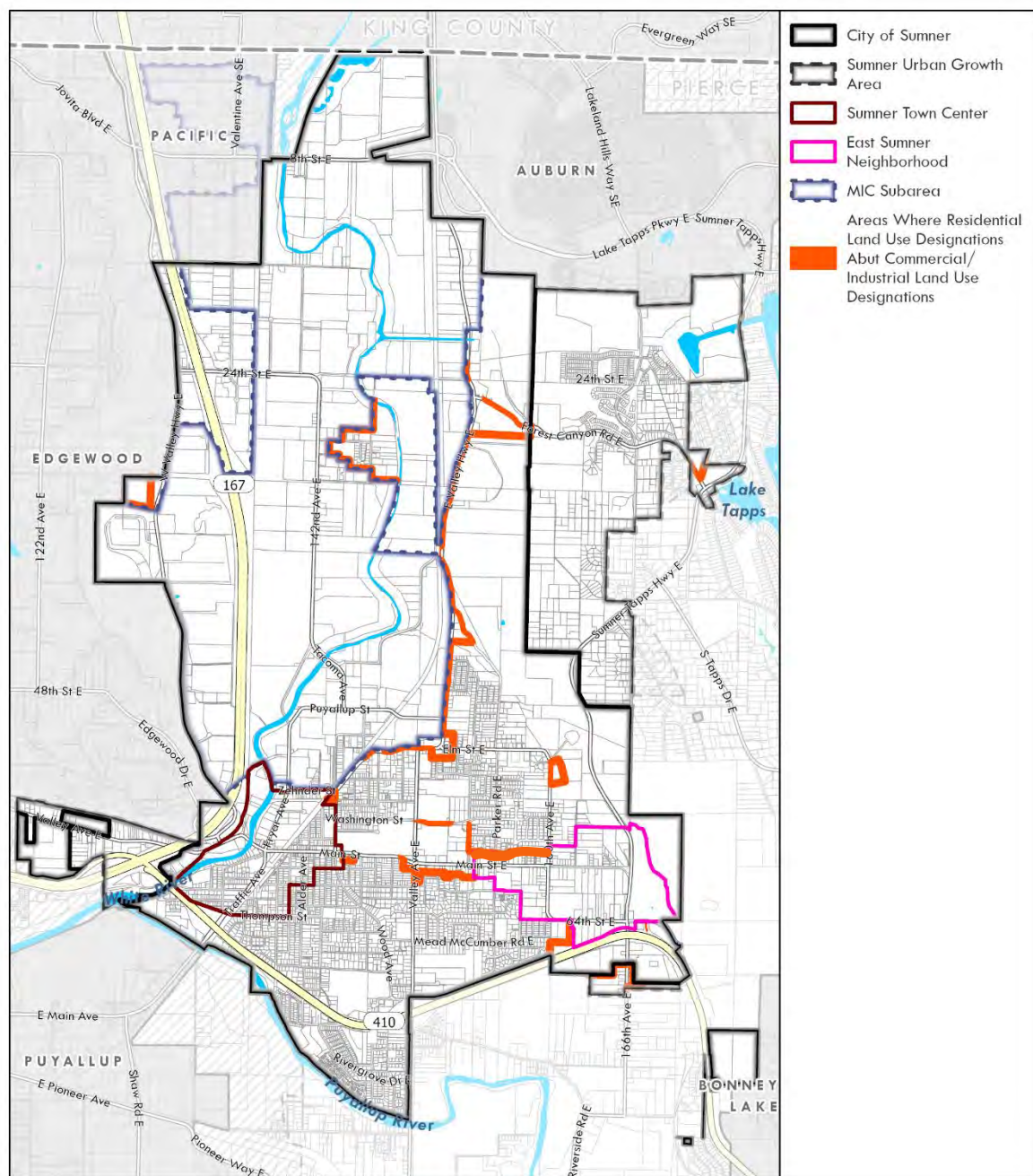
Areas where residential uses abut commercial or industrial uses are the same under all alternatives. The only variation in land use designations from the adopted Comprehensive Plan Map is in Alternative 2 where part of the Cava mine site (located at the intersection of East Valley Highway East and Forest Canyon Road East) is proposed in Alternative 2 to change from Low Density Residential 8.5 to Medium Density Residential. This changes the intensity of the residential use but not its residential nature, therefore the areas impacted are the same as shown for the other alternatives in Exhibit 3-20.

Many of the potential land use incompatibility areas are those where the Sumner-Pacific MIC abuts residential designations, including a large area across East Valley Highway East from residential designations. Other locations include an area immediately west of East Sumner, where General Commercial designations are located next to residential designations. A few small pockets, including

one on West Valley Highway East near Edgewood and two areas east of Town Center, are also highlighted.

Outside of city limits in the UGA, an area near Lake Tapps is highlighted where Neighborhood Commercial abuts Low Density Residential, and an area along 166th Avenue East is highlighted where Interchange Commercial is located next to Low Density Residential.

Exhibit 3-20: Future Land Use Compatibility (All Alternatives)



CITY OF SUMNER

Future Land Use Compatibility

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: January 2024

Source: City of Sumner 2023; BERK Consulting 2023

Plans and Policies

Growth Management Act

Sumner's adopted Comprehensive Plan contains the chapters required by the GMA, except for the requirement for a Climate Change and Resiliency element, introduced in 2023. The City has also adopted zoning and other regulations consistent with the Comprehensive Plan.

All three alternatives are generally consistent with the intent of the GMA planning goals and all alternatives have sufficient capacity for the citywide 20-year job and housing growth targets. However, Alternative 1 does not have the capacity to meet the housing targets by income band, while Alternatives 2 and 3 do have adequate capacity and additional policy support for housing affordability and availability. Alternative 1 also assumes no changes to the adopted Comprehensive Plan or development regulations to meet new State requirements and therefore would be out of compliance (see Exhibit 3-21).

Exhibit 3-21: Consistency with GMA Planning Goals

Planning Goal	Alt 1	Alt 2	Alt 3	Discussion
(1) Concentrate growth in urban areas	+	+	+	All three alternatives focus on growth within Sumner, all of which is an urban area.
(2) Reduce sprawl	+	+	+	All alternatives are focused on urban growth, not on rural areas where sprawl can occur.
(3) Encourage a multimodal transportation system	x	+	+	All alternatives include policies and planning for multimodal transportation. Alternatives 2 and 3 include additional updates to comply with changes to state law that emphasize active transportation.
(4) Plan for and accommodate a variety of housing types affordable to all economic segments	-	+	+	Alternative 1 has enough capacity for the citywide housing target but does not have capacity for all income bands. Alternatives 2 and 3 have the capacity to meet targets for all income bands and include policy changes to reduce barriers to housing affordability and availability.
(5) Promote economic development	x	+	+	All Alternatives include an Economic Development element. Alternatives 2 and 3 include updates to the element that strengthen the city's economic development policies and improve climate resilience.
(6) Recognize property rights	+	+	+	All alternatives recognize private property rights.

Planning Goal	Alt 1	Alt 2	Alt 3	Discussion
(7) Ensure timely and fair permit procedures	+	+	+	All alternatives include provisions for timely and fair permit procedures.
(8) Protect agricultural, forest, and mineral lands	+	+	+	All alternatives include land use designations and codes to protect resource lands.
(9) Retain open space, conserve habitat, increase access to natural resource lands and water	x	+	+	All alternatives carry forward the existing Parks, Recreation, and Open Space Plan and are subject to the city's Critical Areas Ordinance and Shoreline Master Program. Alternatives 2 and 3 include updates to the Critical Areas Ordinance to meet best available science. Alternative 1 does not include these updates.
(9) Enhance and develop parks and recreation facilities	+	+	+	All alternatives carry forward the existing Parks, Recreation, and Open Space Plan.
(10) Protect the environment	x	+	+	All alternatives are subject to the City's Critical Areas Ordinance, but Alternatives 2 and 3 update this for best available science while Alternative 1 does not. Alternatives 2 and 3 also include policy changes in support of climate resiliency and greenhouse gas emissions reductions.
(11) Foster citizen participation	+	+	+	All alternatives include policies that encourage citizen participation.
(12) Ensure adequate public facilities and services	x	+	+	All alternatives include a Capital Facilities and Public Services Element and Capital Facilities Plan. Alternatives 2 and 3 update the element and plan to reflect changes to facility needs and levels of service.
(13) Encourage historic preservation	+	+	+	All alternatives include a Historic and Cultural Resources Element, which encourages historic preservation.
(14) Climate change and resiliency	x	+	+	Alternative 1 includes some policies that support climate change resiliency. Alternatives 2 and 3 are more robust and include updates to meet new state climate change planning requirements.
(15) Management of Shorelines of Statewide Significance	+	+	+	All alternatives are subject to Sumner's Shoreline Master Program.

Sources: RCW 36.70A.020 and RCW 36.70A.480 (1), 2023; BERK 2023.

LEGEND: + = meets; x = partially meets, - = does not meet.

Pierce County Countywide Planning Policies

Sumner's current Comprehensive Plan generally aligns with the Pierce County Countywide Planning Policies but does not thoroughly address new areas of emphasis (see Exhibit 3-22). Alternatives 2 and 3 include updates to the Comprehensive Plan that better address social equity and inclusion, climate change, displacement, and other required County and State requirements, while Alternative 1 carries forward the adopted plan.

Exhibit 3-22: Consistency with Pierce County CPPs

New Area of Emphasis in CPPs	Alt 1	Alt 2	Alt 3	Discussion
Social Equity and Inclusion —Policies and strategies ensuring equity are incorporated throughout the CPPs in keeping with VISION 2050's integrated approach to addressing land use and transportation, along with the environment, economic development, and equity. Equity means that all people can attain the resources and opportunities to improve their quality of life and enable them to reach their full potential.	x	+	+	While Alternative 1 includes some policies that indirectly support social equity and inclusion, Alternatives 2 and 3 include an equity policy review and updated policies to address equity and displacement impacts.
Climate Change —Includes new policies to support climate change resilience and mitigation strategies that address the new GMA climate change and resiliency goal and VISION 2050 priorities related to climate change planning.	x	+	+	Alternative 1 includes some policy support for climate resilience and mitigation, however, Alternatives 2 and 3 include a greater emphasis on this topic and meet the state's new climate change planning requirements.
Interjurisdictional Coordination —Policies added to improved coordination with other jurisdictions, agencies, tribes, ports, military installations, special purpose districts, and adjacent regions in accordance with VISION 2050 MPPs contained in the new regional collaboration chapter.	+	+	+	All alternatives support interjurisdictional coordination.
Displacement of Residents and Businesses —New policies seek to reduce the risks of displacement of lower-income people and businesses through elevating social and racial equity in regional planning and encouraging	x	+	+	Alternatives 2 and 3 include an equity policy review and updated policies that address displacement impacts. Alternative 1 does not.

New Area of Emphasis in CPPs	Alt 1	Alt 2	Alt 3	Discussion
Integration of equity in local plans consistent with VISION 2050.				
Reasonable Measures Process —If the buildable lands report identifies a lack of capacity, jurisdictions may be required to take “reasonable measures” to assure they can accommodate allocated growth so that that land is used efficiently prior to expanding UGAs. The County’s reasonable measures were updated to include innovative approaches to address housing affordability and supply consistent with state law.	-	+	+	Alternatives 2 and 3 include a new policy that addresses reasonable measures, while Alternative 1 does not specify the actions to take when a lack of capacity is identified.

Sources: Pierce County Countywide Planning Policies 2022; BERK 2023.

LEGEND: + = meets; x = partially meets, - = does not meet.

VISION 2050

While all alternatives generally address the VISION 2050 goals, Alternatives 2 and 3 include plan updates that better reflect these regional objectives (see Exhibit 3-23).

Exhibit 3-23: Consistency with VISION 2050

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Discussion
Regional Collaboration (15 MPPs)	+	+	+	All alternatives support regional collaboration.
The region plans collaboratively for a healthy environment, thriving communities and opportunities for all.				
Regional Growth Strategy (16 MPPs)	+	+	+	All alternatives are focused on urban growth near transit and growth in the Sumner-Pacific MIC (a regional growth center).
The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important				

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Discussion
cultural, economic, and rural lifestyle opportunities over the long term.				
Environment (22 MPPs) The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.	x	+	+	All alternatives include policy support for environmental protection and implementation of the Critical Areas Ordinance and Shoreline Master Program. However, Alternatives 2 and 3 include updates to the Critical Areas Ordinance for best available science and add additional policy support for climate change mitigation and adaptation.
Climate Change (12 MPPs) The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.	x	+	+	Alternative 1 includes some policies related to climate change mitigation and adaptation, but Alternative 2 and 3 emphasize this topic through new and updated policies. Alternatives 2 and 3 meet the state's new climate planning requirements while Alternative 1 does not.
Development Patterns (54 MPPs) The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.	x	+	+	All alternatives include policy support for walkability, infill development, and transit-oriented development in the Town Center. However, Alternatives 2 and 3 include support for greater densities and multimodal transportation, which would better support walkability and compact development.
Housing (12 MPPs) The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe	x	+	+	All alternatives include policies that support housing availability and affordability. Alternatives 2 and 3 also include changes that address new state housing requirements and provide capacity for housing for all income bands. Alternatives 2 and 3 also include policy changes that

VISION 2050 Goal	Alt 1	Alt 2	Alt 3	Discussion
housing choices to every resident. The region continues to promote fair and equal access to housing for all people.				reduce barriers to housing affordability.
Economy (23 MPPs) The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.	x	+	+	All alternatives include an Economic Development element in the Comprehensive Plan. Alternatives 2 and 3 strengthen this element and add policies that support climate resilience in the local economy.
Transportation (32 MPPs) The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.	x	+	+	All alternatives address multimodal transportation. Alternatives 2 and 3 include updates to meet new state requirements that emphasize active (non-motorized) transportation, and Transportation Plan updates to reflect future needs to 2044.
Public Services (30 MPPs) The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.	x	+	+	All alternatives include a Capital Facilities and Public Services element, but Alternatives 2 and 3 update the element and Capital Facilities Plan to reflect current conditions and future needs, whereas Alternative 1 carries forward existing plans.

Source: PSRC VISION 2050; BERK 2023.

3.3.3 Alternative 1 (No Action)

Land Capacity

Alternative 1 has enough land capacity to accommodate the citywide job and housing growth targets, as shown in Exhibit 3-19. However, it does not have adequate land capacity to meet housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

Land use compatibility under Alternative 1 is similar to the description under Impacts Common to All Alternatives.

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 1 does not adequately address regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 1 does not include updates to reflect changes to these regional frameworks, whereas Alternatives 2 and 3 do. This is especially true for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-21, Exhibit 3-22, and Exhibit 3-23 for comparisons across the alternatives.

3.3.4 Alternative 2

Land Capacity

Alternative 2 has adequate land capacity to accommodate the 2044 job growth and housing growth targets (see Exhibit 3-19), including housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

The only land use redesignation from the existing Comprehensive Plan Map (Exhibit 3-16) proposed under any alternative is for the Cava Mine site located at the intersection of East Valley Highway East and Forest Canyon Road East, which is proposed to be redesignated from Low Density Residential to Medium Density Residential under Alternative 2 (see Exhibit 3-24 and Exhibit 3-25). While this would change the density of the use, it would not change the residential designation of the site. If the Cava site is reclaimed in stages, with phased housing development, there is the potential for conflicts between new residential and any ongoing mining activities.

Exhibit 3-24: Alternative 2 Future Land Use

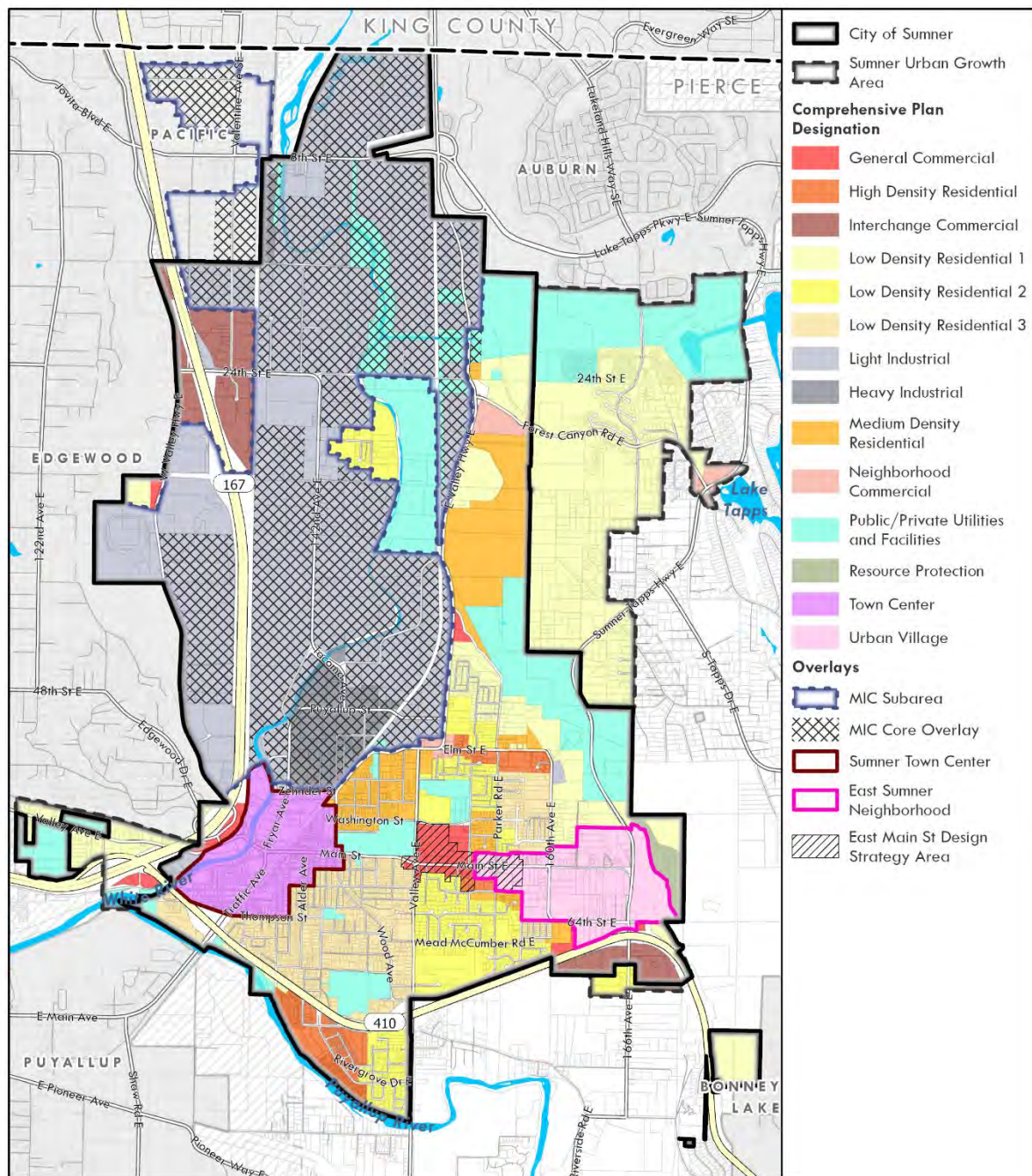
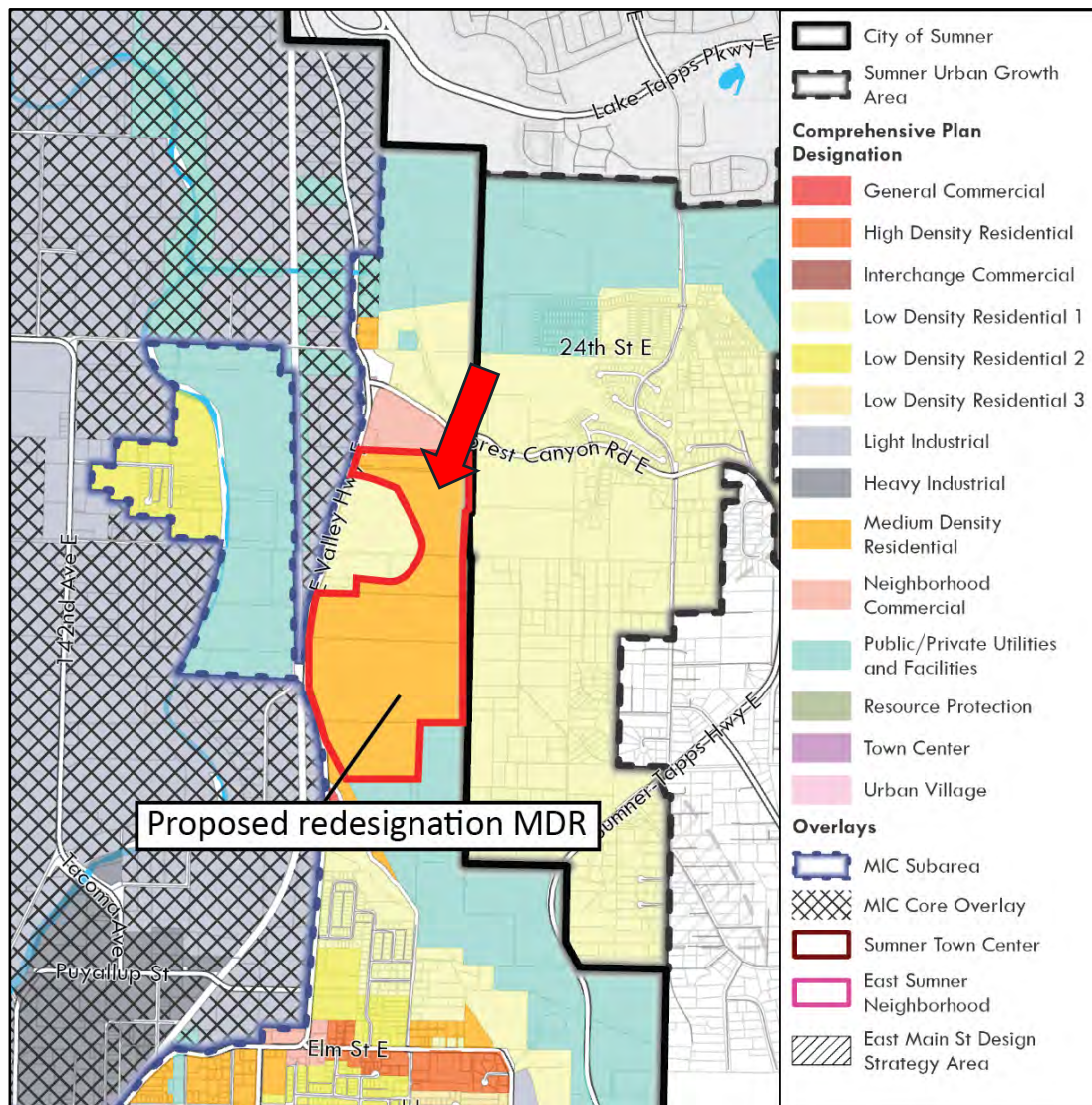


Exhibit 3-25: Cava Mine Site - Alternative 2 MDR Redesignation

Source: City of Sumner 2023; BERK 2023

The proposed area to be changed to Medium Density Residential abuts a small area of Medium Density Residential to the south. Other areas immediately to the south are designated Public/Private Utilities and Facilities and to the west are areas of Light Industrial designation. To the north and east, the area is surrounded by the Low Density Residential 1 designation. The closest commercial designations that would serve the area are a Neighborhood Commercial area approximately 1,400 feet to the north and a small General Commercial pocket approximately 300 feet to the south.

This change, along with additional housing growth around the Sumner-Pacific MIC in Alternative 2, could result in more residents living near industrial uses in potential land use incompatibility areas (see Exhibit 3-20).

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 2, like Alternative 3, addresses regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 2, like Alternative 3, includes policy updates to reflect changes to these regional frameworks. This alignment is particularly strong under Alternatives 2 and 3 for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-21, Exhibit 3-22, and Exhibit 3-23 for comparisons across the alternatives.

3.3.5 Alternative 3

Land Capacity

Alternative 3 has adequate land capacity to accommodate the 2044 job growth and housing growth targets (see Exhibit 3-19), including housing targets by income band. Detailed discussion on housing targets by income band is in Chapter 6: Housing.

Land Use Compatibility

Land use compatibility under Alternative 3 is similar to the description under Impacts Common to All Alternatives. Like Alternative 2, Alternative 3 has more housing growth than Alternative 1, which could result in a greater number of residents in potential land use incompatibility areas (Exhibit 3-20). This is particularly true for residential areas bordering the Sumner-Pacific MIC: these areas are expected to see more housing growth under Alternatives 2 and 3 than under Alternative 1. Some areas in the East Portion of the city near East Sumner are also expected to see more housing growth near commercial uses.

Plans and Policies

As discussed under Impacts Common to All Alternatives, Alternative 3, like Alternative 2, addresses regional plans and policies, including the GMA, Pierce County CPPs, and VISION 2050. Alternative 3, like Alternative 2, includes policy updates to reflect changes to these regional frameworks. This alignment is particularly strong under Alternatives 2 and 3 for the topics of social equity, displacement, climate change, environment and critical areas, and planning for housing for all income bands. See Exhibit 3-21, Exhibit 3-22, and Exhibit 3-23 for comparisons across the alternatives.

3.4 Mitigation Measures

3.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 would mitigate adverse impacts to land capacity, land use compatibility, and plans and policies:

Land Capacity

- No adverse impacts expected under Alternatives 2 and 3

Land Use Compatibility

- Alternatives 2 and 3 include a revised policy to encourage industries and industrial processes that are sustainable, environmentally and socially responsible, and contribute to the local community. This could help mitigate impacts where residential areas are located near industrial areas.

Plans and Policies

- No adverse impacts expected under Alternatives 2 and 3

3.4.2 Regulations and Commitments

The following regulations and commitments apply to all alternatives.

Land Capacity

- Pierce County's Buildable Lands Program ensures ongoing review and monitoring of vacant and underutilized land capacity in Sumner and other Pierce County jurisdictions. The latest Buildable Lands Report was completed in 2022.

Land Use Compatibility

- Sumner's design review process requires new subdivisions, infill single-family development, multi-family, commercial, and industrial developments to be reviewed per the City's Design and Development Guidelines. The guidelines include landscaping and screening requirements for some uses, which can help address compatibility by minimizing noise, lighting, and visual impacts. New laws, including HB 1110 and HB 1337, do now limit the city's ability to require design review for ADUs and middle housing types. Amendments to the code will be needed in order to comply.
- Conditional use review of some uses in certain zoning districts can provide the city an opportunity to require site-specific mitigation if compatibility is a concern.
- Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues by placing buildings further apart and improving privacy.
- The Sumner-Pacific MIC Subarea Plan includes a goal (SPMIC-3) that states "industrial activity in the SPMIC does not adversely impact adjacent uses and neighborhoods." Subpolicies for this goal emphasize building design, site design, and screening to minimize impacts.

Plans and Policies

- The adopted Comprehensive Plan aligns with the previous Pierce County CPPs, VISION 2040, and the GMA as written at the time of Sumner's plan adoption. Many of the same and similar regional policies and requirements remain in effect in the present iterations.

3.4.3 Other Potential Mitigation Measures

Land Capacity

- No additional potential mitigation measures.

Land Use Compatibility

- No additional potential mitigation measures.

Plans and Policies

- No additional potential mitigation measures.

3.5 Significant Unavoidable Adverse Impacts

All alternatives anticipate job and housing growth and will have associated impacts related to land use compatibility. Alternative 1 is expected to have impacts related to land capacity and plans and policies, as it is not updated to meet recent changes to the regional planning framework. The only mitigation that could fully address these impacts would be to adopt features of Alternatives 2 and 3.

4 Population and Employment

4.1 Introduction

The population and employment analysis identifies current population and employment conditions in the City of Sumner and evaluates potential impacts of the three alternatives on population exposure to air and noise pollution, the adopted jobs targets, and involuntary economic displacement.

Under HB 1181, which was enacted in 2023, cities and counties must give special consideration to achieving environmental justice, including efforts to avoid creating or worsening environmental health disparities. Accordingly, this Chapter analyzes environmental health indicators, such as proximity to heavy traffic roadways and facilities involved in the treatment, storage, or disposal of hazardous waste and evaluates impacts from the alternatives on population growth in areas with air and/or noise pollution. Sumner's Comprehensive Plan and development regulations must be consistent with the provisions in the Growth Management Act (GMA). Per the GMA, the City of Sumner's Comprehensive Plan includes goals and policies related to accommodating the city's share of growth.

In 2021, GMA goals and element requirements for housing were amended (see Chapter 6: Housing). These and other amendments between 1995-2022 are described in a summary from Washington State Department of Commerce. See Chapter 3: Land Use. In 2023, a new requirement was added for a climate change and resiliency element per HB 1181. See Chapter 3: Land Use for further discussion of the Growth Management Act and the state, regional, and local framework that Sumner's Comprehensive Plan must be consistent with.

4.2 Affected Environment

4.2.1 Population

Citywide

According to US Census Data, the 2020 population within Sumner city limits was 10,621. In recent years, there has been slow population growth, with a compound annual growth rate of 1% between 2000-2010 and between 2010-2020. This is in line with Pierce County's compound annual growth rates in the same period. See Exhibit 4-1.

Exhibit 4-1: Population Growth (1990 - 2020)

Jurisdiction	Population Estimates				Compound Annual Growth Rates*		
	1990	2000	2010	2020	1990-2000 CAGR	2000-2010 CAGR	2010-2020 CAGR
Sumner	6,459	8,504	9,451	10,621	3%	1%	1%
Pierce County	586,203	700,820	795,225	921,130	2%	1%	1%

* Compound Annual Growth Rate refers to the growth rate of the population smoothed across several time periods.

Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.

Source: US Census Bureau, 2020.

Per population estimates from the Washington State Office of Financial Management (OFM), Sumner has approximately 10,800 residents as of April 1, 2023.

Charged with regional planning programs, the Puget Sound Regional Council (PSRC) makes regular population, housing, and employment forecasts. Population forecasts to the year 2050 equal 16,744 for the city limits (PSRC, 2023). This represents a 55% increase over the 2023 population estimate, with a compound annual growth rate of 2% over the 27-year period.

Exhibit 4-2: PSRC Total Population Forecasts - Sumner

Year	2023	2025	2030	2035	2040	2044	2050
PSRC Population Forecasts	10,800*	11,648	12,675	13,692	14,713	15,519	16,744

Note: * 2023 population estimate is sourced from Washington State OFM.

Source: PSRC, 2023.

Pierce County has adopted a target of 15,525 total residents in Sumner in 2044, which assumes population growth of 4,904 residents above the 2020 Census population of 10,621.

Exhibit 4-3: Summary of Population Characteristics - Sumner and Pierce County

Characteristic	2000	2010	2020	2000	2010	2020
	Sumner	Sumner	Sumner	Pierce Co	Pierce Co	Pierce Co
Total Population	8,504	9,451	10,621	700,820	795,225	921,130
Median Age	35.4	38.2	37.8	34.1	35.9	36.9
Percent under 18 years	26.5%	24.4%	22.8%	27.2%	24.2%	23%
Percent 65+ years	13.4%	14.9%	16.6%	10.2%	12.3%	14.6%

Characteristic	2000 Sumner	2010 Sumner	2020 Sumner	2000 Pierce Co	2010 Pierce Co	2020 Pierce Co
Percent Female	51.6%	51.8%	52%	50.3%	50.3%	50.4%
One Race						
Caucasian	90.3%	87.3%	74.1%	78.4%	76.5%	64.6%
African American	0.9%	1.2%	1.6%	7%	7.3%	7.2%
American Indian/Alaskan Native	1.4%	1%	1.2%	1.4%	1.7%	1.4%
Asian	1.7%	2.4%	3.1%	5.1%	6.4%	6.9%
Native Hawaiian/Pacific Islander	0.2%	0.4%	1.1%	0.8%	1.5%	2%
Other	2.4%	3.4%	7.1%	2.2%	4.3%	5.3%
Two or More Races	3%	4.3%	11.9%	5.1%	6.7%	12.6%
Hispanic/Latino of Any Race	6%	10.1%	13.8%	5.5%	9.9%	12.1%
Household Size	2.4	2.37	2.46	2.6	2.59	2.71
Education: High School Diploma or Greater	85.8%	91.3%*	91.3%**	86.9%	90.5%*	92.4%**
Education: Bachelor's Degree or Higher	19.6%	18.8%*	24.2%**	20.6%	24%*	29.3%**
Median Household Income	\$38,598	\$50,206*	\$83,285**	\$45,204	\$59,478*	\$91,486**

Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.

*Data from 2013 (ACS 2009-2013 5-Year Estimates).

**Data from 2022 (ACS 5-Year Estimates).

Source: US Census Bureau, 2020.

The population of Sumner has grown over the past two decades, as noted above. Key areas of change between 2000 and 2020 include:

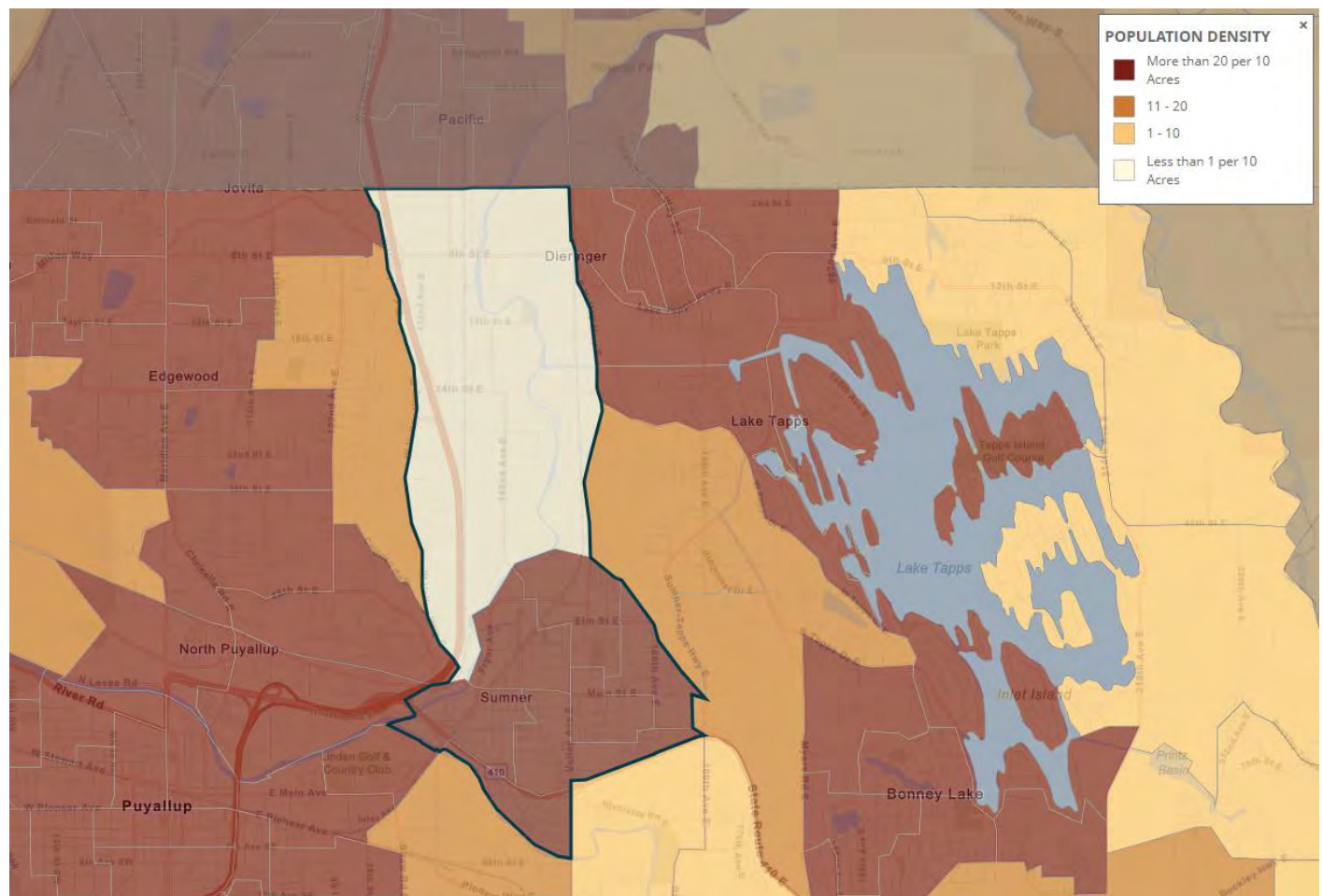
- A decline in the percentage of the Sumner population that is Caucasian (one race) and an increase in the percentage of the population that is two or more races, for both Sumner and Pierce County.
- An increase in the percentage of the population that identifies as Hispanic or Latino (any race), in both Sumner and Pierce County

- An increase in the percentage of the population with a bachelor's degree in and the median household income for both Sumner and Pierce County.
- An increase in the percentage of the population over age 65 and a decrease in the percentage of the population under age 18, both in Sumner and Pierce County.

Population Density

Mapping from Pierce County shows population density for Sumner. The northern portion of the city, the MIC area, has a population density of less than 1 person per 10 acres, which is consistent with the area's status as primarily an employment center, rather than a residential area. The rest of the city has a population of more than 20 people per 10 acres. See Exhibit 4-4.

Exhibit 4-4: Population Density - Sumner



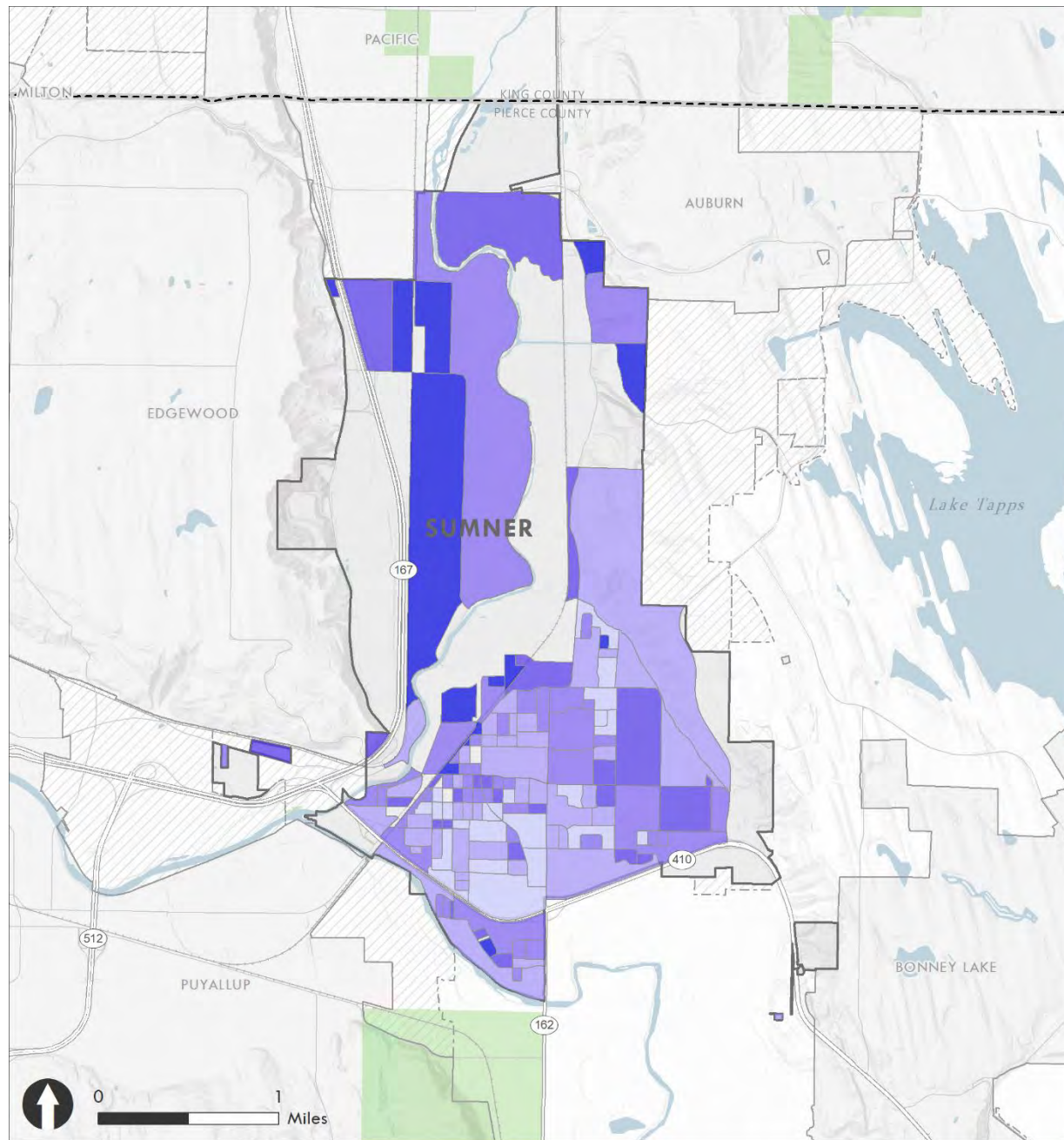
Source: Pierce County 2023.

BIPOC Distribution

According to mapping performed using 2020 Census data, some census blocks have a greater proportion of the population that is BIPOC (Black, Indigenous, and People of Color) than others. There is minimal housing located in the North Portion, however a larger percentage of those residents are BIPOC

than in other parts of the city. This area has the most proximity to industrial uses due to the MIC. Other pockets with greater percentages of BIPOC residents are distributed throughout the city, including a few blocks in the East Portion near Auburn and small areas in the West and South portions. See Exhibit 4-5.

Exhibit 4-5: BIPOC Population - Sumner (Census Blocks)



LEGEND

BIPOC Population %

Lower % of population



Higher % of population

Counties

UGAs



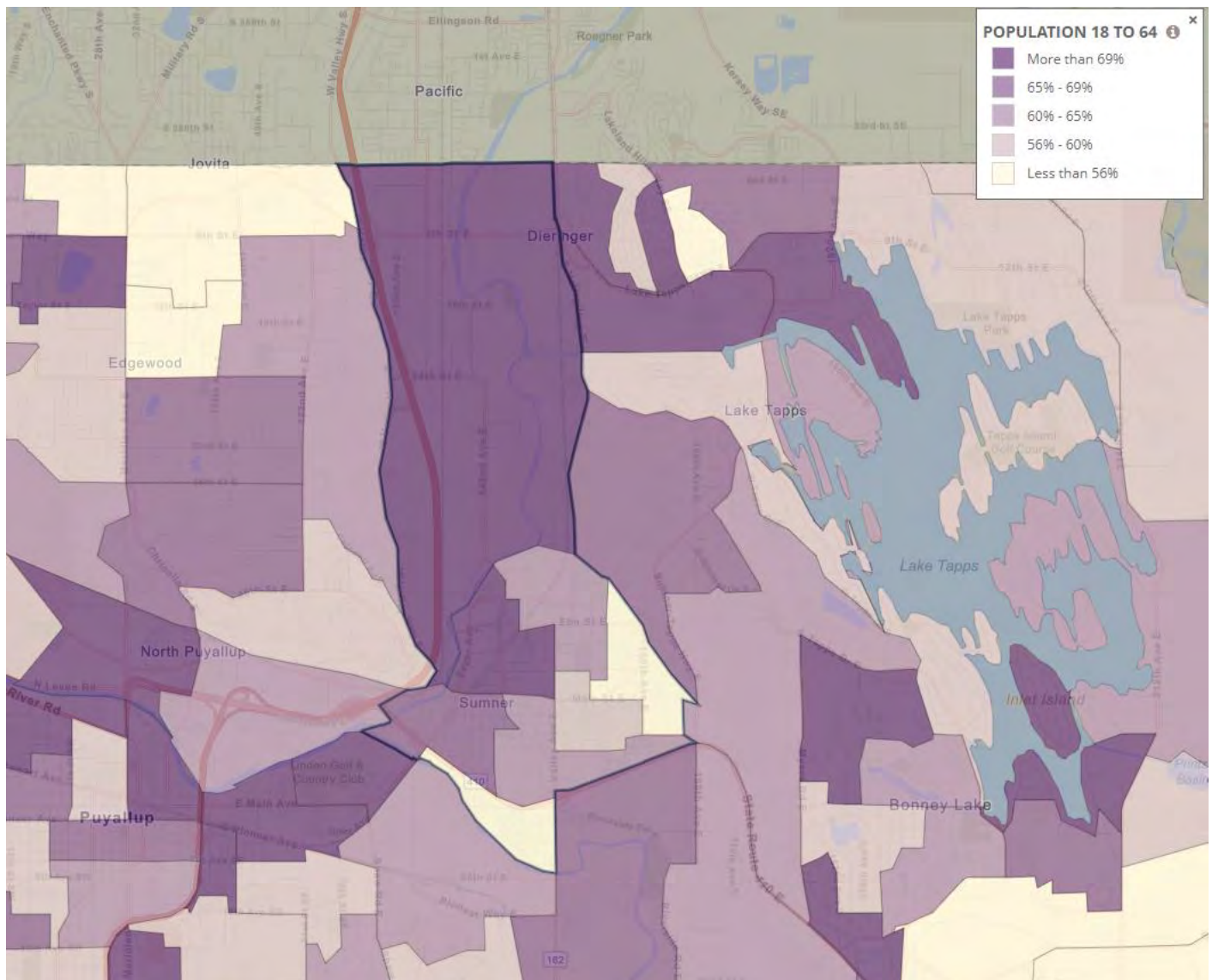
BERK
Map Date: January 2024

Source: BERK 2023, Census 2020.

Age

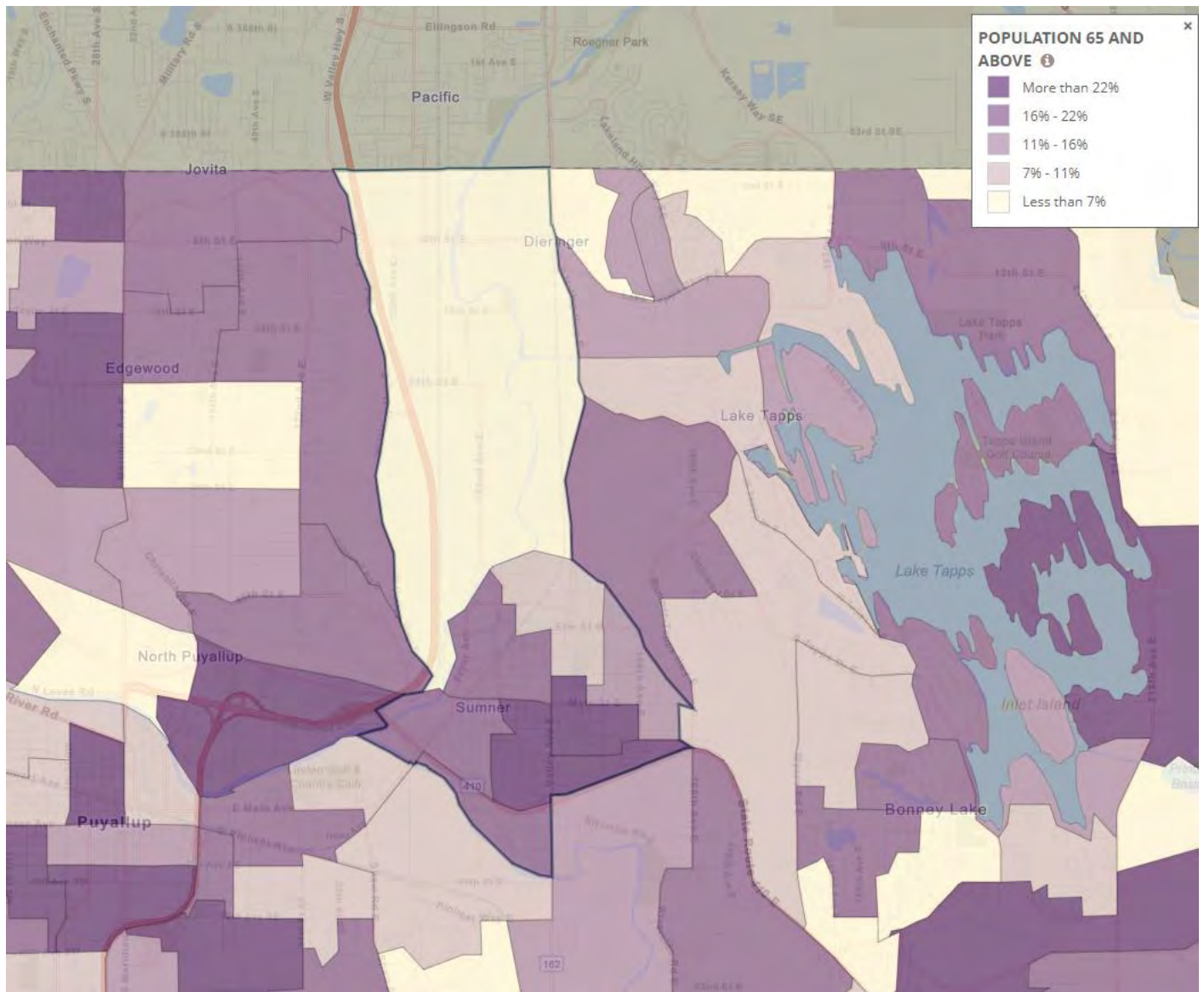
Age distribution from Pierce County mapping shows the northern portion of Sumner, as well as parts of the western portion of the City have highest concentrations of adults between the ages of 18-64. Adults aged 65 and over are primarily concentrated in east Sumner, with some in portions of West Sumner. Youths under the age of 18 are starkly concentrated in east Sumner. See Exhibit 4-6, Exhibit 4-7, and Exhibit 4-8.

Exhibit 4-6: Population 18-64 Years - Sumner



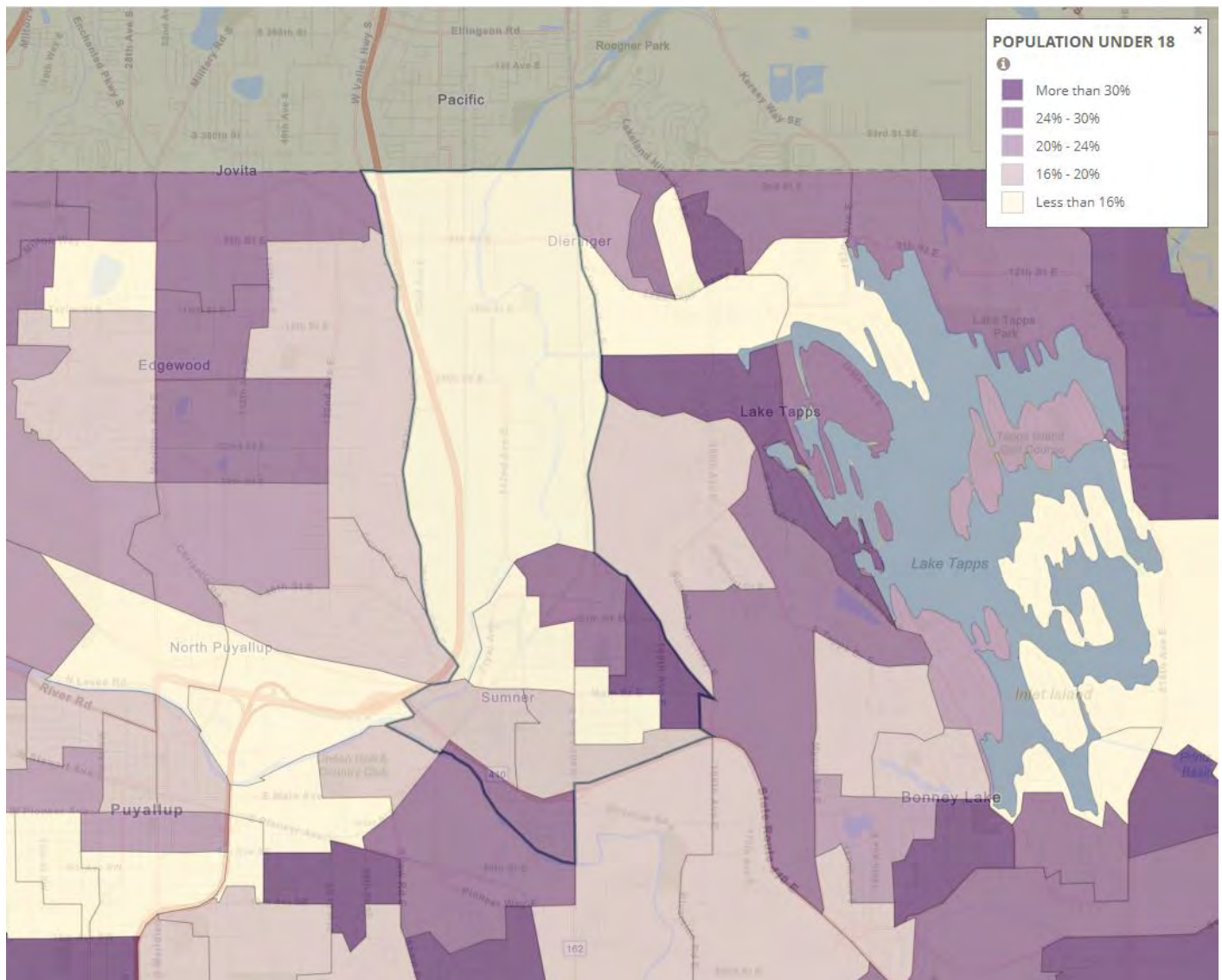
Source: Pierce County, 2023.

Exhibit 4-7: Population 65 & Over



Source: Pierce County, 2023.

Exhibit 4-8: Population Under 18



Source: Pierce County, 2023.

Education & Income

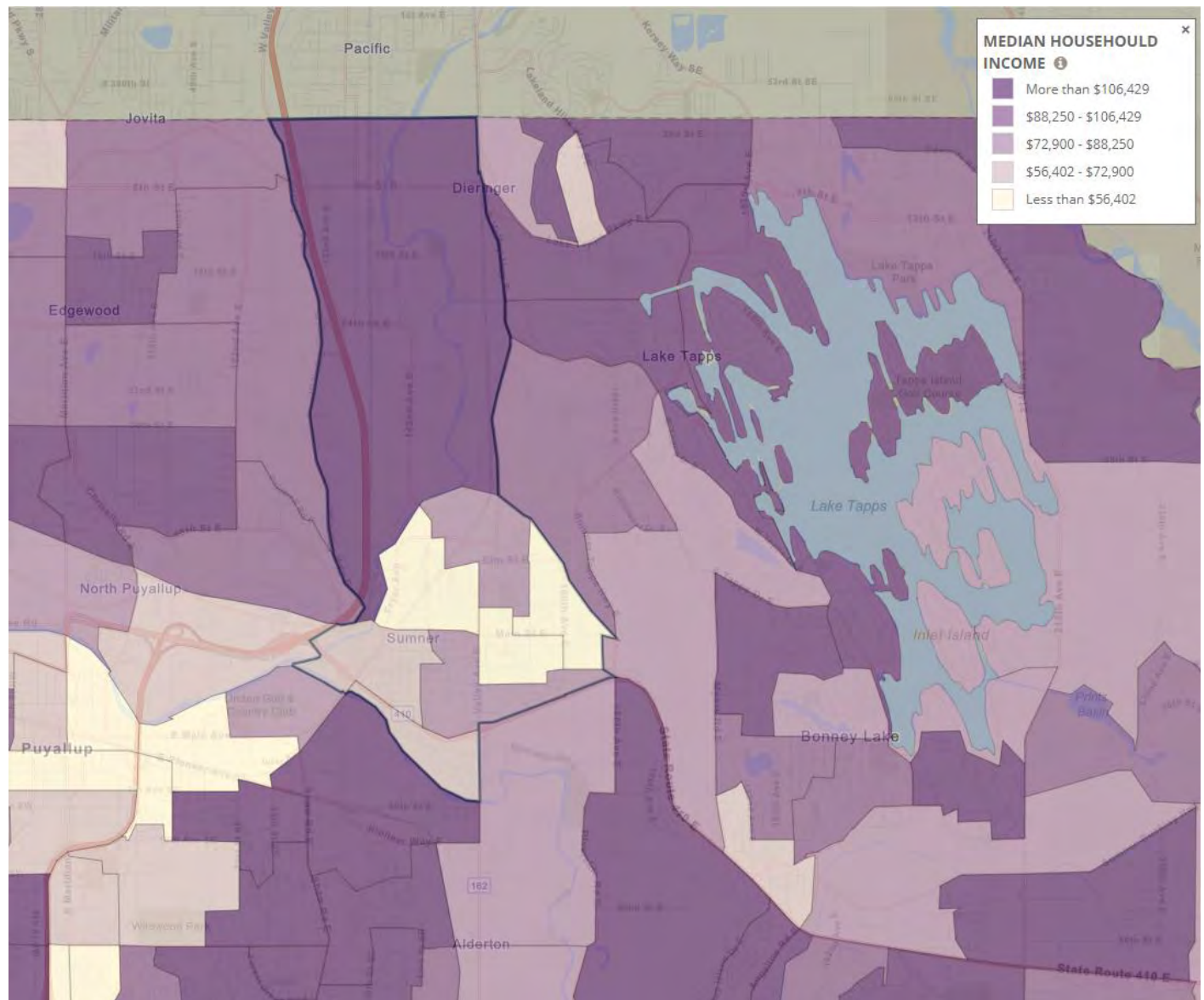
The proportion of the population with a high school diploma and bachelor's degree (or higher) and median household income increased in Sumner between 2000-2021. See Exhibit 4-9.

Pierce County mapping shows geographic distribution of median household income across the City of Sumner. Highest median household incomes (greater than \$106,429) are found in the North Portion, and lowest median household incomes (less than \$56,402) are found in parts of the East Portion. See Exhibit 4-10.

Exhibit 4-9: Summary of Education and Income Characteristics - Sumner and Pierce County

Characteristic	2000 Sumner	2010 Sumner	2021 Sumner	2000 Pierce Co	2010 Pierce Co	2021 Pierce Co
Education: High School Diploma or Greater	85.8%	91.3%	90.7%	86.9%	90.5%	92.1%
Education: Bachelor's Degree or Higher	19.6%	18.8%	25.8%	20.6%	24%	28.4%
Median Household Income	\$38,598	\$50,206	\$77,601	\$45,204	\$59,478	\$82,574

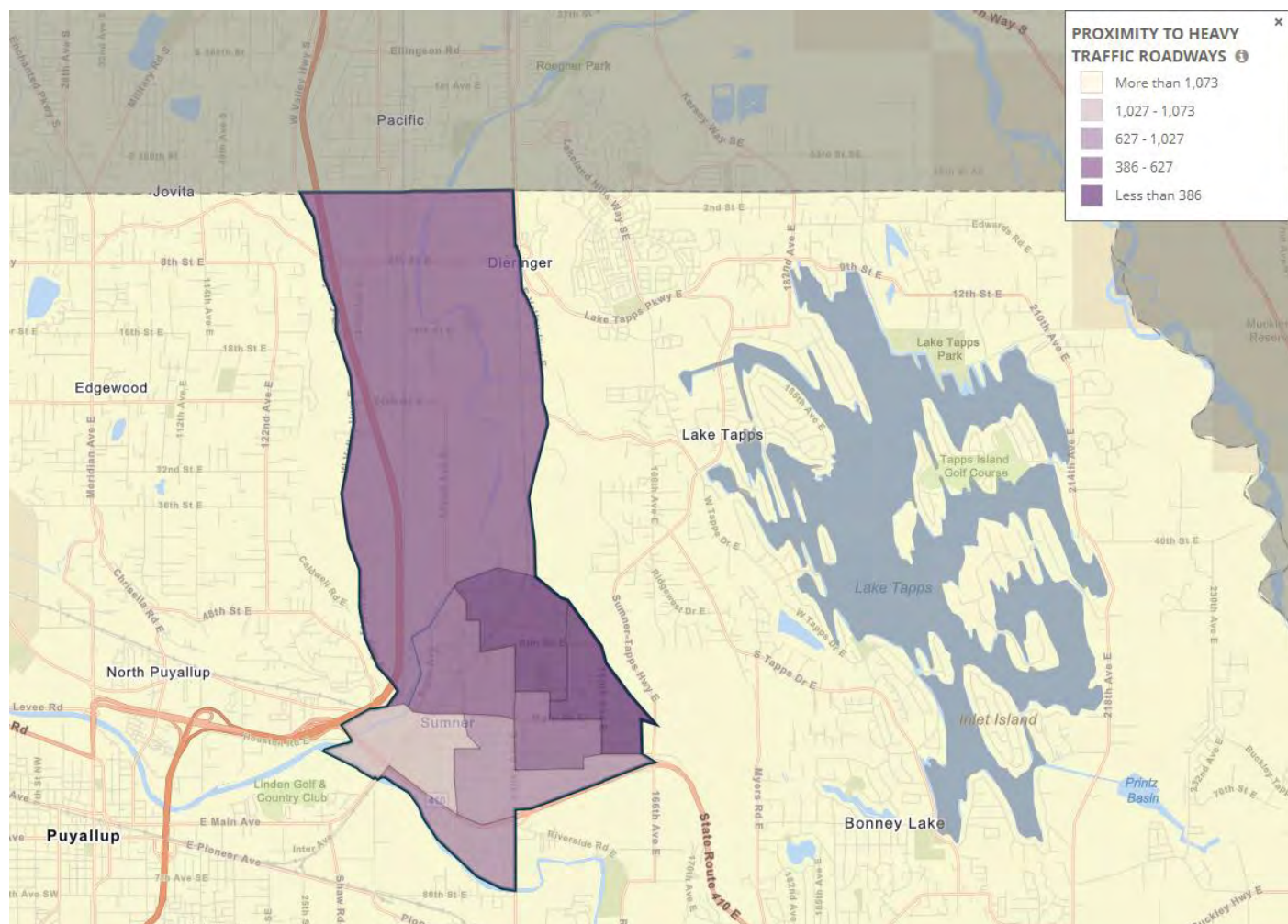
Note: Data for previous years (1990, 2000, and 2010) are sourced from a 2015 City of Sumner Draft EIS.
Source: US Census Bureau, 2021.

Exhibit 4-10: Median Household Income - Sumner

Source: Pierce County, 2023.

Environmental Health

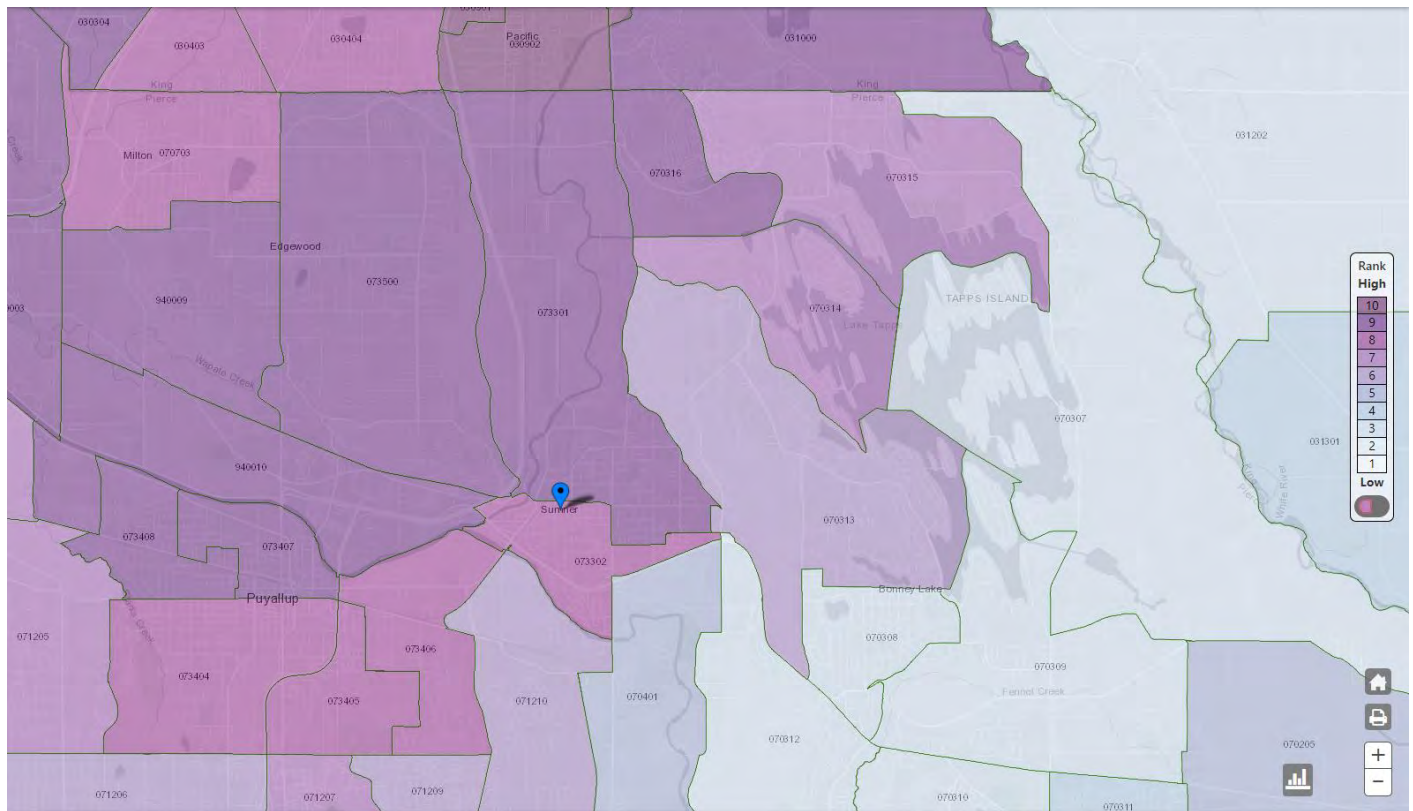
Pierce County mapping also shows environmental health indicators, such as proximity to heavy traffic roadways. The major heavy traffic roadways near Sumner are State Route 167 and State Route 410. The highest concentration of Sumner's population in proximity to heavy traffic roadways is in the western portion of the city near the convergence of State Route 167 and State Route 410. Population is also exposed to heavy traffic roadways in the South and West Portions of Sumner along State Route 167. State Route 410 runs north south through the MIC, though that portion is mainly an employment center, which is why the map shows a smaller portion of population exposed in that area. See Exhibit 4-11.

Exhibit 4-11: Population in Proximity to Heavy Traffic Roadways

Source: Pierce County, 2023.

In addition to heavy traffic roadways, the BNSF rail line runs north-south in Sumner with several at-grade crossings. Horns and bells are used at at-grade crossings to warn drivers of an on-coming train. The at-grade crossing noise impacts the population proximate to the at-grade crossings especially residents. Three at-grade crossings are within the west portion of the city including Maple and Main Streets east of Traffic Avenue and Zehnder Street at Wood Avenue. The number of trains using the tracks within Sumner is anticipated to increase over the next 20-years, which means crossing will be more frequent.

Washington State Department of Health mapping shows proximity to hazardous waste treatment, storage, and disposal facilities. Western and southern portions of Sumner have lower proximity to these facilities than the North and East Portions of Sumner, though all have high rankings when compared to areas to the south and east of the city. See Exhibit 4-12.

Exhibit 4-12: Proximity to Hazardous Waste Treatment Storage and Disposal Facilities - Sumner

Source: Washington State Department of Health, 2023.

North Portion

The North Portion has the smallest residential population and lowest population density in the city as it is primarily an employment center. Similarly, the North Portion has a lower density of BIPOC residents than the rest of the city. The North Portion has a larger concentration of adults between the ages of 18-64. Though there is limited housing in the North Portion, the North Portion does have the highest median incomes in the city. The North Portion has higher proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

East Portion

The East Portion has large concentrations of the city's population of residents over the age of 65 and under the age of 18 years, as well as large concentrations of the city's BIPOC population. Portions of the East Portion have the lowest median incomes in the city. The East Portion contains the lowest concentration of Sumner residents living in close proximity to heavy traffic roadways, though it does have higher proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

West Portion

The West Portion has high concentrations of adults between the ages of 18-64. The highest concentration of Sumner's population in proximity to heavy traffic roadways is in the West Portion near

the convergence of State Route 167 and State Route 410. While relatively high in proximity to heavy traffic roadways, the West Portion has lower proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

South Portion

The South Portion has a large share of the city's BIPOC population and has more residents that are over 65 or under 18 years old than between 18-64 years. The South Portion has lower median income than other parts of the city. The South Portion has a lower concentration of residents in proximity to heavy traffic roadways and proximity to hazardous waste treatment storage and disposal facilities than other parts of the city.

Sumner UGA

The Sumner unincorporated UGA includes three main areas. The western area near to interchange of State Route 410 and State Route 167 is located near the West Portion. Similar to the West Portion, this area has a large concentration of residents in proximity to heavy traffic roadways. The area to the south has a moderate number of residents in proximity to heavy traffic roadways, likely due to its location near State Route 410. The area to the northeast of the city has a small share of residents living near heavy traffic roadways. The area to the west has a higher proximity to hazardous waste treatment, storage, and disposal facilities compared to the areas northeast and south of the city. The area to the northeast has the highest median household income out of the three areas and the area to the west has the highest proportion of adults over the age of 65 years.

4.2.2 Employment

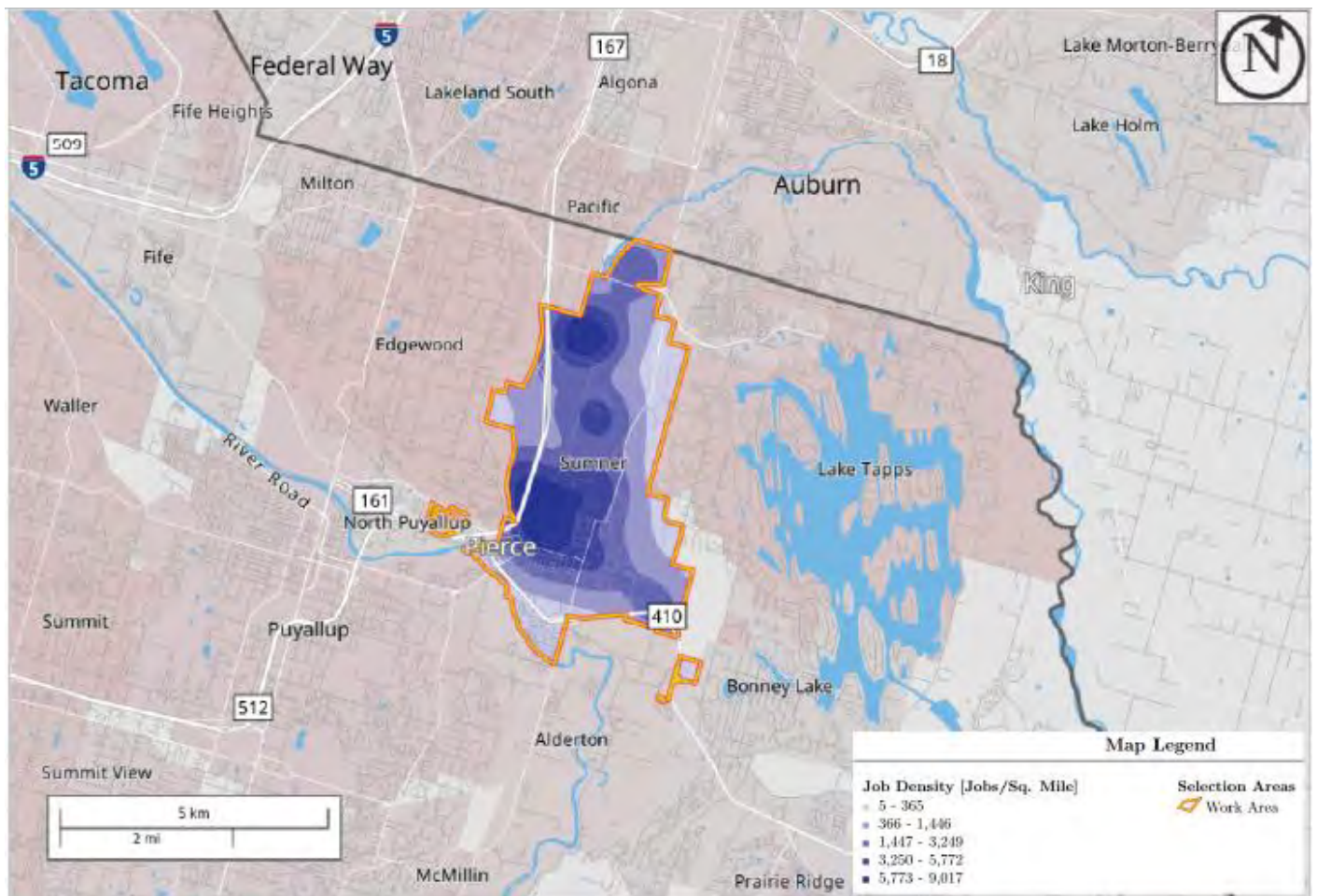
Citywide

The Sumner-Pacific Manufacturing Industrial Center (MIC) is the largest MIC in Pierce County and is a major employer and important warehousing, transportation, distribution, and logistics hub for the region. The MIC is home to an estimated 17,515 jobs as of 2021 (according to PSRC data). Headquartered businesses and major industrial operations include (per the Puyallup Sumner Chamber of Commerce):

- **Headquarters:** Bellmont Cabinet Company, Parsons Construction Company, Shining Ocean, Dillanos Coffee Roasters, Investco
- **Major Industrial Centers:** REI Distribution Center, Amazon Distribution Center, Costco Distribution Center, Martin Brower, Maersk, Keurig Dr. Pepper

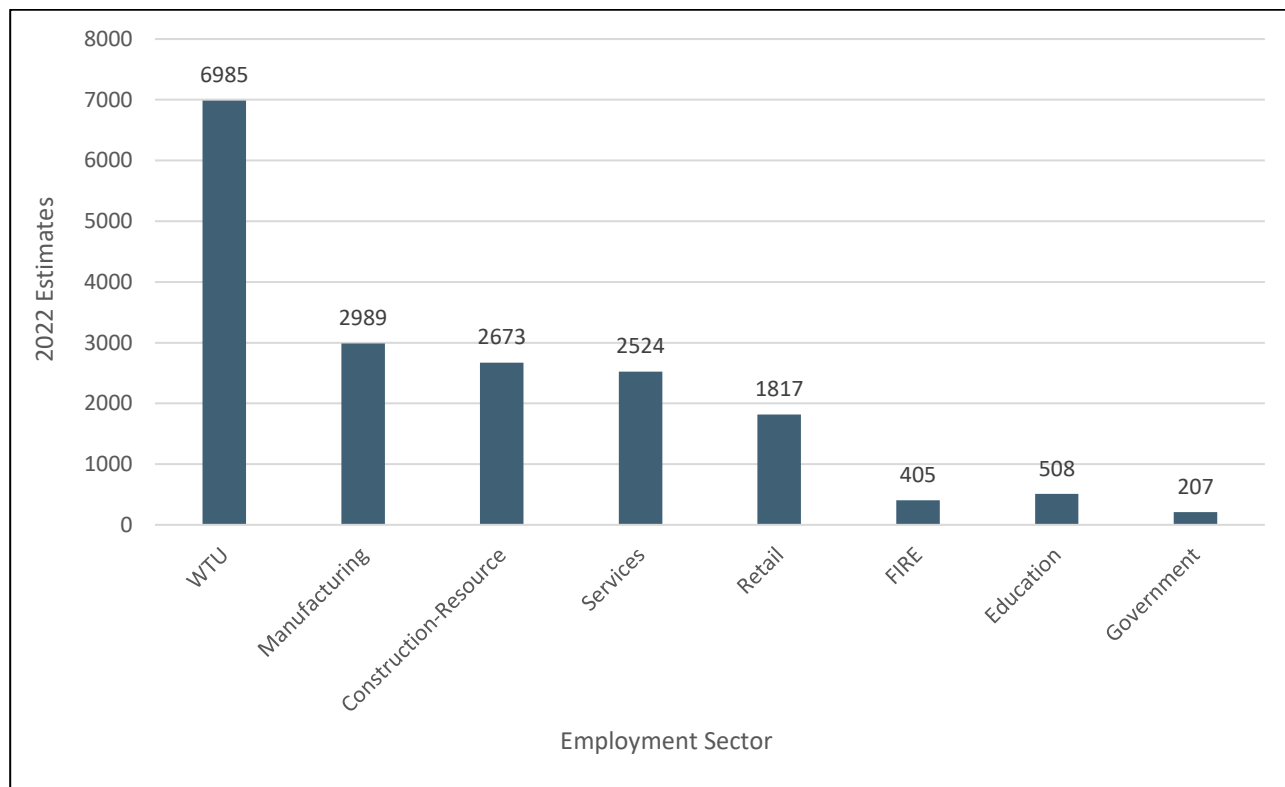
To meet the criteria for an MIC a jurisdiction must be planning for at least a total of 20,000 jobs.

Census OnTheMap, a US Census Bureau tool, provides a geographic representation of where jobs are located throughout the City of Sumner. There is a high concentration of jobs in the in the MIC, as well as in the Town Center area. The map also shows some job density in and around the East Sumner neighborhood. See Exhibit 4-13.

Exhibit 4-13: 2020 Job Densities – Sumner

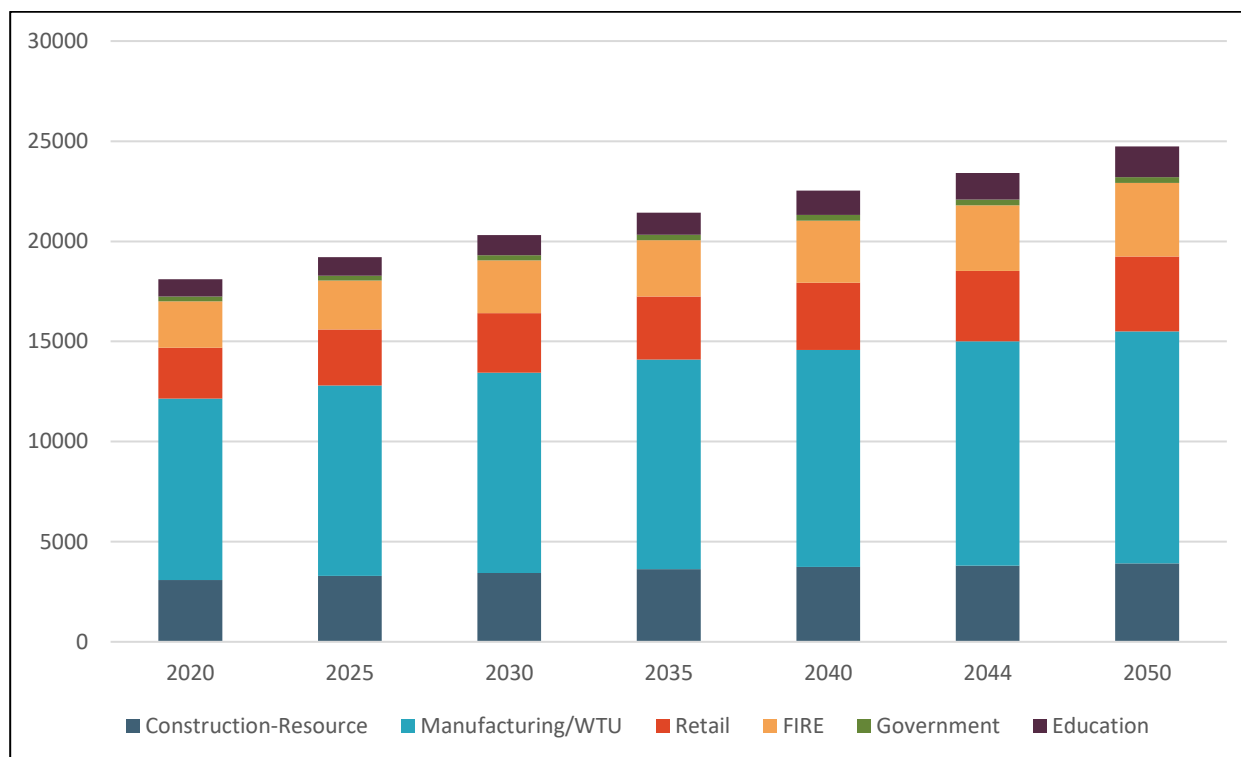
Source: Census OnTheMap, 2023.

Current employment estimates provided by PSRC indicate that wholesale trade/transportation/utilities (WTU), manufacturing, construction resource, and services are the largest employment sectors in Sumner, which comprise 84% of all current employment. See Exhibit 4-14 for estimates of the number of workers in each employment sector.

Exhibit 4-14: 2022 Employment - Sumner

Source: PSRC Covered Employment by City, 2023.

PSRC provides a forecast for employment in Sumner through 2050. 2050 forecasts expect the largest sectors of employment to be manufacturing and WTU, accounting for roughly 47% of the jobs. Forecasts also expect the number of jobs to increase by 6,641 between 2020 and 2050. See Exhibit 4-15.

Exhibit 4-15: Employment Forecasts - Sumner

Source: PSRC LUV-it City Summaries, 2023.

Pierce County has adopted a total jobs target for Sumner of 23,419 in 2044, or an increase of 5,313 jobs over 2020 estimates (18,106).

The majority of Sumner residents aged 16 and over are in the labor force (64.3%), slightly lower than in Pierce County (66.1%). Sumner is in line with Pierce County on employment and unemployment rates. See Exhibit 4-16.

Exhibit 4-16: Current Labor Force, 2021 5-Year Estimates

	Population 16+ Years Old	% in Civilian Work Force	% Employed	% Unemployed
Sumner	8,467	64.3%	60%	5%
Pierce County	718,566	66.1%	60.2%	5%

Source: ACS, 2021.

Commuting Mode

Most workers commute to work, with the primary form being single-occupant vehicles (77.7%). Approximately 14.6% of Sumner residents drove in a carpool, took public transit, or walked to work, compared to approximately 15.3% in Pierce County. See Exhibit 4-17.

Exhibit 4-17: Means of Transportation to Work

	Sumner	Pierce County
Total Workers 16 & Over	5,003	439,523
Car, truck, or van – drove alone	77.7%	74.5%
Car, truck, or van – carpooled	7%	9.9%
Public transportation (excluding	3.6%	3.4%
Walked	4%	2%
Bicycle	0%	0.3%
Taxicab, motorcycle, or other means	1.3%	1.1%
Worked at home	6.4%	8.8%

Source: ACS 2021 5-Year Estimates.

North Portion

The North Portion contains the largest concentration of jobs within the city, due to the MIC. These jobs are largely in the manufacturing and wholesale trade/transportation/utilities sectors.

East Portion

While primarily a residential area, the East Portion does have a moderate distribution of jobs in and around the neighborhood.

West Portion

The West Portion contains a large concentration of jobs, largely in the Town Center, which is Sumner's mixed-use downtown area.

South Portion

Primarily a residential area, the South Portion has a small number of jobs compared to other parts of the city.

Sumner UGA

All three areas have some jobs, but in lower concentrations than the City of Sumner.

4.3 Impacts

4.3.1 Thresholds of Significance

Impacts on population and employment are considered significant if they would:

- Add population growth in areas with considerable air/noise pollution
- Fail to meet the citywide population or jobs target
- Fail to meet MIC criteria for planning for jobs
- Result in involuntary economic displacement by business

4.3.2 Impacts Common to All Alternatives

Population and employment would increase under all of the alternatives, though the extent and location of residential growth differs slightly across the alternatives. Employment growth and distribution is the same across all three alternatives.

Growth in Air or Noise Pollution Areas

Citywide

All alternatives add population growth to areas of high air or noise pollution. This includes growth near the BNSF rail line, therefore more people will be impacted by the noise of the train crossings.

North Portion

Residential uses in the North Portion are limited, as most of the area consists of the MIC, which is designated for industrial uses. Under all the alternatives, there is minor population growth in the North Portion and the number of residents living near high noise and air pollution levels in the North Portion is not expected to increase substantially.

East Portion

As shown in Exhibit 4-11, the East Portion has the smallest concentration of population living in proximity to heavy roadways as the area is not as close to State Route 167 and State Route 410 as other areas in Sumner. The East Portion receives a considerable amount of the population growth under all alternatives, so the number of residents living near high noise or air pollution levels in the East Portion is expected to increase to some extent.

South Portion

Under all the alternatives, there is minor population growth distributed to the South Portion. As shown in Exhibit 4-11, there is a moderate concentration of Sumner's population living along State Route 410 in the South Portion. The number of Sumner residents in the South Portion living near high noise and air pollution levels will increase slightly under all the alternatives.

West Portion

Under all alternatives, much of the population growth is focused in Town Center in the West Portion. As shown in Exhibit 4-11, the West Portion is the area in Sumner with the largest concentration of population in proximity to heavy traffic roadways due to its proximity to State Route 410 and State Route 167. Seeing as population growth is focused in the West Portion, the number of Sumner residents in the West Portion living near high noise and air pollution areas will increase under all the alternatives.

Sumner UGA

Under all alternatives, there is some population growth in the Sumner unincorporated UGA. All alternatives direct the most housing growth to the area to the northeast of the city, which has the lowest concentration of residents living near heavy traffic roadways. However, there is housing growth directed to the areas west and south of the city, which have higher numbers of residents living near heavy traffic roadways, so the number of Sumner residents in the South Portion living near high noise and air pollution levels will increase slightly under all the alternatives.

Growth Targets

All the alternatives are expected to meet citywide population and jobs targets. See Chapter 6: Housing for discussion on housing targets under each of the alternatives.

Exhibit 4-18: Population and Employment Growth Allocations by Alternative

	2020-2044 Target	2020-2023 Growth (and Pipeline, for Employment only)	Alternative 1 (2023-2044)	Alternative 2 (2023-2044)	Alternative 3 (2023-2044)
Population	4,904	179	4,725	6,521	6,521
Employment	5,313	3,656	1,657	1,657	1,657

Source: BERK, 2023.

MIC Criteria

All the alternatives are expected to meet the MIC criteria to plan for at least 20,000 jobs in the area. PSRC estimates that 17,515 jobs were present in the MIC in 2021. Sumner has added since 2021, or is expecting, 2,951 new and future pipeline jobs. All alternatives plan for approximately 950 new jobs, in addition to those already in the pipeline, in the Sumner portion of the MIC. Based on the existing, pipeline, and future jobs, the MIC is expected to reach over 21,000 jobs by 2044. This is not including growth between 2020 and 2044 in the Pacific portion. Pacific's jobs target, citywide, is 638 new jobs by 2044.

Economic Displacement

Citywide

All alternatives expect job, population, and housing growth. As development occurs, some businesses may be displaced through redevelopment or increased land prices and rents. Because all three alternatives include growth, potential displacement could occur, and adverse commercial displacement impacts are expected under each alternative.

It is estimated that over 40% of job capacity in Sumner is on underutilized properties (opposed to vacant properties).¹ This is a potential indicator that existing jobs and businesses on these underutilized properties may be displaced if these properties redevelop.

North Portion

The majority of job growth is focused in the MIC area. Some commercial displacement could occur as a result of redevelopment. However, the MIC Subarea Plan has policies aimed at business retention and encouraging a variety of business sizes in the MIC.

East Portion

The East Portion is expected to receive housing and job growth under each alternative. Commercial displacement could occur as a result of redevelopment and/or increased land prices and rents.

South Portion

Primarily a residential area, the South Portion has a small number of jobs compared to other parts of the city. The South Portion is not expected to receive job growth under any of the alternatives, though it is expected to receive some housing growth. Commercial displacement impacts are expected to be minor.

West Portion

While not receiving the majority of job growth, the West Portion is expected to add some jobs in the Town Center. The Town Center has a concentration of older and historic buildings, which, due to their age, could be vulnerable to commercial displacement if the buildings are redeveloped.

The Town Center in the West Portion is expected to receive housing growth under all the alternatives. Town Center is a mixed-use center and housing growth and development could cause commercial displacement.

¹ Based on data from Pierce County Buildable Lands and City of Sumner permit data, accounting for development since 2020 and projects in the timeline. BERK, 2023.

Sumner UGA

The Sumner unincorporated UGA has a small number of jobs compared to other parts of the city, though its three areas are expected to receive some job and housing growth under all three alternatives. Commercial displacement impacts are expected to be minor.

4.3.3 Alternative 1 (No Action)

Growth in Air or Noise Pollution Areas

Similar to Alternatives 2 and 3, Alternative 1 primarily adds population growth to West Portion and East Portion. While the West Portion currently has a high concentration of residents living near air or noise pollution areas, Alternative 1 adds less population growth than Alternatives 2 and 3, meaning it is expected to add less people living near air or noise pollution areas in Sumner than the action alternatives.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 1, like Alternatives 2 and 3 meets the population and job targets allocated to Sumner. Under Alternative 1, 4,900 additional residents are added to Sumner between 2020-2044. Alternative 1 provides less population growth than Alternatives 2 and 3. All alternatives provide the same amount of job growth.

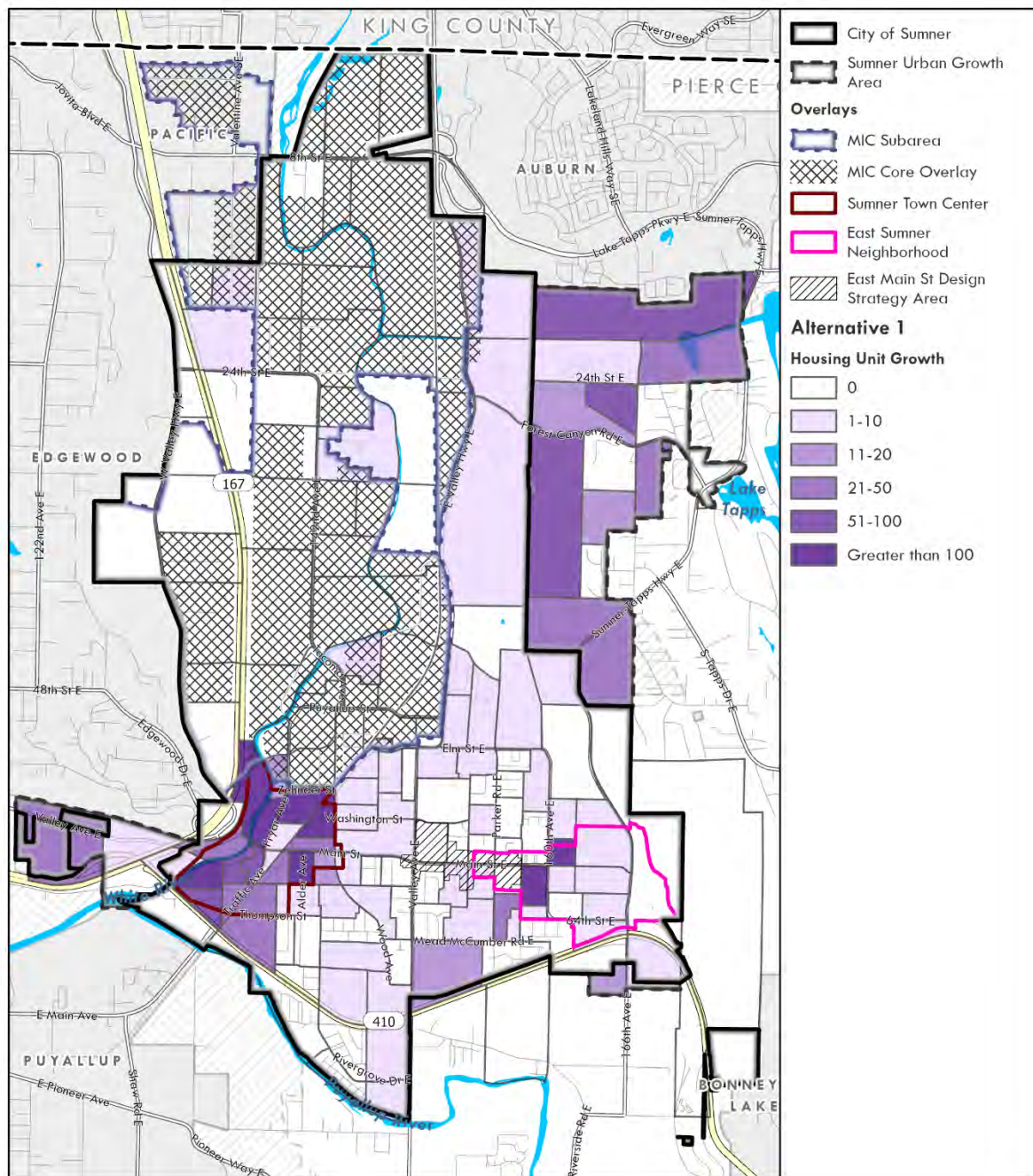
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 1, like Alternatives 2 and 3, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

Exhibit 4-19: Future Housing Growth - Alternative 1



CITY OF SUMNER

Future Housing Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

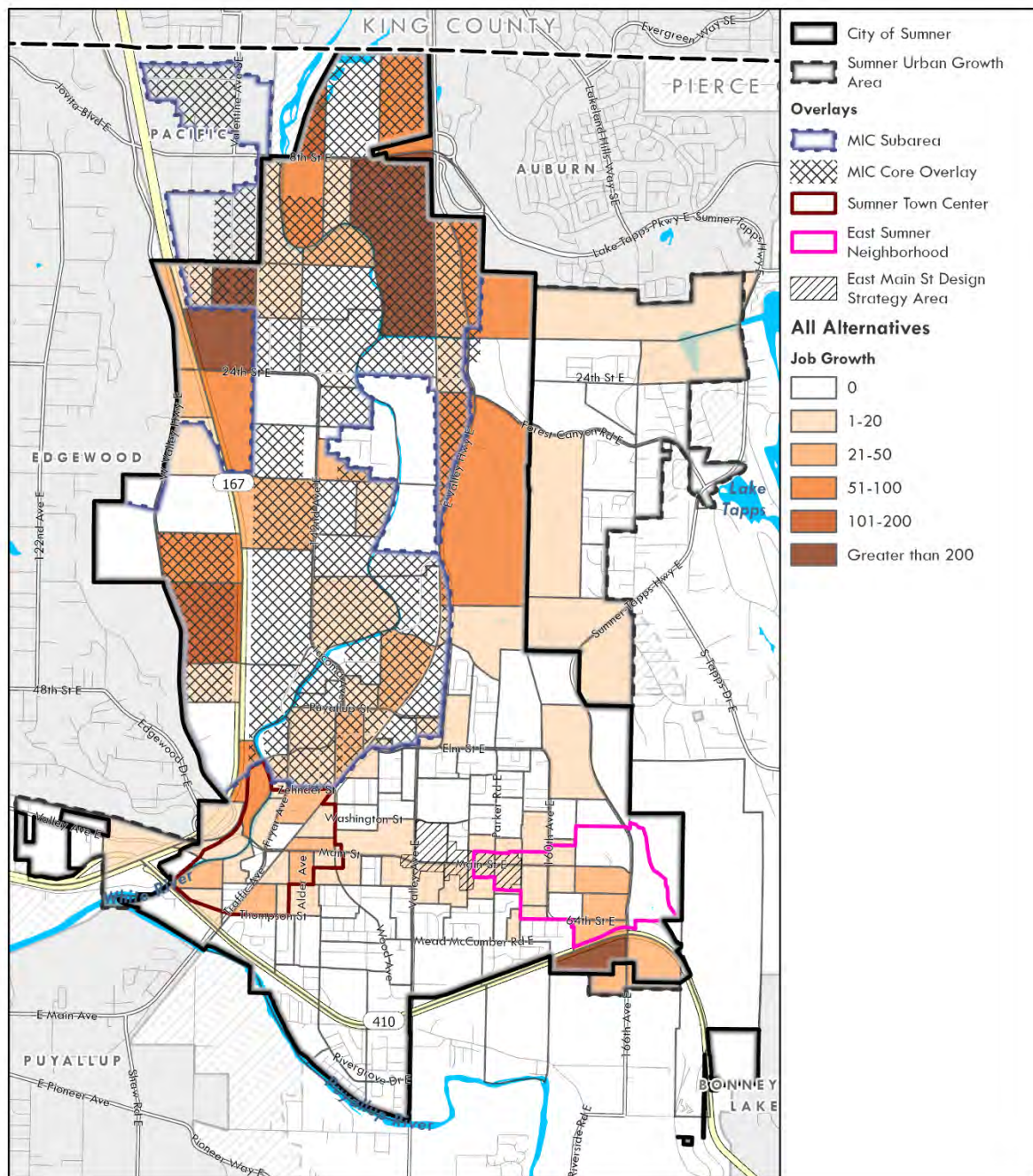
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

Exhibit 4-20: Future Job Growth - All Alternatives



CITY OF SUMNER

Future Job Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.3.4 Alternative 2

Growth in Air or Noise Pollution Areas

Similar to Alternatives 1 and 3, Alternative 2 primarily adds population growth to West Portion and East Portion. While the West Portion currently has a high concentration of residents living near air or noise pollution areas, and since Alternative 2 adds more population growth than Alternative 1 and the same as Alternative 3, meaning it is expected to add more residents living near air or noise pollution areas.

Alternative 2, unlike Alternatives 1 and 3, rezones the Cava gravel mine site in the East Portion to Medium Density Residential (MDR). Given the mine site's proximity to the MIC area and hazardous waste treatment, storage, and disposal facilities (see Exhibit 4-12), Alternative 2 is expected to add more residents living in proximity to these facilities than Alternatives 1 and 3.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 2, like Alternatives 1 and 3 meets the population and job targets allocated to Sumner. Under Alternative 2, 6,700 additional residents are added to Sumner between 2020-2044. Alternative 2 provides more population growth than Alternative 1 and the same as Alternative 3. All alternatives provide the same amount of job growth.

Alternative 2 focuses population growth in Town Center (West Portion) and the East Portion (primarily to the Cava gravel mine site), but also distributes growth citywide.

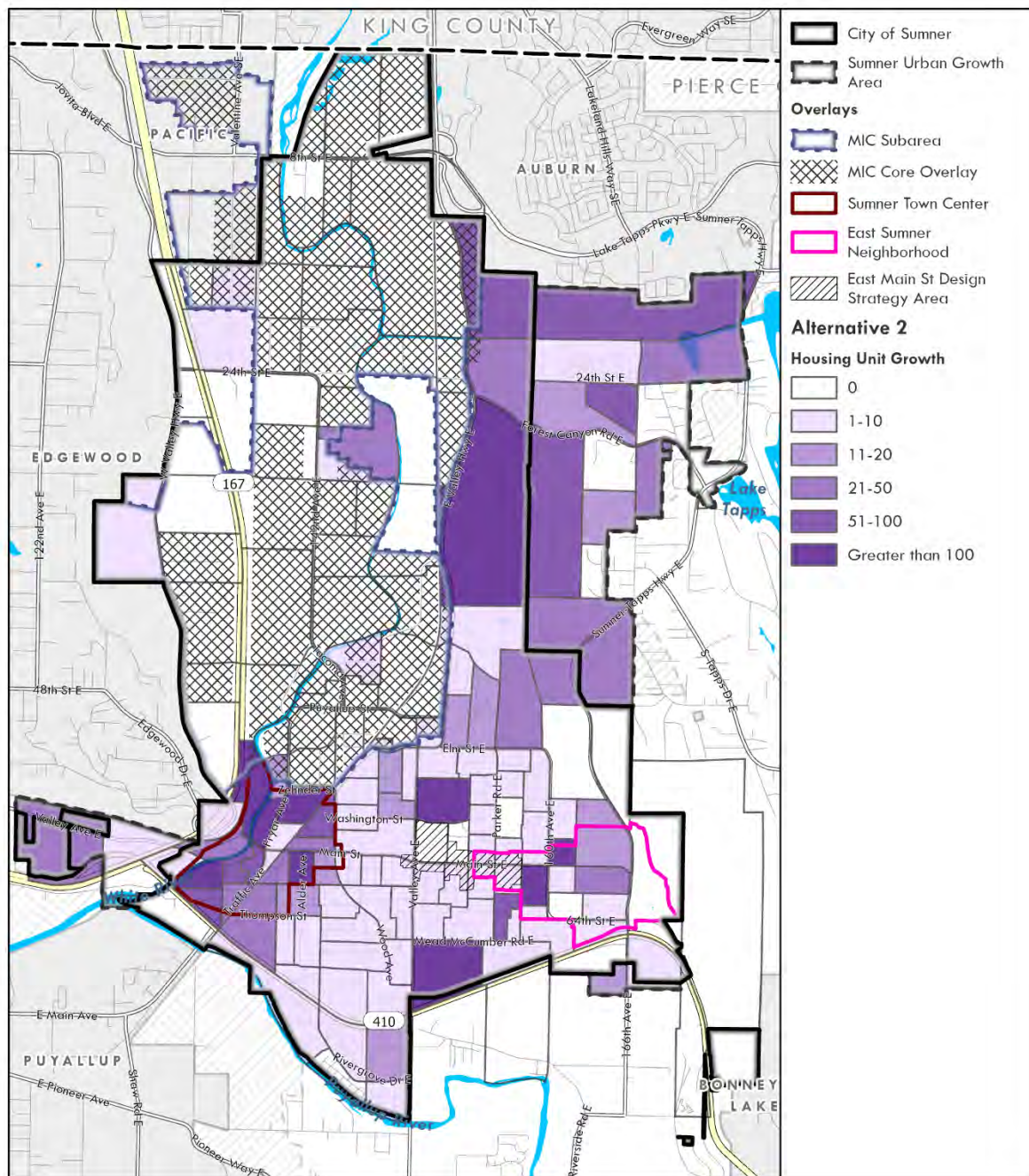
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 2, like the other alternatives, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

Exhibit 4-21: Future Housing Growth - Alternative 2



CITY OF SUMNER

Future Housing Growth



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.3.5 Alternative 3

Growth in Air or Noise Pollution Areas

Similar to Alternatives 1 and 2, Alternative 3 primarily adds population growth to West Portion and East Portion. While the West Portion currently has a high concentration of residents living near air or noise pollution areas, and since Alternative 3 adds more population growth than Alternative 1 and the same as Alternative 2, meaning it is expected to add more residents living near air or noise pollution areas. However, unlike Alternative 2, Alternative 3 does not propose rezoning the Cava gravel mine site, and therefore is expected to add less population in proximity to hazardous waste treatment, storage, and disposal facilities.

Growth Targets

As discussed under Impacts Common to All Alternatives, Alternative 3, like Alternatives 1 and 2 meets the population and job targets allocated to Sumner. Under Alternative 3, 6,700 additional residents are added to Sumner between 2020-2044. Alternative 3 provides more population growth than Alternative 1 and the same amount as Alternative 2. All alternatives provide the same amount of job growth.

Under Alternative 3, population growth is focused in Town Center (West Portion) and the East Portion, with small-scale moderate-density housing spread throughout the city.

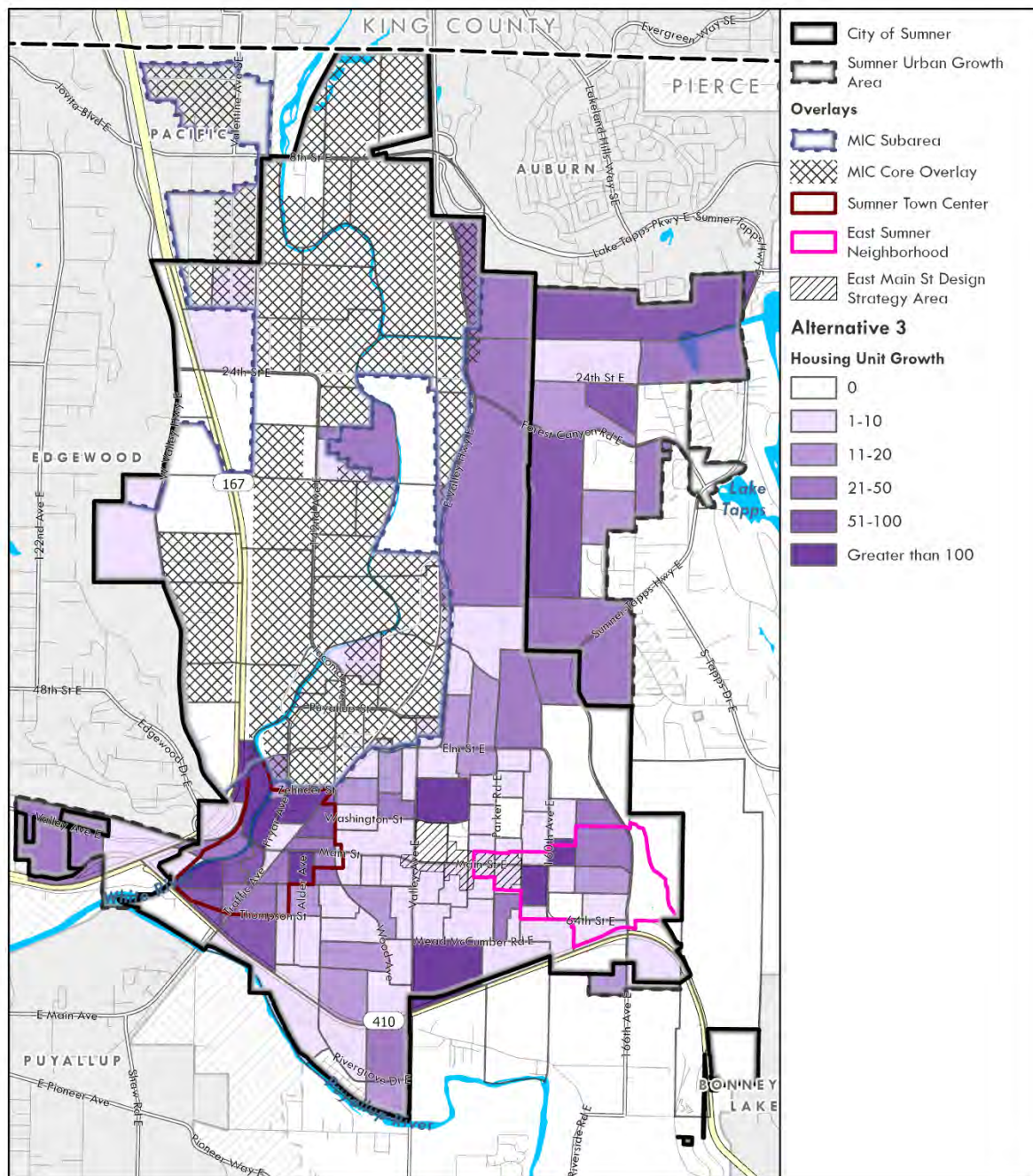
MIC Criteria

As discussed under Impacts Common to All Alternatives, Alternative 2, like the other alternatives, meets the MIC criteria to plan for at least 20,000 jobs in the area.

Economic Displacement

All alternatives add the same number of jobs, though Alternatives 2 and 3 add more housing growth than Alternative 1. Given this, more economic displacement could occur under Alternatives 2 and 3 as there is more expected housing development or redevelopment that could displace existing jobs and businesses.

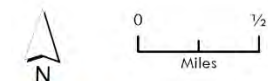
Exhibit 4-22: Future Housing Growth - Alternative 3



CITY OF SUMNER

Future Housing Growth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: BERK, 2023.

Notes: Growth is shown by traffic analysis zone (TAZ). Growth displayed is the total growth for all parcels in each TAZ. Not all parcels within a given TAZ are expected to see growth.

4.4 Mitigation Measures

4.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 would mitigate adverse impacts to growth in air or noise pollution areas, growth targets, MIC criteria, and economic displacement.

Growth in Air or Noise Pollution Areas

- Alternatives 2 and 3 include a revised policy to require new developments that generate noise impacts sufficient to cause environmental health problems to submit an analysis of potential noise impacts and propose mitigation.
- Alternatives 2 and 3 include a new Climate element and revised Transportation policies that aim to reduce vehicle miles traveled (VMT).
- Alternatives 2 and 3 include a revised goal to plan for a variety of land uses and prevent adverse impacts between neighboring uses.

Growth Targets

- No adverse impacts expected under Alternatives 2 and 3.

MIC Criteria

- No adverse impacts expected under Alternatives 2 and 3.

Economic Displacement

- Alternatives 2 and 3 include revised goal around supporting locally and women- and minority-owned businesses and incorporate goals and policies from the MIC Subarea Plan, which promote business retention and a mix of businesses of all sizes.

4.4.2 Regulations and Commitments

The following regulations and commitments would be mitigation measures common to all alternatives.

Growth in Air or Noise Pollution Areas

- The Sumner Comprehensive Plan Environment Element contains multiple goals and policies aimed at protecting air quality and reducing noise impacts. This is achieved through air quality impact analysis of new developments, requirements for buffers between busy roadways and schools or residential areas and conducting noise impact analysis for new developments that could generate substantial levels of noise.
- The Sumner Municipal Code Title 18 (Zoning) establishes zoning and development regulations that govern allowed uses and site development standards, including tree planting and landscaping.
- The Sumner Municipal Code Title 16 (SEPA Procedures and Policies) establishes a framework, consistent with Washington State law, for identifying, analyzing, and if necessary, mitigating

environmental impacts associated with non-exempt development projects and adopting regulations and plans.

- The City enforces the noise ordinance in the Sumner Municipal Code (SMC 18.14).

Growth Targets

- The City of Sumner must meet its designated growth targets per Pierce County Countywide Planning Policies.

MIC Criteria

- With the designation of the Sumner-Pacific Manufacturing/Industrial Center, the Cities of Sumner and Pacific have committed to accommodating significant shares of regional employment growth (planning for at least 20,000 jobs in the area), promoting efficient use of land and provision of infrastructure, and supporting the manufacturing and industrial sectors.
- Puget Sound Regional Council's Centers Criteria guides planning and growth for Manufacturing/Industrial Centers.

Economic Displacement

- Economic Development Element includes goals and policies to promote a strong and diverse economy, home to businesses and industries of all sizes and types and encourages business retention. The policies and implementing regulations encourage a vibrant activity center in downtown and ensure that adequate public services and facilities are available to businesses in Sumner.

4.4.3 Other Potential Mitigation Measures

Growth in Air or Noise Pollution Areas

- All three alternatives add population growth to areas in proximity to heavy traffic roadways. The City could pursue a variety of mitigation strategies, such as transit-oriented development, land use buffers, enhanced vegetated screening, or roadside barriers for sound.
- The noise from the train horns could be mitigated with implementation of quiet zones within the west portion of the city. Establishing "quiet zones" needs to meet the Federal Rail Administration (FRA) requirements. The "quiet zone" provides improvements that allow the train to proceed through the at-grade crossing within using the horn, except in emergencies. The minimum requirements for quiet zones are the crossing must have gates, flashing lights, constant warning time devices and power out indicators and the zone must be ½-mile in length as well as have no non-quiet zone crossings within ¼-mile. Multiple crossings can be included in one quiet zone. In addition to the minimum requirements, typically additional safety measures must be installed at the crossings such as adding gates in all quadrants of the crossing.

Growth Targets

- No additional potential mitigation measures.

MIC Criteria

- No additional potential mitigation measures.

Economic Displacement

- All three alternatives have the possibility for economic displacement. The City could study creating a program to identify and preserve commercial spaces that are suitable for small businesses to ensure that adequate and affordable space is available in Sumner for small, local, and women-and minority-owned businesses.

4.5 Significant Unavoidable Adverse Impacts

Population and employment growth would increase under all three alternatives, although the location of residential growth and the extent of that growth varies by alternative. Employment growth and distribution is the same under all three alternatives.

Significant unavoidable adverse impacts on population and employment are not expected under any alternative due to the above opportunities for mitigation.

5 Aesthetics

5.1 Introduction

The aesthetics analysis reviews possible impacts of the alternatives on the physical character of Sumner and possible mitigation measures. This chapter includes a range of topics, including urban form, viewsheds, and shadows.

5.2 Affected Environment

5.2.1 Aesthetics-Related Policies, Design Guidelines, and Other Considerations

The adopted Sumner Comprehensive Plan includes a Community Character element.

Several Community Character policies are relevant to analysis of citywide aesthetics:

- **CC 1.1:** Encourage development which enhances the human/pedestrian scale, creating a sense of community and place.
- **CC 1.2:** Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, work places, schools, parks, civic facilities, and community services essential to the daily life of residents.
- **CC 1.3:** Maintain design guidelines that address streetscape, landscape, and building design. Materials and methods of construction should be specific to the region, exhibit continuity of history and culture, be compatible with the climate, protect historic and archaeological resources, and promote the community's character and identity.
- **CC 4.1:** Through street standards, design guidelines and land use regulations, promote all entrances to the City, including Traffic Avenue and Valley Avenue, 166th Street as gateways to the community. The character of the Avenues shall be a boulevard with median or other treatments. Gateway design standards for community entrances shall be applied.
- **CC 5.1:** In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complements the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.
- **CC 6.1:** Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other.

- **CC 7.1:** Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets, pedestrian paths, and bike paths should contribute to a system of fully-connected and interesting routes to all destinations. Street design should encourage pedestrian and bicycle use and discourage high speed traffic.

The City of Sumner has adopted Design and Development Review Guidelines which implement these aesthetic-related goals and policies, and through the Sumner Municipal Code (SMC) Chapter 18.40 Design and Development Review the guidelines apply to most new development. These are intended to encourage development which enhances the human and pedestrian scale and creates a sense of community and place.

As proposed in the Draft 2024 Comprehensive Plan, several of the City's Community Character policies may change. For example, changes to CC 1.3 are proposed to be more specific about terms such as "community character" and "identity".

Sumner-Pacific MIC

The Sumner-Pacific Manufacturing/Industrial Center (SPMIC) is an important regional warehousing, transportation, distribution, and logistics hub.

Aesthetics-related Comprehensive Plan goals and policies that are specifically relevant to the Sumner-Pacific MIC include:

- **CC 8:** Promote the development of the Manufacturing/Industrial Center (MIC) and ensure integration and compatibility of this area with adjacent neighborhoods and encourage pedestrian and transit connectivity and access.

The cities of Sumner and Pacific also adopted the Sumner-Pacific MIC Subarea Plan (updated 2018) which articulates a vision for the area and provides goals and policies to guide investments. Aesthetic related goals and policies from the Sumner-Pacific MIC Subarea Plan include:

- **SPMIC-2:** New growth in the SPMIC complements the existing character and development pattern.
- **SPMIC-2.1:** Encourage high quality industrial development through the establishment of appropriate performance standards and design guidelines for industrial areas.
- **SPMIC-3.1:** All industrial development should incorporate aesthetically pleasing building and site design. The City shall ensure its codes and performance standards which govern industrial development this policy.
 - Procedures shall be established to ensure aesthetically pleasing building and site design in areas designated for light industrial areas.
 - Appropriate landscaping and site development standards shall regulate site development in heavy industrial areas.
 - Heavy machinery, service entrances, storage areas, rooftop equipment, loading docks, and parking areas shall be screened from view of adjacent retail, commercial, light industrial and residential areas and from public streets.

- Require industrial businesses and development to minimize exterior odor levels to avoid impacts to adjacent residential and commercial land uses. Work with Puget Sound Clean Air Agency to investigate and respond to odor complaints.
- **SPMIC-3.2:** Allow outdoor storage only as accessory to principal use.
- **SPMIC-3.3:** Require landscape buffers between SPMIC and adjacent neighborhoods to reduce noise, light and glare, and visual impacts from industrial activity.

East Sumner Neighborhood

The 2020 East Sumner Neighborhood Plan Update includes a variety of goals and objectives for the 174-acre planning area located in the eastern portion of the City. Aesthetics-related East Sumner Neighborhood Plan goals and objectives include:

- Provide a graceful transition between higher and lower intensity uses.
- Increase tree canopy throughout the neighborhood.
- Provide opportunities to strengthen the sense of community.
- Increase opportunities for community interaction, such as creating gathering places and places for community events.

Town Center

The City's Town Center is a 197-acre planning area that is intended to be a fully functional everyday downtown, while maintaining its small town character.

Aesthetic related Comprehensive Plan policies specific the Town Center include:

- **CC 3.1:** Plan for the downtown as town center and the community core encouraging a combination of commercial, civic, cultural, recreational, and residential uses.
- **CC 3.3:** Continue design review process for new and expanded uses. Any future amendments to the Sumner design guidelines shall include consultation with Sumner Downtown Association, Sumner Historical Society, other civic groups, and residents.

Policies from the 2018 Town Center Plan include:

- **TC 1.3:** The City, should, in partnership with the Sumner Downtown Promotion Association, actively recruit promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in Downtown Center, away from Main Street and Alder Avenue and designated Activity Centers.
- **TC 1.8:** Through the Comprehensive Plan and Zoning Code and form based code, ensure a central role of the historic central business district, and limit competitive uses as appropriate.
- **TC 5.8:** Maintain a high quality and attractive appearance. Work with Sumner Downtown Promotion Association and others to seasonally decorate Downtown with decorations, hanging baskets, light, etc.
- **TC 6.6:** Subject to a form-based code and design review, encourage infill residential development in the Downtown Center, such as "mixed use buildings" (multifamily units above ground-floor

commercial), and “mixed use developments” (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core.

- **TC: 6.9:** Adopt a “form-based code” in the Town Center to ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.
- **TC 6.11:** Development along Traffic Avenue should be in a range of 4-6 stories and be of a mid-rise urban style and provided for underbuilding parking.
- **TC 6.12:** The height in the Historic Subdistrict should be 3-4 stories to protect and preserve the small town character and scale of Main Street and reduce conflicts with adjacent residential uses.

Minor revisions to the Town Center policies for clarity are included in the Draft 2024 Comprehensive Plan.

5.2.2 Urban Form

Citywide

The City of Sumner covers approximately 7.6 square miles of valley lands and is traversed by the White and Puyallup Rivers, as well as State Route 167 and State Route 410 and the Burlington-Northern Santa Fe and Union Pacific rail lines.

The physical character of Sumner varies, including low-density residential areas, strip mall commercial development, mixed-use centers, and an industrial and manufacturing hub (Exhibit 5-1). The city is characterized by large lot industrial development in the north with smaller lot residential and commercial development occurring largely southeast of Traffic Avenue.

As of 2017, the City of Sumner had a total of seven parks, totaling 28.3 acres of parks and open space and more 9.28 miles of multi-use trails.

Exhibit 5-1: Urban Form Across Sumner

Upper left: Large, low rise building with surface parking that is typical of the MIC area; upper right: small businesses typical of the Town Center area; lower left: single family residence; and lower right: Rainier View Park
Source: Google Street View, 2023.

North Portion

The North Portion is characterized by industrial development and is a vehicle-oriented environment. Industrial buildings are generally large, low-rise buildings with large surface parking lots. Streets generally have grassy strips separating the road from the parking lots and contain street trees.

The North Portion is located in the floodplain of the White River, leaving the northeast portion as undeveloped open space.

East Portion

The East Sumner Neighborhood is characterized by low-density residential development in its central neighborhood, though planning in the area anticipates that over time many of these uses will convert to a more diverse mix of uses and intensities. Several multifamily, townhome, and mixed-use development

projects have recently been developed (or are in permitting/construction process) in the East Sumner Neighborhood, indicating increased interest in and viability of multifamily development in the neighborhood.

Commercial development is varied. A pedestrian-oriented commercial center is located near 160th Avenue East and 60th Street East, allowing residents to walk to commercial services. Beyond this center, commercial uses are not required to be pedestrian-oriented. The southeast portion of the neighborhood is automobile-oriented environment, ideal for “big box” retail to take advantage of easy access to State Route 410.

The East Portion is also characterized by extensive wetlands. The “central wetlands,” an extensive wetland and wetland buffer network, are located in the central neighborhood. Salmon Creek runs along the neighborhood’s eastern edge. Because of this, much of this eastern area contains land that is undevelopable or that would present many challenges to develop and therefore is likely to remain as open space.

South Portion

The South Portion is characterized by low-density residential development in a vehicle-oriented environment. There are pockets of multifamily residential, in the form of townhomes and apartments. Street trees are plentiful. The southern border of the south portion is the Puyallup River.

West Portion

The West Portion is characterized by denser development east of the BNSF railroad and a more suburban development pattern along Traffic/Fryar Avenue. The Town Center Plan area largely features sidewalks on both sides of the street, and a tighter pattern of commercial development that fronts directly off of the sidewalk. Buildings are predominantly one to two stories in height. Many buildings in Sumner’s downtown are historic and have brick facades and contain other traditional architectural elements.

Sumner UGA

The Sumner unincorporated UGA includes three main areas with varied urban form. The area to the west is characterized by largely low-density residential development, with pockets of commercial development. State Routes 410 and 167 bound this area. The area to the northeast of the city is characterized by low density residential development, steep hillsides, and land in resource production and extraction as part of the Cava mine site. The UGA area to the south similarly contains low-density residential development, mineral extraction uses, and some agricultural use.

5.2.3 Viewsheds

Sumner has views of Mount Rainier and the shorelines of the Puyallup River and White River. Views of forested hillsides are also present from most areas of the city.

The adopted Comprehensive Plan and the adopted Parks and Trails Plan includes the following goals and policies in relation to viewsheds:

- **CC 1.5:** Encourage in the community a continuous commitment to maintaining Sumner's character and quality of place, including land conservation and stewardship, wise management of streetscapes and public viewsheds, property maintenance, and historic preservation.
- **POS 2.1.1:** Adopt regulations to protect the hillside areas, including limitations on development on steep slopes, provisions for buffering and clustering, requirements for replanting, limitations on tree cutting, restrictions on ridgeline development, site design standards to protect viewsheds and screen structures and mining areas.
- **SMP 2:** Increase public access to the shoreline and preserve and enhance views of the shoreline.

However, changes are proposed to CC 1.5 with the 2024 Comprehensive Plan update to remove the emphasis on viewsheds, as there are no specific public viewsheds in Sumner that are explicitly protected.

5.2.4 Shadows

Shadows play a role in aesthetics because their presence can change the function, look, and feel of public and private spaces. Areas of Sumner with higher densities, taller buildings, and smaller setbacks cast more shadows than lower density areas and low-rise buildings.

The primary building style in the MIC is large, low-rise industrial buildings with large surface parking lots, and therefore there are few shaded areas. Low-density residential development in the East and South Portions of the City also cast few shadows. Denser commercial development with small setbacks in the Town Center (within the West Portion) can cast shadows into the public realm at different points in the day. Elevated portions of State Route 410 and State Route 167 also cast shadows on the streets and space below. Loyalty Park, located in the West Portion, is home to the tallest and the greatest number of trees out of all Sumner's parks¹, and these large trees can cast shadows into the open space of the park. However, these shaded areas can also provide a refuge from heat.

5.3 Impacts

5.3.1 Thresholds of Significance

Impacts of the alternatives on aesthetics are considered significant if they would:

- Result in disruptions to important city views, such as Mount Rainier.
- Result in additional shadows on public open space.
- Would result in changes to existing scale/bulk transitions.

¹ City of Sumner Parks and Trails, 2023. Retrieved from <https://sumnerwa.gov/parks/>.

5.3.2 Impacts Common to All Alternatives

There is population, housing, and employment growth under all three alternatives, though amounts and locations of housing growth differ across the alternatives. Employment growth and distribution is the same across all alternatives.

All three alternatives direct much of the population and housing growth to the Town Center and East Sumner, with some additional growth targeted in other areas of the city. Additionally, under all three alternatives, most of the employment growth (more than 70%) is directed to the Manufacturing Industrial Center (MIC). All alternatives have the potential for an increase in overall building sizes where existing buildings are not currently maximizing the buildable envelope, based on minimum setbacks and maximum lot coverage. Additionally, given recent changes in state law regarding housing, the action alternatives may see additional development on residential lots (such as two housing units on a lot or two ADUs per lot).

Views

Citywide

All alternatives would have some impacts on views in Sumner because all three alternatives plan for population, housing, and employment growth, which will be reflected by an increase in building area in the city. Alternatives 2 and 3 have the greater potential to impact views as they result in greater building densities and housing unit allowances than Alternative 1.

North Portion

Under all three alternatives, the North Portion is expected to receive a large share of the job growth. Impacts to views could occur as buildings, particularly in the MIC, redevelop or get developed to accommodate increased jobs.

East Portion

Under all three alternatives, the East Portion is expected to receive a large share of the housing and some job growth. Impacts to views are expected as a result of redevelopment or development of new buildings and/or housing units.

South Portion

Under all three alternatives, there is some housing growth in the South Portion. As a result, some minor impacts to views are expected due to redevelopment or development of new buildings and/or housing units.

West Portion

Under all three alternatives, the West Portion is expected to receive a large share of the housing and job growth. Impacts to views are expected as a result of redevelopment or development of new buildings and/or housing units.

Sumner UGA

Under all three alternatives, the Sumner unincorporated UGA is expected to receive some housing and job growth. As a result, some minor impacts to views are expected due to redevelopment or development of new buildings and/or housing units.

Shadows**Citywide**

All alternatives would have some impacts on shadows in public spaces in Sumner because all three alternatives plan for population, housing, and employment growth, which will be reflected as increased building space. Alternatives 2 and 3 have the greatest potential to cause impacts to shadows as they plan for the greatest building densities, and larger/taller building envelopes.

North Portion

Under all alternatives, the North Portion is expected to receive the majority of employment growth. While no changes to zoning or land use policies to the MIC are proposed, new buildings are likely on some vacant properties and it is possible that buildings in the North Portion redevelop and use their allowable buildable area more fully to accommodate increased employees, which could result in minor shadow impacts. The buildings in the North Portion tend to be lower in height and do not cast large shadows.

East Portion

Under all alternatives, the East Portion is expected to receive a large share of the housing and some of the job growth. As a result, shadow impacts are expected to occur from building development or redevelopment.

South Portion

Under all alternatives, the South Portion is expected to receive a small portion of the housing growth because this area is mostly built out with established single-family residential uses. Some redevelopment could occur on underutilized parcels and some ADU development could occur on lots with existing residences, particularly under Alternatives 2 and 3. Minor shadow impacts are expected to occur from building development or redevelopment.

West Portion

Under all alternatives, the West Portion is expected to receive a large share of the housing growth and some of the job growth. Shadow impacts are expected to occur from building development or redevelopment. Existing buildings in the Town Center front directly onto the sidewalk, which casts shadows into the public realm.

Sumner UGA

Under all alternatives, the Sumner unincorporated UGA is expected to receive some housing and job growth. As a result, shadow impacts are expected to occur from building development or redevelopment.

Scale/Bulk Transitions**Citywide**

All alternatives are expected to have some impacts on scale/bulk transitions because all alternatives plan for some housing and job growth within the city. Alternatives 2 and 3 have the greatest potential to cause impacts to shadows as they plan for the most housing and job growth and greatest building densities.

North Portion

Under all alternatives, the North Portion is expected to receive the majority of employment growth. While no changes to zoning or land use policies to the MIC are proposed, it is possible that new buildings are built on vacant properties, and some buildings in the North Portion could redevelop to maximize the buildable envelope, which could result in minor bulk and scale impacts.

East Portion

Under all alternatives, the East Portion is expected to receive a large share of the housing growth. As a result, impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

South Portion

Under all alternatives, the South Portion is expected to receive some housing growth. As a result, minor impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

West Portion

Under all alternatives, the West Portion is expected to receive a large share of the housing growth. As a result, impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

Sumner UGA

Under all alternatives, the Sumner unincorporated UGA is expected to receive some housing growth. As a result, minor impacts to bulk and scale could occur as buildings are developed or redeveloped for housing units.

5.3.3 Alternative 1

Views

Under Alternative 1, Sumner is planning for 1,985 additional housing units and 5,313 additional jobs between 2020-2044. There are no changes to zoning designations or land use policies proposed, meaning that the land uses, densities, and building heights that are currently allowed in Sumner will continue to be allowed. However, Alternative 1 does assume that some properties may redevelop to utilize the allowable building space more fully. Additionally, a small number of single-family parcels (5%) have capacity for an accessory dwelling unit (ADU), meaning some of these lots may develop out and have a larger lot coverage, which could potentially impact neighbor's views. Generally, Alternative 1 is expected to have the least impact on views out of the three alternatives.

Shadows

Under Alternative 1, minimal shadow impacts are expected as there are no proposed code changes that would increase building densities and building heights. However, it is to be expected that some new buildings could be developed on vacant properties, and existing buildings may redevelop to more fully utilize their allowable building space, which could increase shadows in neighborhoods if buildings are closer together than they were previously. Generally, Alternative 1 is expected to have the least impact on shadows out of the three alternatives.

Scale/Bulk Transitions

Under Alternative 1, there are no proposed changes to zoning and land use policies, meaning that the land uses, densities, and building heights that are currently allowed in Sumner will continue to be allowed. Minor impacts to bulk could occur from properties redeveloping to utilize their building area more fully or developing an ADU on the property. Some impacts to scale, as growth occurs, are expected under Alternative 1.

5.3.4 Alternative 2

Views

Under Alternative 2, Sumner is planning for 3,000 additional housing units and 5,313 additional jobs between 2020-2044. This growth is mainly distributed in East Sumner and Town Center, though some growth is also directed to other areas as middle housing and the Cava gravel mine site. Alternative 2 proposes code and zoning changes to meet updated state housing requirements, which could impact

views across the City as these proposed changes would allow increased building densities and increases in the number of housing units allowed per lot in some zones. Alternatives 2 and 3 would also allow low rise apartments in all MDR and HDR zones, however, height limits will remain consistent.

Additionally, Alternative 2, like Alternative 3, updates city regulations to allow two ADUs per lot and to make ADUs more feasible. This means more ADUs may be developed. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to views.

Shadows

Under Alternative 2, there are proposed zoning and code changes that would increase allowable building density and the number of housing units allowed per lot. Some shadow impacts are expected as a result of these proposed changes as denser buildings cast greater shadows. Additionally, Alternative 2, like Alternative 3, allows housing to be developed on vacant land owned by churches in the city, which could cause shadow impacts.

Scale/Bulk Transitions

Under Alternative 2, there would be increases to maximum density allowed in the Medium Density Residential zone and the number of ADUs allowed per lot. These proposed changes have the potential to change the form of existing neighborhoods in Sumner by increasing the number of housing units allowed to develop on a single lot. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to neighborhood form.

Alternative 2, like Alternative 3, modifies the Medium Density Residential (MDR) and High Density Residential (HDR) zones to allow low-rise apartments, such as 3-4 story buildings, in other areas of the city besides just East Sumner. This has the potential for impacts to bulk/scale transitions as it is a change to what is currently allowed and typically being built in those areas of Sumner.

Alternative 2, like Alternative 3, allows housing to be developed on vacant land owned by churches in the city. This has the potential to create scale and bulk impacts as it would be new development on vacant land. However, this housing would be required to meet Sumner Municipal Code requirements that address potential aesthetic impacts and to go through the same permit process as senior housing.

5.3.5 Alternative 3

Views

Under Alternative 3, Sumner is planning for 3,000 additional housing units and 5,313 additional jobs between 2020-2044. This is consistent with Alternative 2. Housing growth is mainly distributed in East Sumner and Town Center, with small-scale, moderate density housing distributed throughout the city. Alternative 3 proposes code and zoning changes to meet state housing requirements. Similarly with Alternative 2, these code and zoning changes could cause impacts to views across the city as they would allow increased building densities and increases in the number of units allowed per lot. Unlike

Alternative 2, Alternative 3 does not propose zoning changes to the Cava gravel mine site, and, resulting impacts to views in the mine site are expected to be lesser under Alternative 3.

Additionally, more ADUs would be expected to be developed under Alternative 3 than the other alternatives, due to changes in city regulations to meet new state requirements, plus additional support for ADU development through pre-approved plan sets and incentives. However, ADUs would still be required to be the same or lower height than the principal unit, minimizing impacts on views.

Shadows

Under Alternative 3, there are proposed zoning and code changes that would increase allowable building density and the number of units allowed per lot. Shadow impacts are expected as a result of these proposed changes as denser buildings cast greater shadows. Additionally, Alternative 3, like Alternative 2, allows housing to be developed on vacant land owned by churches in the city, which could cause shadow impacts.

Scale/Bulk Transitions

Under Alternative 3, like Alternative 2, there are increases to the number of ADUs allowed per lot. These proposed changes have the potential to change the form of existing neighborhoods in Sumner by increasing the number of buildings allowed to develop on a single lot. However, ADUs would still be required to be the same or lower height than the principal dwelling, which would minimize impacts to neighborhood form.

Alternative 3, like Alternative 2, modifies the Medium Density Residential (MDR) and High Density Residential (HDR) zones to allow low-rise (3-5 story) apartments in areas of the city outside of East Sumner. This has the potential for impacts to bulk/scale transitions as it is a change to what is currently allowed and typically built in those areas of Sumner.

Alternative 3, like Alternative 2, allows housing to be developed on vacant land owned by churches in the city. This has the potential to create scale and bulk impacts as it would be new development on vacant land. However, this housing would be required to meet Sumner Municipal Code requirements address potential aesthetic impacts and to go through the same permit process as senior housing.

5.4 Mitigation Measures

5.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 would mitigate adverse impacts to views, shadows, and scale/bulk transitions.

Views

- Alternatives 2 and 3 propose changes to ADU regulations only to the extent of new Washington State law requirements. ADUs would still be required to be the same or lower height than the principal unit.
- Alternatives 2 and 3 do not propose height increases in any zones, except for those required by Washington State law for ADUs.

Shadows

- Alternatives 2 and 3 require new housing units developed on church property to meet the same Sumner Municipal Code requirements and the same permitting process as senior apartments.
- Alternatives 2 and 3 do not propose height increases in any zones, except for those required by Washington State law for ADUs.

Scale/Bulk Transitions

- Alternatives 2 and 3 propose changes to ADU regulations only to the extent of new Washington State law requirements. ADUs would still be required to be the same or lower height than the principal unit.
- Alternatives 2 and 3 require new housing units developed on church property to meet the same Sumner Municipal Code requirements and the same permitting process as senior apartments.
- Alternatives 2 and 3 do not propose height increases in any zones, except for those required by Washington State law for ADUs. These alternatives would allow low-rise apartments in MDR/HDR-zoned areas outside of East Sumner, but at the same height as in current code (35 feet).

5.4.2 Regulations and Commitments

The following regulations and commitments apply to all alternatives.

Views

- Sumner's Comprehensive Plan has policies that aim to preserve views in the city.
- The Sumner Municipal Code Title 16 (SEPA Procedures and Policies) establishes a framework, consistent with Washington State law, for identifying, analyzing, and if necessary, mitigating, environmental impacts associated with non-exempt development projects and adopting regulations and plans. Views are a consideration in this review process.

Shadows

- Conditional use review of some uses in certain zoning districts can provide the City an opportunity to require site-specific mitigation if compatibility between land uses is a concern.
- Height, setback, and yard requirements in SMC 18.32 may mitigate compatibility issues by placing buildings further apart and improving privacy.

Scale/Bulk Transitions

- Sumner Comprehensive Plan Community Character Element and Sumner Municipal Code have existing policies and regulations that mitigate impacts on urban form, community character, and lighting. See 5.2 Affected Environment for the specific policies.
- Sumner Municipal Code (Title 18) establishes zoning and development regulations that govern uses, building and site design, and land use compatibility. Title 18 also includes Design and Development Guidelines (SMC 18.40) and Required Landscaping and Open Space (SMC 18.41) requirements for different types of new development.
- Conditional use review of some uses in certain zoning districts can provide the City an opportunity to require site-specific mitigation if compatibility between land uses is a concern.

5.4.3 Other Potential Mitigation Measures

- All alternatives are expected to cause some adverse impacts to views, shadows, and scale/bulk. Sumner could require areas with higher building heights to have upper-story setbacks, which could help to minimize shading, impacts to views, height, and bulk.
- Sumner could require additional landscaping on major streets, beyond citywide requirements, to screen development and improve the pedestrian experience.

5.5 Significant Unavoidable Adverse Impacts

Under all alternatives, additional growth would result in impacts on the built form across Sumner. Development associated with growth has the potential to cause impacts to views, shadows, and scale/bulk transitions. This is especially true for Alternatives 2 and 3 due to increases in the number of housing units allowed on LDR lots, increased density in the MDR zone, and changes to allowed building types in MDR and HDR zones. These impacts are to be expected as Sumner continues to grow. With the application of mitigation measures, there are no significant unavoidable adverse impacts on views, from shadows, or on scale/bulk transitions expected.

6 Housing

6.1 Introduction

The purpose of this section is to describe current and forecast housing conditions and analyze the alternatives for consistency with state housing requirements and potential residential displacement impacts.

6.2 Affected Environment

6.2.1 Current Policy and Regulatory Framework

Housing in Sumner is influenced by the current policy and regulatory framework, which stems from the Washington State Growth Management Act (GMA), Puget Sound Regional Council (PSRC) Multicounty Planning Policies (MPPs), the Pierce County Countywide Planning Policies (CPPs), and the city's adopted Comprehensive Plan, Shoreline Master Program, and Development Regulations. The City also completed a Housing Action Plan in 2021 to assess and address housing affordability and community needs. See Chapter 3: Land Use for more detail on the overall planning framework.

Washington State Growth Management Act

The GMA includes a goal promoting housing variety and affordability:

(4) Housing. Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.

The GMA also requires a housing element of the comprehensive plan. House Bill (HB) 1220 added new requirements for the housing element in 2021 regarding racially disparate impacts, special housing needs, and planning for housing for all income levels.

Sumner and other jurisdictions planning under the GMA are now required to:

- Include a statement of goals, policies, objectives, and provisions for “middle housing” or moderate-density housing (for example, duplexes, triplexes, and townhomes)
- Identify policies that result in racially disparate impacts, displacement, and exclusion in housing, and implement policies that address and begin to undo these impacts. See *Displacement Risk* below and

Appendix B for additional analysis on racially disparate impacts, displacement, and exclusion in housing.

- Allow permanent supportive housing, transitional housing, emergency housing, and emergency shelters with limited restrictions.
- “Plan for and accommodate” housing affordable to all income bands. The City must determine whether zoning and available land can accommodate 2044 housing growth targets for all income levels, adjust accordingly, and reduce barriers to housing production and affordability. Pierce County adopted housing targets in 2023, including the target for the City of Sumner (Exhibit 6-1).

Exhibit 6-1: Pierce County Adopted Housing Targets - Sumner

	Total	0-30% AMI Non- PSH*	0-30% AMI PSH*	30-50% AMI	50-80% AMI	80-100% AMI	100- 120% AMI	>120 % AMI	Emergency housing needs (beds)
Allocation (2020-2044)	1,985	256	347	368	291	125	114	484	121

Source: Pierce County Ordinance No. 2023-22s

*PSH refers to Permanent Supportive Housing, which is defined in RCW 36.70A.030(16) as “non-time-limited housing for persons with disabling conditions who have experienced homelessness or risk of homelessness and are offered voluntary supportive services aimed at assisting the client in maintaining the terms of their lease agreement.”

Other State Housing Requirements

Other recent changes to state housing requirements include House Bill 1110 and House Bill 1337.

HB 1110 passed in 2023 with the intent to increase middle housing in areas traditionally dedicated to single-family detached housing and address regional housing challenges. See Exhibit 6-2 for examples of middle housing types. Based on Sumner’s size and location, HB 1110 requires the City to allow at least two units per lot on all lots zoned predominantly for residential use. To comply with HB 1110, Sumner would need to adjust maximum densities and allow unit types with two units in these zones, such as duplexes. HB 1110 also dictates that standards for middle housing, such as permit processes and development regulations, may not be more restrictive than those for single-family homes.

Exhibit 6-2: Middle Housing Types

Source: Washington State Department of Commerce 2023; MAKERS 2023.

HB 1337 also passed in 2023 with the intent to expand housing units through accessory dwelling units (ADUs). In Sumner, HB 1337 requires the City to allow at least two ADUs per lot. HB 1337 also places limitations on how the City can regulate ADUs, regarding size, owner-occupancy, parking, design, conversion of existing structures, and allowing ADUs to be sold as condominiums.

Puget Sound Regional Council VISION 2050

VISION 2050 provides a regional growth strategy for King, Pierce, Snohomish, and Kitsap Counties that allocates growth to geographies including metropolitan cities, high-capacity transit communities, and others. Sumner is identified as a high capacity transit (HCT) community in VISION 2050. VISION 2050 emphasizes locating growth near high-capacity transit, both existing and planned, and includes a goal for 65% of the region's population growth to be in regional growth centers and within walking distance of high-capacity transit.

VISION 2050 also includes a housing goal and 12 supporting MPPs:

Housing Goal: *The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.*

Pierce County Countywide Planning Policies

Pierce County adopted updated CPPs in 2022, with revisions to the housing targets in June 2023. Pierce County's updated CPPs are consistent with the MPPs and PSRC's Regional Growth Strategy. The CPPs include policy emphasis on supporting homeownership opportunities, addressing displacement, reducing land costs for affordable housing, and identifying opportunities for infill housing. Pierce County consulted with the cities and towns in adopting the targets (including housing, population, and job growth). The adopted targets are found in Appendix A of the Pierce County Countywide Planning Policies (CPPs), with revised housing targets in Ordinance 2023-22s. 2044 targets represent new growth above a 2020 baseline (Exhibit 6-1).

Sumner Comprehensive Plan

The adopted Comprehensive Plan includes a Housing Element with four goals and 44 supporting policies. Goals include:

- 1. Encourage the maintenance and preservation of existing housing stock and residential neighborhoods*
- 2. Provide a range of housing types for all life stages and economic segments of the Sumner community.*
- 3. Encourage energy efficiency in housing developments.*
- 4. Provide for a variety of housing types and densities in the town center in close proximity to the train station.*

Proposed changes to these goals in the 2024 Comprehensive Plan update include rewording of goal 1 to focus on public and private reinvestment in older residential neighborhoods and private rehabilitation of housing, and two new goals:

- 5. Support high density multifamily development and apartments in key locations in East Sumner Neighborhood Plan area.*
- 6. Prevent and mitigate residential displacement through tenant protections and existing programs.*

Sumner Housing Action Plan

Sumner and Bonney Lake collaborated on a Housing Action Plan (HAP), adopted in 2021, to better understand and address community needs relating to housing. House Bill (HB) 1923 introduced the framework and funding for cities to opt-in to develop a HAP. The HAP focused on topics including preserving rental housing, incentivizing new rental housing, reducing the cost of development, improving permit processing, providing a wider variety of housing types and preventing and mitigating displacement. Sumner especially focused on workforce and senior housing.

Sumner identified an overall goal for the HAP:

The City of Sumner's goal is to provide a realistic picture of affordable housing in Sumner, including an understanding of demographics and economics. It should engage the community and provide a clear picture to the Council and the community of affordable housing issues and provide solutions.

6.2.2 Current Conditions

Households

According to the United States Census, there were approximately 4,317 households in Sumner in 2020, an 8.5% increase since 2010 (Exhibit 6-3). 30.4% of households include at least one child and 31.1% of households include at least one person 65 years old or older. 30.1% of households are single-person households, 46.9% two to three persons, and 23.0% have four or more persons.

Exhibit 6-3: Household Characteristics and Trends

	2010	Share of Households	2020	Share of Households	Percent Change 2010-2020
Number of households	3,980	100.0%	4,317	100.0%	8.5%
Average household size	2.37	-	2.46	-	2.8%
Households with one or more people 18 years and younger	1,266	31.8%	1,314	30.4%	3.8%
Households with one or more people 65 years and over	1,072	26.9%	1,342	31.1%	25.2%
Single-person households	1,260	31.7%	1,301	30.1%	3.3%
Householder over age 65	531	13.3%	552	12.8%	4.0%
Households with 2-3 persons	1,907	47.9%	2,025	46.9%	6.2%
Households with 4+ persons	813	20.4%	991	23.0%	21.9%

Source: Census 2010 and 2020.

Household Size

The average household size has stayed relatively consistent over the past 10 years, at 2.46 in 2020 compared to 2.37 in 2010. Sumner's average household size is smaller than Pierce County's at 2.71 in 2020. According to PSRC, the average household size is expected to decrease to 2.33 in Sumner by 2044.

Single-person households make up an estimated 30.1% of households in Sumner as of 2020. This share has decreased from 31.7% in 2010. These households may be best served by smaller units, studios, or one-bedroom housing units. Households with two to three persons make up a larger proportion of

households (46.9%) in Sumner based on 2020 estimates (Exhibit 6-3). This share has decreased from 47.9% in 2010.

Larger households (four or more persons) make up an estimated 23.0% of households as of 2020. This share has increased from 20.4% in 2010. Larger households can be more difficult to accommodate due to the affordability and availability of larger units. According to 2022 estimates from the American Community Survey, approximately 12.8% of occupied housing units in Sumner have four or more bedrooms.

Older Adults

The proportion of households with residents over age 65 has increased over time, from 23.9% in 2010 to 31.1% in 2020. The proportion of older adults living alone has decreased from 13.3% of households to 12.8%.

An estimated 15.3% of the 2022 Sumner population is over the age of 65. This is slightly higher than the share of over 65 residents in Pierce County overall (14.2 percent). The Washington Office of Financial Management projects that the percentage of the Pierce County population over age 65 will grow to 21.5% by 2045.

Local assisted living and adult family homes in Sumner include the following:

- Franklin House, 5713 Parker Road
- Mountain View Adult Family Home, 15922 66th St East
- Stafford Suites, 15519 62nd St East
- Sumner Cottage, 209 Mountain Circle Drive
- Sumner Meadows, 7417 166th Ave East
- Memory Haven Sumner, 5107 Parker Rd East

Homelessness

The Pierce County Homeless Point-in-Time Count 2023 found that seven individuals had last reported zip codes in Sumner. The total count for Pierce County was 2,148 people experiencing homelessness, including sheltered and unsheltered individuals. However, the Point-in-Time Count has limitations: the County estimated that 6,500 individuals were connected to their homeless crisis response system during the same time period.

Pierce County Countywide Planning Policies include estimates of existing emergency shelter and permanent supportive housing units, as well as future targets. County estimates suggest that Sumner has no existing emergency shelter beds or permanent supportive housing units. Between 2020 and 2044, Sumner's assigned target is 121 emergency shelter beds and 347 permanent supportive housing units.

There are several agencies in the Sumner area that provide housing for households with low incomes or experiencing homelessness. This includes:

- Helping Hand House, based in Puyallup, serves families in Pierce County experiencing or at risk of homelessness with housing relocation and stabilization, emergency housing, transitional housing, and permanent supportive housing.
- Catholic Community Services Family Housing Network serves families with low incomes experiencing homelessness in Pierce County with a shelter program, day center, rental assistance, transitional housing, and other support services.
- Mi Casa, based in Edgewood, provides affordable housing for people with low incomes.

Disability

The American Community survey estimates that 13.0% of Sumner residents have one or more disabilities. This is slightly lower than the countywide estimate of 13.3%. Disabilities can be sensory, physical, or mental, and may or may not affect one's ability to care for oneself, go outside of the home, or work. People of all ages can have disabilities, but older adults (over 65) may be more likely to have disabilities due to the health impacts of aging. Sumner's proportion of older adults is also higher than that of the county (see *Older Adults* above).

Group Quarters

The group quarters population includes all Sumner residents not living in a housing unit and instead living in a group living arrangement managed by an organization. Group quarters include correctional facilities, juvenile facilities, nursing facilities, military quarters, and student housing. 2020 Census data shows 37 Sumner residents in nursing or skilled nursing facilities and 66 residents in "other" noninstitutional facilities, for a total group quarters population of 103. This number does not include assisted living. Franklin Place and Stafford Suites assisted living are estimated to have about 132 units total.

Household Income

Sumner's median household income in 2022 was estimated at \$83,285, about 9% lower than the median income for Pierce County overall (\$91,486).

Exhibit 6-4: Median Household Income (2022)

	Sumner	Pierce County
Median household income	\$83,285	\$91,486

Source: American Community Survey 5-year Estimates 2022

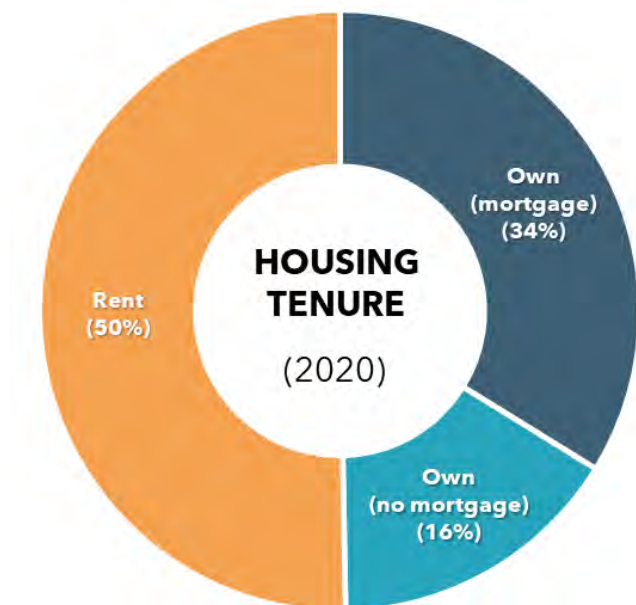
Housing Tenure

About half of Sumner residents rent their homes and about half own their homes (Exhibit 6-5). This split is consistent with 2015 conditions (Exhibit 6-6).

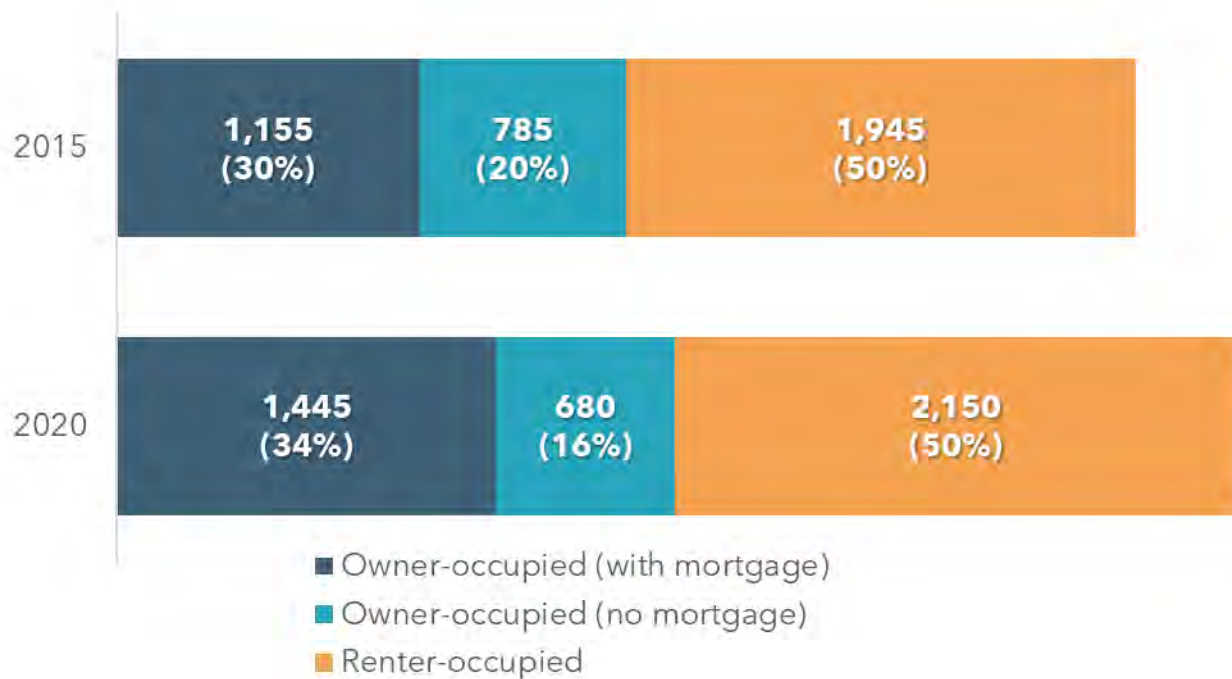
In 2020, an estimated 34% of households own their home with a mortgage and 16% own their home with no mortgage. The percentage of households with a mortgage has increased from 30% in 2015.

Approximately 54% of renter households and 28% of owners have incomes below 80% of the area median (Exhibit 6-7). 16% of renter households and five percent of owners have incomes below 30% of the area median income.

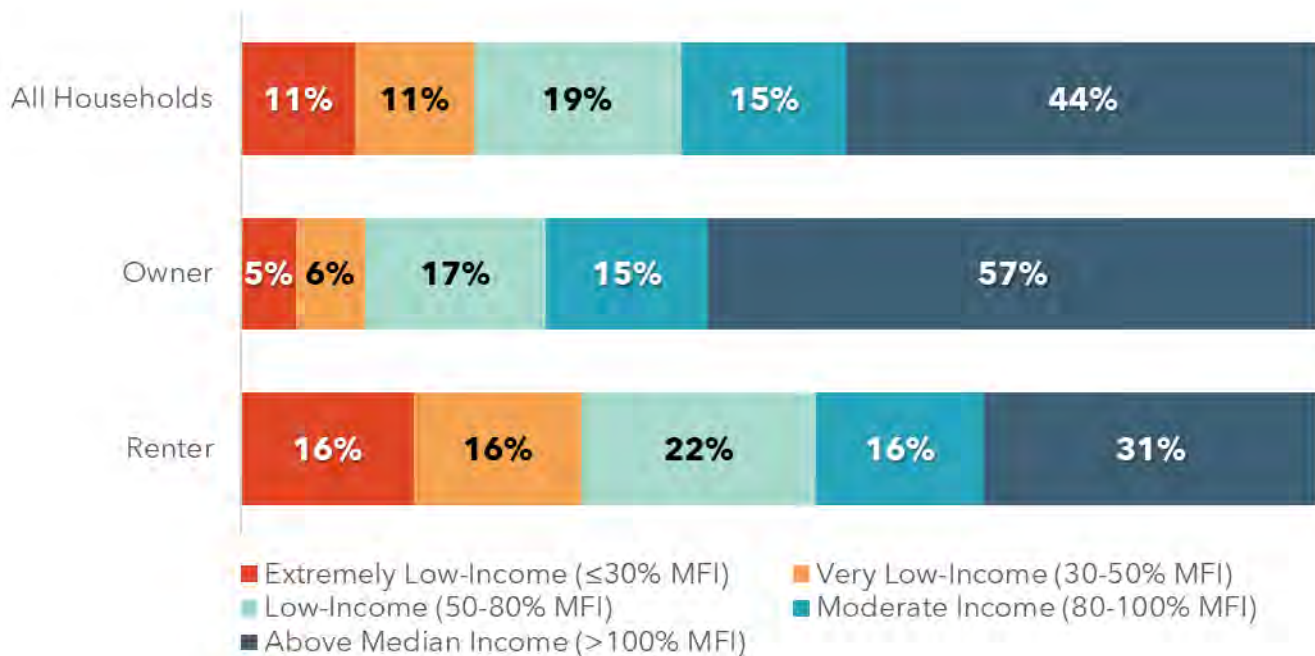
Exhibit 6-5: Housing Tenure (2020)



Source: CHAS Table 15A/B/C, 2020.

Exhibit 6-6: Housing Tenure 2015-2020

Source: CHAS Table 15A/B/C, 2020.

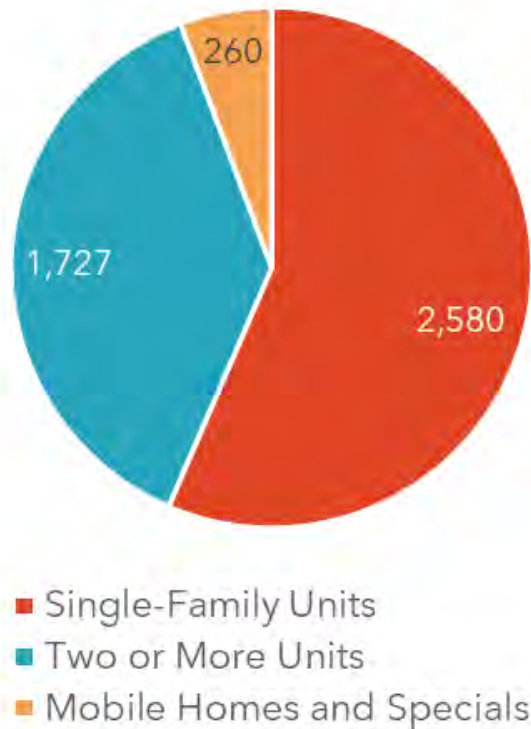
Exhibit 6-7: Housing Tenure by Income

Source: CHAS Table 8, 2020.

Housing Stock

According to the Washington Office of Financial Management, there are an estimated 4,567 housing units in Sumner. This includes 2,580 single family units (56.5 percent), 1,727 multifamily units (37.8 percent), and 260 mobile home and specials (5.7 percent) (see Exhibit 6-8).

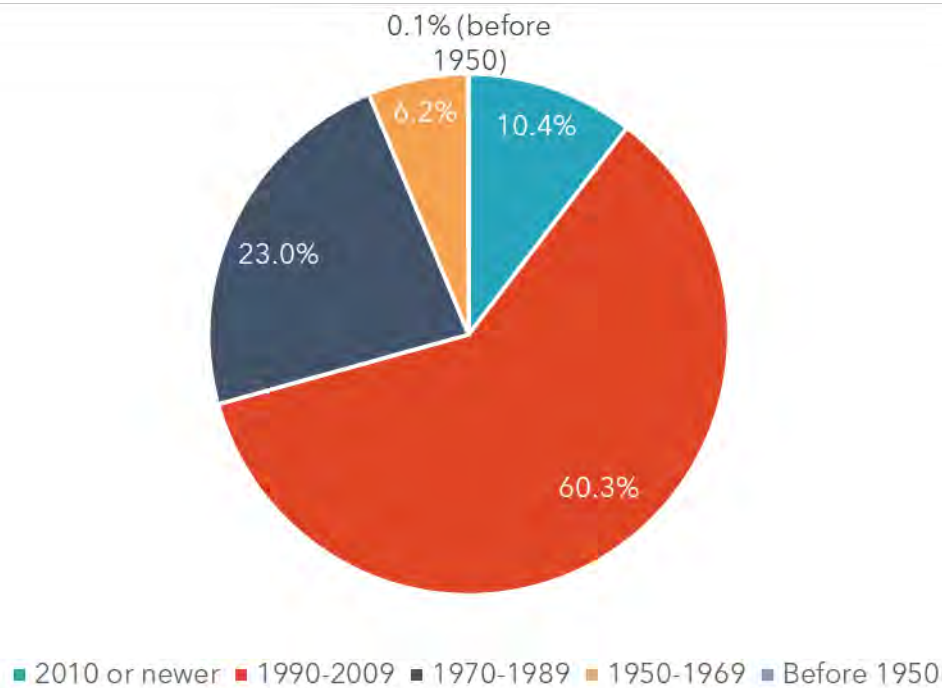
Exhibit 6-8: Housing Stock by Unit Type (2023)



Source: Washington State Office of Financial Management, April 1 estimates (2023).

Age of Housing

Per Pierce County Assessor data (2023), approximately 60.3% of units in Sumner were built between 1990 and 2009. Only 10.4% were built since 2010 and 29.3% were built before 1990 (Exhibit 6-9).

Exhibit 6-9: Age of Housing

Source: Pierce County Assessor, 2023.

Existing Housing Conditions

According to American Community Survey estimates (5-year, 2021), there are no units in Sumner without complete plumbing facilities, but there are 116 units (2.7 percent) lacking complete kitchen facilities and 25 units (0.6 percent) with no telephone service available. 1.9% of units are considered to be overcrowded, with more than one occupant per room. 96.4% of units are heated with utility gas or electricity, with 3.6% heated with other sources such as fuel oil, kerosene, bottled gas, or wood.

Vacancy Rates

The 2020 Census estimates the homeowner vacancy rate in Sumner is 0.7% and the rental vacancy rate is 3.4%. Countywide, the homeowner vacancy rate is 1.0%, and the rental vacancy rate is 5.5%.

The national vacancy rate for metropolitan areas was around 5.7% for rentals and 0.8% for homeownership in 2022 (according to the US Census Bureau). Vacancy rates below four percent are considered low and tend to indicate economic distress in the market, a recession, or a lack of available housing units to serve the population.

Housing Costs

Per recent sales information (Zillow Home Value Index), the estimated average home value in Sumner is \$544,455 as of August 31, 2023, a decrease of 2.9% over the past year. However, values have risen

overall over the past five years: compared to August 2023, the average home value in August 2019 was \$382,391.

According to 2021 American Community Survey estimates, approximately 47.8% of Sumner's housing units are renter-occupied and 52.2% are owner-occupied. Approximately 70.0% of owner-occupied units have a mortgage. The median gross rent was \$1,627 per month for renters, with 41.2% of units having a gross rent under \$1,500 per month, and 24.2% of rental units with a gross rent over \$2,000.

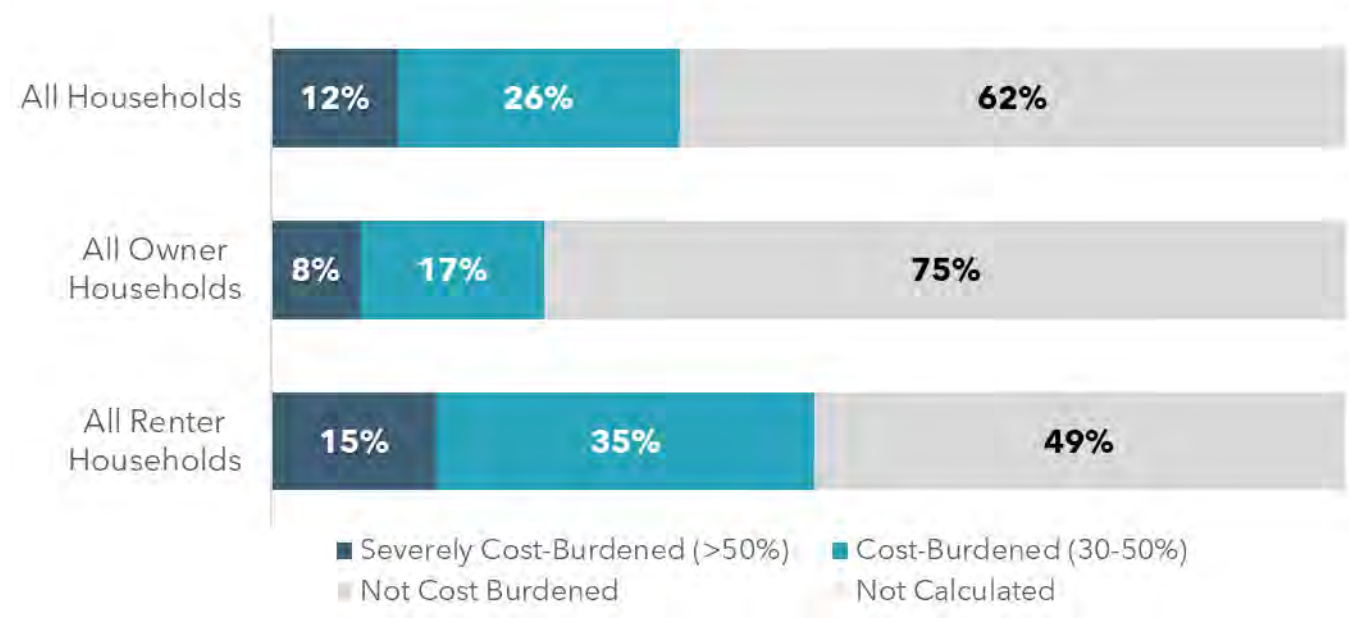
Housing Cost Burden

A household is considered housing cost-burdened if they pay more than 30% of their annual income on housing costs. They are considered severely housing cost-burdened if more than 60% of their income goes to housing. These households may have difficulty affording necessities such as food, clothing, transportation, and medical care. The U.S. Census provides data on gross rent and monthly owner housing costs as a percentage of household income. HUD also provides housing affordability data to describe housing cost burden.

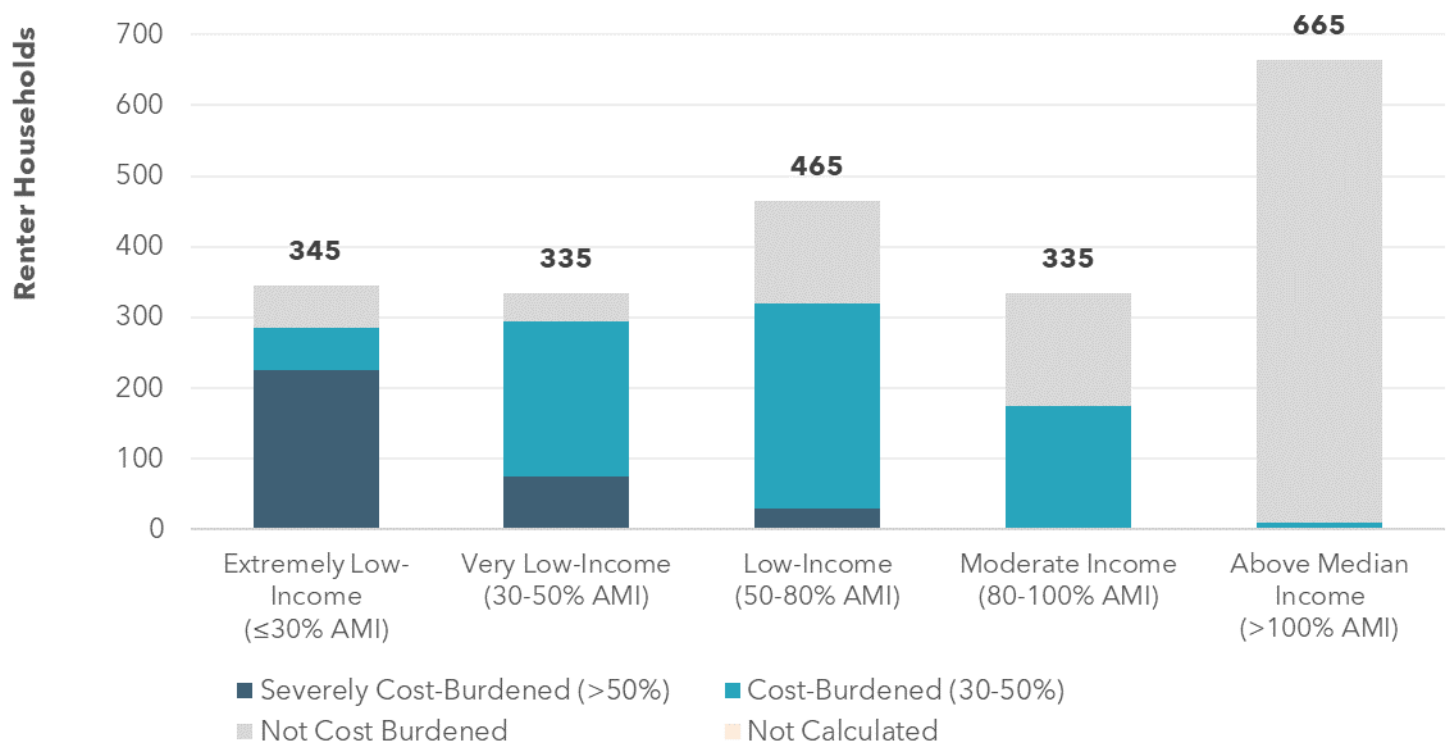
In 2020, approximately 26% of households in Sumner were housing cost-burdened and 12% were severely cost-burdened (CHAS 2020). These rates were higher for renter households than owner households, with 35% of renters cost-burdened and 15% severely cost-burdened (Exhibit 6-10).

Sumner has higher cost-burden rates than Pierce County. In Pierce County, approximately 33% of households were cost-burdened or severely cost-burdened in 2020.

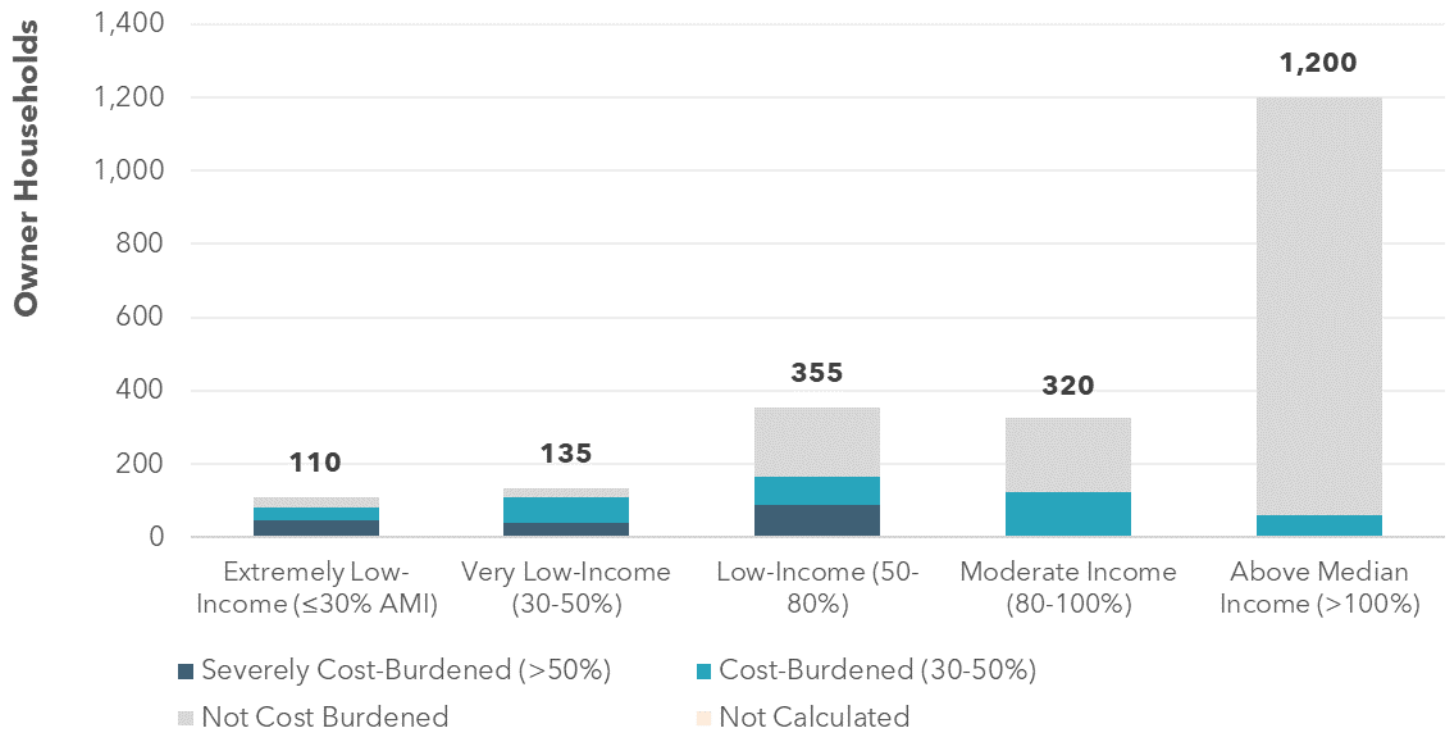
When considering income level, the majority of renter households making less than 100% AMI are cost-burdened or severely cost-burdened (Exhibit 6-11). Severe cost burden is especially prevalent in renters making less than 30% AMI. The majority of homeowner households making less than 50% AMI are also cost-burdened or severely cost-burdened (Exhibit 6-12)

Exhibit 6-10: Housing Cost Burden by Tenure (2020)

Source: CHAS Table 8, 2020.

Exhibit 6-11: Housing Cost Burden by Income: Rental Households (2020)

Source: CHAS Table 8, 2020.

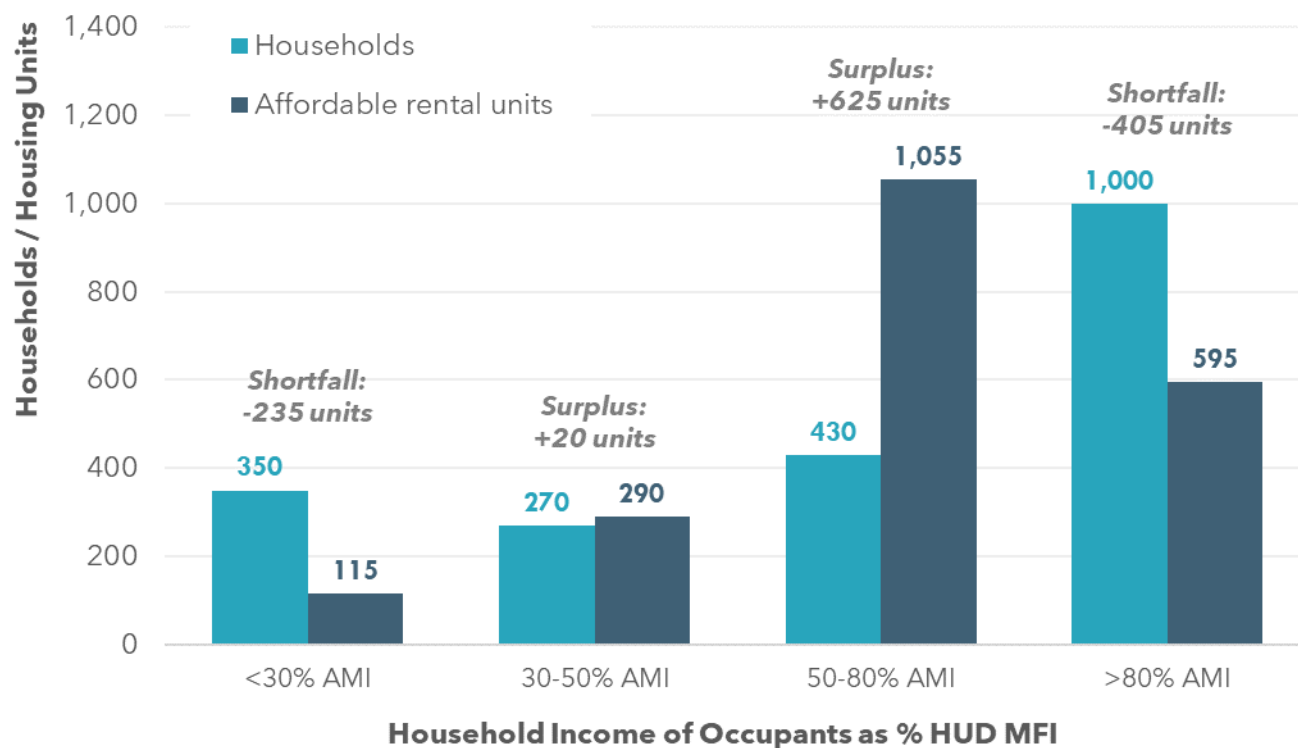
Exhibit 6-12: Housing Cost Burden by Income - Owner Households (2020)

Source: CHAS Table 8, 2020.

Affordability Gap

Based on housing affordability data from HUD, Sumner has a gap in housing for renters making less than 30% median family income (MFI) (Exhibit 6-13). This shortfall is estimated at 235 housing units.

A gap is also shown for renters making more than 80% MFI, however, the surplus for units affordable to 50-80% MFI may be able to fill that gap as higher income renters “down-rent” those more affordable units. As the city grows, these gaps are likely to change depending on the affordability of new housing.

Exhibit 6-13: Rental Affordability Gap (2020)

Source: CHAS Tables 8/14B/15C, 2020.

The National Association of Home Builders / Wells Fargo Housing Opportunity Index (HOI) identifies “the share of homes sold in that area that would have been affordable to a family earning the local median income, based on standard mortgage underwriting criteria” (NAHB 2023). For the Tacoma-Lakewood area in Q2 2023, the HOI estimates that the median home price was \$415,000 and 36.9% of homes were affordable to those earning median family income, estimated by the index to be \$108,900. The HOI has decreased substantially over the past ten years: in Q4 2013, 79.8% of homes were estimated to be affordable to a family earning the median income.

As described above in Exhibit 6-1, Pierce County has adopted housing targets by income band to meet projected housing needs in 2044. Approximately 49% of the unit target is for incomes under 50% AMI, suggesting an existing undersupply of units at this affordability level.

Displacement Risk

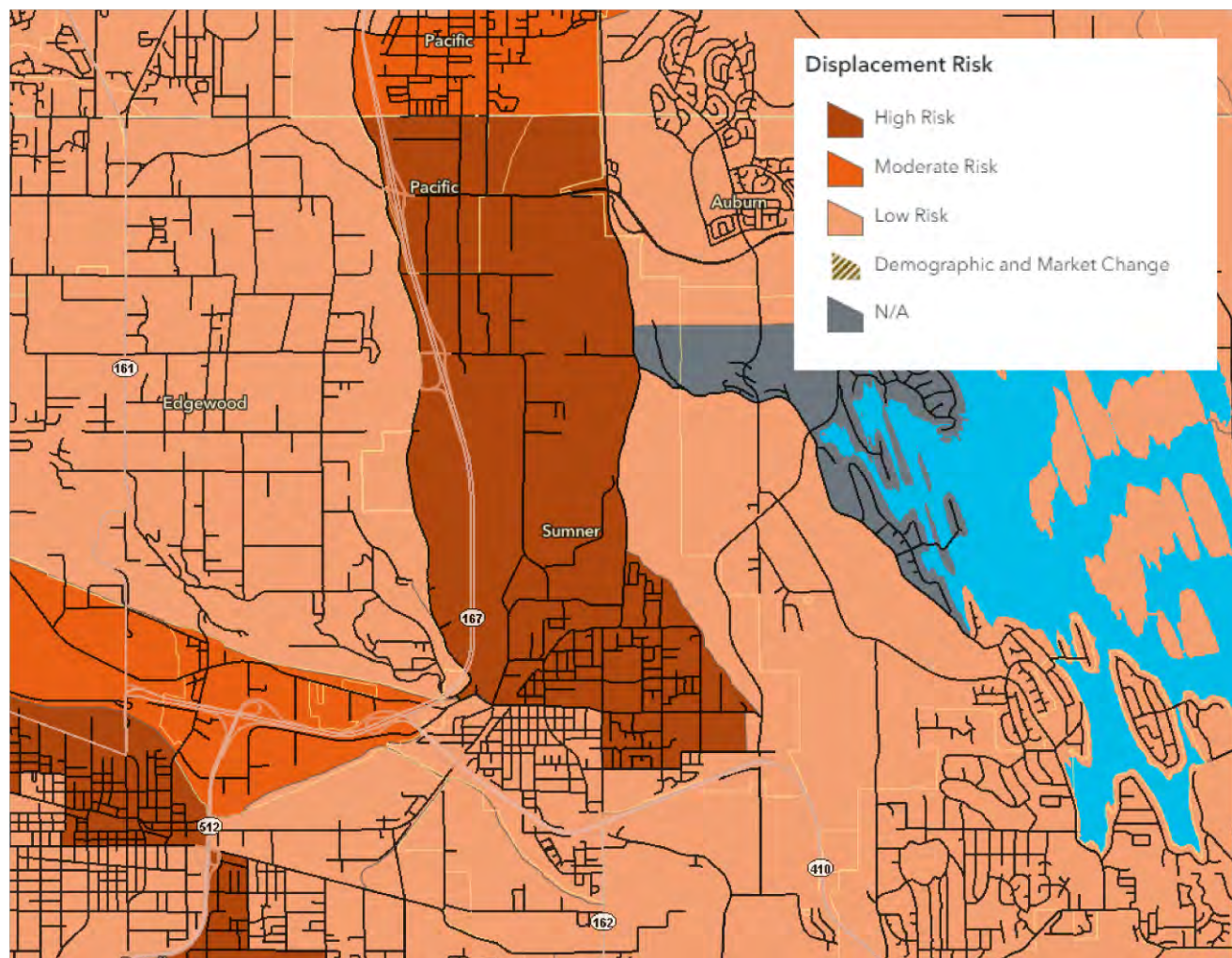
Displacement is defined by the Washington State Department of Commerce as, “The process by which a household is forced to move from its community because of conditions beyond their control”. This can include physical displacement, which could include eviction, foreclosure, natural disaster, or deterioration in housing quality; economic displacement, when households are compelled to move by rising housing costs; or cultural displacement, where residents “are compelled to move because the people and institutions that make up their cultural community have left the area.”

Commerce has developed a draft displacement map for all Census tracts in Washington State (Exhibit 6-14). Most of Sumner is shown as high risk (Census Tract 733.01), generally north of Main Street and west of East Valley Highway East, and north of Meade McCumber Road east of Valley Avenue. All other areas of Sumner are described as low risk.

The draft map also includes indicators that suggest that the north tract's demographic distribution could make it more vulnerable to displacement risk, that gentrification is actively occurring, that the housing market is accelerating, and that costs are rising in this area.

While the Sumner Town Center is shown as low risk for displacement, the southeast part of the area is likely to see development of some single-family dwellings due to new Town Center zoning that allows for higher densities. For this reason, despite the area not being shown on the Commerce map, the city considers this a high risk area for displacement.

Exhibit 6-14: Washington Department of Commerce Draft Displacement Risk Map 2023



Source: Washington State Department of Commerce 2023, BERK 2023.

6.3 Impacts

6.3.1 Thresholds of Significance

Impacts of the alternatives on housing are considered significant if they would:

- Fail to meet state requirements for middle housing (HB 1110), accessory dwelling units (HB 1337), or planning for and accommodating housing at all income levels (HB 1220), including permanent supportive housing (PSH) and emergency housing
- Increase risk for involuntary residential displacement

6.3.2 Impacts Common to All Alternatives

All alternatives assume an increase in housing over the 20-year planning period. Alternative 1 plans for 1,985 housing units above 2020 conditions while Alternatives 2 and 3 plan for 3,000 units above 2020 conditions. All alternatives distribute housing growth differently throughout the city, though all place a similar number of units in the Town Center (938 to 1,002 units, in addition to units already permitted or in the pipeline since 2020). Alternative 1 continues forward the city's existing plans and policies while Alternatives 2 and 3 modify policies to meet new state requirements and provide land capacity for housing at all income levels.

State Requirements

HB 1220

Alternative 1 does not meet HB 1220 requirements for planning for and accommodating housing at all income levels, and to address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Alternatives 2 and 3 include new policies and regulations to comply with the new requirements. Alternative 1 does carry forward adopted regulations for permanent supportive housing, transitional housing, emergency housing, and emergency shelters, which respond to requirements in HB 1220. However, Alternatives 2 and 3 better align with the state guidance on spacing and occupancy restrictions.

Analysis of capacity under the three alternatives followed the methods recommended by Washington State Department of Commerce Guidance. Pierce County Buildable Lands Report data (2020) was used as the basis for the capacity analysis and was updated to reflect recent development data. Zones were categorized based on their most likely income level served, based on densities and housing types allowed. Generally, higher density zones were presumed to be more likely to serve lower incomes than lower density zones. Based on the actual affordability of recent housing development in Town Center and East Sumner, capacity in those areas, though it allows for multifamily housing, was assumed to be affordable to 100% Area Median Income and higher. Other areas of the city assumed the following affordability of different housing types (Exhibit 6-15):

Exhibit 6-15: Housing Types and Zones by Income Band

Zone Category	Housing Types Allowed	Lowest Income Level Served
Low Density	Detached single-family homes	Higher Income (>120% AMI)
Moderate Density	Duplexes and other middle housing types	Moderate Income (>80-120% AMI)
Low-Rise	Apartments up to three stories	Low-Income (0-80% AMI) and PSH
Mid-Rise	Apartments greater than three stories	Low-Income (0-80% AMI and PSH)
ADUs (All Zones)	Accessory dwelling units on developed residential lots	Low-Income (>50-80% AMI)

Source: Washington State Department of Commerce 2023.

Note: These assumptions are based on Commerce guidance for “moderate-cost communities.”

Capacity analysis findings are shown in Exhibit 6-16. Highlighted in red is the capacity for 0-80% AMI housing in Alternative 1, which falls significantly short of the need (estimated capacity for 165 units compared to estimated need of 1,262 units). Alternatives 2 and 3, in contrast, show sufficient capacity to meet the need for this aggregated income category. There is sufficient capacity under all alternatives for the housing needs for households with incomes above 80% AMI.

Exhibit 6-16: Housing Needs and Capacity by Income Band

	Projected Housing Need (2020-2044)	Estimated units permitted / in pipeline since 2020	Remaining housing need (2023-2044)	Aggregated need	Alternative 1 Capacity	Alternative 2 Capacity	Alternative 3 Capacity
0-30% AMI PSH	256	0	256	1,262	165	2,195	1,618
0-30% AMI Other	347	0	347				
30-50% AMI	368	0	368				
50-80% AMI	291	0	291				
80-100% AMI	125	33	92	-596	1,149	2,337	1,613
100-120% AMI	114	802	-688				
120%+ AMI	484	65	419	419	1,263	793	793
TOTAL	1,985	900	1,085	1,085	2,577	5,325	4,025

Source: Pierce County Buildable Lands Report 2020, City of Sumner 2023, BERK 2023.

Notes: As advised in guidance from the Washington State Department of Commerce, income band needs are aggregated into 0-80% AMI, 80-120% AMI, and 120%+ AMI for the purposes of comparing capacity to need.

See the discussion under each of the alternatives for more detail on policies and regulations that affect capacity and affordability.

The City's emergency housing beds target for 2020-2044, as adopted by Pierce County, is 121 beds (see Exhibit 6-1). Existing code limits emergency housing facilities to 20 occupants and the facilities cannot be located within ½ mile of other emergency shelters, emergency housing, permanent supportive housing, or transitional housing. Alternative 1 continues these regulations forward while Alternatives 2 and 3 amend the regulations to meet the latest state guidance on occupancy limits and spacing requirements.

Under all alternatives, there is adequate capacity to meet the need. Based on underutilized and vacant parcels eligible in zones that allow emergency housing, up to approximately eight facilities could be created within the current spacing requirements. With a maximum of 20 occupants under the current code, these could accommodate up to 160 beds, which is above the need of 121 beds. Under Alternatives 2 and 3, where regulations are updated to match state guidance, capacity for more than 160 beds would be possible.

HB 1110

Alternative 1 does not meet HB 1110 middle housing requirements (to allow at least two units per lot on all lots zoned predominantly for residential use) because the Low Density Residential zones only allow for single-family units. Alternatives 2 and 3 update policies and regulations to allow for duplexes in Low Density Residential Zones and to ensure the standards for middle housing are not more restrictive than those for single-family residences.

HB 1337

While all alternatives allow for ADUs to some extent, Alternative 1 does not meet HB 1337 requirements. The existing code does not allow two ADUs per residential lot and includes restrictions for size, owner-occupancy, and other factors that are not allowed under the updated law. Alternatives 2 and 3 include policy and regulation changes to meet HB 1337 through allowing two ADUs per lot and removing noncompliant restrictions.

Residential Displacement

Citywide

All alternatives include job and housing growth, which could put pressure on the limited vacant and underutilized land in Sumner and increase land values. This could result in increased home values and rents and the pricing out of some households. Redevelopment of underutilized residential properties could also result in displacement of existing residents. As the city grows, demographics in some neighborhoods could also shift and result in cultural displacement, which is when residents "are compelled to move because the people and institutions that make up their cultural community have left the area" (Commerce 2023).

While all three alternatives anticipate the same amount of job growth, Alternatives 2 and 3 include more housing growth (3,000 units above 2020 conditions) than Alternative 1 (1,985 units above 2020 conditions) and therefore could result in more redevelopment impacts, impacts to land values, and demographic shifts. However, Alternatives 2 and 3 provide enough capacity for housing targets at all income levels and include housing affordability policies that could reduce displacement risk. Alternatives 2 and 3 also include policy support for homeownership opportunities by connecting residents to county, state, and other programs. Alternative 1 does not provide enough housing capacity for all income bands or any new anti-displacement or affordability policies.

North Portion

Draft displacement risk mapping from the Washington State Department of Commerce shows the North Portion is at high risk of displacement. However, residential uses in the northernmost North Portion are limited, as most of the area consists of the Sumner-Pacific MIC, which is designated for industrial uses and new housing is prohibited. The North Portion, therefore, is expected to see limited housing unit growth under all alternatives, and only in the small designated residential areas located outside of the MIC. Two pockets of existing residential uses around SR 167, near 24th Street East, could also see commercial redevelopment aligned with the current zoning and future land use designation for that area, both Interchange Commercial. Redevelopment of small areas of existing residential uses to accommodate residential growth or to align with commercial zoning could result in some displacement in the North Portion.

East Portion

The East Portion is mostly shown as high displacement risk in the Commerce mapping. Much of the East Portion contains older single family dwellings and older multifamily, and this area is expected to see housing unit growth under all alternatives. This could lead to redevelopment of some residential parcels to accommodate growth. Residential uses currently located in commercial designations could also be affected as redevelopment occurs to accommodate new jobs. Some amount of residential displacement is therefore expected to occur in the East Portion under all alternatives.

South Portion

The South Portion is expected to see some housing growth under all alternatives, with more housing growth under Alternatives 2 and 3, however, displacement risk is considered low in Commerce mapping. No job growth is anticipated under any alternative in this area. Displacement impacts are expected to be minimal under all alternatives.

West Portion

Most of the West Portion is shown as low displacement risk in the Commerce mapping. However, due to recent zoning changes and existing single-family land uses, the city considers the southeast area of the Town Center area to be high risk. There is a mapped area of high risk east of the SR 167 and SR 410 interchange, which is within the Town Center. The Town Center is expected to see substantial housing growth and some job growth under all alternatives. Areas of the West Portion outside of the Town Center

are also expected to see housing growth. A small area bordering the Sumner-Pacific MIC includes a small amount of residential development and is also within a high displacement risk area, and this overlaps in part with the Town Center.

Redevelopment in the West Portion to accommodate new jobs and housing could have displacement impacts, particularly in the areas shown as high displacement risk towards the MIC and in the southeast part of the Town Center.

Sumner UGA

Some housing and job growth is expected in the Sumner unincorporated UGA under all alternatives. Residential displacement risk in these areas is shown as low in Commerce mapping. Displacement impacts are expected to be low and may also be addressed by any Pierce County policies related to anti-displacement and housing affordability.

6.3.3 Alternative 1 (No Action)

State Requirements

Alternative 1 does not meet new state requirements as it carries forward the adopted plan and regulations.

HB 1220

While Alternative 1 has capacity for and meets the citywide housing target of 1,985, it does not have adequate capacity for housing units at all income bands as required by HB 1220 (see Exhibit 6-16). It also does not include revisions to address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Existing regulations for emergency housing, emergency shelter, transitional housing, and permanent supportive housing address the law, but do not adhere to updated guidance from the state on spacing and occupancy requirements.

HB 1110

As discussed under Impacts Common to All Alternatives, Alternative 1 does not meet the middle housing requirements in HB 1110, as it does not revise codes and policies to address the changes.

HB 1337

As discussed under Impacts Common to All Alternatives, Alternative 1 does not meet ADU requirements in HB 1337, as it does not revise codes and policies to address the changes.

Residential Displacement

Most housing growth under Alternative 1 is focused in the Town Center, of which part is in a high displacement risk area and part is in a low displacement risk area. Alternative 1 also anticipates housing growth in other areas of the city where there is existing underutilized and vacant land in residential

zones. This includes some areas shown as high displacement risk in the East Portion of the city. Redevelopment of underutilized residential parcels to accommodate housing growth, particularly in Town Center and the East Portion of the city, could result in residential displacement. Job growth in Alternative 1 is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

While Alternative 1 anticipates less housing growth than Alternatives 2 and 3, it also does not include new policies or regulations to address housing affordability and displacement. Alternative 1 does not include capacity for housing affordable to all income bands. Less housing growth overall could also put more pressure on the local housing market leading to increased rents and housing prices. These factors may make Alternative 1 particularly susceptible to displacement impacts.

6.3.4 Alternative 2

State Requirements

Alternative 2, like Alternative 3, meets new state requirements for housing.

HB 1220

Alternative 2 includes adequate capacity to meet housing needs by income band (see Exhibit 6-16). This is accomplished through a mix of land use and affordability strategies, which varies somewhat from the mix in Alternative 3. These strategies include:

- Incentives such as MFTE to support affordable units in Town Center and East Sumner
- Permitting duplexes in LDR zones (per HB 1110 requirements)
- Permitting larger lots (1.5 times the minimum parcel size) in LDR 8.5 and 12 to construct four units per lot
- Permitting two ADUs per lot and adding flexibility to ADU regulations (per HB 1337 requirements)
- Allowing multiplexes / small apartments throughout MDR and HDR
- Raising the maximum density in MDR from 15 to 22
- Support for Cava mine reclamation and rezoning of the site to MDR
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Policy support and density bonus for religious organizations building affordable apartment housing

In addition, Alternative 2 includes policy revisions that address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Alternative 2 also updates city regulations to better align with state guidance on emergency shelter, emergency housing, transitional housing, and permanent supportive housing spacing and occupancy requirements.

HB 1110

Alternative 2, like Alternative 3, complies with HB 1110 by allowing for duplexes in Low Density Residential zones and updating policies so as not to treat middle housing differently from single-family housing in terms of permitting and development regulations.

HB 1337

Alternative 2, like Alternative 3, allows for two ADUs per residential lot and removes restrictions on owner occupancy, size, and other factors in order to comply with HB 1337.

Residential Displacement

Housing growth under Alternative 2 is spread throughout the city based on land capacity, with an emphasis on the Town Center. Development in parts of Town Center and the East Portion of the city is most likely to have displacement impacts where underutilized residential properties are redeveloped with higher density housing or commercial uses. These areas have high risk of displacement according to Commerce mapping. Job growth in Alternative 2 is consistent with the other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

Alternative 2 plans for more growth on the existing Cava gravel mine site than the other alternatives, as it includes policies supportive of mine reclamation, assumes the mine will be reclaimed within the planning period, and increases density from Low Density Residential to Medium Density Residential. By creating more capacity on this unimproved property, less redevelopment of underutilized residential parcels would need to occur to achieve the planned growth. This could lead to less displacement impacts than Alternative 3.

Alternative 2, like Alternative 3, also assumes that Low Density Residential designations, which cover much of the city, will have more development potential by allowing two units per lot. Accessory dwelling units are also expected to increase as regulations are made more flexible and allow two ADUs per lot. This increased flexibility could lead to more infill-like development in the form of renovations and ADUs, which could absorb some of the city's growth in a way that is less likely to displace residents than redevelopment of entire parcels.

Alternative 2, like Alternative 3, plans for more housing growth than Alternative 1 (3,000 units compared to 1,985 units from 2020-2044). This could increase displacement impacts due to redevelopment on underutilized residential parcels. However, unlike Alternative 1, Alternatives 2 and 3 include new policies and regulations to address housing affordability and displacement. Alternative 2's capacity for housing units for all income bands is also likely to help manage residential displacement and make it possible for residents to stay in Sumner where housing becomes more expensive or is redeveloped to accommodate growth. A greater number of planned units could also relieve pressure on housing costs.

6.3.5 Alternative 3

State Requirements

HB 1220

Alternative 3 includes adequate capacity to meet housing needs by income band (see Exhibit 6-16). This is accomplished through a mix of land use and affordability strategies, including:

- Mandatory affordability in Town Center and East Sumner (20% of units)
- Permitting duplexes in LDR zones (per HB 1110 requirements)
- Permitting larger lots (1.5 times the minimum parcel size) in LDR 8.5 and 12 to construct four units per lot if at least one is designated affordable
- Permitting two ADUs per lot, adding flexibility to ADU regulations (per HB 1337 requirements), including incentives such as fee waivers
- Allowing multiplexes / small apartments throughout MDR and HDR
- Raising the maximum density in MDR from 15 to 17
- Policy support and density bonus for religious organizations building affordable apartment housing, with a greater emphasis on policy support than Alternative 2, including incentives such as fee waivers

Alternative 3 also includes policy revisions that address racially disparate impacts, displacement, displacement risk, and exclusion in housing. Additionally, Alternative 3 updates city regulations to better align with state guidance on emergency shelter, emergency housing, transitional housing, and permanent supportive housing spacing and occupancy requirements.

HB 1110

Alternative 3, like Alternative 2, complies with HB 1110 by allowing for duplexes in Low Density Residential zones and updating policies so as not to treat middle housing differently from single-family housing in terms of permitting and development regulations.

HB 1337

Alternative 3, like Alternative 2, allows for two ADUs per residential lot and removes restrictions on owner occupancy, size, and other factors in order to comply with HB 1337.

Residential Displacement

Housing growth under Alternative 3 is similar to the distribution in Alternative 2. Growth is distributed throughout the city based on land capacity, with an emphasis on the Town Center. Development in parts of Town Center and the East Portion of the city is most likely to have displacement impacts where underutilized residential properties are redeveloped with higher density housing. These areas have high risk of displacement according to Commerce mapping. Job growth in Alternative 3 is consistent with the

other alternatives and could also lead to residential displacement where residential uses are currently located in commercial or industrial designations.

Unlike Alternative 2, Alternative 3 does not assume reclamation of the Cava gravel mine site and upzone to Medium Density Residential. Alternative 3 assumes the same overall housing growth as Alternative 2 but does not allocate growth to that site. Therefore, under Alternative 3, more units would be developed elsewhere in the city, including on some underutilized residential parcels, which could result in displacement impacts.

Alternative 3, like Alternative 2, also assumes that Low Density Residential designations, which cover much of the city, will have more development potential by allowing two units per lot. Accessory dwelling units are also expected to increase as regulations are made more flexible and allow two ADUs per lot. This increased flexibility could lead to more infill-like development in the form of renovations and ADUs, which could absorb some of the city's growth in a way that is less likely to displace residents than redevelopment of entire parcels.

Alternative 3, like Alternative 2, plans for more housing growth than Alternative 1 (3,000 units compared to 1,985 units from 2020-2044). This could increase displacement impacts due to redevelopment on underutilized residential parcels. However, unlike Alternative 1, Alternatives 2 and 3 include new policies and regulations to address housing affordability and displacement. Alternative 3's capacity for housing units for all income bands is also likely to help manage residential displacement and make it possible for residents to stay in Sumner where housing becomes more expensive or is redeveloped to accommodate growth. A greater number of planned units could also relieve pressure on housing costs.

6.4 Mitigation Measures

6.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 would mitigate adverse impacts to consistency with state housing requirements and displacement impacts.

State Requirements

- No adverse impacts expected under Alternatives 2 and 3

Displacement Impacts

- Alternatives 2 and 3 include antidisplacement and housing affordability policies. They also both include adequate capacity to meet housing needs by income band, meaning affordable units are more likely to be available for residents displaced due to increased costs or redevelopment. Planning for a greater number of housing units overall may also mean less pressure on housing prices and rents than Alternative 1.

6.4.2 Regulations and Commitments

State Requirements

- The City's existing comprehensive plan includes some policies related to housing affordability and availability. The Housing Action Plan also identifies strategies to address housing needs.

Displacement Impacts

- Pierce County has some existing programs to assist lower income residents with energy and housing costs. Some Sumner residents may be eligible for these programs.

6.4.3 Other Potential Mitigation Measures

State Requirements

- No additional potential mitigation measures.

Displacement Impacts

- The City could consider additional anti-displacement strategies, such as connecting residents with information on existing tenant protections and programs; adopting preference policies that give previously displaced households priority in applications for subsidized housing; or facilitating a range of ownership opportunities through supporting condominiums, cooperatives, community land trusts, and other structures. Adoption of manufactured home park zoning could also minimize displacement of park residents.

6.5 Significant Unavoidable Adverse Impacts

Housing growth will occur under all alternatives, resulting in impacts related to residential displacement. Alternative 1, specifically, will have impacts related to meeting state requirements, as it does not provide enough capacity to accommodate housing targets at all income bands, as is now required under GMA. The only mitigation to fully address these impacts would be to adopt features of Alternatives 2 and 3.

7 Public Services and Utilities

7.1 Introduction

This section examines existing public services and utilities in Sumner, the potential impacts of the growth alternatives, and possible mitigation.

7.2 Affected Environment

7.2.1 City Facilities and Police

General Facilities

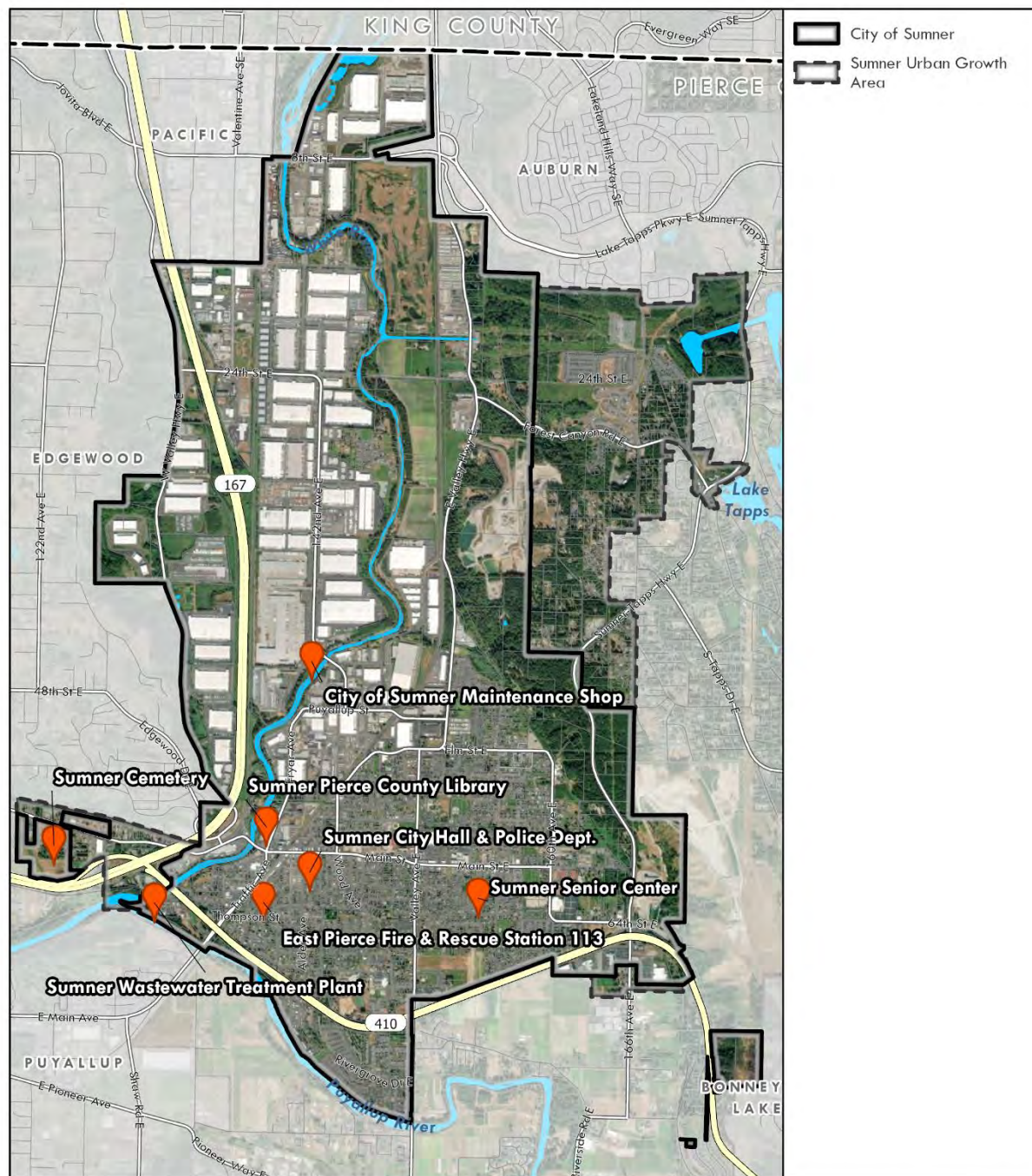
The major city facilities in Sumner, excluding parks, fire, and emergency medical facilities, include the Sumner Cemetery, City Hall, City Public Works Facilities, Sumner Library, and Sumner Senior Center. Most general government facilities are mainly located at City Hall at 1104 Maple Street, including offices for the Administration, Finance, Community & Economic Development, City Attorney, Human Resources, Public Works, and Police Departments (Exhibit 7-2). See Exhibit 7-1 for the existing space allocation for general government facilities.

Exhibit 7-1: City General Government Buildings

City Facility		Building Area (sf)
City Hall	General Government Services	14,577
	Police	7,654
Public Works Shops		17,136
Total		39,367

Source: City of Sumner Capital Facilities Plan, 2015.

Exhibit 7-2: Sumner General Government Facilities Map



CITY OF SUMNER

General Government Facilities

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



CITY OF
SUMNER
WASHINGTON

Map Date: January 2024

Source: BERK, 2023.

Sumner's Comprehensive Plan includes adopted levels of service (LOS) for city facilities in order to meet the needs of city operations. There are adopted LOS from the 2015 Capital Facilities Plan (CFP) and proposed changes to the LOS as part of the 2024 update to the CFP (Exhibit 7-3).

Exhibit 7-3. City Facilities Levels of Service

City Facility	Adopted LOS	Proposed LOS (s.f. per capita)
General Government	1.13 s.f. per capita	1.36 s.f. per capita
Police	0.44 s.f. per capita	294 s.f. per employee
Public Works Shops	1.80 s.f. per capita	(no change)

Source: City of Sumner Capital Facilities Plan, 2015; City of Sumner Comprehensive Plan, 2021.

Police

The Sumner Police Department (SPD) provides law enforcement services within the city limits. The SPD headquarters are located at Sumner City Hall, occupying a building area of 7,654 sf. The SPD currently employs 21 commissioned officers, 4 special commissioned employees, and 6 non-commissioned employees. In 2021, SPD responded to 15,800 calls for police service and 14,530 calls in 2023 (slightly fewer due to reduced number of officers, who initiate many of the calls).

Officers circulate throughout the City on patrol and respond to calls from a dispatch center in Tacoma through South Sound 911. The police facility in City Hall currently houses the communications center, holding cells, conference room, locker facilities, and sundry offices. Jail facilities are provided through an inter-local agreement with the City of Puyallup. Sumner's court services operate through Bonney Lake Municipal Court with Sumner judge presiding.

The Sumner Comprehensive Plan sets the following Level of Service standards for Law Enforcement:

- Maintain a ratio of two (2) commissioned officers per 1,000 population.
- Establish and maintain a ratio of not less than 1 commissioned patrol officer for every 1,000 calls for service per year.
- Provide one sergeant for every 6-7 commissioned patrol officers.
- Provide and maintain one detective position at a ratio of 1/400 Part A offenses.
- Police Government Buildings: 0.44 square feet per capita

Library

The Pierce County Library System (PCLS) provides library services to the City of Sumner. PCLS operates 19 branch libraries, serving residents in unincorporated Pierce County as well as the cities and towns of Bonney Lake, Buckley, Dupont, Eatonville, Edgewood, Fife, Gig Harbor, Lakewood, Milton, Orting, South Prairie, Steilacoom, Sumner, University Place, and Wilkeson.

The Sumner Pierce County Library branch is located at 1116 Fryar Avenue occupying a 10,600 square foot building. This branch library is open seven days a week and includes several amenities/services,

including a book drop, library curbside service, community bulletin board, book donations/sale, ballot drop box, computers (with printing/scanning/copying capabilities), a law library, fax machine, meeting room, study room, and Wi-Fi.

As of 2023, the Pierce County Library System is in the process of updating its Facility Master Plan. There is no City-adopted level of service for library services in Sumner. In August 2023 a bond was passed to support the Sumner library relocation and expansion to an East Main Street location, through the creation of an independent taxing district. The goal is to expand the library from approximately 10,000 s.f. to 20,000 s.f.

7.2.2 Fire and Emergency Medical Services

The City of Sumner formally joined East Pierce Fire and Rescue (EPF&R) through a resident vote 2008. EPF&R provides fire, rescue, and emergency medical services to approximately 105,000 residents living in and around Bonney Lake, Edgewood, Milton, Lake Tapps, the Ridge communities, South Prairie, Tehalah, and surrounding communities. The total service area covers 153 square miles. As of 2022, EPF&R employs 82 career firefighter-EMT's, 59 career firefighter-paramedics, and five volunteer firefighters.

EPF&R operates from nine fire stations. Station 113 is located in Sumner at 800 Harrison Street, see Exhibit 7-4. In 2022, EPF&R received a total of 12,653 calls for service, the majority (about 74%) were emergency medical calls. The average response time in 2022 was 7 minutes, 33 seconds.

The Sumner Comprehensive Plan includes the following levels of service for fire and emergency medical services in the Capital Facilities and Public Services Element:

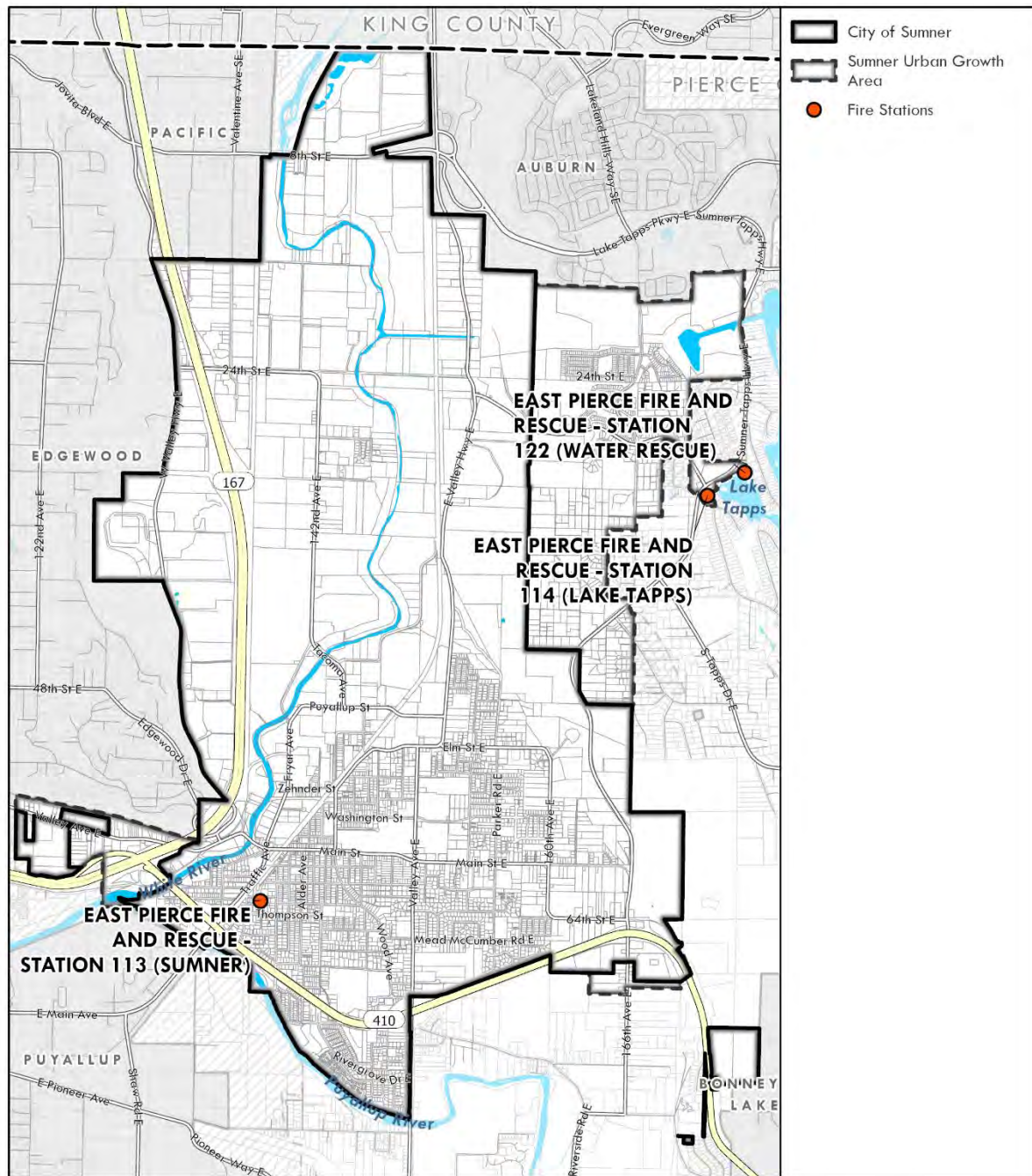
- Policy 1.3.1 East Pierce Fire & Rescue shall strive to maintain sufficient personnel and equipment, strategically located such that the first-due response units arrive at fire and emergency medical incidents in urban areas served by staff fire stations (as characterized by the City of Sumner) within 5 minutes to the 90th percentile.
- Policy 1.3.2 East Pierce Fire & Rescue shall strive to maintain sufficient personnel and equipment, strategically located to provide a minimum acceptable (effective) response force capable of arriving at emergency incidents within 10 minutes to the 90th percentile.

EPF&R has adopted the following benchmarks for standards of coverage for urban areas:

- First Apparatus to arrive at a fire scene (90th percentile): 8 minutes, 30 seconds.
- Minimum acceptable response for full effective response force arriving at a fire scene (90th percentile): 13 minutes, 30 seconds.

In 2022, EPF&R achieved this benchmark of the first unit arriving at a fire scene approximately 81% of the time and the minimum acceptable response approximately 77% of the time.

Exhibit 7-4: Fire Stations



CITY OF SUMNER Fire Stations

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

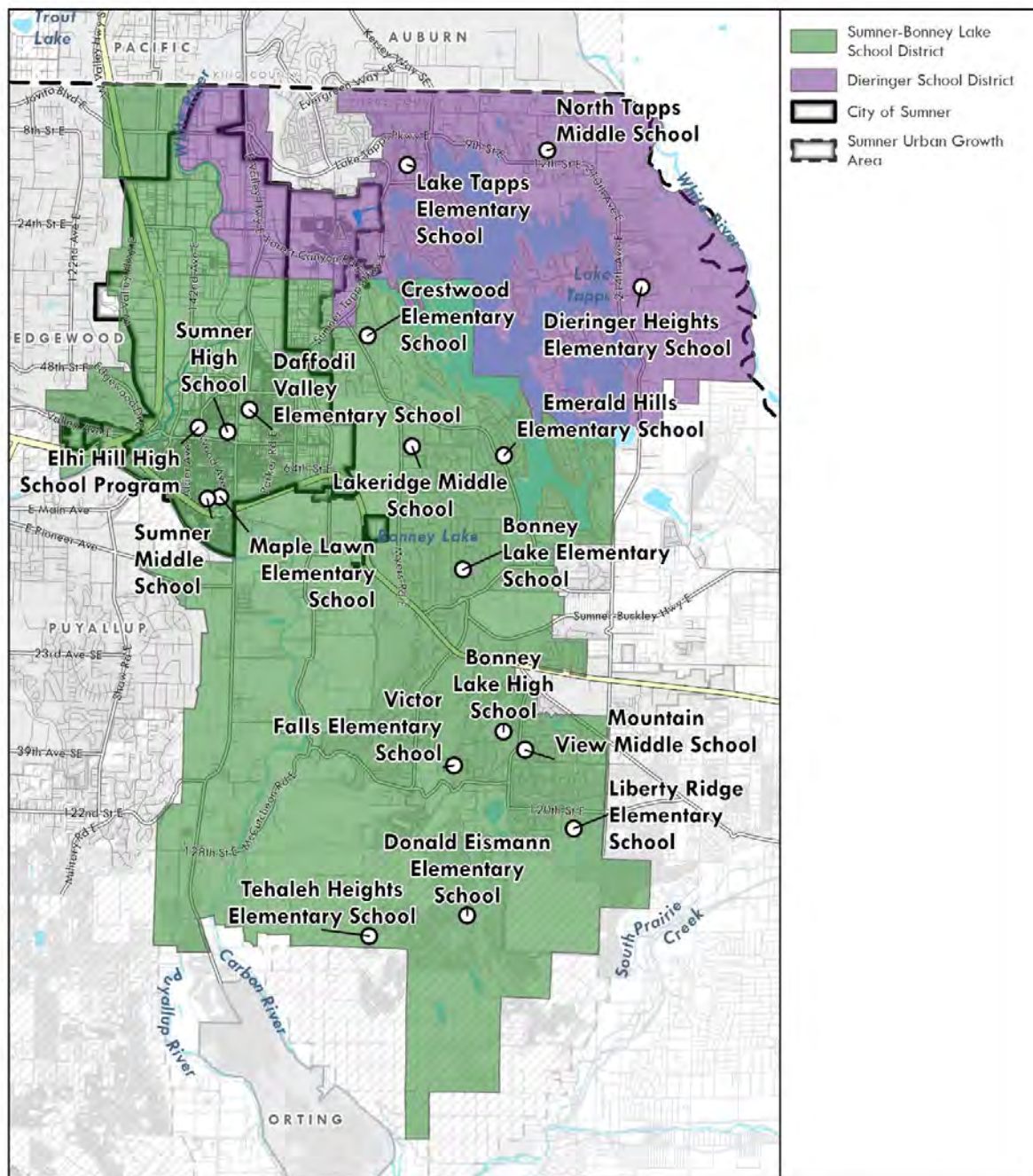


Source: Pierce County, 2023; BERK, 2024.

7.2.3 Schools

The City of Sumner is served by the Sumner-Bonney Lake and Dieringer School Districts, which also serve surrounding cities and unincorporated areas. School district boundaries and school locations are shown in Exhibit 7-5.

Exhibit 7-5: School District Boundaries and Facilities



CITY OF SUMNER

Public Schools

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Note: Sumner Early Learning Center was not constructed at the time of this map and is located on the Sumner Middle School campus.

Source: BERK, 2023; Pierce County, 2023.

Sumner-Bonney Lake School District

The Sumner-Bonney Lake School District serves the communities of Sumner, Bonney Lake, parts of Edgewood, Pacific, and Lake Tapps, and unincorporated areas of Pierce County and operates a total of 16 schools. The following K-12 schools are located within and serve the City of Sumner:

- Sumner High School
- Sumner Middle School
- Daffodil Valley Elementary
- Maple Lawn Elementary
- Sumner Early Learning Center
- Elhi Hill Program

The Sumner Early Learning Center serves kindergarten students in the Daffodil Valley and Maple Lawn Elementary service areas and offers classrooms and playgrounds areas that are different from traditional educational facilities and encourage self-direction and exploration in students. Elhi Hill, located in downtown Sumner, provides an alternative learning experience for high school students. An inventory of the existing Sumner school facilities is shown in Exhibit 7-6.

Exhibit 7-6: Sumner School Facilities

School	Site Size (Acres)	Facility Size (SF)	Capacity (Students)	Year Built
Sumner High School	26.83	186,888	1,260	1954
Sumner Middle School	23	107,194	722	1962
Daffodil Valley Elementary	12.7	48,035	481	2000
Maple Lawn Elementary	8.5	51,291	454	1952
Sumner Early Learning Center	3.65	35,290	168	2019
Elhi Hill Program*	0.10	4,743	N/A	1958

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

According to the Washington State Office of the Superintendent of Public Instruction (OSPI), the Sumner-Bonney Lake School District had a districtwide enrollment of 10,622 students for the 2022-23 school year, with the four Sumner schools accounting for 3,651 students. Enrollment and capacity figures are shown in Exhibit 7-7, Exhibit 7-8, and Exhibit 7-9. Sumner Middle School is the only school under its enrollment capacity. The Sumner-Bonney Lake School District Capital Facilities Plan includes enrollment projections based on a Demographic Study prepared for the District.

Exhibit 7-7: Sumner Schools Enrollment and Capacity

School	Capacity (Students)	2022-23 Enrollment (Students)	Percent Over/Under Capacity
Sumner High School	1,260	1,844	46%
Sumner Middle School	722	681	-6%
Daffodil Valley Elementary	481	492	0.2%
Maple Lawn Elementary	454	634	40%
Sumner Early Learning Center	168	<i>Unknown</i>	<i>Unknown</i>
Elhi Hill Program	N/A	<i>Unknown</i>	<i>N/A</i>

Source: Enrollment: OPSI Report Card, 2023.

Capacity: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

Notes: Sumner Early Learning Center capacity does not include pre-K students (82 students).

Daffodil Valley and Maple Lawn Elementary capacity includes capacity at the kindergarten level housed at Sumner Early Learning Center.

Exhibit 7-8: Projected Student Enrollment, Sumner-Bonney Lake School District

	2021	2022	2023	2024	2025	2026	Change
Total Students	9,823	10,085	10,322	10,507	10,599	10,739	1,105

Note: Projections were calculated by Educational Data Solutions for a Demographic Study for Sumner-Bonney Lake School District

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

The Sumner-Bonney Lake School District maintains student generation numbers to determine the number of students that can be expected from new residential construction. These numbers are shown in Exhibit 7-9. Within the boundaries of the Sumner-Bonney Lake School District there are three large, master planned developments: Tehaleh, Falling Water, and Plateau 465. Housing construction in these developments has the potential to substantially increase enrollment in the District in both the short and long term, depending on how quickly the housing is developed. However, it is not expected that students from these new developments would be served by schools located within or primarily serving the City of Sumner.

Exhibit 7-9: Student Generation Rates, Sumner-Bonney Lake School District

School Type	Single Family	Multifamily
Elementary School	0.403	0.095
Middle School	0.140	0.043
High School	0.099	0.033

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

The Sumner-Bonney Lake School District Board of Directors, in association with local jurisdictions, establishes impact fees for new residential construction. Impact fees are a means of collecting funds to meet the “unhoused student need” and provide funds to accommodate growth and demand for school facilities. Impact fees ensure that new development pays for fair share proportional amount of the costs incurred by the school district for expanding new facilities and new construction. The impact fee charged is based on the costs for providing the additional space and the projected number of students in each new residential unit. The current impact fee is \$3,575.61 for a single-family residence and \$1,818.07 for a multifamily residential unit.

The Sumner-Bonney Lake School District’s strategy to meet future demand includes system upgrades to replace aging infrastructure, improvements to existing facilities to better meet District needs, creation of new classroom space, acquisition of land for a future elementary and middle school, full buildout of the Sumner High School Master Plan, and additional capacity and upgrades at Bonney Lake High School.

In recent years, the Sumner-Bonney Lake School District has completed or begun construction on many of the 2016 capital bond projects, including:

- The new Tehaleh heights Elementary School opened in 2018.
- The Emerald Hills Elementary Replacement project was completed in 2020.
- The Sumner Early Learning Center opened in 2019.
- Upgrades to Bonney Lake High School were completed in 2019 and include a new Performing Arts Center, interior improvements, safety/security improvements, and improvements to the athletic field.
- The athletic fields at Sumner, Lakeridge, and Mountain Middle Schools were upgraded with new synthetic turf.
- Security upgrades were installed at Crestwood, Liberty Ridge, and Daffodil Valley Elementary Schools.
- Improvements to Mountain View Middle School, including new classrooms and support facilities, upgraded security measures, new floors, and reconfigured parking and drop off areas are expected to be completed in the 2022-2023 school year, and
- The District is undertaking a project for a complete replacement of Sumner High School, which broke ground in 2021.

Dieringer School District

The Dieringer School District includes three schools: Lake Tapps Elementary School, Dieringer Heights Elementary School, and North Tapps Middle School and provides a K-8th grade education. The majority of Dieringer School District #343 is located in unincorporated Pierce County. The District is bounded by the White River to the east, the Stuck River on to the west, the City of Auburn to the north, and the cities of Bonney Lake and Sumner to the south. The District covers approximately 5.5 square miles. During the 2022-23 school year, the Dieringer School District had a total enrollment of 1,444 students. Lake Tapps Elementary School is over capacity and Dieringer Heights Elementary School and North Tapps Middle School are near capacity (Exhibit 7-10). The Dieringer School District serves the northeast Sumner city limits along East Valley Highway.

The Dieringer School District establishes student generation rates for the purposes of facility planning, see Exhibit 7-11.

Exhibit 7-10: Dieringer School District - Enrollment

School	Capacity	2022-23 Enrollment	Percent Over/Under Capacity
Lake Tapps Elementary School	357	451	26%
Dieringer Heights Elementary School	508	472	-7%
North Tapps Middle School	536	521	-3%

Source: Enrollment: OPSI Report Card, 2023.

Exhibit 7-11: Student Generation Rates, Dieringer School District

School Type	Single Family	Multifamily
Elementary School	0.322	0.172
Middle School	0.13	0.07

Source: Dieringer School District Capital Facilities Plan, 2021-2026, 2020.

7.2.4 Parks

Sumner currently manages 28.6 acres of parks and several trails (see

Exhibit 7-12 and Exhibit 7-14). The City has adopted levels of service (LOS) for different amenity types (Exhibit 7-13) in the 2018 Parks and Trails Plan. There is also an LOS for amount of investment in the parks system (\$1,060 per capita in 2017) that can be adjusted periodically to account for system value, inflation, or annexation. The City currently collects a Park and Trails Mitigation Fee to address level of investment per capita. Adoption of the fee by the City Council is done under a separate action from the

Capital Facilities Plan. A level of service for access and distribution is also defined (resident properties are located within ¼ mile of a Sumner park accessible by pedestrian or bicycle facilities). This LOS is analyzed as part of the Parks and Trails Plan.

There are also four school district recreation facilities in Sumner. The Senior Center is owned by the City of Sumner who contracts with an independent vendor to provide a range of programs and activities for adults 55 and older. The Sumner Library, managed by Pierce County Library District, provides activities and meeting rooms to the public. The Gordon Family YMCA is a fitness center and also a community/arts center; the City has a service agreement with the YMCA to provide some fitness/recreation services.

The Parks and Trails Plan includes an inventory, vision and needs, a system plan, and a capital facility plan. The plan is currently undergoing an update that is expected to be completed in 2024.

Exhibit 7-12: Parks and Trails in Sumner

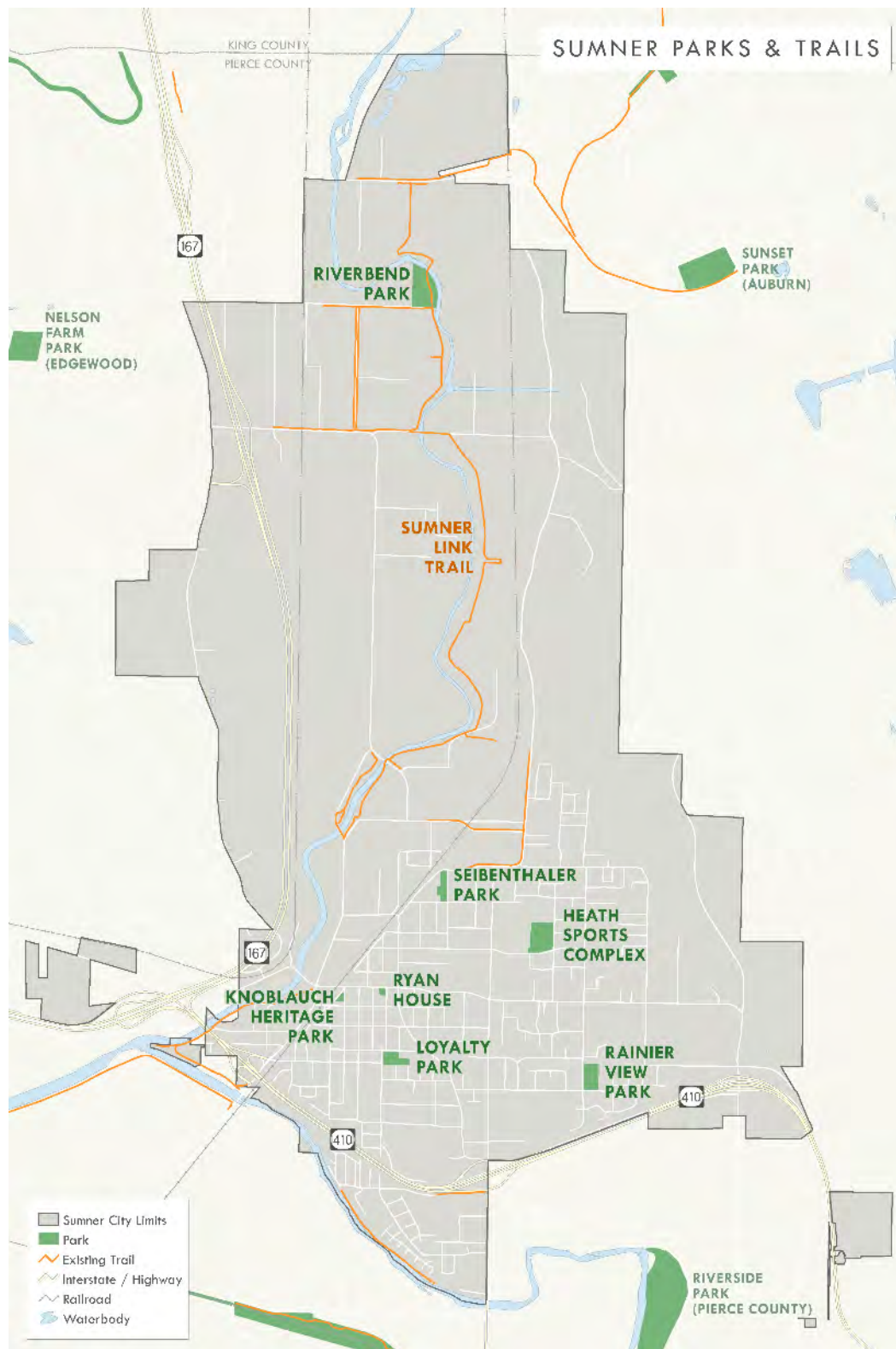
Park Areas and Facilities	Acres	No. of Sites
Improved Community Parks	10.2	4
Loyalty	3.3	
Seibenthaler	2.3	
Reuben Knoblauch Heritage	0.7	
Rainier View Park	3.9	
Unimproved Community Parks	15.4	3
Riverbend Park	11.0	
Salmon Creek Park	4.2	
Qunell Property	0.2	
Regional Parks	7.0	1
Bill Heath Sports Complex	7.0	
Special Use Area	0.4	1
Lucy B Ryan Park	0.4	
Total City Park Land	28.3	7
Other City Recreation Facilities	1.5	2
Library	0.5	
Senior Center	1.0	
School District Recreation Facilities	73.8	4

Source: 2018 Sumner Parks and Trails Plan; City of Sumner, 2023.

Exhibit 7-13: Existing Parks and Recreation Facilities and LOS

Activity	Required LOS	Existing Number
Active Recreation Facilities	1/1,700	9
Informal Recreation Facilities	1/1,500	10
Trails	1/1,600	9.3
Parks	1/500	28.6

Source: 2018 Sumner Parks and Trails Plan.

Exhibit 7-14: Sumner Parks and Trails (2018)

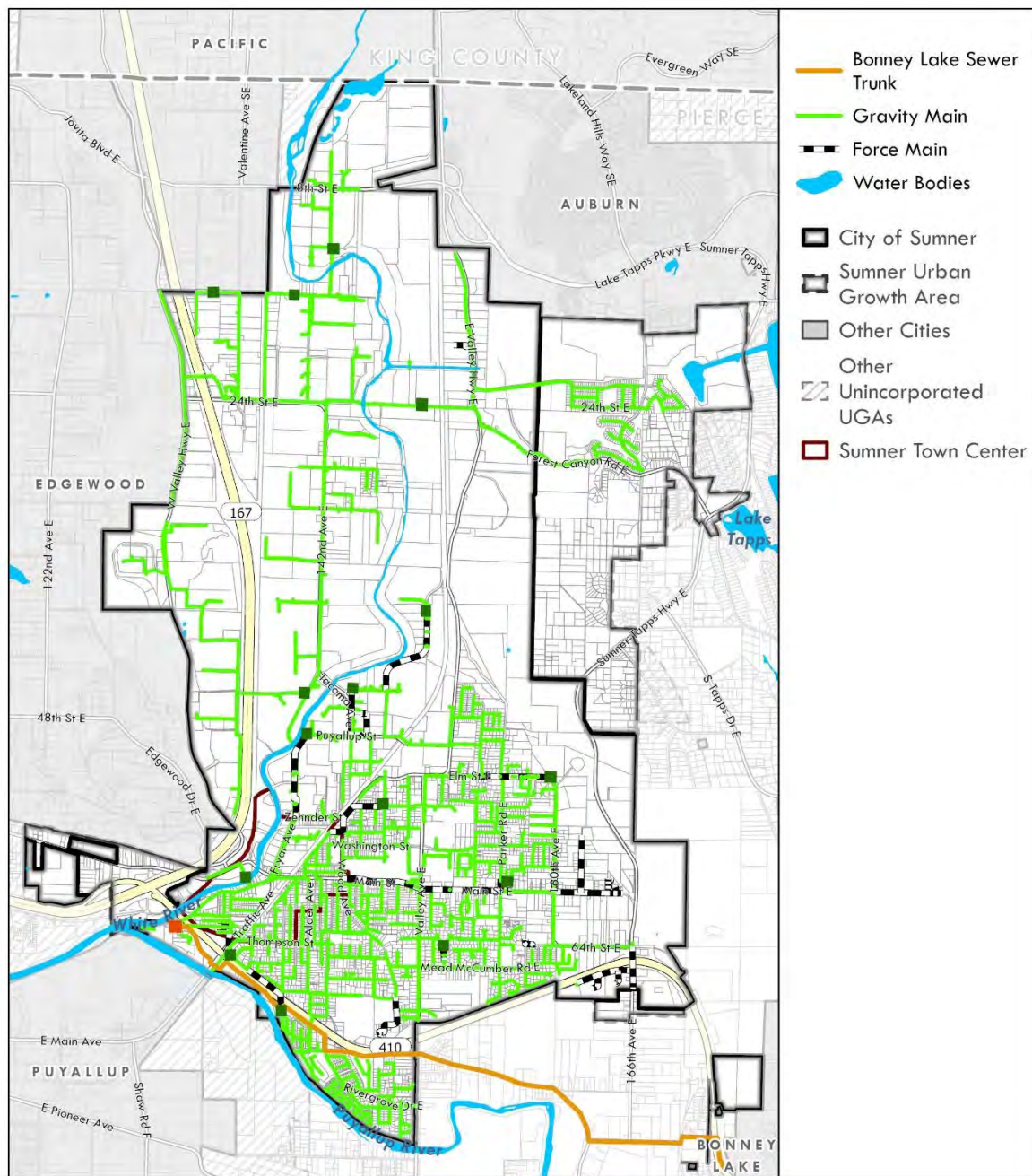
Source: Sumner Parks and Trails Plan 2018; BERK, 2017.

7.2.5 Utilities

Sewer

The information in this section is based on the 2020 Sanitary Sewer Comprehensive Plan (Sanitary Sewer Plan), which is based on projections for a 20-year period to 2038, and the 2009 Wastewater Treatment Plant Capacity Increase Analysis. The Sanitary Sewer Plan analyzes the City's collection system, identifies any system deficiencies for existing and future flow conditions, and provides recommended improvements and cost estimates. In preparing the plan, the City's wastewater collection system was analyzed for existing and future capacity. The City has operated a sanitary sewer system since 1927 and a wastewater treatment plant since 1957. The City's sanitary sewer service area encompasses approximately 4,090 acres and includes the Sumner city limits, as well as portions of the Sumner UGA. As of 2020, the City owns and operates a collection system that includes 7.4 miles of force mains, 52.4 miles of gravity sewer, and 16 pump stations (Exhibit 7-15). The service area is divided into 18 basins to analyze capacity needs. Delineation of basins is based on existing sewer service and topography. The boundaries of the service area and its constituent basins are shown in Exhibit 7-16, along with the existing collection system for sanitary sewer.

Exhibit 7-15: Sewer System



CITY OF SUMNER Sewer System

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Source: City of Sumner, 2023; Parametrix, 2023

Wastewater Treatment Plant

The wastewater treatment plant (WWTP) is located at 13114 63rd Street E, at the confluence of the Puyallup and White (Stuck) rivers (Exhibit 7-15). The WWTP provides sanitary sewer treatment to all of the current plan area, as well as the City of Bonney Lake. The City of Sumner owns and operates the plant and has an Intergovernmental Agreement to accept waste from the City of Bonney Lake. Areawide, the WWTP collects waste from 15+ square miles, serves 28,700 residents, processes 860 million gallons of flow annually (391 million from Sumner and 469 million from Bonney Lake), treats 2.8 million pounds of solids, removes 98.2% of solids, and gives away 338 tons of biosolid to gardeners, as described in the 2018 Sumner Regional Wastewater Treatment Facility Annual Report. The WWTP is a secondary treatment facility and discharges treated effluent to the White (Stuck) River. The last major upgrade to the WWTP occurred in March 2016. Capacity measurements for treatment plants include wastewater flow (measured in gallons per day) and organic influent loadings (or solids). Per the City's Sanitary Sewer Plan, the most common measurements of organic loadings are 5-day biochemical oxygen demand (BOD5) and total suspended solids (TSS). As of 2020, the permitted capacity of the WWTP is :

- Maximum Month (Design Flow): 6.10 million gallons per day (mgd)
- Peak Day Flow: 11.66 mgd
- Peak Hour Flow: 19.87 mgd
- Influent 5-Day BOD5: 10,900 pounds/day
- Influent TSS: 12,660 pounds/day

As described in the Sanitary Sewer Plan, the City of Sumner maintains an agreement with the City of Bonney Lake which allows Bonney Lake to use up to 3.3 mgd of the plant's maximum month flow capacity, while the remaining 2.8 mgd of the plant's capacity is reserved for flows from the Sumner service area.

Wastewater Flow

The City's Sanitary Sewer Plan analyzed 2015-2017 wastewater flow data recorded at the WWTP to determine current wastewater flow characteristics. Average annual flow in Sumner from 2015-2017 was 1.06 mgd, of which about 66% was assumed from residential flows and 34% from commercial/industrial flows. The Sanitary Sewer Plan compares this to population and employment data from 2016 (a residential sewered population of 10,251 and 15,313 employees) to develop the following residential and employee based per capita flows used to project future flows:

- Residential per capita flow: 68 gpd/resident
- Commercial and industrial per employee flow: 23 gpd/employee

The Sanitary Sewer Plan uses the following peaking factors, determined by dividing the measured maximum month (1.71 mgd), peak day (3.67 mgd), and peak hour (3.60 mgd) flows by average annual flows:

- Maximum month to annual average: 1.61
- Peak day to annual average: 3.46
- Peak hour to peak day in 2017: 1.27
- Peak hour to annual average: 4.39

The maximum month, peak day, and peak hour factors are related to the served population and typically these peak factors decline as the population increases.

Infiltration and inflow were also considered in determining the peak day and peak hour flows throughout the system. Inflow is runoff entering the sewer directly, typically from storm sewer connections, basement sump pumps, roof drains, and submerged manholes. Infiltration occurs as groundwater leaks into the sewer system through cracked or broken pipes and manholes or through loose joints and connections. I/I rates ranged from 267 gpd/acre in 2016 to 641 gpd/acre in 2015.²¹ The Sanitary Sewer Plan uses the 2015 rate of 641 gpd/acre for planning purposes because it was the highest over the analyzed time period.

Assumed Population and Employment

The Sanitary Sewer Plan considers projected wastewater flows through the years 2024 and 2038. Throughout the sewer service area that includes the city limits and portions of the UGA, the residential population planned for is 11,658 for 2024 and 13,146 for 2038. The Sanitary Sewer Plan assumes that by 2038 all households within the service area will be sewered and that the sewered area (the area of all parcels and right-of-way adjacent to a sewer line) will include city limits and the entire UGA. Anticipated employment in the sewer service area is 18,917 for 2024 and 21,046 for 2038.

Major Recent and Planned Improvements

Funds were allocated in the City of Sumner's 2023-2024 Biennial Budget to upgrade equipment and add weather protection to increase longevity, as well as perform major long-term maintenance on aeration basins and digesters at the WWTP. The City's 2023-2024 Biennial Budget also includes funds to replace back-up generators that keep the WWTP working during power outages. In addition, funds are allotted

to receive full delegation of the Pretreatment Program currently under development to meet Washington State Department of Ecology requirements.

The Sanitary Sewer Plan identified the following improvement projects for 2018-2024:

- Many of the City's pump stations will exceed their typical 25-year life expectancy of electrical and mechanical equipment and will require rehabilitation or replacement improvements.
- The City is taking a proactive approach to keeping inflow and infiltration rates low and preserving the overall functionality of the collection system by funding a program to source to repair and replace problematic or deteriorated areas within the City's sanitary sewer system. This also allows the maintenance crews to monitor the condition of the collection system and make recommendations for repairs and replacement, as needed.
- A general budget was included for WWTP operation and maintenance improvements that may include roof replacements, painting, replacement of mechanical equipment, and replacement of electrical, instrumentation, and control equipment.
- A general budget was included to repair or replace broken pipes, as needed.

Level of Service (LOS)

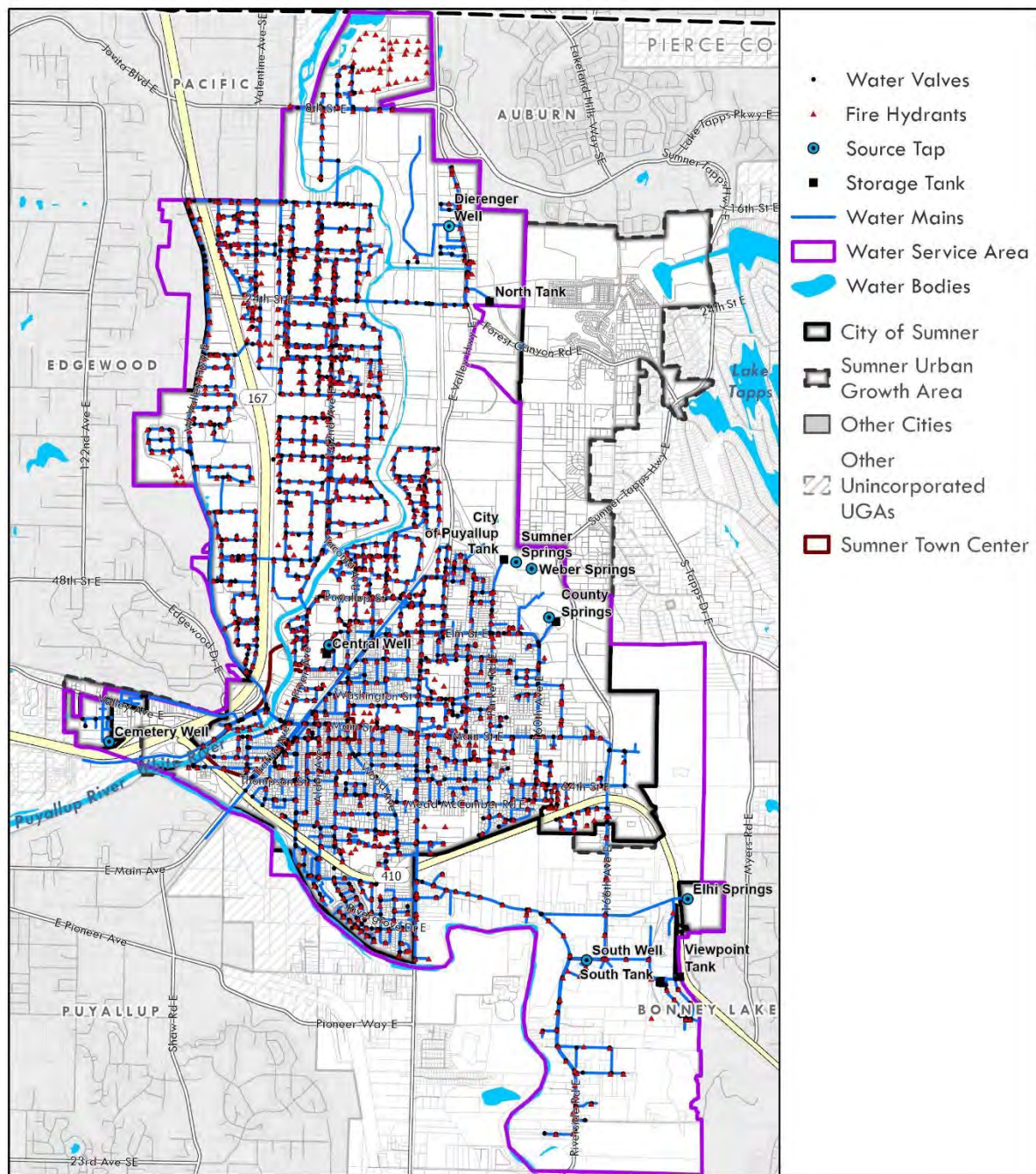
Policy 1.8. of the 2020 Comprehensive Plan's Capital Facilities and Public Services Element directs the City to establish and provide for the sanitary sewer system LOS defined in the Sanitary Sewer Plan (City of Sumner, 2020). The Sanitary Sewer Plan establishes the following per capita flows to project future flows:

- Residential per capita flow: 68 gpd/resident
- Commercial and industrial per employee flow: 23 gpd/employee

Water

Information in this section is primarily based upon the 2020 Water System Plan (Water System Plan), which is based on projections for a 20-year period to 2038. The City water system service area covers approximately 6,300 acres, 1,500 of which lie outside city limits. The service area is adjoined by the Bonney Lake, Valley (Alderton-McMillin), Puyallup, Pacific, Mountain View-Edgewood, and Tacoma water districts. The City of Sumner has assumed the spring supply, water rights, and customers of the Fowler Mutual Water Company, located in northwest Sumner, and portions of the Webstone Water District located outside the City of Pacific.

Exhibit 7-16: Water Utility & Infrastructure



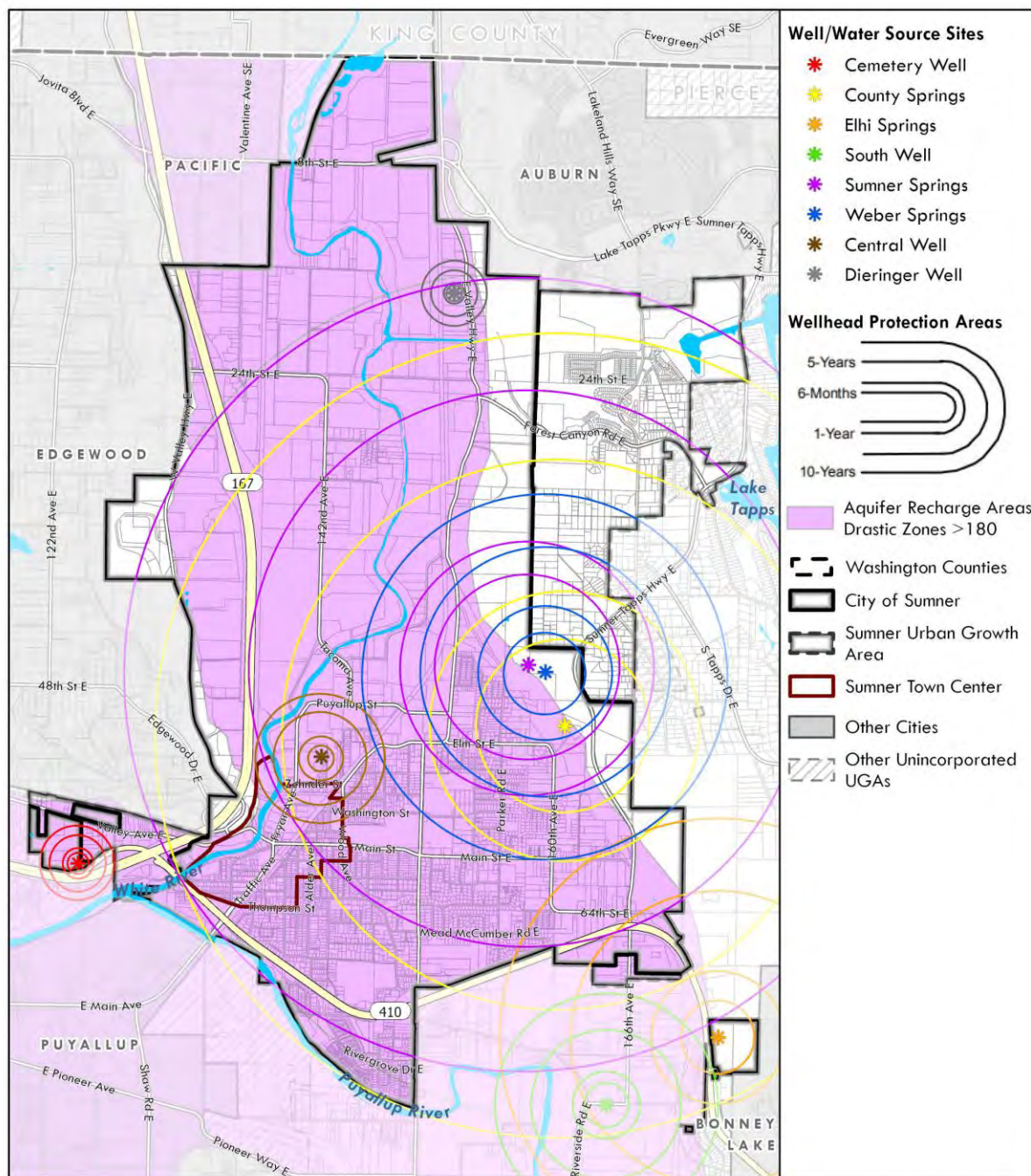
CITY OF SUMNER Water Utility & Infrastructure Area

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Source: City of Sumner, 2023; Parametrix, 2024.

Exhibit 7-17: Aquifer Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



Map Date: August 2023

Source: City of Sumner, 2023; Parametrix, 2024.

Average Daily Demand

Based on actual usage for years 2015 through 2017, the average per capita residential water usage for the three years was 72.73 gpd/resident, and this was used for residential demand projections. Also for the 2015-2017 period, average per employee water usage for the three years was 25.28 gpd/employee.

Total annual use as of 2018 was estimated to be 1.75 million of gallons per day (mgd). The projected 2038 amount is 1.96 mgd. The plan also extends to 2068 and has a range of 2.38 to 2.85 mgd annual use.

Maximum Daily Demand

Comparing maximum daily production to average demand for the period, the Water System Plan uses 2.05 as the estimated peaking factor.

Water Facilities

Sumner's water system includes about 90 miles of transmission mains (2 inches to 18 inches). The City currently has the rights to utilize up to eight potable water sources, including four springs (Sumner Springs, County Springs, Weber Springs, and Elhi Springs) and four wells (South Well, Central Well, Dieringer Well, and West Well) (see Exhibit 7-16 and Exhibit 7-17). The City's water system currently has a physical source capacity of approximately 5.31 mgd and a storage capacity of approximately 5.40 million gallons.

Source Evaluation

The Sumner water system has a current operational source capacity of approximately 3.59 mgd. Based on water demand projections, the instantaneous capacity of the existing City sources may be insufficient to meet the projected maximum day demand by the year 2038 if the City does not receive approval of future additional water rights for the Central Well to allow for the increased source capacity of 1.05 mgd with provisions to expand to 2.1 mgd.

Assumed Population and Employment

The Water System Plan considers projected water demand through the years 2028, 2038, and 2068 for purposes of long-range planning necessarily associated with planning for water rights acquisitions (BHC Consultants, 2020). Throughout the water service area that includes the city limits and a rural area to the south, the residential population planned is 12,321 for 2028 and is 13,343 for 2038 according to the Plan's projections in 2020. The anticipated population for the year 2068 is also considered in the plan at 16,946. Anticipated employment in the water service area is 18,064 for 2028 and 19,096 for 2038. By 2068 this grows to 23,057.

Major Recent and Planned Improvements

The 2023-2024 City of Sumner Biennial Budget allocates funds to retrofit and recoat the South Tank and recoat the Sumner Spring Tank, as well as convert the City's telemetry system to cellular and retire the

outdated monitoring system. The 2023-2024 Biennial Budget also includes funders to replace the chlorine analyzer and generator, and to manage vegetation in the watershed. In addition, city staff have indicated that capital projects completed in 2021-2022 involved the start of the 24th Street East relocation Project and new infrastructure, as well as advanced design for the Town Center, including the Cherry and Maple Utilities Projects.

The following improvements were identified and recommended for implementation in 2018-2028 in the Water System Plan:

The City plans to continue to expand the water system to service areas not adequately served by the distribution system as currently constructed.

- Project D7 - Extend from 149th Avenue to East Valley Highway
- Project D8 - East Valley Highway from Salmon Creek to CTI

As significant City projects are constructed, the City will make improvements to realize efficiencies.

- Project C1 - Bridge Street Bridge Replacement
- Project C2 - Stewart Road Bridge Replacement
- Project C3 - Lower White River Restoration Project
- Project C4 - 64th & Sumner Tapps Highway
- Project C5 - Operations Facility

The proposed source and storage improvement projects address reliability.

- Project S1 - Additional Water Rights Acquisition
- Project S2 - Central Well Treatment Capacity Expansion
- Project S3 - South Well Improvements
- Project S4 - Dieringer Well Improvements
- Project S5 - West Well Improvements
- Project S6 - Sumner Springs Improvements
- Project S7 - County Springs Improvements
- Project ST1 - Earthquake Control Valves and Foundation Improvements
- Project ST2 - Viewpoint BPS Improvements
- Project ST3 - North Tank Improvements
- Project ST4 - Viewpoint Tank Detention Pond
- Project ST5 - Springs Tank Improvements

Additional projects have been identified to increase the operational effectiveness of the system:

- Project O&M1 - Hydrant and Isolation Valve Upgrades - 20 Years

The following improvements were identified and recommended for implementation in 2029-2038 in the Water System Plan:

- Many of the City's existing lines are made of asbestos concrete (AC) and have reached the end of their design life. These water lines are proposed to be replaced as significant repairs are made, leaks

are found on a segment, in coordination with street improvements, or as needed due to inadequate sizing. For example, the City has a plan to replace existing AC and small steel pipes through Project D5 Water Main Replacement Program.

- The City has filed application G2-30534 to increase the approved combined withdrawal rate from the West, South, and Central Wells in order to have sufficient production capacity to meet the projected maximum day demand beyond the year 2038. Although the City is currently in the application review and approval process, the City plans for Project S2 Central Well Treatment Capacity Expansion, which doubles the production capacity of the Central well and is pending acquisition of the additional water rights.

Level of Service

The City of Sumner adopted the following LOS standards for the water system in Policy 1.6.1 of the Comprehensive Plan's Capital Facilities and Public Services Element.

- Residential Demand: 60.3 gpd/capita
- Employee Demand: 58.3 gpd/employee plus 252,000 gpd

While included in the 2020 Comprehensive Plan, the policies have not been updated since the adoption of the 2020 Water System Plan. This DEIS includes analysis based on the Water System Plan: 72.73 gpd/resident and 25.28 gpd/employee.

Stormwater

The information in this section is based on the City of Sumner 2011 Stormwater Comprehensive Plan Update (2011 SWCP) (Parametrix Inc. 2011), which is an update to the City of Sumner Stormwater Comprehensive Plan adopted in 1992 (1992 SWCP), the City of Sumner 2020 Stormwater Capital Improvement Plan (Parametrix Inc. 2020), and the Pierce County 2023 Comprehensive Flood Hazard Management Plan (Pierce County, 2023) and is incorporated in this analysis by reference.

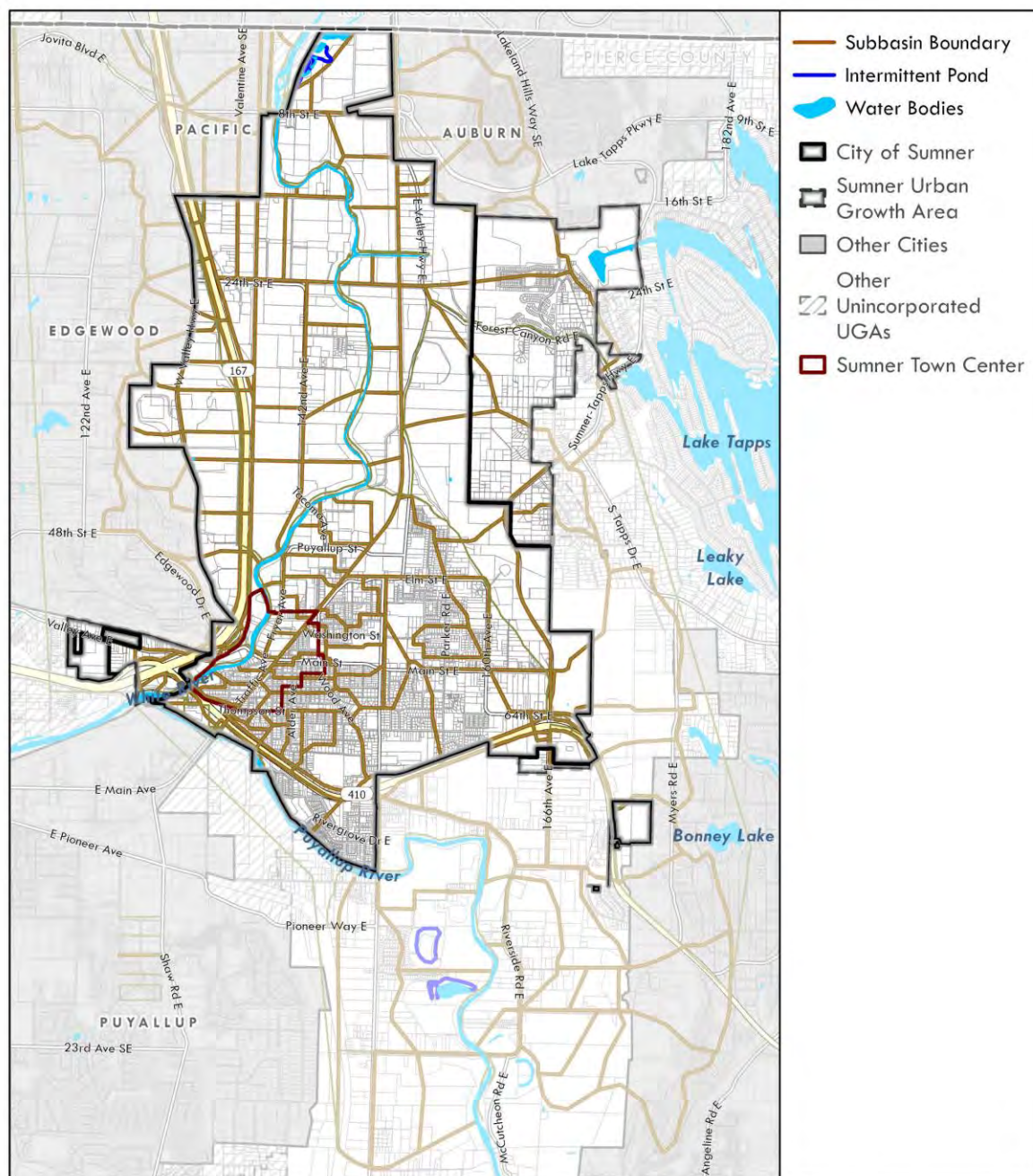
Sumner is located in the valley where the White River flows into the Puyallup River and within the middle reach of the Puyallup River, which acts as a transitional zone between the more urbanized lower reach and rural upper reach (Pierce County, 2023). The valley has historically been drained to lower the natural water table, control flooding, and create land that was more conducive for agriculture. As more intensive commercial/industrial and residential development has occurred, expansion of the stormwater system has been necessary to collect and convey stormwater to the rivers and to prevent flooding.

The purpose of the Stormwater Plan has been to project the capacity infrastructure needs and address current problems with the stormwater system. Changes in state and federal water quality regulations, stormwater retention and detention standards, and other parameters have an effect on the overall system as well as accurately anticipating what type of growth will occur.

Stormwater Modeling

The 1992 SWCP identified 44 drainage basins that generate and affect stormwater flows within the city limits. These basins were further divided into 115 subbasins, as shown in Exhibit 7-18.

Exhibit 7-18: Stormwater Subbasin Boundaries



CITY OF SUMNER

Stormwater Subbasin Boundaries

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: October 2023

Source: City of Sumner, 2023; Parametrix, 2023.

The majority of these basins were modeled in 1992 for the 25-year, 24-hour event and the 100-year, 24-hour event using Type 1A precipitation distribution. Hydrologic modeling data was subsequently used to complete hydraulic modeling of the Sumner stormwater infrastructure to determine system deficiencies and identify potential capital improvement projects. The results of the modeling are contained in the 1992 Stormwater Comprehensive Plan.

The 2004 Stormwater Comprehensive Plan (2004 SWCP) update included remodeling up to four of the subbasins because of a significant change of land use designation (i.e., an increase in allowable development density) between 1992 and present. Remodeling based on the 2004 land use map and allowable densities showed there was no significant increase in allowable density for developable areas located within the city limits over what was modeled in 1992.

The modeling in 1992 assumed average densities for Low Density Residential (LDR) and Medium Density Residential (MDR) zones: one dwelling unit per acre (approximately 15% impervious surface area) and four dwelling units per acre (approximately 42% impervious), respectively. These density assumptions are too low for new development based on the minimum lot sizes currently allowed in LDR and MDR zones. Based on the current allowable lot sizes, density assumptions of 40% for LDR and 35% for MDR are more appropriate (City of Sumner 2023). Although the densities assumed for inputs in the 1992 hydrologic modeling are not suitable for current development trends, they were appropriate for development occurring before and at the time the modeling was conducted. A majority of the capital improvement projects proposing upsizing existing conveyance as part of the 2004 planning is in the “Old Town” portion of Sumner, so previous modeling is still applicable.

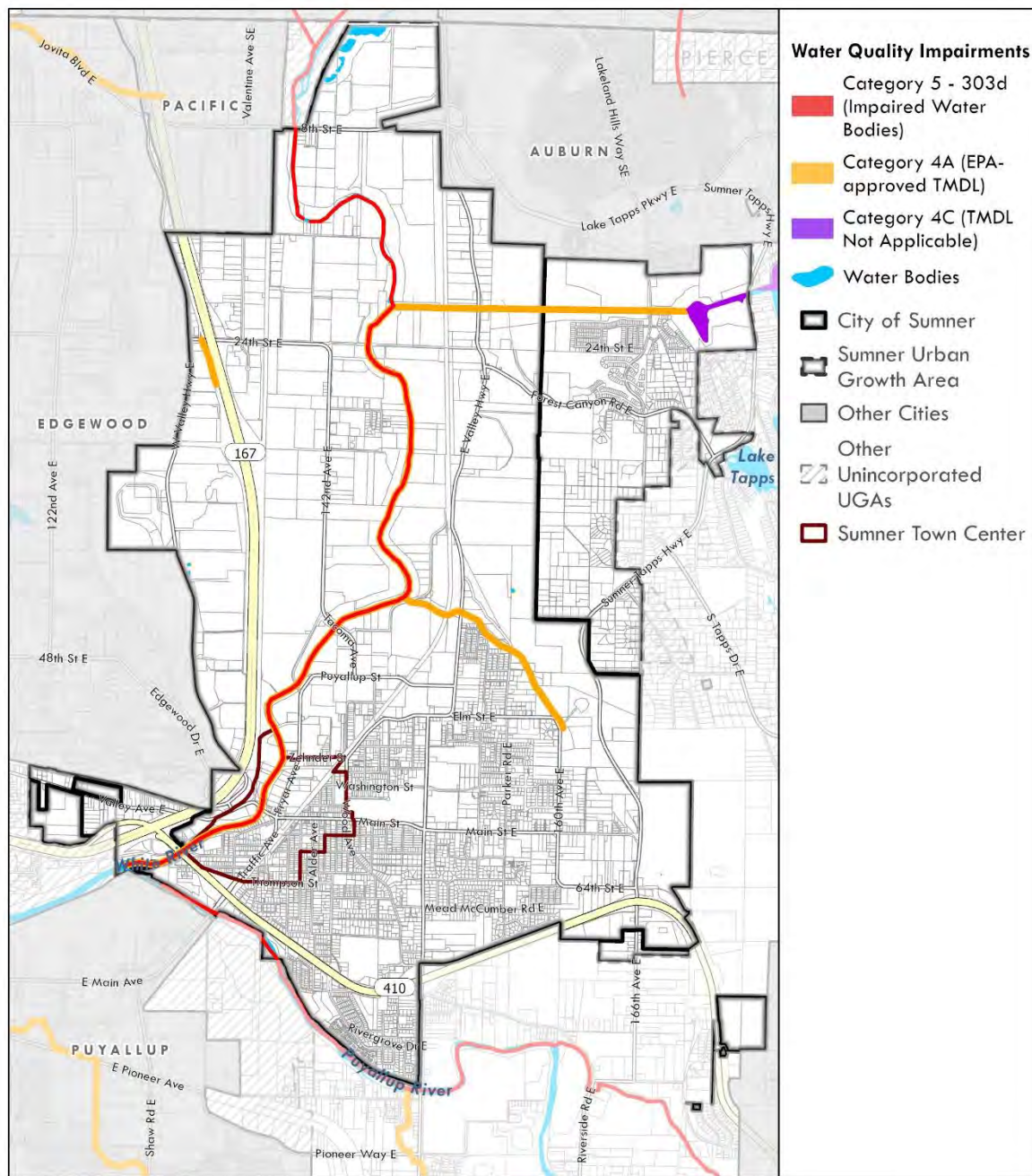
Modeling conducted during preliminary regional facility sizing for the capital improvement section of the 2011 SWCP was completed using the Western Washington Hydrology Model and the basin characteristics and model inputs presented in the 1992 SWCP, with the exception that the LDR and MDR density assumptions were revised to more accurately represent current development trends. The modeling results for preliminary regional facility sizing are included in the 2011 SWCP.

Stormwater Requirements

Stormwater requirements for the City are included in Chapter 13.48 of the Sumner Municipal Code, Stormwater Management Regulations.

The 2011 SWCP presents an overview of federal, state, county, and local regulations and policies that impact stormwater and surface water. Federal regulations include Clean Water Act NPDES Stormwater Permits, Total Maximum Daily Loads (see Exhibit 7-19 for impaired waterbodies in the City of Sumner), Safe Drinking Water Act, Endangered Species Act, and Federal Emergency Management Agency. State regulations include Puget Sound Partnership Action Agenda, Hydraulic Project Approval, and Shoreline Management Act. County regulations include Stream Team, and Flood Control Hazard District. Local regulations include Surface Water Design, City of Sumner Comprehensive Plan, Critical Areas, and Development Regulations.

Exhibit 7-19: Impaired Water Bodies



CITY OF SUMNER

Impaired Water Bodies

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Source: Sumner, 2023; Parametrix, 2023.

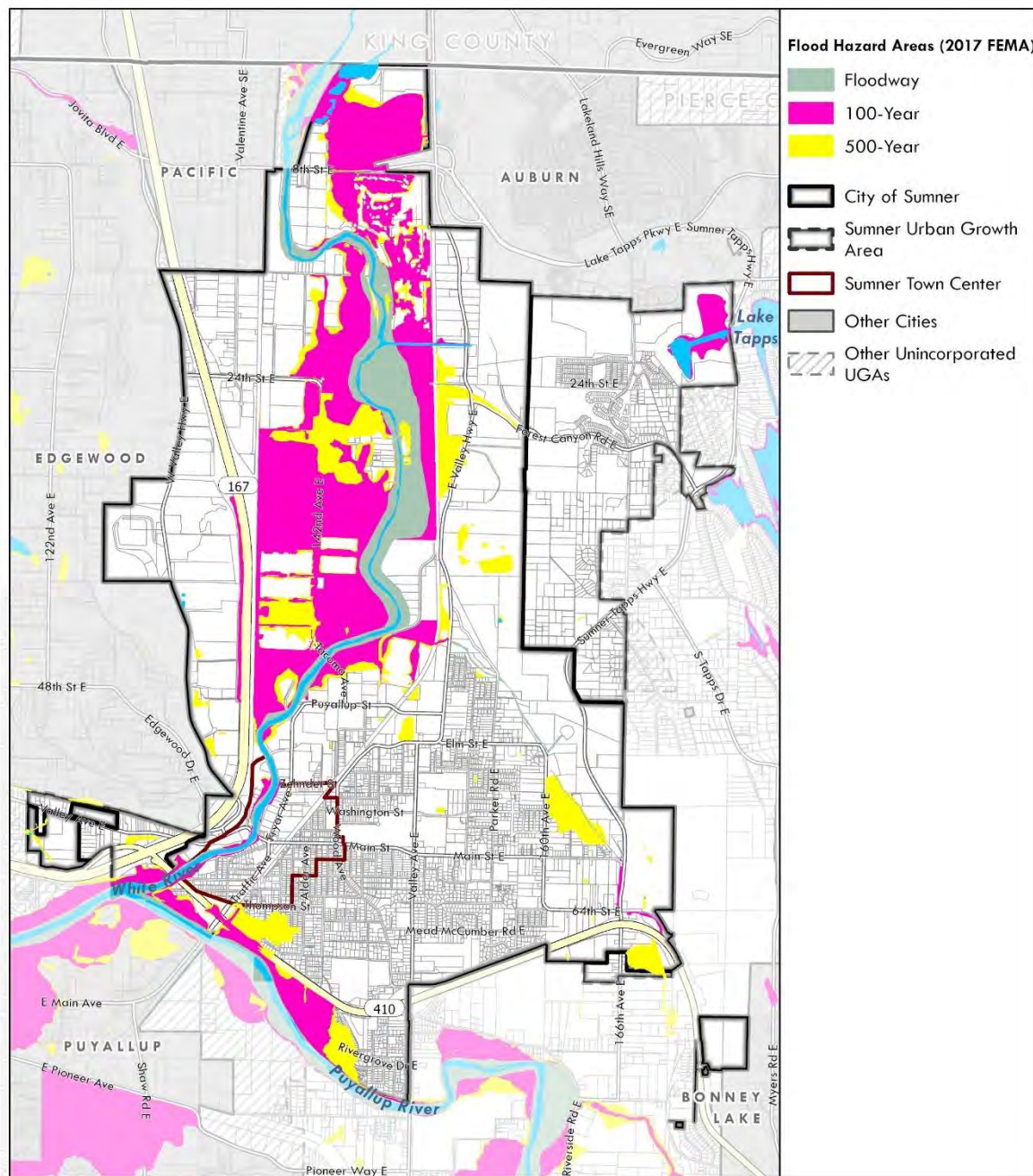
Flood Hazard Areas

Within the study area, there is a regulated 100-year floodplain for the White and Puyallup Rivers (Exhibit 7-20). Any development, such as adding fill, within the floodway and floodplain may increase surface water elevations during flood events. This, in turn, could expand the area affected by floodwaters, unless mitigation measures are implemented to compensate for the increased elevations. The City of Sumner currently implements the floodplain regulations required by the National Flood Insurance Program (NFIP) and through its Shoreline Master Program (SMP) and SMC Chapters 15.52 (Flood Hazard Protection).

Land along the White River is largely developed. Some of this area is in the 100-year flood hazard area (Zone AE), but most is outside the 100-year flood hazard area and in the 500-year flood area (Zone X).

Pierce County owns and maintains many levees along the lower White River within Sumner city limits. There is a history of flooding-related problems in the Middle Puyallup River and lower White River in Sumner. Identified recommendations include improvements to the levees and revetments to provide a 100-yr level of protection within the City of Sumner, per the County's 2023 Comprehensive Flood Hazard Management Plan.

Exhibit 7-20: Flood Hazard Areas



CITY OF SUMNER

Flood Hazard Areas

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: Sumner, 2023; Parametrix, 2023.

Low Impact Development

The objective of Low Impact Development (LID) methods is to mimic the predeveloped site hydrology by using site design techniques that store infiltrate, evaporate, and detain runoff. Since every aspect of site development affects hydrologic patterns on the site, LID control techniques focus mainly on site hydrology. If LID techniques can be used, the net result will be to more closely mimic the watershed's natural hydrologic functions. This can have a benefit to receiving waters by maintaining base flows, more closely approximating the natural conditions that are good for fish and wildlife using the streams and rivers.

The City's 2020 Comprehensive Plan promotes a sustainable growth pattern in support of VISION 2040 and Pierce County Countywide Planning Policies, including its environmental policies promoting low impact development. These goals and policies are contained in the City's 2020 Comprehensive Plan Environment Element, and include the following policies relevant to stormwater:

- Policy 1.4.6 - Continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development.
- Policy 1.4.7 - Low impact development techniques will be encouraged for both private and public developments including retention of native vegetation, soil amendment, rainwater harvesting, pervious pavement and bio-retention.
- Policy 1.4.8 - Incorporate low impact development principles and practices into the design, construction and operation of all city facilities and city-funded projects only when economically feasible.
- Policy 1.4.9 - Work with residential and commercial developers to incorporate low impact development that preserves a site's natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.
- Policy 1.4.10 - Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.
- Policy 1.7.3 - Seek broad funding for stormwater system improvements.
- Policy 1.7.4 - Coordinate with Pierce County on stormwater matters of common interest such as protection and preservation of water quality and resources in watersheds shared by both the City and County.
- Policy 1.7.5 - Continue to implement storm drainage, erosion control and critical area ordinances to help reduce off-site impacts of development and protect stream channels, aquatic resources, habitat and wetlands. The regulations shall reflect the requirements and manuals of state and federal agencies as appropriate.
- Policy 1.7.6 - Ensure that existing and future public and private stormwater and other water quality protection infrastructure is properly maintained and operated.
- Policy 1.7.7 - Identify locations for regional surface water facilities in areas of anticipated redevelopment in Downtown. Promote the establishment of regional surface water management facilities to support infill development and preclude the need for individual on-site ponds and

facilities, provide development incentives, encourage efficient use of land, and reduce overall facility maintenance costs.

- Policy 2.2.4. - Continue to implement wetland protection and stormwater management regulations to help mitigate flooding impacts to the community.
- Policy 6.5 - Provide incentives for the use of low impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems. Low impact development should be the preferred alternatives for new transportation projects.

Some updates to these policies are proposed in the draft Comprehensive Plan (2024 periodic update) but low impact development; stormwater system funding; wetland, water quality, and habitat protection; and surface water management continue to be emphasized.

The City of Sumner has adopted the following documents, per chapter 13.48.030 of the Sumner Municipal Code:

- 2019 Washington State Department of Ecology Stormwater Management Manual for Western Washington;
- Appendix 1, Minimum Technical Requirements for New Development and Redevelopment, of the 2019-2024 Western Washington Phase II municipal stormwater permit;
- 2012 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound together with any amendments or corrections;
- City of Sumner Development Specifications and Standard Details, together with any amendments or corrections.
- The City of Sumner requires that all applicants for residential, commercial, institutional and government agency projects implement LID strategies and practices in their stormwater site plan. LID standards and criteria are set forth in the manuals and the Sumner Development Specifications and Standard Details.

Capital Improvement Projects

The City's 2020 Stormwater Capital Improvement Plan Update (2020 Plan Update) presents a summary of capital improvement projects proposed to alleviate existing and future infrastructure deficiencies and increase the water quality of stormwater discharged to receiving waters. The 2020 Plan Update was prepared to summarize projects previously completed and updated the Capital Improvement Projects (CIPs) to be carried forward based on updated City needs. The 2020 Plan Update documents previously identified projects that were either completed, no longer needed, or needed to be carried forward. The 2020 Plan summarizes the status of the projects from the 2011 SWCP.

The 2020 Plan Update includes a table summarizing each proposed capital improvement project, including priority, scheduled completion date, and estimated construction cost in 2091 dollars and at the time of completion, and a site map showing the locations of proposed projects. There are a total of 32 capital improvement projects identified in the project list. The projects have been scheduled based on a high, medium, or low priority. Projects prioritized as high, medium, and low are scheduled for completion in 0 to 5 years, 5 to 10 years, and 10 to 20 years, respectively. The total estimated cost for

these projects at time of construction completion is \$82,728,000, in 2019 dollars. The projects have been prioritized based on urgency and to balance the annual cost. The cost per year ranges from \$833,000 to \$26,363,000.

Existing Conditions

North Portion

The North Portion of the city is currently heavily developed industrial area, some agricultural area, and some commercial area. There is also a resource protection area identified east of the White River. Stormwater is currently managed via stormwater infrastructure in the street system.

East Portion

The East Portion of the city is currently developed residential and commercial area and includes the East Sumner neighborhood and East Main St Design Strategy Area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

South Portion

The South Portion of the city is currently developed residential area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

West Portion

The West Portion of the city is currently heavily developed commercial and residential and includes the town center area. Stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas.

Sumner UGA

The Sumner UGA includes the areas described above and is currently developed commercial and residential area with some industrial uses and areas of undeveloped forest slopes, including publicly-owned watersheds. Limited stormwater is currently managed via stormwater infrastructure in the street system and natural infiltration in open space areas. It is subject to the County's stormwater management rules and plans.

Power and Natural Gas

Puget Sound Energy (PSE) provides both electric and natural gas services in Sumner¹. PSE is the oldest local energy provider in Washington and maintains nearly 2,400 miles of electric distribution lines and nearly 2,500 miles of natural gas pipeline in Pierce County. While natural gas is considered a non-essential utility, the Washington Utilities and Transportation Commission (WUTC) requires providers of electricity to provide service on demand in support of growth that occurs in their service areas. As such

¹ Puget Sound Energy's contact address is 355 110th Ave NE, Bellevue, WA 98004

PSE conducts its own ongoing capacity planning process to ensure their power supply and infrastructure are adequate to meet anticipated future needs.

Telecommunications

Telephone service in Sumner is provided by CenturyLink (formerly Qwest Communications)², who owns a main feeder line in Fryar Avenue in western Sumner and a primary feed line along the BNSF railroad that runs along the eastern boundary of the golf course property. CenturyLink commonly co-locates its facilities, including both underground and aerial lines, with the facilities of electric power providers, such as Puget Sound Energy. The BNSF right-of-way is also the location of a Sprint fiber optic line for high-speed data transfer. Cellular phone service from a variety of providers is ready available on-demand throughout Sumner. Sumner has adopted regulations and permit processes applicable to wireless facilities, particularly 5G services. Telecommunication providers, such as CenturyLink and Sprint, provide their services upon demand from consumers and engage in their own capacity planning processes to ensure that they have adequate facilities to accommodate future growth in their service areas. In addition, providers of essential utilities, such as landline telephone service, are required by the Washington Utilities and Transportation Commission (WUTC) to regularly evaluate the capacity of their facilities.

7.3 Impacts

7.3.1 Thresholds of Significance

Impacts of the alternatives are considered significant if they would:

- Fail to meet established levels of service under projected growth:
 - **City Facilities.** 1.13 s.f. per capita for general government (and proposed change to 1.36 s.f. per capita), 0.44 s.f. per capita for police (and proposed change to 294 s.f. per employee), and 1.8 s.f. per capita for public works shops.
 - **Police.** Two commissioned officers per 1,000 population.
 - **Parks.** Levels of service for each facility type, as detailed above in Affected Environment.
 - **Sewer.** The Sanitary Sewer Plan standards of 68 gpd/resident and 23 gpd/employee, as well as the U.S. Census Bureau statistic of 2.47 persons/household for the City, are applied to each alternative.
 - **Water.** Fail to meet established levels of service under projected growth. The Water System Plan standards of 72.73 gpd/resident and 25.28 gpd/employee, as well as the U.S. Census Bureau statistic of 2.47 persons/household for the City, are applied to each alternative.
 - **Stormwater.** The stormwater pipe system shall be designed to convey and contain the peak runoff rate for the 25-year design storm.

² CenturyLink's contact address is 120 Lenora St, Suite 502, Seattle, WA 98121

- Affect the ability of East Pierce Fire and Rescue to meet their established benchmarks for standards of coverage.
- Exceed planned student capacity for Sumner-Bonney Lake School District and Dieringer School District.
- Increase demand for energy or telecommunications infrastructure beyond the planning and service capabilities of providers.
- Increase hard surfaces and fill, removal of vegetation, and flooding impacts.

7.3.2 Impacts Common to All Alternatives

City Facilities and Police

Citywide

Under all alternatives, the City of Sumner and its UGA will see population, job, and housing growth, which will impact city facilities and police.

The need for general government facilities in 2044, with the adopted LOS of 1.13 square feet per capita, will increase to between 18,000 and 20,000 square feet to serve the city population. To serve both the city and the UGA, this would increase to between 21,000 and 23,000 square feet. The current facility area is 14,577 square feet. Under all alternatives, the city will need to add more square footage to meet the adopted LOS. This need would be even higher with the proposed change to an LOS of 1.36 square feet per capita. With this higher LOS, the city would have to provide a total of 21,000 - 24,000 square feet by 2044 to meet city population needs, and 25,000 - 28,000 square feet if serving the city and UGA.

Public works shops would need between 28,000 and 31,200 square feet to meet the adopted LOS for the 2044 city population, compared to 17,136 square feet of existing area. If the City were to annex the UGA, this need would increase to 33,400-36,600, depending on the alternative.

To serve the city population in 2044 and maintain the adopted LOS (0.44 square feet per capita), police facility needs will be between 6,800 and 7,600 square feet. If the city were to annex the UGA in the planning period, the need would be between 8,200 and 9,000 square feet, exceeding the existing 7,700 square-foot facility. This need would be higher if the proposed LOS of 294 square feet per employee were adopted: a total of 12,000 - 13,000 s.f. to serve the city population or a total of 14,000 - 15,000 s.f. to serve the city and UGA in 2044.

There are currently 21 police officers in Sumner. Under all alternatives, the need for officers in 2044 will reach 31-35 officers to achieve the adopted LOS for the city population (two commissioned officers per 1,000 population). If Sumner were to annex the UGA in the planning period, the need would be 37-41 officers, depending on the alternative.

North Portion

Under all alternatives, most of the city's job growth is expected to occur in the MIC, which is located in the North Portion. This could increase demands on city facilities, such as general government facilities

and Public Works shops, and police services. A small amount of housing growth is also expected in the North Portion, outside of the MIC, in all alternatives.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion would likely lead to more demand for government facilities and police services.

South Portion

The South Portion, compared to other parts of the city, is expected to see minimal housing growth and no job growth under the alternatives. Impacts to city facilities, such as general government facilities and Public Works shops, and police services are expected to be minimal.

West Portion

The West Portion, which contains the Town Center, will see an increase in jobs and housing in all alternatives. This is likely to lead to more demand for city facilities, such as general government facilities and Public Works shops, and police services.

Sumner UGA

The Sumner UGA will see slight job and housing growth across the alternatives, leading to minimal increases in demand for city facilities, such as general government facilities and Public Works shops, and police services.

Fire and Emergency Medical Services

Citywide

Under all alternatives, housing growth and population growth are expected, which will increase fire and EMS dispatches. The total number of calls for East Pierce Fire and Rescue (EPF&R) is expected to increase linearly with an increase in population. Data from 2021 shows that Station 113, which serves the majority of the City of Sumner and the UGA had 2,850 dispatched responses. Station 113 had 2,970 total incident responses and Medic 113 responded to 2,713 calls for service. These responses include dispatches to support other EPF&R stations and service areas outside of Sumner. If call volume increases at the same rate that population increases, EPF&R can expect 4,184 to 4,589 total dispatched responses, 4,360 to 4,782 Ladder 113 incidents, and 3,983 to 4,368 Medic 113 calls for service per year depending on the alternative (Exhibit 7-21).

Exhibit 7-21: Fire and EMS Projected Annual Calls

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)	Alternatives 2 and 3 (Pop. 20,351 City + UGA)
General	2,850	4,184	4,589

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)	Alternatives 2 and 3 (Pop. 20,351 City + UGA)
Ladder 113	2,970	4,360	4,782
Medic 113	2,713	3,983	4,368

Source: East Pierce Fire and Rescue 2021; BERK 2023.

Other stations that partially support the service area include Station 114 (West Tapps Station) and Station 122 (Boat House Station). These stations support the East Hill UGA and apparatus inventory for each of these stations can be found in Exhibit 7-22.

Exhibit 7-22: Additional Fire and EMS Stations Serving Sumner UGA

Station	Apparatuses	Minimum Personnel	Notes
Station 114 (West Tapps)	1 Engine Unit 1 Medic Unit	3	Serves the North half of Lake Tapps and East Hill UGA
Station 122 (Boat House)	1 Pontoon Rescue Boat	0	This station is not staffed and is used as a storage and dispatch station for Marine 122-Rescue Boat.

Source: East Pierce Fire and Rescue 2021; BERK 2023.

While Stations 122 and 114 support the East Hill UGA, Station 113 serves a vast majority of the service area based on EPF&R service areas. Station 113 is therefore responsible for maintaining levels of service in Sumner and the possible future incorporated UGAs. Population and associated dispatch are anticipated to increase to 145%-160% of current level, additional personnel and equipment beyond the existing minimum will be required at Station 113 as determined by EPF&R Unit and Response Benchmarks. The station currently has capacity for 4 additional personnel per shift (capacity for 9 staff per shift), which would support an additional apparatus to dispatch in the service area.

The 2022 Annual Report by EPF&R also cites that the aging population in the City of Sumner and the UGA will result in a higher demand for EMS dispatch relative to fire dispatch as citizens aged 65 and older tend to call for advanced life support and basic life support at a rate 2-3 times higher than those younger than 65.

North Portion

Under all alternatives, most of the city's job growth is expected to occur in the MIC, which is located in the North Portion. This could increase demands on fire and EMS services. A small amount of housing growth is also expected in the North Portion, outside of the MIC, in all alternatives.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion would likely lead to more demand for fire and EMS services, particularly growth located on the forested slopes in the WUI area.

South Portion

The South Portion, compared to other parts of the city, is expected to see minimal housing growth and no job growth under the alternatives. Impacts to fire and EMS are expected to be minimal.

West Portion

The West Portion, which contains the Town Center, will see an increase in jobs and housing in all alternatives. This is likely to lead to more demand for fire and EMS services.

Sumner UGA

The Sumner UGA will see slight job and housing growth across the alternatives, leading to minimal increases in demand for fire and EMS services.

Schools

Under all alternatives, housing growth is expected to result in more students, impacting school capacity. Exhibit 7-23 shows estimated student growth based on the housing capacity in each school district and each school district's assumed student generation rates.

Exhibit 7-23: School Student Growth (from City of Sumner growth)

District	Alternative 1: Additional Students	Alternative 2 Additional Students	Alternative 3 Additional Students
Sumner-Bonney Lake School District	513	995	998
Elementary School	302	601	603
Middle School	121	228	228
High School	90	166	166
Dieringer School District	7	35	31
Elementary School	5	25	22
Middle School	2	10	9

Source: Sumner-Bonney Lake School District 2022; Dieringer School District 2021; Sumner 2023; BERK 2023.

Sumner-Bonney Lake School District

All alternatives would result in a greater number of students in the district. With growth in the city and UGA, the Sumner-Bonney Lake School District could see a total of between 513 and 998 new students, depending on the alternative. This could include between 302 and 603 elementary school students, 121-228 middle school students, and 90-166 high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since all alternatives add new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Under all alternatives, the Dieringer School District would serve more students than it does currently. New students could be between 7 and 31, depending on the alternative. This could include between 5 and 22 elementary students and 2 to 9 middle school students.

Parks

Under all alternatives, Sumner parks and trails would serve more people than they do currently. Current levels of service established in the 2018 Parks and Trails Plan for each amenity can be found in Exhibit 7-24 as well as whether or not current inventory will be sufficient for each proposed alternative. While no current deficiencies are present, future deficits are expected for active recreation facilities, informal recreation facilities, trails, and parks based on the 2044 city and UGA population under each alternative.

Exhibit 7-24: Existing Parks Facilities and Minimum Facilities at Current LOS (rounded)

Activity	Req'd LOS	Exist. #	2022 City Minimum Facilities	2044 Alt 1 City + UGA Minimum Facilities	2044 Alts 2 & 3 City + UGA Minimum Facilities
Active Recreation Facilities	1/1,700	9	6	11	12
Informal Recreation Facilities	1/1,500	10	7	12	14
Trails	1/1,600	9.3	6.8	11.6	12.7
Parks	1/500	28.6	21.6	37.1	40.7

Source: Sumner Parks and Trails Plan 2018; BERK 2023.

Notes: **Bolded** numbers indicate a facility deficit.

North Portion

Substantial job growth in the MIC could lead to more demand for parks and recreation services for workers, however, housing growth is expected to be minimal in the North Portion. The 2015 Parks and Trails Plan identifies the MIC as an area that is already less well served by parks than other parts of the city.

East Portion

The East Portion will see job and housing growth across all alternatives. This includes growth in the East Sumner neighborhood. Growth in the East Portion could increase demand for parks and recreation services.

South Portion

The South Portion is expected to see some housing growth, but it is not a growth focus area. This area will have no job growth under the alternatives. Impacts to parks and recreation are expected to be minimal.

West Portion

The West Portion, including the Town Center, will see housing and job growth in all alternatives, leading to more demand for parks and recreation services in this area.

Sumner UGA

The Sumner UGA will see some job and housing growth, but this growth is minimal compared to City growth. The UGA is not currently within Sumner's parks official service area, however, UGA residents may

still use Sumner parks. Some increases to demand on nearby Sumner parks would be expected but would likely be minimal.

Sewer

Citywide

WWTP FLOWS

Increased population and employment under all alternatives would increase wastewater flows in the city and UGA, requiring conveyance and treatment, thus placing greater demand on the City's wastewater collection system. The Sanitary Sewer Plan assumes that by 2038 all households within the service area will be sewerred and that the sewerred area will include city limits and the entire UGA (BHC Consultants, 2020). The Sanitary Sewer Plan does not anticipate the WWTP will reach its average annual flow, maximum month flow, peak day flow, or peak hour flow capacity by 2038. There is also a possibility that by 2044, the WWTP might still not have reached its capacity for these flow parameters, as influent wastewater flows have grown more slowly than originally predicted (BHC Consultants, 2020, pp. 8-2, 8-3). Projected 2038 influent flows for the City of Sumner are compared to Sumner's portion of the WWTP's rated capacity in Exhibit 7-25.

Exhibit 7-25 Existing and Projected WWTP Sumner Influent Flows (mgd)

	Average Annual Flow	Maximum Month Flow	Peak Day Flow	Peak Hour Flow
WWTP Rated Capacity ¹	4.27	6.10	11.66	19.87
Sumner Allocated WWTP Capacity²	1.74	2.80	6.02	7.64
Existing 2016 Flows	1.06	1.71	6.67	4.66
Year 2024 Flows	1.23	1.86	3.93	5.00
Year 2038 Flows	1.53	2.32	4.38	5.56
2038 Surplus/(Deficit) Based on Sumner's Allocated Capacity	0.21	0.48	1.64	2.08

¹ The rated WWTP capacity numbers are taken from the City of Sumner Wastewater Treatment Facility Final Comprehensive Facility Plan Addendum No. 2 approved by Ecology. They have not been incorporated in the Facility's NPDES permit yet but are anticipated to be adopted soon. ² The maximum month flow of 2.8 mgd is the only specified capacity for Sumner stated within the WWTP Operating Agreement between the Cities of Sumner and Bonney Lake. Other values are interpolated using the peaking factors for flow established within Chapter 6 of the 2020 Sanitary Sewer Comprehensive Plan for purposes of illustrating hydraulic adequacy of the existing WWTP to meet future projections.

Sources: Sumner Sanitary Sewer Plan, 2020; BERK, 2020.

Based on the per capita flow rates from the Sanitary Sewer Plan (68 gpd/resident and 23 gpd/employee), the total additional maximum month flow for residents and employees (using the peaking factor of 1.61 established in the 2020 Plan) is approx. 0.73 mgd from Alternative 1 and 0.93 mgd from Alternatives 2 and 3 by 2044. It may be possible that the anticipated deficit can be accommodated through regular

monitoring and capital planning for all alternatives. The Capital Facility Plan Element of the Comprehensive Plan and associated Sanitary Sewer Plan is updated every 6 years, and the City's next Comprehensive Plan periodic review is due in 2030, and every eight years thereafter.

As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake. In anticipation of this need, the Wastewater Treatment Plant Phase III Feasibility Study was completed in 2016 and examines a service area that includes the city limits and the entire UGA. This study concluded that a maximum month WWTP capacity of 9.2 mgd was achievable on the current site. At such a time that influent flows necessitate the initiation of another expansion, the agreement would need to be updated to reallocate new capacity shares, per the Sanitary Sewer Plan.

WWTP BOD5 and TSS Loading

Per the Sanitary Sewer Plan, with the completion of the WWTP expansion in 2016, the WWTP has sufficient capacity to accommodate projected influent 5-day BOD₅ and TSS loads through 2038. The 2038 projected maximum month influent loadings to the WWTP are 8,620 pounds/day for 5-day BOD₅ and 9,400 pounds/day for TSS, approximately 2,280 and 3,260 pounds/day less than the respective permitted capacities

North Portion

Increased demand for sewer services will occur under all alternatives as housing and job growth occurs in the North Portion. Job growth, in particular, will add substantial demand in the MIC area. While projected wastewater flows and associated BOD₅/TSS loading generated from the North Portion would vary based on population and employment, overall flows are similar and would be processed at the WWTP regardless of where they are generated.

East Portion

All alternatives add housing and job growth in the East Portion, including the East Sumner neighborhood, which would require improvements to the collection and conveyance infrastructure, especially under Alternatives 2 and 3. Projected wastewater flows and associated BOD₅/TSS loading generated from the East Portion would be processed at the WWTP.

South Portion

While the South Portion is not a focus area for growth, some housing growth will occur under all alternatives and increase demand on the wastewater system. Overall demand on the City's wastewater system from the South Portion is anticipated to remain fairly consistent compared to the other portions of the city. While projected wastewater flows and associated BOD₅/TSS loading generated from the South Portion would vary slightly based on population and employment, overall flows would be processed at the WWTP.

West Portion

Housing and job growth in the West Portion will occur under all alternatives, with an emphasis on the Town Center, and require planned improvements to the collection and conveyance system. This is especially true for Alternatives 2 and 3, which add more growth than Alternative 1. Projected wastewater flows and associated BOD₅/TSS loading generated from the West Portion would be processed at the WWTP.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, placing additional demand on the wastewater system.

Water

Citywide

The 2020 Water System Plan notes that existing City sources may be insufficient to meet the projected maximum day demand by the year 2028 if the City does not receive approval of the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd. Under all alternatives, increased population and employment would result in increased demand for water service, placing additional load on the current water supply system. Overall demand placed on the City's water system is similar regardless of where the growth occurs.

Average 2044 daily water demand for each alternative is estimated using factors in the Water System Plan (72.73 gpd/resident and 25.28 gpd/employee). Using the peaking factor of 2.05 established in the Water System Plan, the total additional maximum daily water demand for residents and employees is approx. 1.01 mgd from Alternative 1 and 1.27 mgd from Alternatives 2 and 3 by 2044. Since the Water System Plan anticipates growth to 2068 and associated strategies and investments, it is possible that the DEIS growth assumptions may be accommodated. Growth timing can be addressed through regular monitoring and capital planning, as the Water System Plan is updated every 6-10 years.

North Portion

Increased water demand will occur under all alternatives as housing and job growth occurs in the North Portion. Job growth in the MIC in particular will add substantial demand.

East Portion

All alternatives add housing and job growth in the East Portion, including the East Sumner neighborhood, which will require planned improvements to the water system. This is especially true for Alternatives 2 and 3, which add the most housing growth in the East Portion and may require improvements beyond what is already planned.

South Portion

While the South Portion is not a focus area for growth, some housing growth will occur under all alternatives, increasing demand on the City's water system. Overall demand on the City's water system from the South Portion is anticipated to remain fairly consistent compared to the other portions.

West Portion

Housing and job growth will occur in the West Portion under all alternatives, with an emphasis on the Town Center. Improvements to the water system will be needed to support development and growth. This is particularly true for Alternatives 2 and 3, which may require improvements beyond those already planned.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, resulting in increased demands on the water system.

Stormwater

Citywide

Additional growth and development will increase the amount of impervious surfaces and the level of stormwater runoff under all of the alternatives. In general, growth and development may require the expansion of stormwater infrastructure, and will require the maintenance, repair, or replacement of existing infrastructure facilities. The resulting higher stormwater peak flows can overwhelm roadways and stormwater infrastructure, leading to flooding, erosion, and potential property damage. New stormwater facilities will need to comply with current stormwater regulations and quality standards and the increased development can result in poorer stormwater quality, requiring additional treatment measures to protect local water bodies from pollution.

The Pierce County 2023 Comprehensive Flood Hazard Management Plan identified, policies, programs, and projects to reduce the impacts to the community from major flooding events, reduce damage to critical infrastructure and private improvements, reduce ongoing maintenance costs, and improve habitat conditions while protecting and maintaining the regional economy. This includes projects identified along the White River and Puyallup River in the City of Sumner.

Since the relatively minor differences in growth capacity between the alternatives is attributable primarily to location, the increased growth capacity will not necessarily translate into greater amounts of impervious surfaces since most additional growth will likely be accommodated through greater building heights. Increases in impervious surfaces are also expected to be from development and redevelopment on underutilized and vacant parcels and development that increases building footprints or parking on existing lots, such as through ADUs or larger buildings. Impacts will be especially pronounced in areas where the current land use is predominantly vacant or vegetated.

North Portion

The White River valley, which makes up most of the North Portion of the city, is at greatest risk of flood events. Large developments in the White River valley would reduce floodplain storage and would increase the number of people and property at risk of flooding impacts.

East Portion

The East Portion does not contain any major floodplains or risk of flooding; therefore, there is not expected to be any increase in flood risk under all alternatives.

South Portion

Much of the South Portion is part of the Puyallup River Valley, and therefore susceptible to flooding. The growth anticipated under the alternatives would be outside the mapped FEMA flood zones and unlikely to be at risk of flooding.

West Portion

The West Portion contains the confluence of the White and Puyallup Rivers, is in both valleys, and therefore susceptible to flooding. However, due to previously implemented flood risk reduction measures (such as hardened riverbanks), most of the growth anticipated under all alternatives is primarily outside the mapped FEMA flood zones and unlikely to be at risk of flooding. Some growth and development are anticipated along the Western side of the White River, small pockets of which are at risk of flooding. Portions of these areas are within the buffers required in the Shoreline Master Program and unlikely to be developed.

Sumner UGA

Impacts in the Sumner UGA would be similar to those in the city in all Alternatives.

Power and Natural Gas

Citywide

Under all alternatives, development within the City will increase the consumption of electricity and natural gas, though the precise level of consumption will vary based on the specific uses developed. Additionally, electricity and natural gas consumption may vary based on current energy codes. Both electric power and natural gas are readily available in the study area and PSE conducts continuous resource planning to ensure adequate energy supply within its service area. No significant impacts associated with power and natural gas are anticipated under any of the alternatives.

North Portion

In all alternatives, the North Portion will see increased energy demands primarily due to job growth in the MIC. Some additional demand from housing growth outside of the MIC would also occur.

East Portion

All alternatives add housing and job growth in the East Portion, which would increase demands for energy in these areas. This is especially true for Alternatives 2 and 3 due to greater housing growth.

South Portion

The South Portion is not a focus area for growth under any alternative, but it will see a small amount of housing growth under all alternatives, leading to increased demand for energy.

West Portion

The West Portion will see housing and job growth under all alternatives, with an emphasis on Town Center. Energy demands are likely to increase due to this growth.

Sumner UGA

Some housing and job growth will occur in the Sumner UGA, which would likely increase power needs.

Telecommunications

Citywide

A variety of telecommunications services are available within the City. While development in the City would likely require additional installation of telecommunication infrastructure, such as phone lines, fiber optic cables, cellular receivers, etc., these are private facilities owned and operated by private service providers. The cost for these system improvements would be borne by the individual service providers and no significant impacts associated with telecommunications are anticipated under any of the alternatives.

North Portion

Additional demand on telecommunications infrastructure would likely occur due to job and housing growth, particularly job growth in the MIC.

East Portion

Housing and job growth in the East Portion would likely place additional demand on telecommunications infrastructure, especially under Alternatives 2 and 3, which include more housing growth than Alternative 1.

South Portion

The South Portion would see some housing growth under all alternatives, though growth is minimal, so impacts to telecommunications infrastructure are likely to be minimal.

West Portion

The West Portion will see housing and job growth under all alternatives, with an emphasis on the Town Center. This would likely increase demand on telecommunications infrastructure.

Sumner UGA

Some housing and job growth will occur in the UGA under all alternatives, which could increase demand on telecommunications infrastructure.

7.3.3 Alternative 1 (No Action)

City Facilities and Police

Alternative 1 will have the least impacts to city facilities and police services because it adds the least growth of the three alternatives.

Under the adopted LOS, by 2044, based on city population growth, the city will need 18,000 square feet of city facilities, 7,000 square feet of police facilities, and 28,000 square feet of public works shops. If the City were to annex the UGA, this need would increase to 21,000 square feet of city facilities, 8,200 square feet of police facilities, and 33,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-26.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would be higher. 21,000 square feet of general government facilities would be needed and 11,000 square feet of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 25,000 square feet of general government facilities and 14,000 square feet of police facilities based on proposed LOS changes. See Exhibit 7-26.

The City would also need to add more police officers. Currently, there are 21 officers. With city population growth, the City will need 31 officers. If the City were to annex the UGA by the year 2044 (not proposed in the 2024 Comprehensive Plan Update), 37 officers would be needed. This means an increase of 10-16 officers, depending on whether the UGA were to be annexed.

Exhibit 7-26: Alternative 1 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	21,000	6,400	25,200	10,600
Police	7,700	8,200	500	13,500	5,800
Public Works Shops	17,100	33,400	16,300	33,400	16,300

Source: City of Sumner 2023; BERK 2023.

Fire and EMS

Under Alternative 1, East Pierce Fire and Rescue stations serving Sumner are anticipated to serve 5,916 more people than they do currently if the UGA is incorporated by 2044. The impacts for Alternative 1 are consistent with impacts common to all alternatives (Exhibit 7-27).

Exhibit 7-27 Current and Projected Calls for Service

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)
General	2,850	4,184
Ladder 113	2,970	4,360
Medic 113	2,713	3,983*

Source: East Pierce Fire and Rescue, 2021, 2022; BERK 2023

*Expected to be higher than this projection with aging population per 2022 EPF&R Annual Report

Under Alternative 1, Station 113 of East Pierce Fire and Rescue will require 2 additional firefighter/EMS staff per shift to meet current response time, turnout time, and level of service standards. To effectively reduce strain on current staff and apparatuses, Station 113 will need to add or be reallocated an additional apparatus to serve this area.

Schools

Sumner-Bonney Lake School District

Alternative 1 will have the least impact to schools because it adds the least amount of growth. Under Alternative 1, Sumner-Bonney Lake School District is expected to serve approximately 513 more students than they do currently. Alternative 1 is expected to add an estimated 302 additional elementary school students, 121 additional middle school students, and 90 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 1, like Alternatives 2 and 3, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Alternative 1 will have the least impact to schools because it adds the least amount of growth. Under Alternative 1, Dieringer School District is expected to serve approximately 7 more students than they do currently. Alternative 1 is expected to add an estimated 7 additional elementary school students and 2 additional middle school students.

Parks

Under Alternative 1, Sumner parks and trails are anticipated to serve 5,916 more people than they do currently if the UGA is incorporated by 2044. To meet current required levels of service for each park amenity in the city, additions listed in Exhibit 7-28 will be required.

Exhibit 7-28: Current and Projected Needs for Parks Amenities Alternative 1 (rounded)

Activity	Req'd LOS	Exist. #	2044 Alt 1 City + UGA Minimum Facilities	Deficit
Active Recreation Facilities	1/1,700	9	11	2
Informal Recreation Facilities	1/1,500	10	12	2
Trails	1/1,600	9.3	11.6	2.3
Parks	1/500	28.6	37.1	8.5

Source: Sumner Parks and Trails Plan 2018; BERK 2023.

Sewer

Impacts are consistent with those described under Impacts Common to All Alternatives. Under the No Action Alternative, the WWTP will likely have a maximum monthly flow capacity deficit without capacity upgrades. This deficit would likely be accommodated if the WWTP capacity were increased to 9.2 mgd per the Wastewater Treatment Plant Phase III Feasibility Study. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake (BHC Consultants, 2020). While projected wastewater flows generated from the city under the No Action Alternative would vary slightly from Alternatives 2 and 3, overall citywide flows are similar and would be processed at the WWTP regardless of where they are generated.

Water

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. If the City does not receive approval of the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd, the City's existing sources may be insufficient to meet the projected maximum day demand by the year 2028, as noted by the Water System Plan. The increased population and employment by year 2044 would result in increased demand for water service, placing additional load on the current water supply system. Growth under Alternative 1 would be primarily in the MIC, East Sumner, and Town Center. Overall demand placed on the City's water system is similar regardless of where the growth occurs.

Stormwater

Under the No Action Alternative, it is likely impervious surfaces would increase due to continued development and growth throughout Sumner; however, these increases would be minimal and consistent with the current growth rate in Sumner as they would comply with the current zoning restrictions. There is not anticipated to be a significant increase in new impervious surfaces or removal of vegetation. The majority of the development under Alternative 1 is anticipated to occur in areas which already consist of mostly impervious surfaces, including the MIC, East Sumner, and Town Center, which have been previously developed.

Power and Natural Gas

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. By 2044, the increased population and employment would result in increased demand for power, placing additional demand on power and natural gas service. PSE will continue to provide natural gas services on demand. Overall utility demand placed on the City's is similar regardless of where the growth occurs.

Telecommunications

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives. The increased population and employment by 2044 would result in increased demand for telecommunication, placing additional demand on telecommunication services. As development increases, the City may continue to facilitate the advancement of telecommunication supply throughout the City. Overall telecommunication demand placed on the City is similar regardless of where the growth occurs.

7.3.4 Alternative 2

City Facilities and Police

Alternative 2 will have greater impacts to city facilities and police services because it adds more growth than Alternative 1 and would be similar to Alternative 3.

Under the adopted LOS, by 2044, based on city population growth, the city will need 20,000 square feet of city facilities, 8,000 square feet of police facilities, and 31,000 square feet of public works shops. If the City were to annex the UGA, this need would increase to 23,000 square feet of city facilities, 9,000 square feet of police facilities, and 337,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-29.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would increase. 24,000 s.f. of general government facilities would be needed and 13,000 s.f. of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 28,000 s.f. of general government facilities and 15,000 s.f. of police facilities based on proposed LOS changes. See Exhibit

7-29. The City would also need to add more police officers. Currently, there are 21 officers. With city population growth under Alternative 2, like Alternative 3, the City will need 35 officers. If the City were to annex the UGA, 41 officers would be needed. This means an increase of 14-20 officers, depending on whether the UGA were to be annexed between now and 2044.

Exhibit 7-29: Alternative 2 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	23,000	8,400	27,700	13,000
Police	7,700	9,000	1,300	14,700	7,000
Public Works Shops	17,100	36,600	19,500	36,600	19,500

Source: City of Sumner 2023; BERK 2023.

Alternative 2 would still see growth in Town Center, the MIC, and East Sumner, but would include additional housing growth throughout the city compared to Alternative 1. This is especially true in the East and West portions of the City. Alternative 2, unlike Alternative 3, also includes additional housing growth on the current Cava mine site.

Fire and EMS

Compared to Alternative 1, more demand under Alternative 2 would come primarily from the East and West portions of the City, due to more housing growth. East Pierce Fire and Rescue stations serving Sumner are anticipated to serve 7,712 more people than they do currently assuming incorporation of the UGA (Exhibit 7-30).

Exhibit 7-30: Current and Projected Calls for Service

Dispatch	Current (Pop. 12,639 City + UGA)	Alternative 1 (Pop. 18,555 City + UGA)
General	2,850	4,589
Ladder 113	2,970	4,782
Medic 113	2,713	4,368*

Source: East Pierce Fire and Rescue, 2021, 2022; BERK 2023

*Expected to be higher than this projection with aging population per 2022 EPF&R Annual Report

Under Alternative 2, Station 113 of East Pierce Fire and Rescue will require 3 additional firefighter/EMS staff per shift to meet current response time, turnout time, and level of service standards. To effectively reduce strain on current staff and apparatuses, Station 113 will need to add or be reallocated an additional apparatus to serve this area.

Schools

Sumner-Bonney Lake School District

Alternative 2 would have greater impacts to schools because it adds more growth than Alternative 1, similar to Alternative 3. Under Alternative 2, Sumner-Bonney Lake School District is expected to serve approximately 995 more students than they do currently. Alternative 2 is expected to add an estimated 601 additional elementary school students, 228 additional middle school students, and 166 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 2, like Alternatives 1 and 3, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Alternative 2 like Alternative 3 will have the most impacts to schools because it adds more growth than Alternative 1. Under Alternative 2, Dieringer School District is expected to serve approximately 35 more students. Alternative 2 is expected to add an estimated 25 additional elementary school students and 10 additional middle school students.

Parks

Under Alternative 2, Sumner parks and trails are anticipated to serve 7,712 more people than it does currently in both the City and if the UGA is incorporated by 2044. To meet current adopted levels of service for each park amenity in the city, additions listed in Exhibit 7-31 will be required.

Exhibit 7-31: Current and Projected Needs for Parks Amenities Alternative 2 (rounded)

Activity	Req'd LOS	Exist. #	2044 Alt 2 City + UGA Minimum Facilities	Deficit
Active Recreation Facilities	1/1,700	9	12	3
Informal Recreation Facilities	1/1,500	10	14	4
Trails	1/1,600	9.3	12.7	3.4
Parks	1/500	28.6	40.7	12.1

Source: Sumner Parks and Trails Plan 2018; BERK 2023.

Compared to Alternative 1, demand for parks under Alternative 2 may be higher in the East and West portions of the City, due to more housing growth. The current Cava mine site would be designated

Medium Density Residential, which could result in a need for more parks and recreation amenities in that area in particular. In addition, as the population increases and older adults make up a larger percentage of the population (following the current trend), the City may find a need for expanded facilities/services at the Sumner Senior Center.

Sewer

Under Alternative 2, like Alternative 3, it is projected that more growth and development will occur than under Alternative 1 and the WWTP is anticipated to have a maximum monthly flow capacity deficit without capacity upgrades. This deficit would likely be accommodated if the WWTP capacity were increased to 9.2 mgd per the Wastewater Treatment Plant Phase III Feasibility Study. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary and would likely be funded heavily by Bonney Lake per the City's Sanitary Sewer Plan. Much of the increased demand in Alternative 2, like Alternative 3, would come from the East and West portions of the City.

Water

Under Alternative 2, it is projected that more growth and development and the increase of additional housing and employment would result in an increased demand for water service, placing an additional load on the current water supply system. Overall demand placed on the City's water system is similar regardless of where the growth occurs. However, If the City does not receive approval of the additional water rights for the Central Well to allow for the increased source capacity of 1.01 mgd, the City's existing sources may be insufficient to meet the projected maximum day demand by the year 2028, as noted by the Water System Plan. Much of the increased demand in Alternative 2, like Alternative 3, would come from the East and West portions of the City.

Stormwater

Under Alternative 2, it is projected that more growth and development would occur and more acres of new impervious surface will be created than in Alternative 1. The majority of the development anticipated under Alternative 2, with the exception of the Cava gravel mine, is anticipated to occur in already developed areas. A greater number and size of housing units are anticipated to be built under Alternative 2 and would, therefore, result in more impervious surfaces than under Alternative 1. It can also be assumed that more vegetation would be removed, especially when building multiple units on a previously single-family home lot. Greater impervious surface could result in more flooding in flood-prone areas, particularly in the White River Valley.

On the Cava gravel mine site, additional development would occur and likely result in greater amounts of impervious surface compared to Alternatives 1 and 3. The current site has very little impervious surfaces and any additional development would be a significant increase. Additionally, the Cava gravel mine site contains wetlands and forested land which would likely be removed during development, creating stormwater impacts such as those described under Impacts Common to All Alternatives. Any fill of wetlands in the Cava gravel mine site would reduce the area's ability to reduce runoff and remove pollutants from stormwater. Mitigation required from the impacts to wetlands will need to follow

requirements set forth in chapter 16.46 of the Sumner Municipal Code, Wetlands Protection. Development in the Cava gravel mine site would be at a small risk of flooding from the current wetlands and ponds on the property.

Power and Natural Gas

More growth and development is projected under Alternative 2, like Alternative 3, than Alternative 1. The increased population and employment would result in increased demand for power and natural gas. This additional demand on utility supply may require additional infrastructure to support the demand than Alternative 1. PSE may continue to provide natural gas services on demand. Compared to Alternative 1, more demand would come from the East and West portions of the city. Overall utility demand placed on the City's is similar regardless of where the growth occurs.

Alternative 2, like Alternative 3, also includes new greenhouse gas emissions reduction policies, including policies around expanding access to electric vehicle charging infrastructure. This would likely shift some of the capacity between infrastructure types but would still place more demand on power utility infrastructure.

Telecommunications

Under Alternative 2, like Alternative 3, more housing growth will occur than under Alternative 1, resulting in more demands on telecommunications infrastructure. Housing growth in the East and West Portions are the primary sources of this additional demand above the demand in Alternative 1.

7.3.5 Alternative 3

City Facilities and Police

As described under Alternative 2, Alternatives 2 and 3 will have the most impacts to city facilities and police services because they add more growth than Alternative 1.

Under the adopted LOS, By 2044, based on city population growth, the city will need 20,000 square feet of city facilities, 8,000 square feet of police facilities, and 31,000 square feet of public works shops. If the City were to annex the UGA at some point by 2044, this need would increase to 23,000 square feet of city facilities, 9,000 square feet of police facilities, and 37,000 square feet of public works shops. Expected deficits are outlined in Exhibit 7-32.

If the City were to adopt proposed changes to the LOS for general government square footage and police square footage, the needs for these facility types would increase. 24,000 s.f. of general government facilities would be needed and 13,000 s.f. of police facilities would be needed to serve the city population in 2044. If serving both the City and UGA, the need would be 28,000 s.f. of general government facilities and 15,000 s.f. of police facilities based on proposed LOS changes. See Exhibit 7-29. The City would also need to add more police officers. Currently, there are 21 officers. With city population growth under Alternative 3, like Alternative 2, the City will need 35 officers. If the City were to

annex the UGA, 41 officers would be needed. This means an increase of 14-20 officers, depending on whether the UGA were to be annexed.

Exhibit 7-32: Alternative 3 City Facilities and Police Needs

Facility Type	Existing s.f.	2044 Needs (City + UGA) – Adopted LOS	Deficit – Adopted LOS	2044 Needs (City + UGA) – Proposed LOS	Deficit – Proposed LOS
General Government	14,600	23,000	8,400	27,700	13,000
Police	7,700	9,000	1,300	14,700	7,000
Public Works Shops	17,100	36,600	19,500	36,600	19,500

Source: City of Sumner 2023; BERK 2023.

Fire and EMS

Fire and EMS impacts would be similar as described under Alternative 2 since Alternative 3 expects the same amount of citywide growth. The housing growth distribution varies somewhat, due to Alternative 2 reclaiming the Cava mine site, however impacts to Fire and EMS are expected to be similar.

Schools

Sumner-Bonney Lake School District

Like Alternative 2, Alternative 3 will have the most impact to schools because it adds more growth than Alternative 1. Under Alternative 3, like Alternative 2, Sumner-Bonney Lake School District is expected to serve approximately 998 more students than they do currently. Alternative 2 is expected to add an estimated 603 additional elementary school students, 228 additional middle school students, and 166 additional high school students. As shown in Exhibit 7-7, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Since Alternative 3, like Alternatives 1 and 2, adds new students to the District, it is likely the schools located in Sumner will further exceed their capacities.

Dieringer School District

Like Alternative 2, Alternative 3 will have the most impacts to schools because it adds more growth than Alternative 1. Under Alternative 3, Dieringer School District is expected to serve approximately 31 more students than they do currently. Alternative 3 is expected to add an estimated 22 additional elementary school students and 9 additional middle school students.

Parks

Under Alternative 3, Sumner parks and trails are anticipated to serve 7,712 more people than it does currently in both the City and if the UGA is incorporated by 2044. This number is the same as Alternative

2 but distributed slightly differently throughout the City and UGA. To meet current adopted levels of service for each park amenity in the city, additions listed in Exhibit 7-33 will be required.

Exhibit 7-33: Current and Projected Needs for Parks Amenities Alternative 3 (rounded)

Activity	Req'd LOS	Exist. #	2044 Alt 3 City + UGA Minimum Facilities	Deficit
Active Recreation Facilities	1/1,700	9	12	3
Informal Recreation Facilities	1/1,500	10	14	4
Trails	1/1,600	9.3	12.7	3.4
Parks	1/500	28.6	40.7	12.1

Source: Sumner Parks and Trails Plan 2018; BERK 2023.

Compared to Alternative 1, demand for parks may be higher in the East and West portions of the City, due to more housing growth under Alternative 3. Unlike Alternative 2, Alternative 3 does not plan for housing growth on the current Cava mine site, so parks demand in this area will be lower.

Sewer

Citywide impacts for Alternative 3 are consistent with those described under Impacts Common to All Alternatives and is similar to Alternative 2.

Water

Citywide impacts for this alternative are consistent with those described under Impacts Common to All Alternatives and Alternative 2.

Stormwater

Under Alternative 3, there is anticipated to be less creation of impervious surface compared to Alternative 2 and more than Alternative 1. Alternative 3 anticipates most growth in previously developed areas, which will utilize previous impervious surfaces, while Alternative 2 will also develop the Cava mine site which is mostly undeveloped with minimal impervious surfaces. Other citywide impacts are expected to be similar to those described under Alternative 2.

Power and Natural Gas

Under Alternative 3, citywide impacts are expected to be similar to those described under Alternative 2.

Telecommunications

Under Alternative 3, citywide impacts are expected to be similar to those described under Alternative 2.

7.4 Mitigation Measures

7.4.1 Incorporated Plan Features

The following features of Alternatives 2 and 3 mitigate potential impacts to public services and utilities:

City Facilities and Police

- Under Alternatives 2 and 3, the city is preparing an updated Capital Facilities Plan which identifies future needs and funding sources.

Fire and EMS

- Alternatives 2 and 3 include a new Climate Change Resiliency element, which includes some hazard mitigation policies that could provide advanced resilience measures or preparation on fire and EMS in a citywide emergency.

Schools

- No incorporated plan features.

Parks

- No incorporated plan features.

Sewer and Water

- Alternatives 2 and 3 include new comprehensive plan policies, including policies to seek regional planning efforts to address regional sanitary sewer and water concerns and emergency response, as well as implementing strategies that balance cost, benefits, health and safety, and promote affordability and equity to sanitary sewer and water services.
- Alternatives 2 and 3 include revised comprehensive plan policies, including supporting proactive water conservation efforts throughout the City and septic system policies based on best practices.

Stormwater

- Alternatives 2 and 3 include new and revised comprehensive plan policies, including policies in Capital Facilities and Public Services, Environment, and the new Climate Change element, to encourage low-impact development, upgrade systems to address flooding, and retain flood storage capacity.
- Alternatives 2 and 3 update critical areas regulations for the latest best available science, which could better protect structures from flooding through updated stream buffers.

Power, Natural Gas, and Telecommunications

- Alternatives 2 and 3 include new comprehensive plan policies, including policies to seek regional planning efforts to address regional utility concerns and emergency response, as well as implementing strategies that balance cost, benefits, health and safety, and promote affordability and equity of utilities to all communities.
- Alternatives 2 and 3 include a new Climate Change Resiliency Element, which includes policies to improve energy conservation and efficiency.
- Alternatives 2 and 3 includes a new comprehensive plan policy that facilitates the conversion from natural gas to alternative technologies and energy sources and support advancement of telecommunications within the City.

7.4.2 Regulations and Commitments

City Facilities and Police

- Under all alternatives, the City is planning to construct new public works shops totaling 83,050 square feet. This will provide adequate square footage to meet the adopted LOS under all alternatives.
- All alternatives propose retaining the existing City Hall and Public Works Shops in public use land use designation.

Fire and EMS

- The East Pierce Fire and Rescue Capital Facilities Plan outlines future projects to improve service.

Schools

- The Sumner-Bonney Lake and Dieringer School Districts have capital facilities plans that outline future projects to address capacity issues.
- The City of Sumner implements school impact fees in permits for new development.

Parks

- Sumner has adopted a park impact fee in its municipal code at Chapter 12.38 addressing residential and non-residential uses.

Sewer

- The U.S. Environmental Protection Agency (EPA) regulates wastewater discharge under the Federal Water Pollution Control Act and the Clean Water Act. EPA administers the National Pollutant Discharge Elimination System, which requires permits for various types of discharge to streams and rivers, including treated wastewater effluent. In Washington State, EPA delegates its permitting authority to the Washington State Department of Ecology (Ecology).
- Public sanitary sewer system operations in Washington State are regulated under Chapters 35.67 and 36.94 of the Revised Code of Washington (RCW), as well as RCW Title 57.

- The City manages its sewer system under SMC Title 13, Public Services.
- The City has adopted the 2020 Sanitary Sewer Comprehensive Plan.
- The Capital Facilities Element of the City's Comprehensive Plan contains policies relating to level of service for the City's sanitary sewer system.
- The City's 2024 Capital Facilities Plan contains policies relating to level of service for the City's sanitary sewer system.
- Long-term goals noted in the 2023-2024 City of Sumner Biennial Budget include regulating new pretreatment code to support the WWTP and the community, replacing the end-of-life biosolids dryer, and modernizing the entire biosolids treatment system.

Water

- The Washington State Department of Health requires water systems with 1,000 or more connections to submit water system plan updates every six years.
- Ecology regulations apply to water rights and source development, including rules for the appropriate treatment of groundwater.
- The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.
- The City has adopted the 2020 Water System Plan.
- The Capital Facilities Element of the City's Comprehensive Plan and the Capital Facilities Plan contain policies relating to level of service for the City's water system and addressing needs.
- Long-term goals noted in the 2023-2024 City of Sumner Biennial Budget include securing water rights to meeting present and future demands of the water system, continuing to replace aging water distribution mains, and continuing to comply with changing distribution mains.

Stormwater

- All alternatives retain existing buffers along rivers, streams, and wetlands.
- Sumner-specific strategies in the Pierce County Hazard Mitigation Plan include those to retain and expand flood storage capacity and to limit new homes and businesses from being sited in flood hazard areas.
- Washington State Hydraulic Permit Approval requirements apply to City outfalls and secondary standards also apply to new development utilizing those outfalls.
- The City has adopted stormwater standards requiring, among other things, 25-year storage with the 2-year predevelopment release rate.
- LID is an approach to stormwater quantity and quality control that mimics the predeveloped hydrology of a project site by using site design techniques. All alternatives retain goals, policies, and implementing regulations that support the development and implementation of stormwater management techniques such as LID.
- The Capital Facilities Element of the City's 2024 Comprehensive Plan contains policies relating to level of service for stormwater drainage. Objective 1.7.1 states "Establish and maintain the Level of

Service as the 25-year storm event, except in those areas where the 100-year storm design is appropriate to protect the natural environment.

- Through Chapter 13.48 SMC, the City applies the standards included in the 2019 Ecology Stormwater Management Manual for Western Washington and the 2019-2024 Western Washington Phase II municipal stormwater permit's Minimum Technical Requirements for New Development and Redevelopment to new development and redevelopment of public and private improvements. The City also applies the 2012 Puget Sound Partnership Low Impact Development Technical Guidance for Puget Sound. The City requires documentation of LID practices in each project subject to stormwater requirements.
- The City is required to comply with the National Pollution Discharge Elimination System (NPDES) permit program.
- The City of Sumner currently implements the floodplain regulations required by the National Flood Insurance Program (NFIP) and through its Shoreline Master Program (SMP) and critical areas regulations (Sumner Municipal Code [SMC] 15.52). The City of Sumner has adopted a code (SMC 15.52.250) for future floodplain development which prohibits any increase in flood levels as a result of development.
- The National Marine Fisheries Service (NMFS) provided a biological opinion in 2008 on the effects of FEMA's National Flood Insurance Program (NFIP) on endangered species protected under the Endangered Species Act (ESA) (discussed in the Comprehensive Plan Update EIS in 2010). The biological opinion included reasonable and prudent alternatives (RPAs) that govern how the NFIP can be implemented along streams and rivers that support listed salmon populations. One of the RPAs regarded restriction of development within the 100-year floodplain. It specified that affected communities:
 - Either prohibit all development in the 100-year floodplain; or
 - Allow development to proceed only if ecological functions of the floodplain are preserved or compensated (i.e. mitigated).
- The City of Sumner currently reviews impacts on the ESA on a permit by permit basis through preparation of Habitat Management plan and annual agency consultation.
 - The City responds to the 2008 biological opinion by requiring development in the floodplain to preserve or compensate for loss of ecological functions of the floodplain.
 - The City will continue to implement requirements of the NFIP to protect new and existing development in and near floodplains.
 - The City will continue to implement SMC 15.52.250 to prevent increases in flood elevations.
 - The City has adopted the Washington State Department of Ecology (Ecology) Low Impact Development Manual (LID) and a requirement for LID approaches to stormwater management for new development.
 - The City will continue to cooperate with Pierce County Water Programs and King County implement conveyance improvements required along rivers.
 - The City will continue to enforce the Shoreline Master Program and critical area regulations as currently adopted or as amended in the future.

- White River Restoration Project is a major flood protection project that will restore floodplain habitat, replace the Stewart Road Bridge, and improve flood protection in the Lower White River reach.

Power, Natural Gas, and Telecommunications

- The City should continue to implement the Washington State Energy Code.
- The adopted Comprehensive Plan includes some policies around energy conservation and efficiency.

7.4.3 Other Potential Mitigation Measures

City Facilities and Police

- No additional proposed mitigation measures

Fire and EMS

- No additional proposed mitigation measures

Schools

- No additional proposed mitigation measures

Parks

- Integrate the updated 2024 Parks and Trails Plan when approved. Update the park impact fee as appropriate.

Sewer

- The City could implement recommendations of the Sanitary Sewer Plan to correct existing deficiencies in the 6-year planning period.
- The City could identify additional improvements to the sewer system for the 20-year planning period to address deficiencies projected in the long term.
- The City could partner with the City of Bonney Lake if another plant expansion becomes necessary. As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, expansion would likely be funded heavily by Bonney Lake.

Water

- The City could implement an aggressive water conservation program – including water reuse and recycling or demand management measure – for residential, commercial, and industrial users.
- The City could expand watershed protection by acquiring additional land around the existing watershed.
- The City could choose to fund more public education and outreach to water conservation programs.

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 2019 Stormwater Manual as adopted by the City.
- The City could implement stronger code & design incentives for LID, such as bonuses for pervious surfaces and green roofs.
- The City could choose to fund more public education on water quality for residents and businesses.

Power, Natural Gas, and Telecommunications

- Consistent with City policies, the City should provide annual updated population, employment, and development projections to PSE so they can evaluate actual patterns and rates of growth and compare these patterns to electrical demand forecasts.
- The City could coordinate and cooperate with other jurisdictions in the implementation of multijurisdictional electric utility facility additions and improvements.
- The City could choose to fund more public education and outreach to promote renewable energy technologies.

7.5 Significant Unavoidable Adverse Impacts

7.5.1 City Facilities and Police

To meet adopted and proposed LOS for general government facilities and police the City will need to add building square footage and commissioned officers under all growth alternatives. The 2044 need for public works shops will be fulfilled by the new shops once completed. Impacts can be mitigated by capital facilities and police resource planning. No significant unavoidable adverse impacts are expected.

7.5.2 Fire and EMS

Growth is expected under all alternatives which will increase demand for fire and EMS services and associated equipment and personnel needs. Impacts can be mitigated through capital and personnel planning to meet these needs. No significant unavoidable adverse impacts are expected.

7.5.3 Schools

Both the Sumner-Bonney Lake and Dieringer School Districts will see student enrollment growth due to increased housing units under all alternatives. Impacts can be mitigated through school district facility and personnel planning. No significant unavoidable adverse impacts are expected.

7.5.4 Parks

Increased demand for parks will occur under all alternatives due to growth. Impacts can be mitigated through the parks planning process. No significant unavoidable adverse impacts are expected.

7.5.5 Sewer and Water

Additional population, employment, and industrial/commercial growth throughout the City's service area would result in increased demands on sanitary sewer facilities and water services. Advance planning for the sewer and water system and capital facility improvements should minimize the possibility of unavoidable impacts. No significant unavoidable adverse impacts are expected.

7.5.6 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.

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, 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.

7.5.7 Power, Natural Gas, and Telecommunications

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.

8 Transportation

8.1 Introduction

This section provides a summary of the current transportation conditions and potential impacts associated with the Sumner Comprehensive Plan and associated Transportation Plan. Transportation impacts are identified through a comparison of the No Action Alternative (Alternative 1) to the Action Alternatives (Alternatives 2 and 3).

8.2 Affected Environment

A detailed discussion of the affected environment is provided in the draft Sumner Transportation Plan.

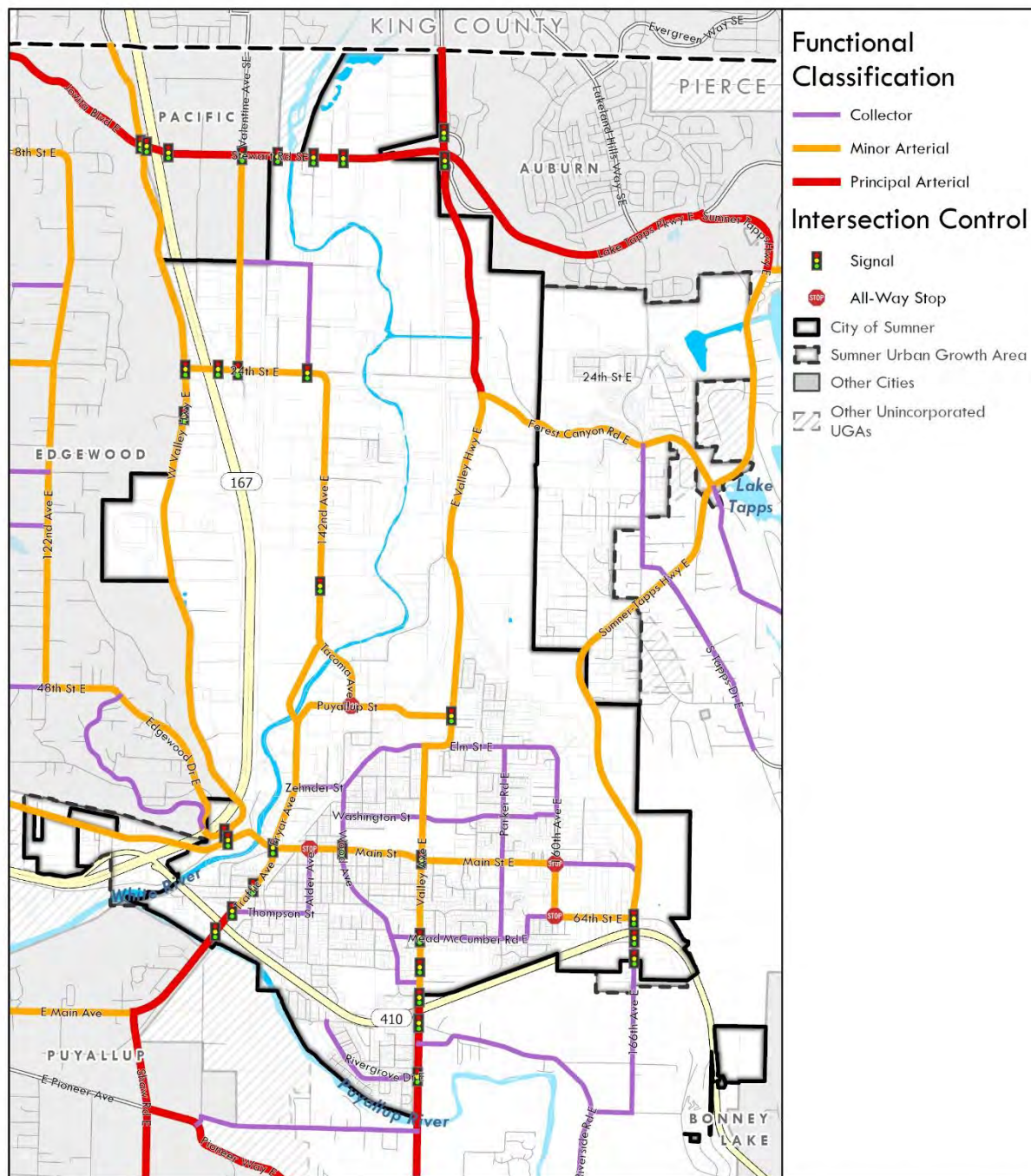
8.2.1 Street System

The street system is described in terms of general facility characteristics as well as traffic volumes and operations.

Freeways, Arterials, and Collectors

Exhibit 8-1 summarizes the existing traffic control and functional classification of the city street system. Two major limited access, divided state highways serve Sumner, SR 167 and SR 410. The major north-south arterials serving the city include East Valley Highway, West Valley Highway, Sumner-Tapps Highway, 142nd Avenue E, 136th Avenue E, Valley Avenue, and Traffic Avenue. A number of collector arterials provide connectivity between residential areas of Sumner to arterial roadways and the regional freeway system. The collectors are also vital in connecting the residential areas to the central business district and are excellent candidates for improvements to active mode facilities. In general, most of the collector roads in Sumner are two-lane roadways with turn lanes and signals provided at a limited number of cross streets.

Exhibit 8-1. Existing Traffic Control and Functional Classification



CITY OF SUMNER

Existing Traffic Control and Functional Classification

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

Traffic Volumes

Daily traffic volumes were provided by the city and weekday PM peak hour traffic volumes were collected in March 2023 by IDAX at key intersections throughout the city. Daily traffic volumes are highest along Valley Avenue East (SR 162) and Sumner-Tapps Highway with approximately 25,000 to 30,000 vehicles per day in the city. Comparing 2023 traffic volumes with 2015 Transportation Plan traffic levels, shows weekday PM peak hour traffic growth was largest at intersections serving the north part of the city industrial areas where most of the growth has been concentrated over the past ten years. The largest increase in weekday PM peak hour traffic volumes occurred at the intersection of 142nd Ave and 24th St E, where traffic increased by 5%. At the access ramps to SR 167, traffic volumes have grown modestly between one tenth of a percent to 1.5%. The city's lowest growth in volumes occurred along the SR 162/Valley Avenue corridor. This pattern of little to no change in traffic volumes is thought to be a result of changing patterns in weekly commuter patterns. Since the COVID-19 pandemic travel patterns have changed with more people working from home or having more flexible hours where they may not commute daily or during the evening period.

Traffic Operations

Traffic volumes were used to evaluate traffic operations in Sumner at 43 study intersections. Traffic operations analysis provides a quantitative method for evaluating existing transportation conditions. Intersection operations were evaluated based on the level of service (LOS) methodologies of the Highway Capacity Manual (HCM) (Transportation Research Board). Criteria range from LOS A, indicating free-flowing conditions with minimal vehicle delays, to LOS F, indicating extreme congestion with long vehicle delays. At signalized intersections, LOS is measured in terms of average delay per vehicle. At unsignalized intersections, LOS is measured in terms of the average vehicle delay and is typically reported for the worst traffic movement instead of for the whole intersection.

The current adopted LOS standards set by each jurisdiction are summarized below:

- City of Sumner
 - LOS D all intersections except as specifically noted
 - Exception to the LOS D standard are:
 - Traffic Avenue/Main Street/Fryar Avenue (LOS F)
 - Main Street/Alder Avenue (LOS F)
 - Valley Avenue East/Main Street (LOS F)
 - West Valley Highway East/Valley Avenue/Sumner Heights Drive (LOS F)
- WSDOT/PSRC
 - LOS D for Highways of Statewide Significance (HSS) in urban areas
 - LOS C for Highways of Statewide Significance (HSS) in rural areas
 - LOS D for Regional Significance State Highways (RSSH), Tier 2

Because SR 167 is a designated HSS, the State requires local jurisdictions to adopt this LOS standard for HSS facilities in their Comprehensive Plans. For non-HSS facilities, the State requires that an agency coordinate with WSDOT in establishing a LOS standard for those facilities. SR 410 and SR 162 are not

HSS-designated facilities. Puget Sound Regional Council (PSRC) has adopted LOS standards for regionally significant state highways or state transportation facilities that are non-HSS such as SR 410 and SR 162. SR 162 and SR 410 both Tier 2 RSSH. Based on the PSRC tiered LOS system, both SR 410 and SR 162 have an adopted LOS D standard. SR 410 is also part of the National Highway System within the City.

Generally, traffic operations have remained consistent over the last 10 years. Four intersections do not meet the currently adopted LOS standard during the weekday PM peak hour operating at LOS E or F.

Exhibit 8-2 provides a comparison between 2015 and 2023 LOS, delay, and worst movements at the study intersections not meeting the LOS standard. Poor operations are known issues at the SR 162 and SR 410 interchanges and the East Valley Highway/Forest Canyon Road East intersection. The City of Sumner's 6-Year Transportation Improvement Program 2024-2029 includes improving the Stewart Road SE/Butte Avenue SE intersection. The city is currently considering installing a new signal at Butte Avenue in 2023.

Exhibit 8-2. Weekday PM Peak Hour LOS Comparison

Intersection	2015			2023		
	LOS ¹	Delay ²	WM ³	LOS	Delay	WM
Stewart Rd/Butte Ave SE	Not Studied in 2015			F	186	SB
East Valley Hwy E/Forest Canyon Rd	D	29	WB	F	327	WB
Sumner-Tapps Hwy E/SR 410 WB Ramps	F	>50	WB	F	61	WB
Valley Ave/74th St E	C	19	WB	F	110	EB

Notes:

1. LOS = level of service based on the Highway Capacity Manual (HCM)
2. Average delay in seconds per vehicle.
3. WM means worst movement and SB means southbound, WB means westbound, NB means northbound, EB means eastbound.

8.2.2 Traffic Safety

A review of citywide collision records was completed to identify potential safety issues for vehicles, pedestrians, and cyclists. The traffic safety analysis included collision data for a five-year period from January 1, 2018 through December 31, 2022. Four (4) fatalities occurred over the 5-year period and 17 serious injury crashes. The number of collisions occurring at locations in the city are generally low to moderate a moderate concentration of collisions occurring along Main Street, Traffic Avenue and 166th Avenue E/Sumner Tapps Highway.

8.2.3 Transit and Rail Service

Sound Transit provides bus service to the Sumner Sounder Train Station facility located on the west side of Traffic Avenue at Maple Street. Transit routes that serve the Sumner Train Station include Routes 578

and 596. In addition, Pierce County provides Beyond the Borders Connector bus service for eligible residents to public transportation, medical services, employment, shopping, and social activities. Sound Transit's Sounder line offers commuter rail service between Lakewood and downtown Seattle with stops in Tacoma, Puyallup, Sumner, Auburn, Kent, and Tukwila. Exhibit 8-3 illustrates transit service in Sumner.

8.2.4 Freight Train Traffic

The main BNSF railroad line through the region travels northeast to southwest through the City of Sumner, paralleling East Main Street/Traffic Avenue. The at-grade crossings within the city are located at Maple Street, Main Street, Zehnder Street, Puyallup Street, and west of East Valley Avenue at 150th Avenue. The rail line is used by freight train, passenger rail, and commuter rail services.

8.2.5 Pedestrian and Bicycle Facilities

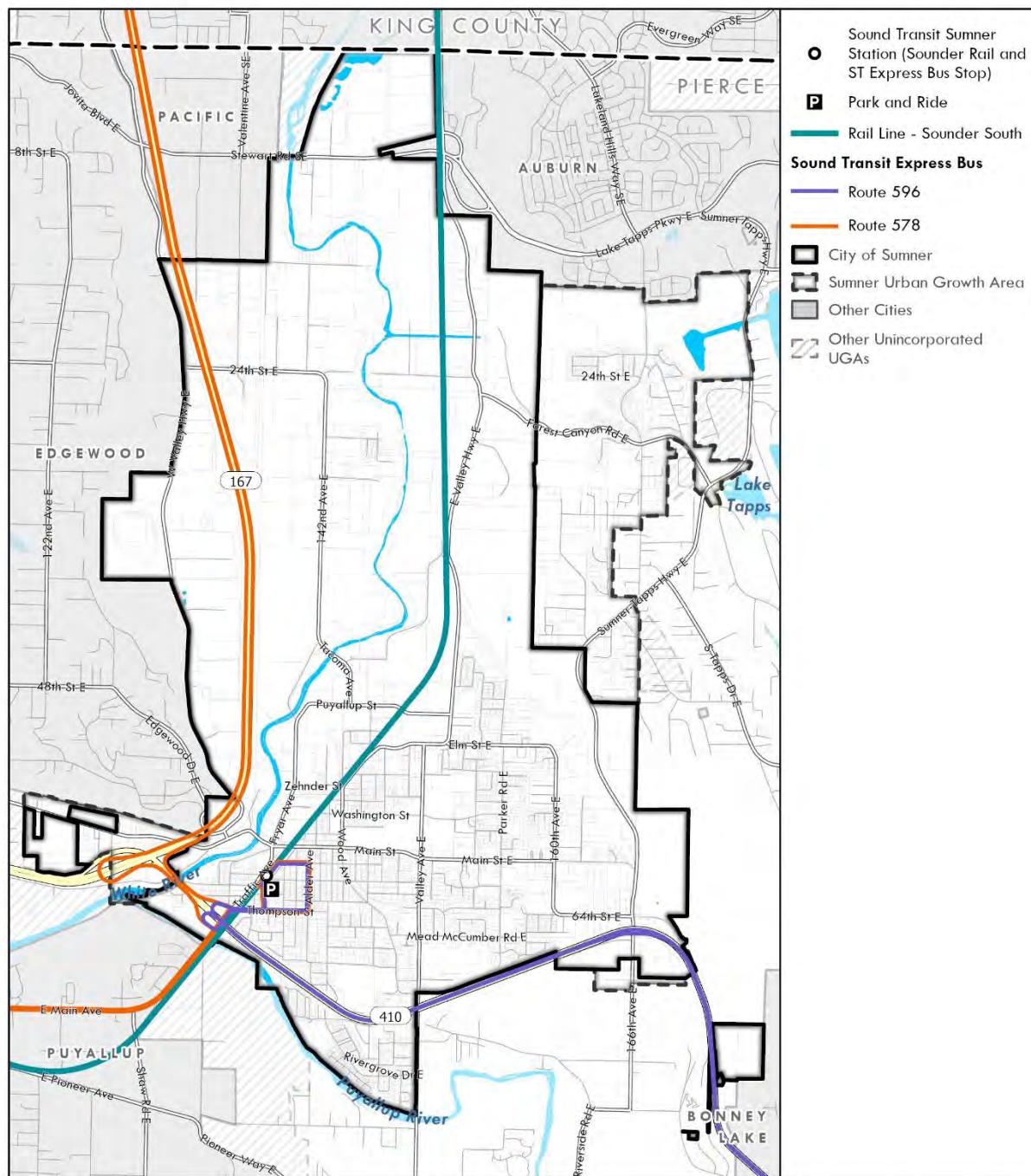
Continuity in pedestrian and bicycle access within the city provides for increased safety, comfort, and ease for residents and recreational users. The city is striving to create a fully integrated system for these modes of transportation and recognizes the need to prioritize locations where it expects heavy non-motorized use, such as routes connecting residential areas to recreational facilities and schools, and places of employment.

Exhibit 8-4 illustrates the current non-motorized system within the city. The city's existing transportation system was historically designed and constructed for vehicular traffic. The existing system provides access for people on foot, bike, or other modes primarily with sidewalks, bike lanes, and off-street trails. Sidewalks are located intermittently around the city, mostly along arterial roadways located within Sumner's central business district and nearby neighborhoods.

8.2.6 Transportation Demand Management

The City of Sumner has adopted a commute trip reduction (CTR) program. The CTR program establishes goals consistent with State legislation. The individual demand management strategies that are typical elements of the CTR and TDM programs are different for employment and residential developments. In addition, the Manufacturing and Industrial Center (MIC) and Town Center Subarea Plans described TDM strategies to reduce employment and residential drive alone trips including shuttles and transit options, improving bicycle and pedestrian connectivity and incentive programs led by employers.

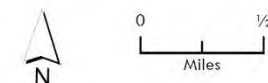
Exhibit 8-3. Transit Service



CITY OF SUMNER

Existing Transit Service

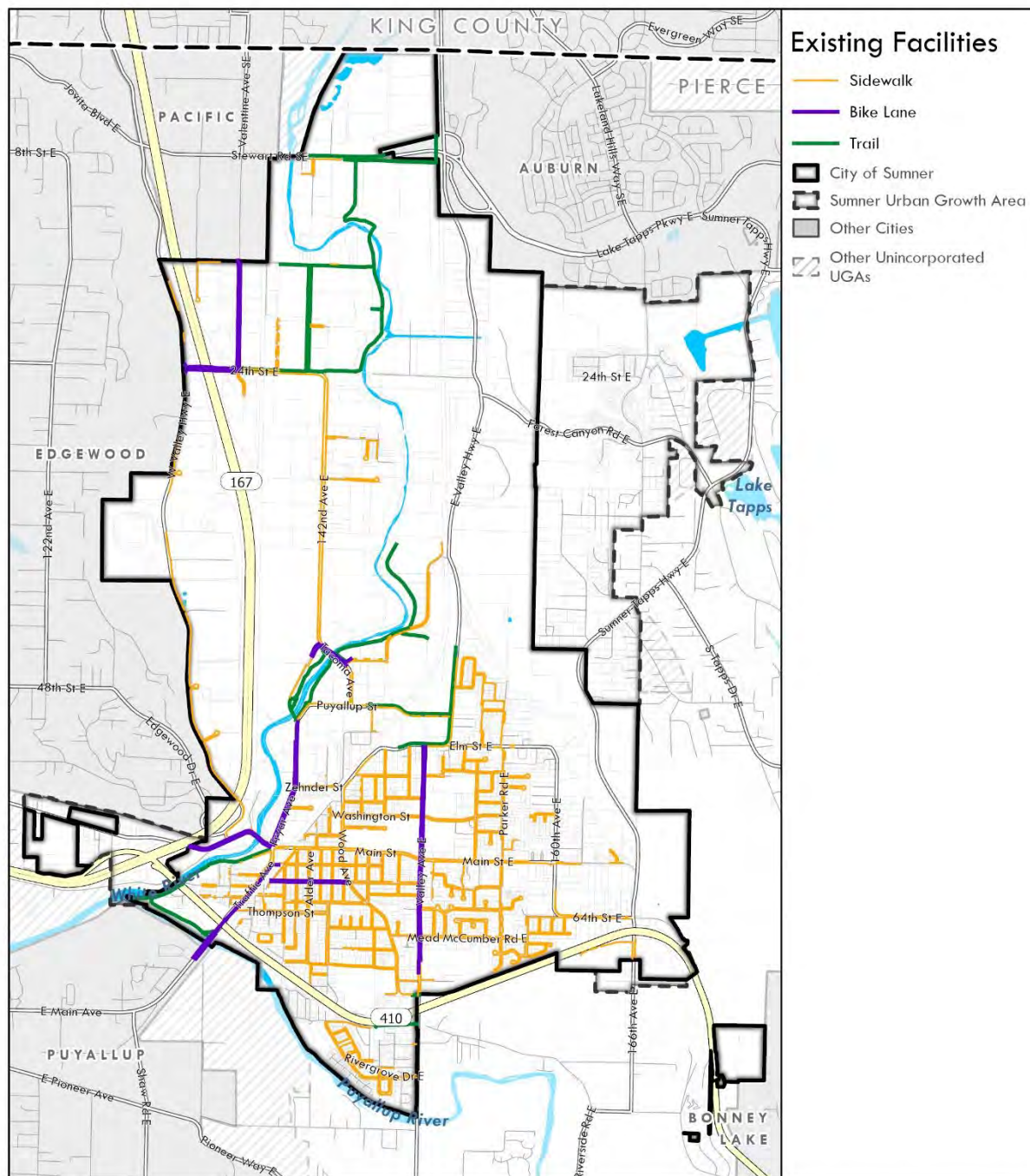
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

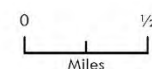
Exhibit 8-4. Existing Non-Motorized Facilities



CITY OF SUMNER

Existing Non-Motorized Facilities

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Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

8.2.7 Technology

Transportation System Management and Operations (TSMO) is an integrated approach to optimize the performance of existing infrastructure by implementing multimodal, intermodal, and often cross-jurisdictional systems, services and projects. Most of the city's current transportation infrastructure is outdated and there are limited abilities to provide TSMO without future upgrades. The city is currently looking into investments in fiber systems and will be considering what upgrades are needed and leveraging the fiber project to allow for TSMO.

8.3 Impacts

8.3.1 Thresholds of Significance

Multimodal level of service (LOS) standards are required for non-motorized transportation facilities, locally owned arterials, and transit routes that serve urban growth areas, to serve as a gauge to judge system performance, and to help achieve the statewide goal of environmental justice. The City of Sumner has adopted vehicle LOS standards and as part of the 2024 Comprehensive Plan Update is proposing pedestrian and bicycle LOS standards. There are no public transit services in Sumner; therefore, no transit LOS standards are adopted or proposed.

LOS standards are used to evaluate impacts. The LOS standards used to evaluate the Sumner transportation system are described below and are based on the proposed 2024 Comprehensive Plan Update multimodal LOS standards.

Vehicle

Vehicle LOS in the transportation study area is set by Sumner, Pacific and WSDOT. There are no proposed changes to the City of Pacific and WSDOT vehicle LOS standards with the adopted 2024 Comprehensive Plan. The Sumner vehicle LOS standards are proposed to change by eliminating the LOS F standard at Traffic Avenue/Main Street/Fryar Avenue, Main Street/Alder Avenue, Valley Avenue East/Main Street, and West Valley Highway East/Valley Avenue/Sumner Heights Drive intersections. The proposed vehicle LOS standards are as follows.

- Sumner
 - LOS D
 - Exception allows left turns and through movements on side streets intersecting with arterials to operate below the adopted LOS D standard, when the LOS affects relatively low traffic volumes and may not meet warrants for traffic signals.
- Pacific
 - LOS D

- WSDOT/PSRC¹
 - LOS D for Highways of Statewide Significance (HSS) in urban areas
 - LOS C for Highways of Statewide Significance (HSS) in rural areas
 - LOS D for Regional Significance State Highways (RSSH), Tier 2

There are no adopted pedestrian and bicycle LOS standards. The non-motorized system is evaluated based on the proposed 2024 Comprehensive Plan LOS standards described below.

Pedestrian

The LOS standards for the pedestrian network are described in Exhibit 8-5 and the future network identified on Exhibit 8-6. A green LOS indicates a facility meets adopted roadway standards. The city utilizes these standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the Sumner land use plan.

Exhibit 8-5 Pedestrian LOS Standard

LOS	Primary Route	Secondary Route
	Meets City standards, facilities on both sides	Meets City standards, facilities on one or both sides
	Facilities exist, but only on one side	N/A
	No facilities exist, does not meet standards	No facilities exist, does not meet standards

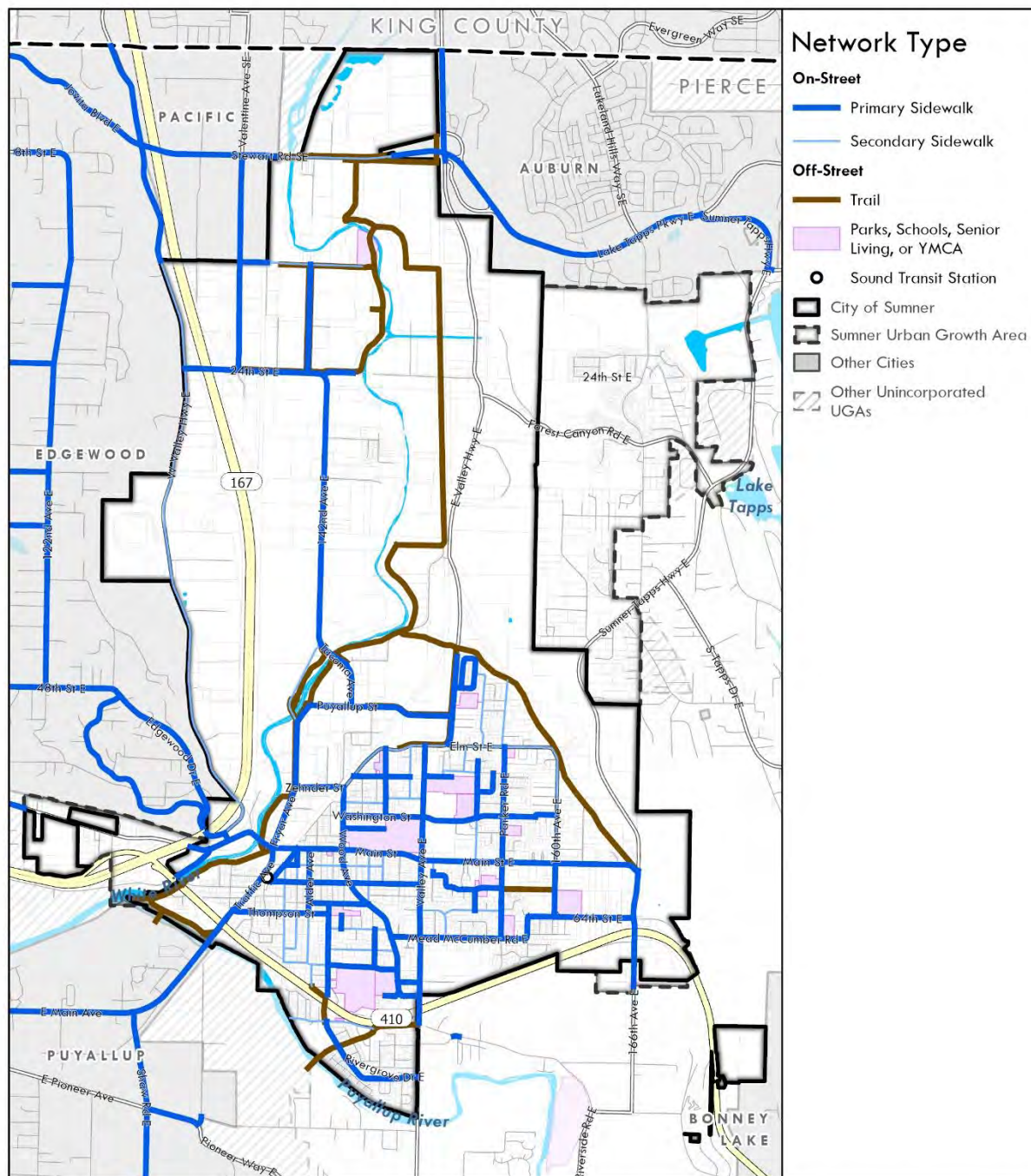
Source: Transpo Group, 2023

Bike

A future bike network was identified and is shown on Exhibit 8-7. The bike LOS identified through an understanding of the availability of bike facilities along designated routes. Bike facilities could include sharrows, dedicated bike lanes, or protected bike lanes. A green LOS is the standard for the bike routes. Like the pedestrian LOS, Sumner utilizes these bike standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the city's land use plan.

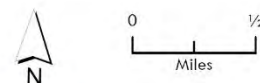
¹ Level of Service Standards for Washington State Highways, 2010

Exhibit 8-6. Future Pedestrian Network



CITY OF SUMNER

Future Pedestrian Network

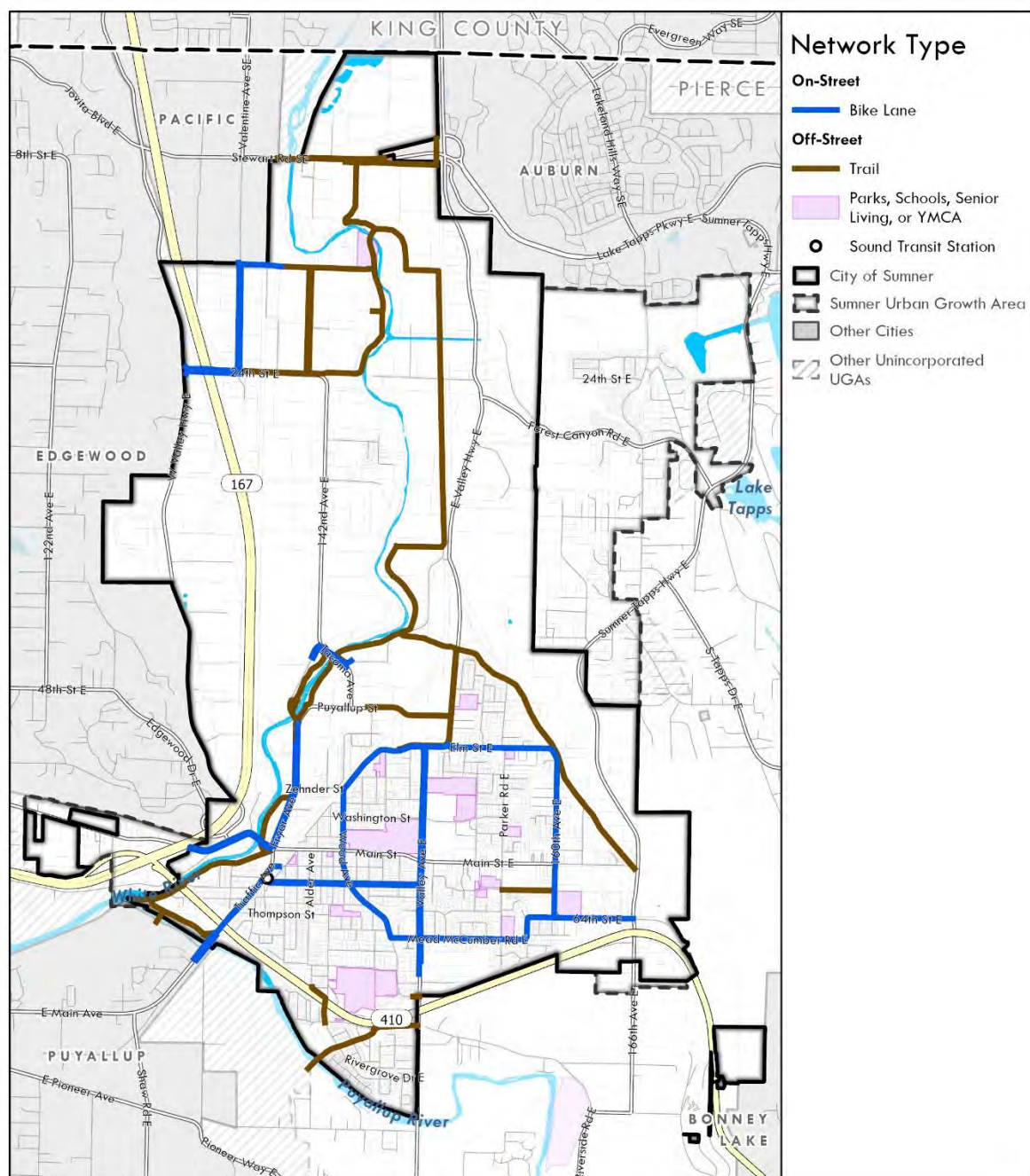


Map Date: February 2024

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Source: City of Sumner, 2023; Transpo, 2024.

Exhibit 8-7. Future Bike Network



CITY OF SUMNER Future Bike Network

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Map Date: February 2024

Source: City of Sumner, 2023; Transpo, 2024.

There are currently no local transit routes providing service within Sumner. If transit service is established within the city, Sumner will develop LOS standards.

8.3.2 Impacts Common to All Alternatives

The following conditions and impacts are common to all alternatives, including Alternative 1 (No Action).

Travel Forecast Model and Transportation Network Assumptions

A travel demand forecasting model was developed to assist in defining future transportation system needs. The model uses the VISUM software package and forecasts weekday PM peak hour traffic volumes based on the 2044 land use alternatives. The model study area includes a portion of the City of Pacific and parts of Pierce County just beyond the city limits.

The model was calibrated to match existing base year traffic volumes (2023) and then used to develop a baseline 2044 traffic forecast. City, County, and State transportation improvement projects likely to be funded and built by 2044 were included in the future baseline model and are described below. The 2044 baseline model only included city projects that are in design, construction, or recently built. The 2044 travel forecasts were used to identify future transportation needs.

Exhibit 8-8 summarizes the future baseline transportation improvement projects that were assumed to be completed as part of the baseline 2044 transportation system modeling. The projects listed in the exhibit are planned improvements with either full or partial funding and would be completed before 2044 by Sumner or other agencies.

Exhibit 8-8. 2044 Baseline Transportation Improvements

Location	Project Description
SR 167: SR 410 to City of Auburn	Add southbound high occupancy or toll (HOT) lane
Butte Avenue SE/Stewart Road SW	Construct a traffic signal with additional capacity including: -Northbound and southbound left-turn lanes -Eastbound left-turn lane and right-turn lane
Stewart Road SW: Butte Avenue SE to 140th Avenue Court E	Widen to 5 lanes including a center two-way left-turn lane
Main Street/Wood Avenue	Pedestrian and signal improvements
SR 410 WB Ramps/166th Avenue E	Construct roundabout
SR 410/SR 162 Interchange	Construct roundabouts
64th Street/164th Avenue E	Construct roundabout
Sumner Tapps Highway/60th Street E	Construct signal. Remove eastbound left-turning movement restrictions
166th Avenue E: SR 410 Ramps to 64th Street E	Widen to 4 to 5 lanes
SR 167/I-5 Connection: Puyallup to Fife	Construct remaining 4 miles of SR 167 between Meridian and I-5

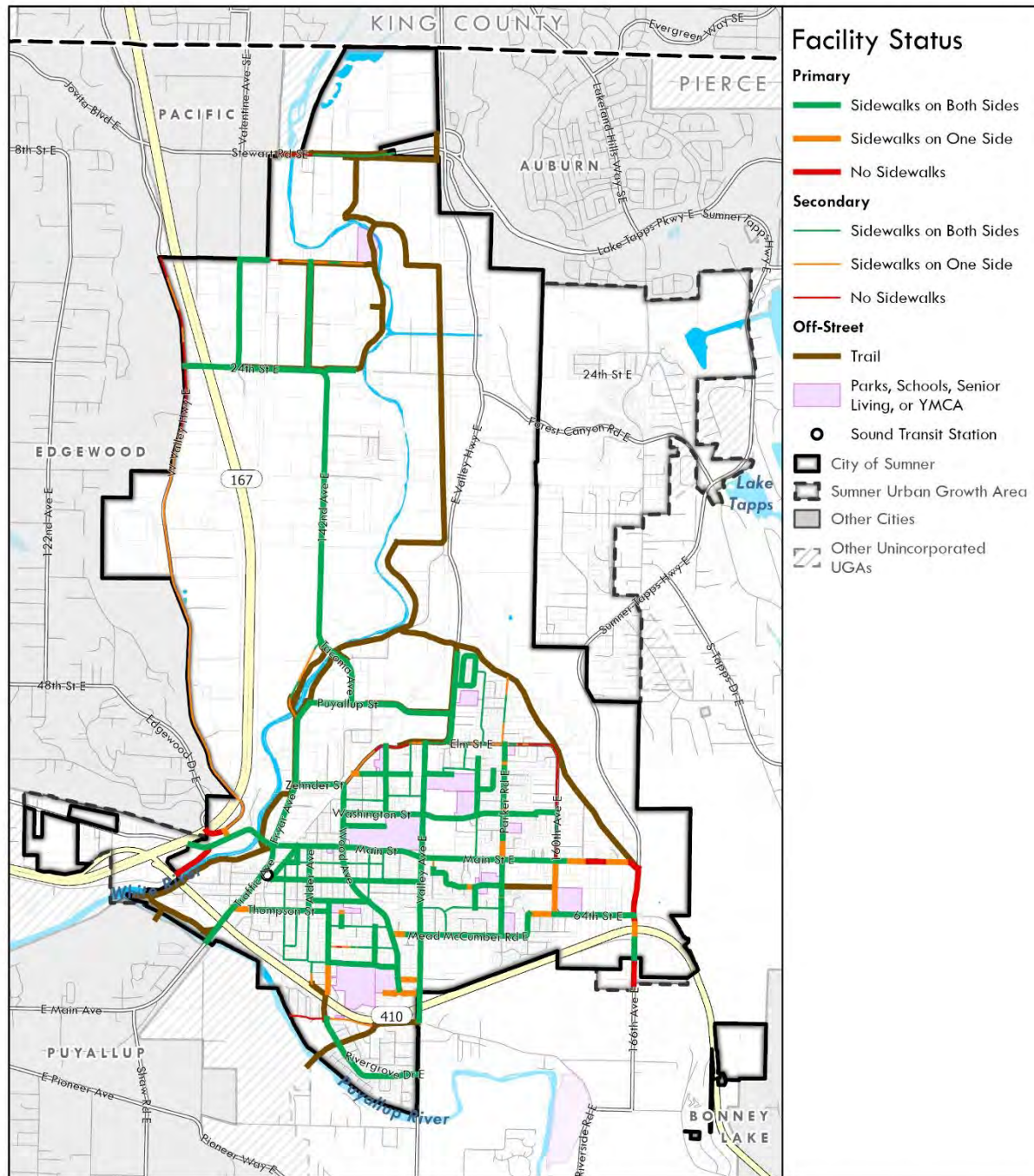
Pedestrian

Applying the standards described above, the pedestrian LOS analysis is shown on Exhibit 8-9. The LOS is determined by comparing the 2044 future pedestrian network to the existing, planned, and funded pedestrian network. The pedestrian LOS analysis shows most of the future pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors such as Elm Street and 160th Avenue E that have missing sidewalk. Impacts would be mitigated by identifying long-term projects that would implement the orange LOS for primary routes and green LOS for secondary routes.

Bike

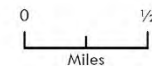
The LOS analysis for the bike network is shown on Exhibit 8-10. The LOS is determined by comparing the 2044 future bike network to the existing, planned, and funded bike network. The bike LOS analysis shows that bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. The East Sumner Subarea Plan envisioned additional bike connectivity in this area as development occurred. These impacts would be mitigated by identifying long-term project that would implement the green LOS for bike routes.

Exhibit 8-9. Future Pedestrian Level of Service



CITY OF SUMNER

Future Pedestrian Level of Service

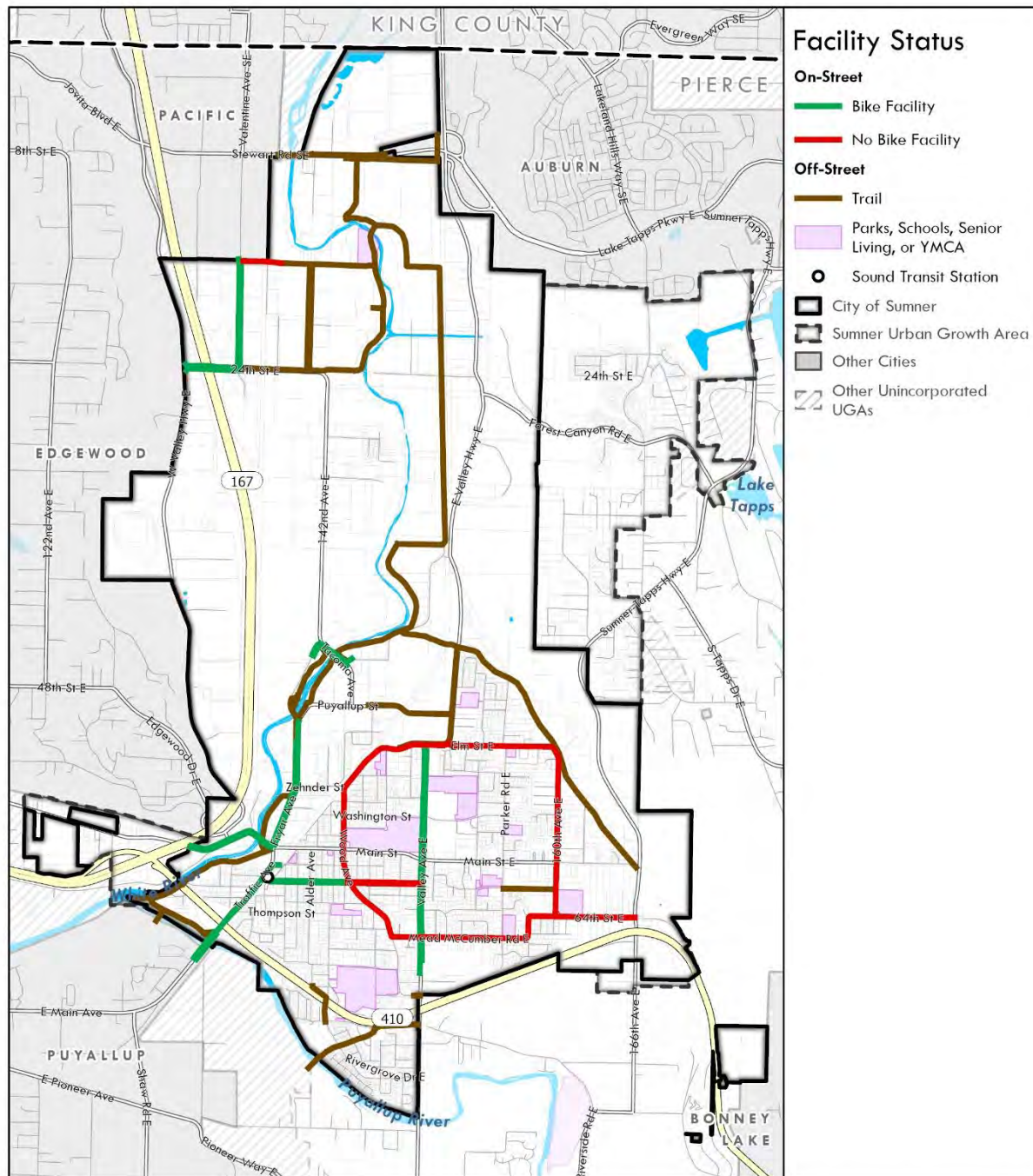


Map Date: February 2024

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Source: City of Sumner, 2023; Transpo, 2024.

Exhibit 8-10. Future Bike Level of Service



CITY OF SUMNER Future Bike Level of Service



0 1/2
Miles



Map Date: February 2024

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Source: City of Sumner, 2023; Transpo, 2024.

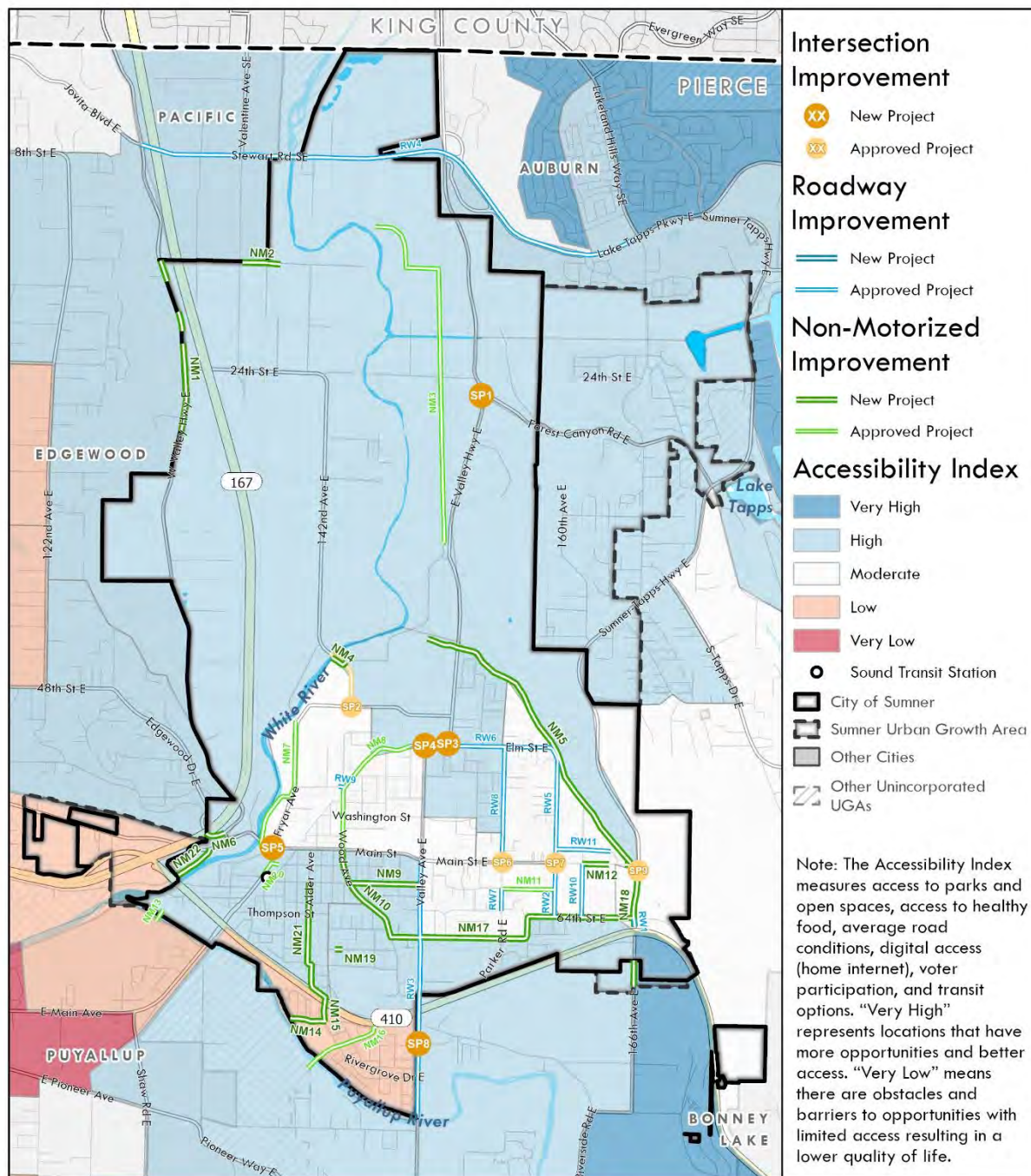
Equity

Transportation equity for Sumner was reviewed based on the accessibility index. The accessibility index measures access to parks and open spaces, access to healthy food, average road conditions, digital access (home internet), voter participation, and transit options. A very high accessibility index represents locations that have more opportunities and better access. A very low index means there are obstacles and barriers to opportunities with limited access resulting in a lower quality of life.

Exhibit 8-11 shows the accessibility index for Sumner, which is consistent with the alternatives. Most of Sumner has a high index except for the Riverview neighborhood south of SR 410 with a low index and East Sumner and areas north of Main Street with a moderate index. SR 410 provides a barrier for the Riverview neighborhood resulting in low accessibility. The Transportation Plan incorporates non-motorized, roadway and intersection improvements that will increase the accessibility index throughout Sumner including in Riverview, East Sumner and north of Main Street.

Exhibit 8-11 also shows the transportation improvements overlayed on the current accessibility index for Sumner. The “approved” transportation improvements are included for all alternatives and the “new” improvements are only included with Alternatives 2 and 3. There will be greater improvements in accessibility throughout Sumner and especially in the Riverview, East Sumner, and north of Main Street areas with Alternatives 2 and 3 given the additional transportation improvements especially non-motorized connections that connect north and south of SR 410 as well as east-west through the City.

Exhibit 8-11: Accessibility Index and Transportation Improvements



CITY OF SUMNER

Accessibility Index and Transportation Improvements

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



Map Date: February 2024

Source: Pierce County, 2023; Transpo 2024.

8.3.3 Alternative 1 (No Action)

This section describes the transportation-related impacts of Alternative 1. Alternative 1 would increase land use density resulting in growth in traffic over current conditions.

Land Use

Future 2044 forecasts for land use growth throughout the city and its Urban Growth Area (UGA) under Alternative 1 are consistent with development levels evaluated as part of the 2015 Comprehensive Plan. Exhibit 8-12 summarizes 2044 land use data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA).

Exhibit 8-12. Alternative 1 2044 Land Use Allocation

Land Use by Subarea	Alternative 1		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	938	1,245
MIC	0	0	0
Other	593	147	740
Total Growth	900	1,085	1,985
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK Consulting, 2023

As shown in Exhibit 8-12, the number of housing units and jobs increase in all areas of the city except for the number of housing units in the MIC remaining consistent with the existing conditions. Exhibit 8-13 provides a summary of the total anticipated housing units and jobs under Alternative 1.

Exhibit 8-13. Alternative 1 2044 Total Land Use

Land Use by Subarea	Alternative 1
Housing Units	6,356
Jobs	24,919

Source: BERK Consulting, 2023

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the land use estimates of housing and employment into daily person trips by trip purpose. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-14 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternative 1. As shown in Exhibit 8-14, Alternative 1 results in an increase of approximately 2,500 weekday PM peak hour trips and 6,000 VMT.

Exhibit 8-14. Alternative 1 Weekday PM Peak Hour Vehicle Trips and Vehicle Miles Traveled (VMT)

	Existing	Alternative 1	Increase
Vehicle Trips	10,071	12,544	+2,473
VMT	23,682	30,015	+6,333

Source: Transpo Group, 2023

The 2044 weekday PM peak hour traffic volumes and average annual growth rate for Alternative 1 was forecast in the study area and is summarized in Exhibit 8-15 for key intersections.

Exhibit 8-15. Alternative 1 PM Peak Hour Traffic Volumes

Intersection	2023 Existing	2044 Alternative 1	
	PM Peak Volumes	PM Peak Volumes	Average Annual Growth
Stewart Road SE/Butte Avenue SE	1,675	2,315	2%
E Valley Highway E/Forest Canyon Road E	1,525	1,860	1%
Puyallup Street/Tacoma Avenue	860	1,090	1%
E Valley Highway E/Elm Street E	1,425	1,710	1%
Valley Avenue/Elm Street E	1,120	1,280	1%
Sumner Heights Drive E/W Valley Highway E	820	1,085	1%
Traffic Avenue/Main Street	2,080	2,520	1%
Alter Avenue/Main Street	750	910	1%

Intersection	2023 Existing	2044 Alternative 1	
	PM Peak Volumes	PM Peak Volumes	Average Annual Growth
Valley Avenue/Main Street	1,810	2,235	1%
Parker Road E/Main Street E	960	1,270	1%
160th Avenue E/Main Street (60th Street E)	1,085	1,540	2%
Sumner-Tapps Highway E/SR 410 WB Ramp	1,675	1,985	1%
Valley Avenue/SR 410 EB Ramp	2,150	2,965	2%
Valley Avenue/74th Street E	1,915	2,545	1%

Source: Transpo Group, 2023

As shown in Exhibit 8-15, the average annual growth rate at the studies intersections is approximately 1 to 2%. The growth overall represents an increase in traffic volumes at key study intersections of 160 to 815 weekday PM peak hour trips for the Alternative 1 condition by 2044.

Traffic Operations

Traffic operations were evaluated at 43 intersections based on the HCM methodology. Intersection improvements were assumed based on the transportation improvement list outlined. Traffic signal timing was optimized for each alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes. Exhibit 8-16 summarizes the existing and Alternative 1 operations at intersections where further review and potential improvements may be needed.

Exhibit 8-16. Alternative 1 Weekday PM Peak Hour LOS Summary

Intersection	2023 Existing			2044 Alternative 1		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	F	186	SB	C	33	-
E Valley Highway E/Forest Canyon Road E	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	C	19	-	F	84	-
E Valley Highway E/Elm Street E	D	30	NBL	F	57	NBL
Valley Avenue/Elm Street E	D	31	NBL	E	43	NBL
Sumner Heights Drive E/W Valley Highway E	C	29	-	D	41	-
Traffic Avenue/Main Street	D	43	-	E	58	-
Alder Avenue/Main Street	B	11	-	B	14	-
Valley Avenue/Main Street	C	23	-	C	32	-

Intersection	2023 Existing			2044 Alternative 1		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Parker Road E/Main Street E	C	24	SB	F	56	SB
160th Avenue E/Main Street (60th Street E)	C	16	-	E	47	-
Sumner-Tapps Highway E/SR 410 WB Ramp	F	61	WB	A	7	0.54
Valley Avenue/SR 410 EB Ramp	F	80	-	B	12	0.87
Valley Avenue/74th Street E	F	110	EB	F	>180	EB

Source: Transpo, 2024.

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections, where SB = southbound, WB = westbound, NBL = northbound left-turn and EB = eastbound.

Overall, the analysis finds that most of the study intersections operate at LOS D or better during the weekday PM peak hour with the projected growth under Alternative 1. As shown in Exhibit 8-16, the following intersections are anticipated to improve with Alternative 1 compared to existing conditions during the weekday PM peak hour with the planned and funded improvements:

- **Stewart Road SE/Butte Avenue SE** – Completion of the traffic signal is anticipated to improve operations to LOS D
- **Sumner-Tapps Highway E/SR 410 WB Ramp** – The planned roundabout results in LOS A conditions
- **Valley Avenue/SR 410 EB Ramp** – The planned roundabout results in LOS B conditions

Exhibit 8-16 shows that eight (8) intersections are forecast to degrade below LOS D during the weekday PM peak hour under Alternative 1 conditions. Most of the poor intersection operations during the weekday PM peak hour under Alternative 1 is projected along E Valley Highway and Valley Avenue. This is consistent with the observed regional cut-through traffic, which avoids congestion along SR 167 and uses routes through Sumner. Other intersections impacted by shifts in traffic and growth in the City of Sumner are the Parker Road E/Main Street E and 160th Avenue E/Main Street E intersections.

8.3.4 Alternative 2

This section describes the transportation-related impacts of Alternative 2. Alternative 2 would increase land use density resulting in growth in traffic over current conditions and Alternative 1. Impacts of Alternative 2 are identified through a comparison to Alternative 1 (No Action) conditions.

Land Use

Future 2044 forecasts for land use growth throughout the city and its Urban Growth Area (UGA) under Alternative 2 represents growth beyond what was planned for in 2015. Exhibit 8-17 and

Exhibit 8-18 summarize 2044 land use growth data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA) under Alternative 2 as it compares to Alternative 1.

Exhibit 8-17. Alternative 2 2044 Land Use Allocation

Land Use by Subarea	Alternative 2		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	938	1,245
MIC	0	0	0
Other	593	1,162	1,755
Total Growth	900	2,100	3,000
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK Consulting, 2023

Exhibit 8-18. 2044 Land Use Growth Allocation for Alternatives 1 and 2

Land Use by Subarea	Alternative 1	Alternative 2	Increase
Housing Units			
Town center	1,245	1,245	+0
MIC	0	0	+0
Other	740	1,755	+1,015
Total	1,985	3,000	+1,015
Jobs			
Town center	330	330	+0
MIC	3,900	3,900	+0
Other	1,083	1,083	+0
Total	5,313	5,313	+0

Source: BERK Consulting, 2023

As shown in Exhibit 8-18, no growth is anticipated in the number of jobs comparing Alternatives 1 and 2. The number of housing units increases by 1,015 units throughout the city under Alternative 2 compared to Alternative 1. Exhibit 8-19 provides a summary of the total anticipated housing units and jobs under Alternative 2.

Exhibit 8-19. 2044 Total Land Use for Alternatives 1 and 2

Land Use by Subarea	Alternative 1	Alternative 2	Increase
Housing Units	6,356	7,371	+1,015
Jobs	24,919	24,919	+0

Source: BERK Consulting, 2023

As shown in Exhibit 8-19, Alternative 2 shows over 7,300 housing units and 24,900 jobs within the city and surrounding study area by 2044. Representing an increase of 3,000 housing units and 5,313 jobs over 2020 conditions.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the above land use estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-20 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternative 2 as they compare to existing and Alternative 1 conditions.

Exhibit 8-14 summarizes the weekday PM peak hour vehicle miles traveled (VMT) and trip generation for Alternatives 1 and 2. As shown in Exhibit 8-14, Alternative 2 results in an increase of approximately 1,000 weekday PM peak hour trips and 1,100 VMT compared to Alternative 2 as a result of the additional housing planned within Sumner.

Exhibit 8-20. Alternatives 1 and 2 Weekday PM Peak Hour Vehicle Trips and Vehicle Miles Traveled (VMT)

	Alternative 1	Alternative 2	Increase
Vehicle Trips	12,544	13,626	+1,082
VMT	30,015	31,122	+1,107

Source: Transpo Group, 2023

The 2044 weekday PM peak hour traffic volumes and average annual growth rate for Alternative 2 was forecast in the study area and is summarized in Exhibit 8-21 for key intersections.

Exhibit 8-21. 2044 Weekday PM Peak Hour Traffic Volumes for Alternatives 1 and 2

Intersection	Alternative 1		Alternative 2	
	PM Peak Volumes	Average Annual Growth	PM Peak Volumes	Average Annual Growth
Stewart Road SE/Butte Avenue SE	2,315	2%	2,375	2%
E Valley Highway E/Forest Canyon Road E	1,860	1%	1,970	1%
Puyallup Street/Tacoma Avenue	1,090	1%	1,155	1%
E Valley Highway E/Elm Street E	1,710	1%	1,795	1%
Valley Avenue/Elm Street E	1,280	1%	1,330	1%
Sumner Heights Drive E/W Valley Highway E	1,085	1%	1,110	1%
Traffic Avenue/Main Street	2,520	1%	2,610	1%
Alter Avenue/Main Street	910	1%	955	1%
Valley Avenue/Main Street	2,235	1%	2,340	1%
Parker Road E/Main Street E	1,270	1%	1,310	1%
160th Avenue E/Main Street (60th Street E)	1,540	2%	1,605	2%
Sumner-Tapps Highway E/SR 410 WB Ramp	1,985	1%	2,025	1%
Valley Avenue/SR 410 EB Ramp	2,965	2%	3,025	2%
Valley Avenue/74th Street E	2,545	1%	2,590	1%

Source: Transpo Group, 2023

As shown in Exhibit 8-21, the average annual growth rate at the studies intersections is approximately 1 to 2% with both Alternatives 1 and 2. The growth overall represents an increase in traffic volumes at key study intersections of 200 to 875 PM peak hour trips with Alternative 2 by 2044. Alternative 2 results in approximately 25 to 100 more weekday PM peak hour trips at the study intersections compared to Alternative 1 due to the additional housing planned with Alternative 2.

Traffic Operations

Similar to Alternative 1, traffic operations were evaluated at 43 intersections based on the HCM methodology. Intersection improvements were assumed based on the transportation improvement list outlined. Traffic signal timing was optimized for each alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes. Exhibit 8-16 summarizes the Alternative 1 and Alternative 2 operations at intersections where further review and potential improvements may be needed.

Exhibit 8-22. 2044 Weekday PM Peak Hour LOS Summary for Alternatives 1 and 2

Intersection	Alternative 1			Alternative 2		
	LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	C	33	-	D	36	-
E Valley Highway E/Forest Canyon Road E	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	F	84	-	F	106	-
E Valley Highway E/Elm Street E	F	57	NBL	F	64	NBL
Valley Avenue/Elm Street E	E	43	NBL	E	45	NBL
Sumner Heights Drive E/W Valley Highway E	D	41	-	D	43	-
Traffic Avenue/Main Street	E	58	-	E	60	-
Alder Avenue/Main Street	B	14	-	B	15	-
Valley Avenue/Main Street	C	32	-	D	37	-
Parker Road E/Main Street E	F	56	SB	F	66	SB
160th Avenue E/Main Street (60th Street E)	E	47	-	F	56	-
Sumner-Tapps Highway E/SR 410 WB Ramp	A	7	0.54	A	8	0.55
Valley Avenue/SR 410 EB Ramp	B	12	0.87	B	13	0.88
Valley Avenue/74th Street E	F	>180	EB	F	>180	WB

Source: Transpo, 2024.

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections.

Overall, the analysis finds that intersection operations during the weekday PM peak hour are similar between Alternatives 1 and 2. Alternative 2 would result in increases in delay due to additional growth in traffic volumes; however, intersections not meeting the LOS D standard would be the same between the alternatives.

8.3.5 Alternative 3

This section describes the transportation-related impacts of Alternative 3. Alternatives 2 and 3 have the same levels of development but allocated differently throughout the city. Alternatives 2 and 3 represent growth beyond what was planned for in 2015.

Land Use

Exhibit 8-23 and Exhibit 8-24 summarize 2044 land use data as allocated to the Town Center, Manufacturing and Industrial Center (MIC) and other areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA) under each alternative.

Exhibit 8-23. Alternative 3 2044 Land Use Allocation

Land Use by Subarea	Alternative 3		
	Permitted or in the Pipeline 2020-2023	Additional Growth	Total Growth
Housing Units			
Town center	307	1,002	1,309
MIC	0	0	0
Other	593	1,098	1,691
Total	900	2,100	3,000
Jobs			
Town center	32	298	330
MIC	2,951	949	3,900
Other	673	410	1,083
Total	3,656	1,657	5,313

Source: BERK Consulting, 2023

Exhibit 8-24. 2020-2044 Land Use Growth Allocation for the Alternatives

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Housing Units				
Town center	1,245	1,245	1,309	+64
MIC	0	0	0	+0
Other	740	1,755	1,691	-64
Total	1,985	3,000	3,000	+0
Jobs				
Town center	330	330	330	+0
MIC	3,900	3,900	3,900	+0
Other	1,083	1,083	1,083	+0
Total	5,313	5,313	5,313	+0

Source: BERK Consulting, 2023

As shown in Exhibit 8-24, no growth is anticipated in the number of jobs across the three alternatives. Alternatives 2 and 3 both increase the number of units by 3,000 units compared to 2020 conditions but would be allocated the growth to different areas of the city. As shown in the exhibit, 64 units are allocated to the Town Center under Alternative 3 instead of being allocated to other areas of the city, as these units are under Alternative 2.

Exhibit 8-25 provides a summary of the total anticipated housing units and jobs under Alternative 3 as it compares to Alternatives 1 and 2.

Exhibit 8-25. 2044 Total Land Use by Alternative

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Housing Units	6,356	7,371	7,371	0
Jobs	24,919	24,919	24,919	0

Source: BERK Consulting, 2023

As shown in Exhibit 8-25, Alternatives 2 and 3 have the same number of households and jobs. Both Alternatives 2 and 3 represent an increase in housing units of 1,015 over Alternative 1.

Traffic Forecasts

Future 2044 traffic forecasts were developed through the modeling process, which converts the above land use estimates of housing and employment (by category) into daily person trips by trip purpose for each TAZ. The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 8-26 summarizes the weekday PM peak hour vehicle trip generation and VMT for the existing conditions and alternatives.

Exhibit 8-26. Weekday PM Peak Hour VMT and Vehicle Trips by Alternative

	Existing	Alternative 1	Alternative 2	Alternative 3	Increase (Alternative 3 – Alternative 2)
Vehicle Trips	10,071	12,544	13,626	13,542	-84
VMT	23,682	30,015	31,122	30,907	-215

Source: Transpo, 2024.

As shown in the exhibit, Alternative 3 results in less weekday PM peak hour trips and VMT compared to Alternative 2.

Traffic Operations

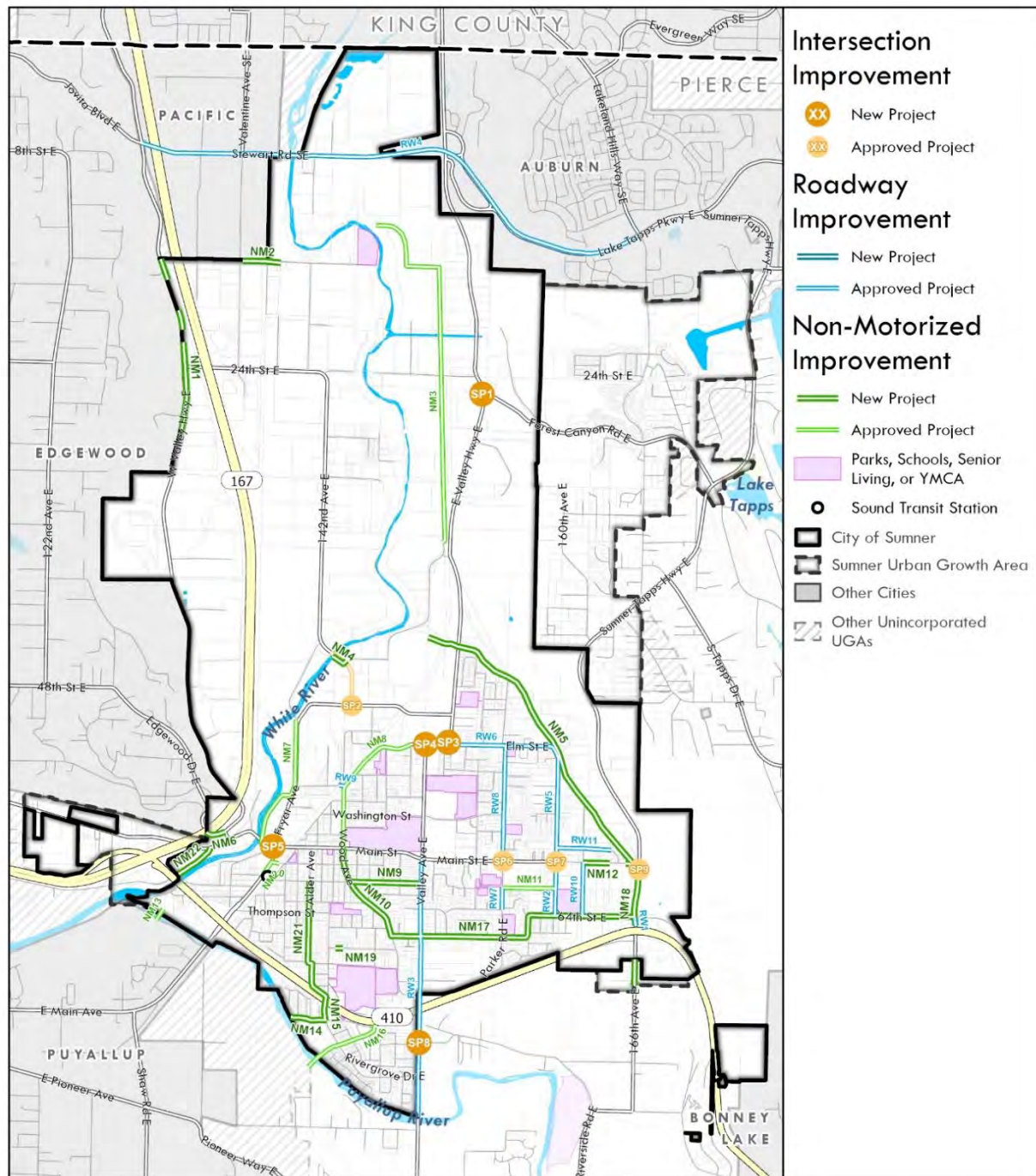
Given the same level of development between Alternative 2 and Alternative 3 with only a small change in household allocation as well as the slight decrease in VMT and vehicle trips shown in Exhibit 8-26, the traffic volumes and traffic operations for Alternative 3 would be similar to Alternative 2. No new impacts are anticipated with Alternative 3.

8.4 Mitigation Measures

8.4.1 Incorporated Plan Features

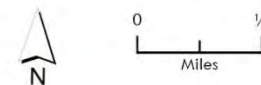
- All Alternatives would implement Transportation Element policies that address circulation system classification and design, concurrency standards, transit coordination and improvements, non-motorized facilities, financing including impact fees, and joint transportation planning, among other policies. The two Action Alternatives include implementation of the Transportation Element.
- Alternatives 2 and 3 include updates to the vehicle LOS policy.
- Alternatives 2 and 3 includes new and existing street improvements to enhance traffic flow, pedestrian mobility and facilitate infill development consistent with the Comprehensive Plan Land Use Element.
- A comprehensive list of improvement projects and programs are included as part of the Alternatives to meet the existing forecast transportation needs of the City (see Exhibit 8-27). The improvements address safety, capacity, trail connections, expanded non-motorized transportation facilities, and roadway preservation needs. They also cover upgrades to existing roads and construction of new roadways and interconnected street systems to support the forecast economic development and growth in the city and its UGA. The roadway and intersection projects incorporate needs for pedestrians and bicyclists that will use the same corridors. A map of proposed transportation improvements is shown in Exhibit 8-27 and described in detail in the Transportation Plan Update. Alternative 1 incorporates only the “approved” projects while Alternatives 2 and 3 incorporate both the approved and new projects. In addition, Alternatives 2 and 3 incorporate new programs and recommendations described in the Transportation Plan such as the signal replacement program and exploring additional transit service for Summer.

Exhibit 8-27: 20-year Improvement Projects



CITY OF SUMNER

20-Year Improvement Projects



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner, 2023; Transpo, 2024.

8.4.2 Regulations and Commitments

- SMC Chapter 12.36 addresses Transportation Impact Fees. This ordinance will be updated to reflect multimodal transportation impact fees.
- The City applies standards for streets and sidewalks in Title 12 Streets, Sidewalks and Public Places.
- The City collects mitigation fees for trails (see Section 3.10).
- The City policies indicate commitment to pursue expansion of the Pierce Transit benefit district. If transit service is implemented within Sumner, the City will develop a transit LOS standard.

8.4.3 Other Potential Mitigation Measures

The City is committed to reassessing their transportation needs and funding sources each year as part of their annual Six-Year Transportation Improvement Program (TIP). This allows the City to match the financing program with the shorter-term improvement projects and funding. The Transportation Plan also includes goals and policies to periodically review land use growth, adopted level of service standards, and funding sources to ensure they support one another and meet concurrency requirements.

8.5 Significant Unavoidable Adverse Impacts

Increases in future development will result in increased traffic volumes. Under all alternatives, the City has established levels of service that can be met with proposed transportation improvements and programs. Greater mobility through bicycling and walking could be achieved with the proposed non-motorized plan under Alternatives 2 and 3. Although congestion can be addressed through the mitigation measures presented in this document, the increase in auto traffic itself is considered a significant unavoidable adverse impact.

9 Natural Environment

9.1 Introduction

This section discusses potential impacts, and mitigation of impacts, to the natural environment, including earth, water resources, and plants and animals, under the plan alternatives described in Chapter 2: Alternatives. Vulnerability to wildfire is also discussed in this section, in response to new requirements in the Growth Management Act relating to climate change planning.

9.2 Affected Environment

9.2.1 Earth

Geologically hazardous areas in Sumner include landslide, erosion, seismic, and volcanic hazard areas. Seismic hazard areas are subject to earthquake-induced ground shaking, slope failure, settlement, fault rupture, and soil liquefaction. Volcanic hazards are lahars, debris flows, and related flooding associated with volcanic activity from Mount Rainier. Landslide and erosion hazards include a variety of downslope ground movements triggered by saturation of slopes by precipitation, erosion or undercutting of slopes, and earthquakes.

The purpose of protecting these areas is to regulate land disturbing activity in areas not suited for development to protect lives, property, and public infrastructure.

Citywide

The City is within a broad and flat valley created by glacial events. A widespread mudflow, named the Osceola Mudflow, occurred approximately 5,600 years ago and deposited mud and alluvium from Mount Rainier over existing glacial drift on the lowland plains. It contains a high amount of clay, silt, and sand, with a smaller proportion of gravel. This material can be up to 75 feet thick in the White River Valley.

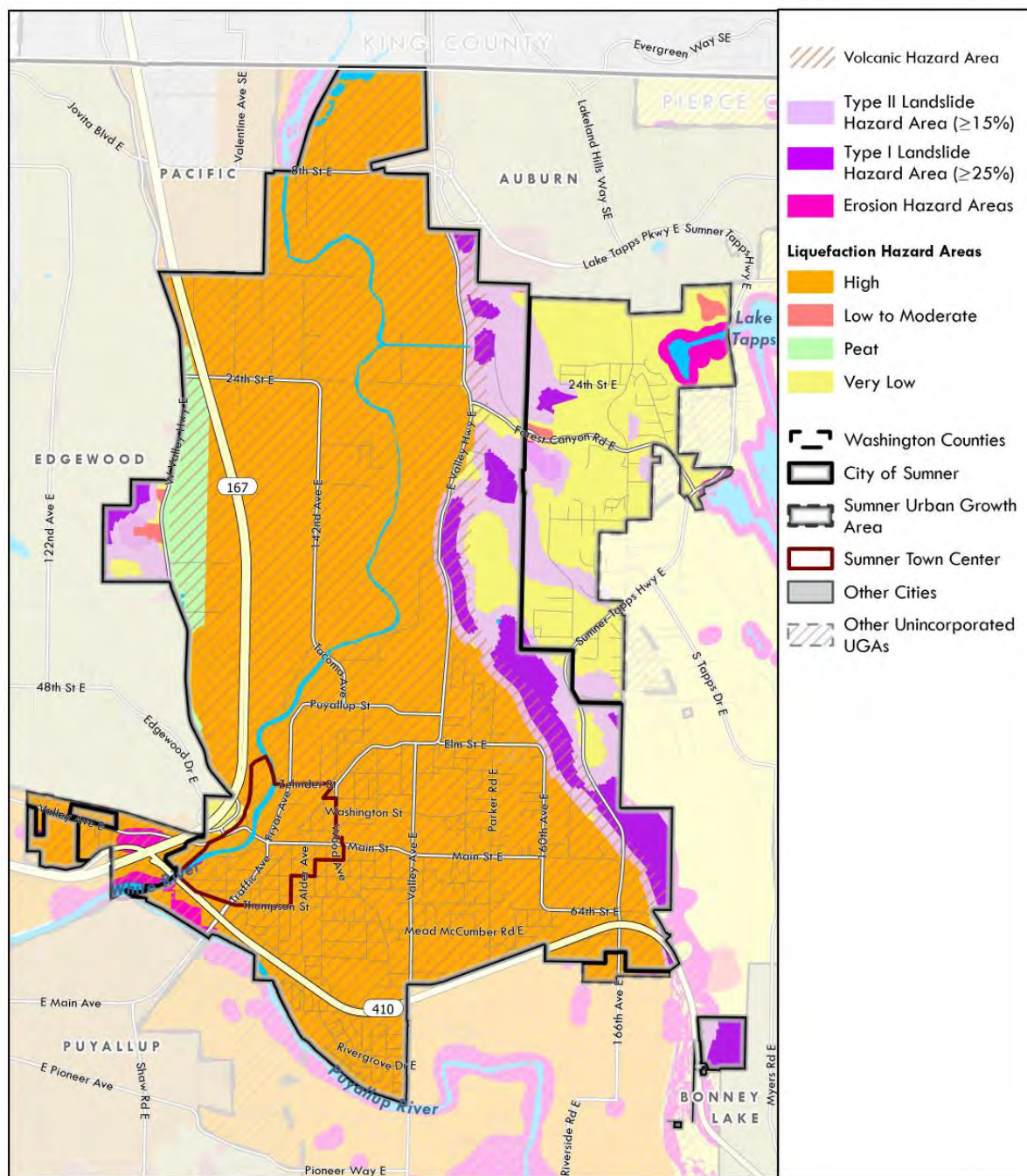
Erosion and landslide hazard areas are located on the slopes along Sumner's east and west borders (Exhibit 9-1). Landslides are not uncommon in Sumner and significant landslides have occurred in the recent past.

The majority of Sumner is located within a volcanic hazard area (see Exhibit 9-1). The White and Puyallup River valleys are in the potential path of debris flows from Mount Rainier if an eruption occurs. The city's

close proximity to Mount Rainier and its connection with the Puyallup River increases the City's vulnerability and risk of a lahar. A large portion of the City is also within a high potential dynamic settlement and liquefaction hazard areas and is also therefore in a susceptible seismic hazard area (see Exhibit 9-1). The Tacoma fault line is north of Sumner, approximately 8 miles away.

Pierce County has adopted a Region 5 All Hazard Mitigation Plan (HMP) in collaboration with Region 5 cities in Pierce County. The plan includes a Sumner-specific addendum with local strategies. The HMP identifies natural, man-made, and technological hazards and threats to the Sumner community and provides mitigation measures to address and reduce these impacts. Regular review and update of the HMP occurs within a five-year cycle. As part of this plan the city has developed an emergency communication system including a smart phone app, and an evacuation plan (Exhibit 9-2), which outlines routes to avoid volcanic hazards should they occur.

Exhibit 9-1: Sumner Geologically Hazardous Areas



CITY OF SUMNER

Geologically Hazardous Areas

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

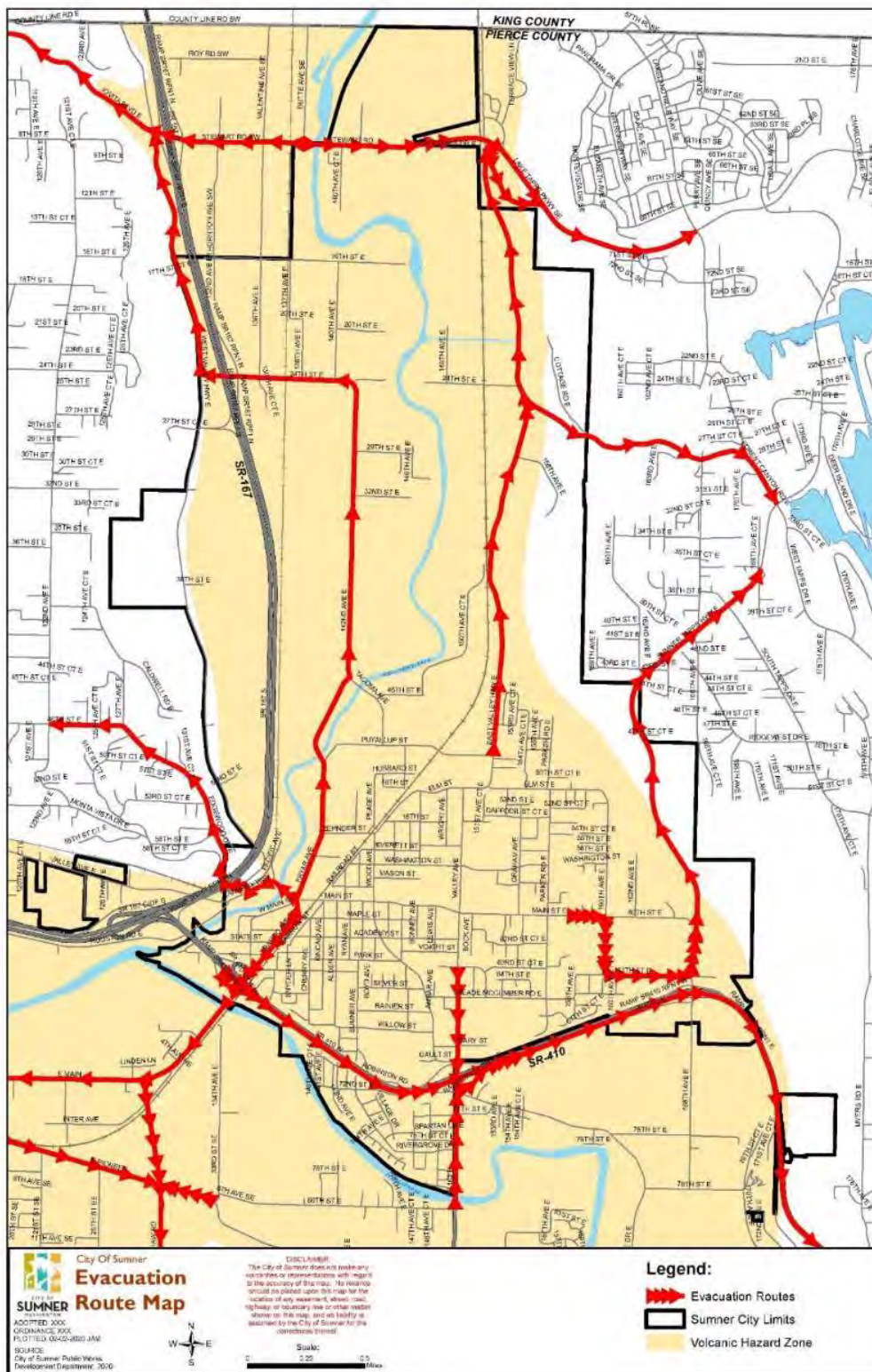


Map Date: February 2024

Source:

Parametrix, 2023; City of Sumner, 2023.

Exhibit 9-2: Evacuation Routes



Source: Parametrix, 2023; City of Sumner, 2023.

Exhibit 9-3: Sumner Geologically Hazardous Areas

Hazard	Description	Summary
Erosion	Soil units susceptible to erosion by wind, water, and unstable slopes	Some erosion hazard areas exist along the city's east and west borders.
Landslides	Steep Slopes underlain by weak, fine, and unstable geology	West of West Valley Hwy East contains slopes greater than 40% which are susceptible to landslide and erosion.
Seismic Hazards	Active faults and earthquake locations	None
Volcanoes	Volcano hazards	The City of Sumer lies within a Lahars hazard zone
Liquefaction	Liquefaction Susceptibility zone under alluvium deposit	Sumner has a moderate to high liquefaction susceptibility in most of the city with small portions in the center of the city with a high susceptibility rating

Source: WDNR Washington Geologic Information Portal, 2023.

Geologically hazardous area regulations are found in Sumner Municipal Code (SMC) Title 16, Division III:

- SMC 16.50 Landslide and Erosion Hazard Area
- SMC 16.52 Seismic Hazard Area
- SMC 16.54 Volcanic Hazard Area

North Portion

The North Portion of Sumner contains a hillside to the west of West Valley Hwy East, which contains slopes greater than 40% which are susceptible to landslide and erosion. The liquefaction hazard at the base of these hillsides is considered to be high. Soils in this area are predominantly Puyallup fine sandy loam, Snohomish silty clay loam, Sultan silt loam, and Puget silty clay loam per the USDA web soil survey.

East Portion

Topography in the East Portion is a combination of flat land with a high susceptibility of liquefaction and steep slopes on the eastern hillslope of Sumner city limits. Much of the East Portion of Sumner is susceptible to landslides due to the 20% and 40% or greater slopes along the eastern hillslope leading to Lake Tapps (see Exhibit 9-1). The land at the top of these hills and within Sumner city limits, has low susceptibility to liquefactions (see Exhibit 9-1). Soils in this area are predominantly Alderwood gravelly sandy loam on 15 to 30% slopes, Briscot loam, and Xerochrepts on 45 to 70% slopes per the USDA web soil survey).

Lands with State permits for mineral extraction include the CTI Pit/Cava gravel mine and Corliss Pit/gravel mine, both of which are located along the eastern hillslope of Sumner city limits.

South Portion

Topography in the South Portion is relatively flat. South Sumner is subject to volcanic hazards and seismic hazards as is the rest of the city. The South Portion of Sumner contains a small area of sloped hills and subsequent landslide and erosion risk. Soils in this area are predominantly Puyallup fine sandy loam, Pilchuck fine sand, and Sultan silt loam per the USDA web soil survey.

West Portion

The terrain in the western section is generally level until reaching east of West Valley Hwy East, where it transitions to sharp slopes. Soils typically consist of Snohomish silty clay loam, Semiahmoo muck, and Puget silty clay loam per the USDA web soil survey.

There is a small area along the mid-western City boundary with steep slopes along the White River and the Puyallup River which are highly susceptible to landslides and erosion.

There is a small mapped non-metallic mineral (peat) west of 167 and east of West Valley Hwy East between 27th St Ct E and 38th St E per the USDA web soil survey.

Sumner UGA

The UGA has areas susceptible to landslides due to the 20% to 40% slopes, with areas of 40% to 100% slopes around the western arm of Lake Tapps. The majority of the area is mapped as very low liquefaction hazard, with one small segment of high liquefaction hazard along Forest Canyon Road East. The UGA is outside of the volcanic (lahar) hazard area.

9.2.2 Water Resources

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

Surface Water

The major surface water bodies within the City of Sumner are the White River (Type S), Puyallup River (Type S), Salmon Creek (Type F), and Sotain Creek/Milwaukee Ditch (Type F). Other streams are: Stewart Road Creek (Type F), Dieringer Flume (tailrace) (non-typed, thus assumed Type F), as well as a number of non-fish bearing tributaries. Stream types are as shown on Exhibit 9-8, DNR stream types are Type S (shoreline of the state), Type F (fish bearing), and Type N (Non-fish bearing includes both perennial and seasonal).

Surface water bodies within the Sumner UGA are the White River, Salmon Creek, and Sotain Creek/Milwaukee Ditch. The Puyallup River bounds the UGA to the south and a small portion of Lake Tapps is located within the UGA to the northeast. The rivers and the Lake Tapps reservoir are subject to the Sumner Shoreline Master Program. Other streams are: Stewart Road Creek, Dieringer Flume (tailrace), as well as a number of non-fish bearing tributaries.

White (Stuck) River

The lower portion of the White River flows north to south through the middle of the city, in the north and west portions. The White River originates from the Emmons and Fryingpan glaciers on the north face of Mount Rainier, it flows 68 miles from its mountain source to its confluence with the Puyallup River, according to Shared Strategy Development Committee's Puget Sound Salmon Recovery Plan and Kerwin report on Salmon Habitat Limiting Factors. The river has a drainage area of approximately 494 square miles.

The lower White River is regulated by the Mud Mountain Dam at river mile (RM) 28, which diverts upstream flows to Lake Tapps. These flows then rejoin the White River through either the Lake Tapps diversion or the Dieringer Flume, located at approximately RM 3.6. Additionally, the river is subject to flood control modifications such as diking, levees, and gravel removal to deepen the channel. Levees reduce floodplain connectivity and increase peak flows within the main channel, therefore also causing increased flood water elevations further downstream (unless the levees are breached). Due to the extensive flood control efforts, certain habitat elements such as pool frequency, refugia, and off channel habitat do not function properly within the lower White River. Buffers are set by the Shoreline Master Program and range from 50 feet for urban and 200 feet for Urban Conservancy and Natural shoreline designations.

The White River experiences typical sediment loading issues common to glacial fed river system. In its upper reaches, it cuts through glacial and mudflow deposits, resulting in substantial transportation of sediments. It has been estimated to transport about 440,000 to 1,400,000 tons of sediment annually. The sediments are deposited in the lower reaches, including the vicinity of Sumner, leading to aggradation and flooding problems in the river valley per the Kerwin report.

Within Sumner city limits, three segments of the White River are currently listed on the Washington State Department of Ecology's 303(d) list of impaired waters of the state. The 303(d) list identifies all assessed waters within the state that are impaired by pollutants and do not meet state surface water quality standards and are not expected to improve within the next two years.

The assessed waters are categorized to describe their current state of water quality. Category 5 waters are those polluted waters that require a total maximum daily load (TMDL) or other water quality improvement (WQI) plan. These make up the 303(d) list. The reach of the White River, extending from the northern City limits to approximately 1.5 miles downstream is listed as a Category 5 water for pH, dissolved oxygen, and temperature. It is also listed as a Category 4c water for instream flow. Category 4c waters are impaired from non-pollutant sources or waters that are impaired by causes that cannot be addressed through a TMDL. A second segment from the vicinity 32nd Street East to 1.3 miles downstream is listed as Category 5 for temperature. A third segment, covering 0.2 miles near the confluence with Puyallup River is also listed as Category 5 for temperature.

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

Puyallup River

The Puyallup River serves as the southwest border of city limits, in the south portions. Within this reach, the river has been substantially altered through channelization and loss of riparian and off-channel habitats. The river originates from the Klapatche area on the southwest slopes of Mount Rainier and drains to Commencement Bay. Since at least 1980, summer low flows in the Puyallup River have declined continuously, despite the closure of new surface water withdrawals and the establishment of minimum flow requirements (Kerwin 1999). The lower portion of the Puyallup River now only provides a migration corridor for salmonids as it has been dramatically altered and restricted by human developments. Within the City of Sumner, the Puyallup River is listed as Category 5 for temperature on the 303(d) list. Buffers are set by the Shoreline Master Program and range from 100 feet for Residential and 200 feet for Urban Conservancy designations.

Salmon Creek

Salmon Creek in the east portion of the city, originates in the Orton Junction area south of Sumner and is joined by several Type N (non-fish bearing) tributaries. Salmon Creek then flows northwest to join the White (Stuck) River. The stream is surrounded by steep slopes to the northeast throughout much of its length and is primarily bordered by residential land use to the southeast. The forested, steep slopes provide priority habitat for terrestrial species, and the stream is on Washington State Department of Fish and Wildlife (WDFW)'s Priority Habitat and Species (PHS) list as a 'biodiversity corridor' (WDFW 2023). The stream provides habitat for Coho, Chum, and Chinook salmon, and Steelhead and Cutthroat trout. It has a number of culvert-related fish passage barriers. Its width ranges from approximately 3 to 4 feet at its upper reaches and up to 10 feet near its mouth. The stream supports a number of riparian wetlands.

Sotain Creek/Milwaukee Ditch

Located in the north portion, this stream runs from the northern city limits at 16th Street East south along SR167 to approximately 48th Street East where it crosses under SR 167 and the railroad to join the White River. It has been heavily channelized by SR167, the railroad and former agricultural land uses. The stream generally ranges from 3 to 4 feet wide in its northern reaches and from 8 to 10 feet wide near its mouth. The stream is bordered by a number of riparian wetlands, but existing buffers are generally narrow because of existing development.

Stewart Road Creek

This stream was relocated from the vicinity of the Lake Tapps Parkway Stormwater Treatment Pond during the reconstruction of Stewart Road (Exhibit 9-4). Stewart Road Creek, located in the east portion, meanders approximately 1,600 feet from Stewart Road south to within 175 feet of the White (Stuck) River and then flows through wetland and culvert to outfall at the river. According to WDFW's PHS map, the stream is utilized by Steelhead trout, Cutthroat trout, and Coho salmon.

Exhibit 9-4: Steward Road Creek

Source: Parametrix, 2023.

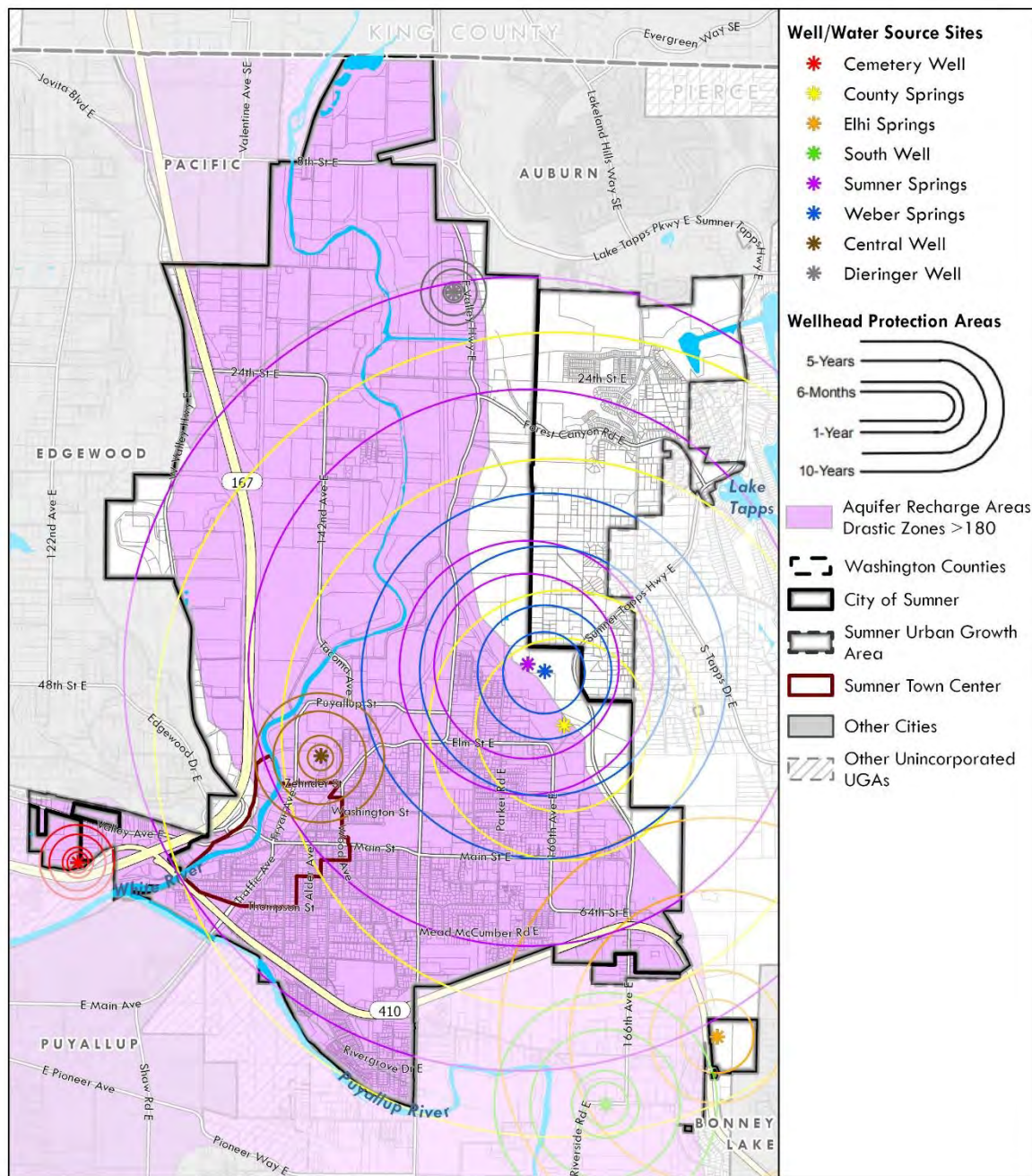
Dieringer Flume / Tailrace Canal

The Dieringer Flume (tailrace canal) is a manmade channel flowing west from the Dieringer Powerhouse on East Valley Highway East to the White River approximately 0.2 miles north of 24th Street East. The channel is approximately 60 to 70 feet wide with boulder/cobble substrate. It is located in the east and north portion of the city. Water levels and flow rates in the channel are controlled by Cascade Water Alliance, which maintains the powerhouse and canal. Although the powerhouse is no longer used for power, water is piped from Lake Tapps to the powerhouse. Migrating adult salmonids may enter the canal from the White (Stuck) River during high velocity flows in the summer and fall. As part of the multi-agency future White River Restoration Project, the tailrace course will be altered and integrated into new floodplain habitat areas.

Groundwater

The majority of the City of Sumner is located within a highly susceptible wellhead protection (10-year travel time) area (Washington Department of Health 2023). See Exhibit 9-5. The City has rights to use four springs and four wells. The springs are located on the hill on the east side of the city: Sumner, County, and Elhi Springs, Elhi is currently inactive (BHC Consultants, 2020). the wells are West Well, South Well, Central Well, and the Dieringer well. The west well is used primarily for irrigation (BHC Consultants, 2020). Groundwater quality is tested on an annual basis for organics and inorganics. Water quality in Sumner is generally very good per the City's General Water Plan Update.

Exhibit 9-5: Aquifer Recharge Areas and Groundwater Resources



CITY OF SUMNER

Aquifer Recharge Areas and Groundwater Resources

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Source: City of Sumner, 2023; Parametrix, 2023.

Wetlands

Wetlands in Sumner are primarily associated with the White River, Sotain Creek, and Salmon Creek. Wetlands primarily occur along the base of the slopes on both the western and eastern sides of the city; west of SR 167, along the East Valley Highway corridor, and along Salmon Creek. There are also wetland complexes in the floodplain of the White River, with smaller patches of wetland mapped throughout the city, according to City mapping and the USFWS Wetland Inventory. Wetlands are important for providing habitat, storm and flood water storage and filtration, groundwater recharge, recreational/educational opportunities, and shoreline protection.

9.2.3 Plants and Animals

Fish and wildlife habitat conservation areas are areas of critical importance to sustain needed habitats and species for the functional integrity of the ecosystem in Sumner Municipal Code and Washington Administrative Code (SMC 16.56.050 and WAC 365-190-130). These areas include designated critical habitat for federally or state-listed endangered, threatened, or sensitive species of fish, wildlife, or plants; areas containing species of local importance, waters of the state including lakes and streams. Sumner regulates plants and animal habitat in SMC 16.56 Wildlife Habitat Areas. Wetlands are regulated separately under SMC 16.46, thus are not treated as fish and wildlife habitat conservation areas under the regulations. Streams and wetlands are also described in *Water Resources*.

Citywide

The City of Sumner has a variety of habitats including streams, riparian areas, wetland, forests, and open space. The White River and its riparian corridor, which flows south through Sumner and into the Puyallup River, is an important habitat feature (Exhibit 9-8). The White River and a number of tributaries such as Salmon Creek support habitat for fish including anadromous salmon habitat. Open spaces and the forested areas along the eastern and western hillsides bordering Sumner provide additional habitat to support wildlife. Sumner has three areas zoned for resource protection (publicly-owned restoration sites) which provide valuable long-term protection (see Chapter 3: Land Use). Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River. The rivers and streams within the study area are generally affected by channelization, levees, and the close proximity of residential, industrial, and commercial land uses. Development often directly abuts or encroaches on the riparian buffer of the rivers and streams. This reduces the connectivity of rivers and streams with their natural floodplains, creating more area that is affected by floods, and reduces quality and complexity of aquatic/riparian habitat. Common vegetation in riparian areas within the study area includes invasive species such as reed canary grass and Himalayan blackberry. Other common vegetation is deciduous trees such as red alder, black cottonwood, and willows. Species recorded within the White and Puyallup Rivers include Coho, Pink, Chinook salmon, Bull trout, Steelhead trout, and Cutthroat trout. Of these, the US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) list Bull trout, Chinook salmon and Steelhead trout as threatened under the Endangered Species Act (ESA). Exhibit 9-6 identifies the ESA-listed and state-listed threatened or endangered fish species that are known or expected to occur in Sumner streams.

According to the National Wetland Inventory (NWI) and existing City maps, there are wetlands along the western edge of city limits, west of SR 167, along the East Valley Highway corridor, along Salmon Creek and the White and Puyallup Rivers, and smaller patches of wetland along the valley floor in east, southwest, and southeast Sumner. Wetlands are important for providing habitat, storm and flood water storage and filtration, groundwater recharge, recreational/educational opportunities, and shoreline protection. WDFW also identifies a large biodiversity area on the forested hillside above Salmon Creek in East Portion of the city.

Wildlife utilizing this biodiversity area and other open space within the study area include terrestrial species commonly found in developed suburban environments such as raccoon, opossum, squirrels, skunk, coyote, other small rodents, crows, woodpeckers, red-tailed hawk, and songbirds. Wetlands and riparian areas are utilized by great blue herons and waterfowl. Developed areas, especially residential neighborhoods with trees and landscaping, provide additional habitats for urban-adapted wildlife, such as raccoons, squirrels and some bird species.

Like most of Western Washington, Sumner is within the Pacific Flyway, a migratory bird route that extends from Alaska to South America. Open spaces, forests and wetland areas on the valley floor in Sumner provide habitat for migratory birds. According to USFWS Information for Planning and Consultation (IPaC), bald and/or golden eagles are most likely present and breeding in the Sumner and have been observed along the White River. Bald eagles and golden eagles continue to receive protection under the federal Bald and Golden Eagle Protection Act (16 USC 668-668d), which prohibits take (defined to include pursuing, shooting, poisoning, wounding, killing, capturing, trapping, collecting, molesting, or disturbing bald or golden eagles), possession, and commerce of these species. Proposals for commercial or residential development within 660 feet of bald eagle nests, roost sites, or foraging areas may be required to comply with federal guidelines for bald eagle management. North American Wolverine, Marbled Murrelet, Streaked Horned Lark, Yellow-billed Cuckoo, Monarch butterfly, and Taylor's Checkerspot butterfly might be found within Sumner; however, there is no known critical habitat for these federally or state listed species within the city.

Exhibit 9-6: Threatened and Endangered Fish Species Known or Expected to Occur in Sumner

Species	Water Body Name	Federal Status	State Status
Bull Trout	White River, Puyallup River	Threatened	Candidate
Fall Chinook Salmon	White River, Salmon Creek, White River tributaries, Puyallup River	Threatened	Candidate
Winter Steelhead	White River, Salmon Creek, White River tributaries, Puyallup River	Threatened	None
Coho	White River, Salmon Creek, White River tributaries, Puyallup River	Candidate	None

Source: WDFW, 2023.

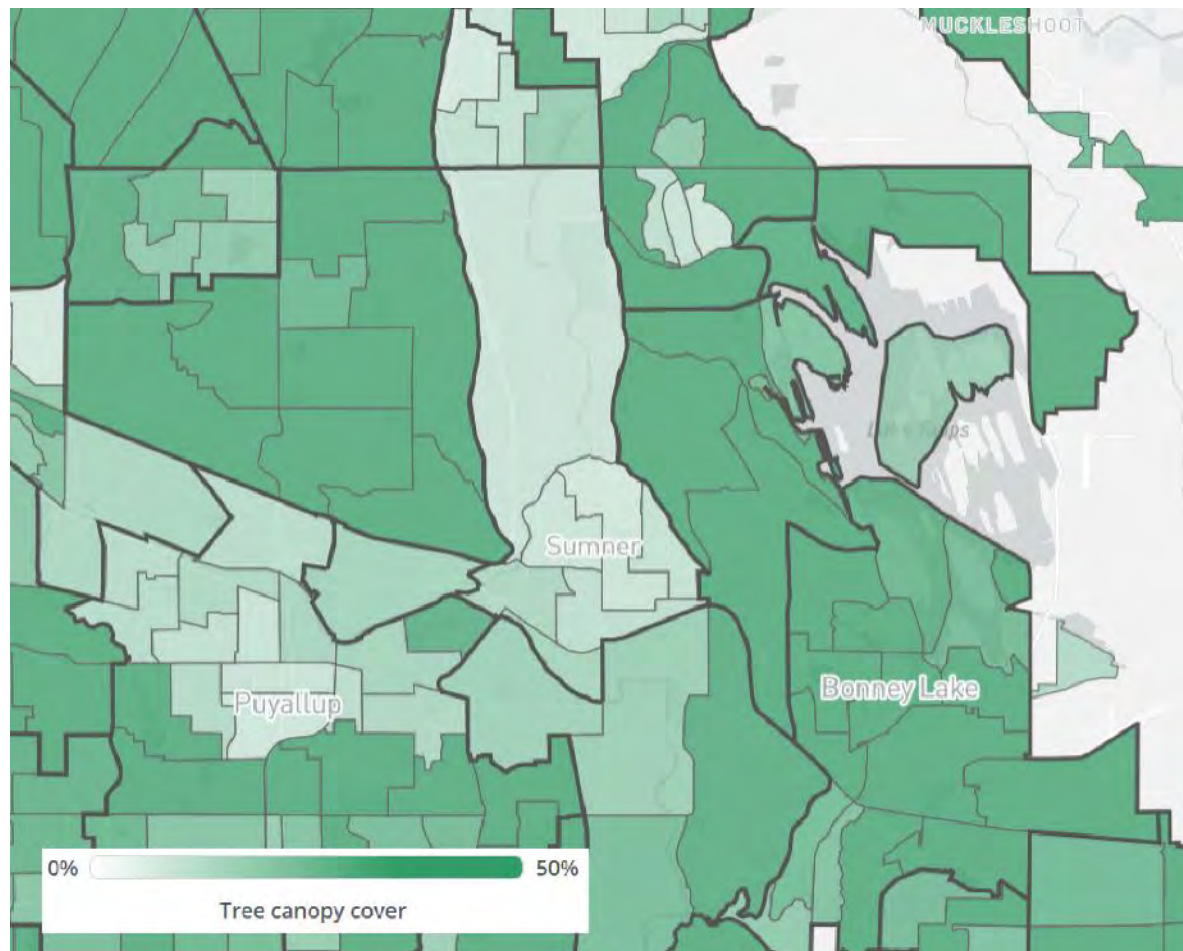
Note that lack of observations does not necessarily mean that the species is absent from an area.

According to the Washington Natural Heritage Program (WNHP), there are no known or historical rare plants or rare and high-quality ecosystems within the city.

Culturally significant plants are present in the undeveloped areas in Sumner, particularly within riparian corridors, wetlands, and forested slopes. Plants have been traditionally collected by tribes for generations for a variety of purposes, food, and construction of tools and clothing.

Mapping from Tree Equity Score, a tool created by American Forests, shows that Sumner's block groups range from 11% to 20% tree canopy cover (Exhibit 9-7). This is low compared to neighboring jurisdictions: block groups in Edgewood show 44 to 48% tree canopy cover, block groups immediately to the east range from 48 to 63% canopy cover, and block groups to the southwest show 21 to 33% cover. Areas to the north and south are more similar to Sumner's canopy cover. The block groups in the West Portion, which includes Town Center, and South Portion show the highest percentages in Sumner, at 19 and 20% canopy cover respectively. Part of Sumner's low tree canopy cover may be explained by its agricultural history where extensive clearing occurred on the valley floor.

Sumner's urban tree canopy is regulated primarily by the City's critical areas code (SMC Title 16) that protects forested slopes, zoning code (SMC Title 18, such as landscaping requirements in Chapter 18.41), and the City's street tree code, Chapter 12.42 SMC, which establishes policies for tree planting, preservation, and maintenance on City-owned lands and public right-of-way. Sumner also has a Forestry and Parks Commission, which advises the City on issues related to parks, recreational facilities, the cemetery, trails, trees, and planting strips. The Commission is responsible for developing and implementing the Sumner Urban Forestry Strategy Plan and ensuring the City maintains its designation as a Tree City USA. To qualify as a Tree City USA, cities must have a tree board or department, a public tree care ordinance, a community forestry program with an annual budget of at least \$2 per capita, and an Arbor Day observance and proclamation.

Exhibit 9-7: Tree Canopy Cover (from Tree Equity Score)

Source: American Forests, 2023.

North Portion

Land in North Sumner is primarily zoned light industrial and interchange commercial, with smaller areas of heavy industrial, resource protection, and low density residential. According to the NWI and city maps, the northern portion of North Sumner contains mapped wetlands and are classified primarily as forested/shrub wetlands. They are primarily located between the northern border of Sumner, east of Butte Avenue SE to E Valley Highway E, and south to 16th Street E. There are also mapped wetlands on the west side of the North Portion of Sumner. They are classified as forested/shrub and emergent. They provide low to high water quality function and poor to excellent habitat value per DNR and City mapping.

The White River runs south through North Sumner and is an important river in the area that supports salmon runs. It flows into the Puyallup River and has historically been important for spawning salmon. It is mapped as being a migration corridor for threatened species including bull trout and Steelhead, Chinook, other species include Chum, Cutthroat, and Coho per WDFW. The White River is mapped as a Type S and is a shoreline of the state. There are also wetlands associated with White River.

East Portion

Land in the East Portion of Sumner is currently used for low, medium, and high density residential, urban village, general commercial, public, and private utilities, agricultural fields, and open space. There are mapped wetlands within portions of the East Sumner area. According to the NWI, they are freshwater emergent and forested wetlands. They are primarily located between 60th St E and 64th St E, west of Sumner Tapps Highway E., as well as within the riparian areas associated with Salmon Creek. They provide low to moderate water quality function and habitat value. Some of the wetlands are actively mowed and provide limited habitat value. The maintained fields and other open space in the vicinity provide habitat for accustomed urban species.

Salmon Creek runs south to north along the eastern end of the East Sumner Neighborhood. It is primarily straightened and channelized in this area but has a narrow band of forested riparian buffer consisting of red alder, black cottonwood, willow, and scattered coniferous trees. Salmon Creek is mapped as being a migration corridor for steelhead trout, coho, Chinook, chum, and pink salmon by WDFW and classified as Type F (Fish bearing) by WDNR. According to spawner surveys conducted by the Puyallup Tribe for the study period between 1991 and 2010, an average of 16 Chinook, 7 Coho, and 56 Chum return to Salmon Creek annually. There are also wetlands associated with Salmon Creek. The City has ongoing restoration projects along Salmon Creek, including expanding the floodplain and buffer and replacing fish-barrier culverts.

South Portion

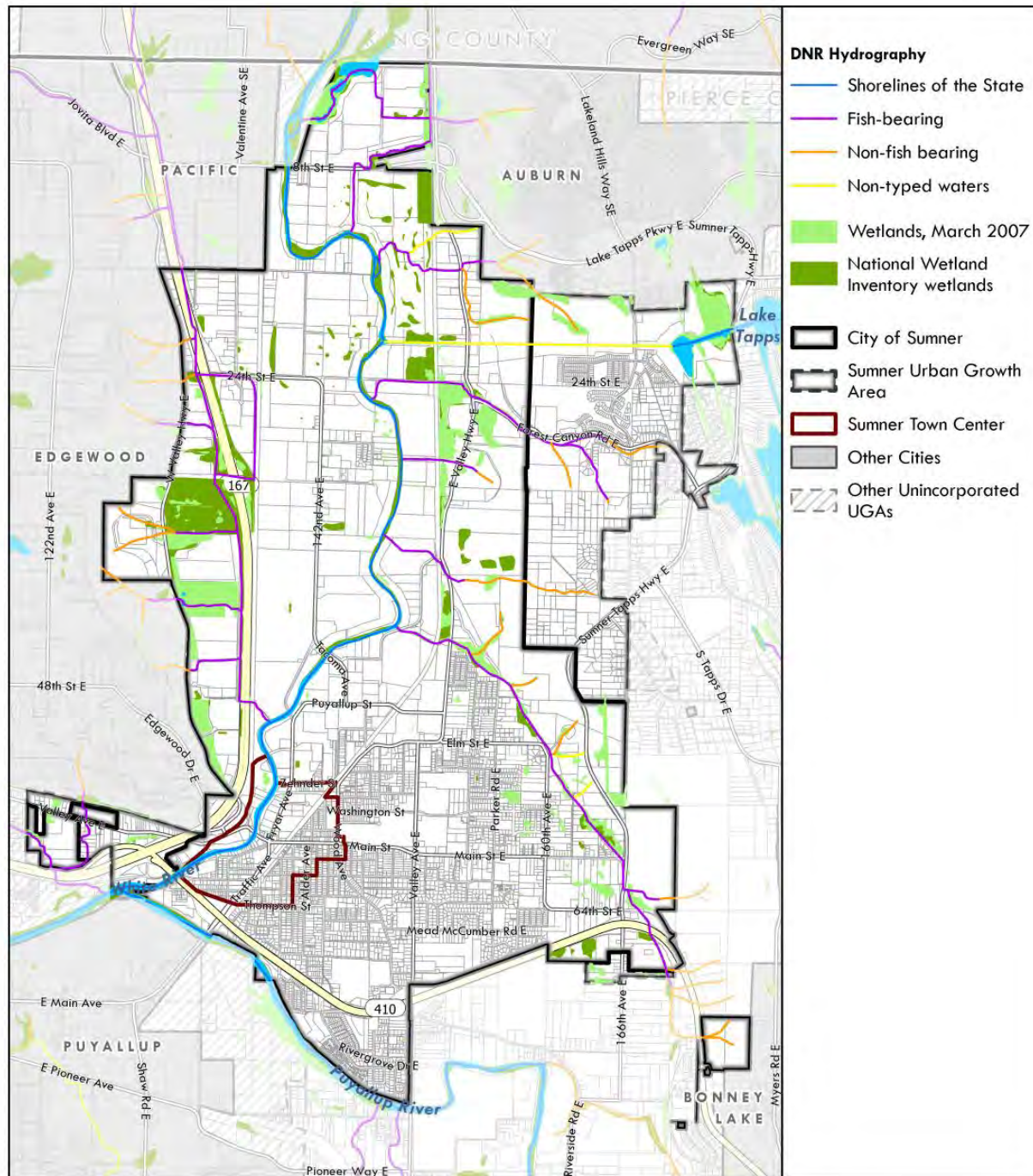
The land use in the South Portion comprises a range of low to high density residential areas, as well as urban village and areas with public-private utilities and facilities. There is a small portion of mapped wetlands within the riparian areas associated with the Puyallup River. These wetlands consist of forested/shrub and one emergent wetland, and a small cluster of freshwater ponds in the residential areas per USFWS mapping. They provide low to moderate water quality function and poor to fair quality ranking for ecological integrity according to WDNR.

The Puyallup River flows along Sumner's southern border and is mapped as a migration corridor for Chinook, coho, chum, cutthroat, steelhead, bull trout, and pink salmon per WDFW 2023. The Puyallup River is a Type S (shoreline of the state) per WDNR. The river provides important habitat for salmon spawning.

West Portion

Land use in the West Portion comprises of light industrial, heavy industrial and general commercial areas, along with some low density residential and multi-family/commercial uses within the town center area. Mapped wetlands within portions of West Sumner include forested/shrub and emergent wetlands per USFWS.

Exhibit 9-8: Important Areas for Fish and Wildlife



CITY OF SUMNER

Streams and Wetlands



0 1/2
Miles



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: Parametrix, 2023; City of Sumner, 2023.

9.2.4 Wildland Urban Interface

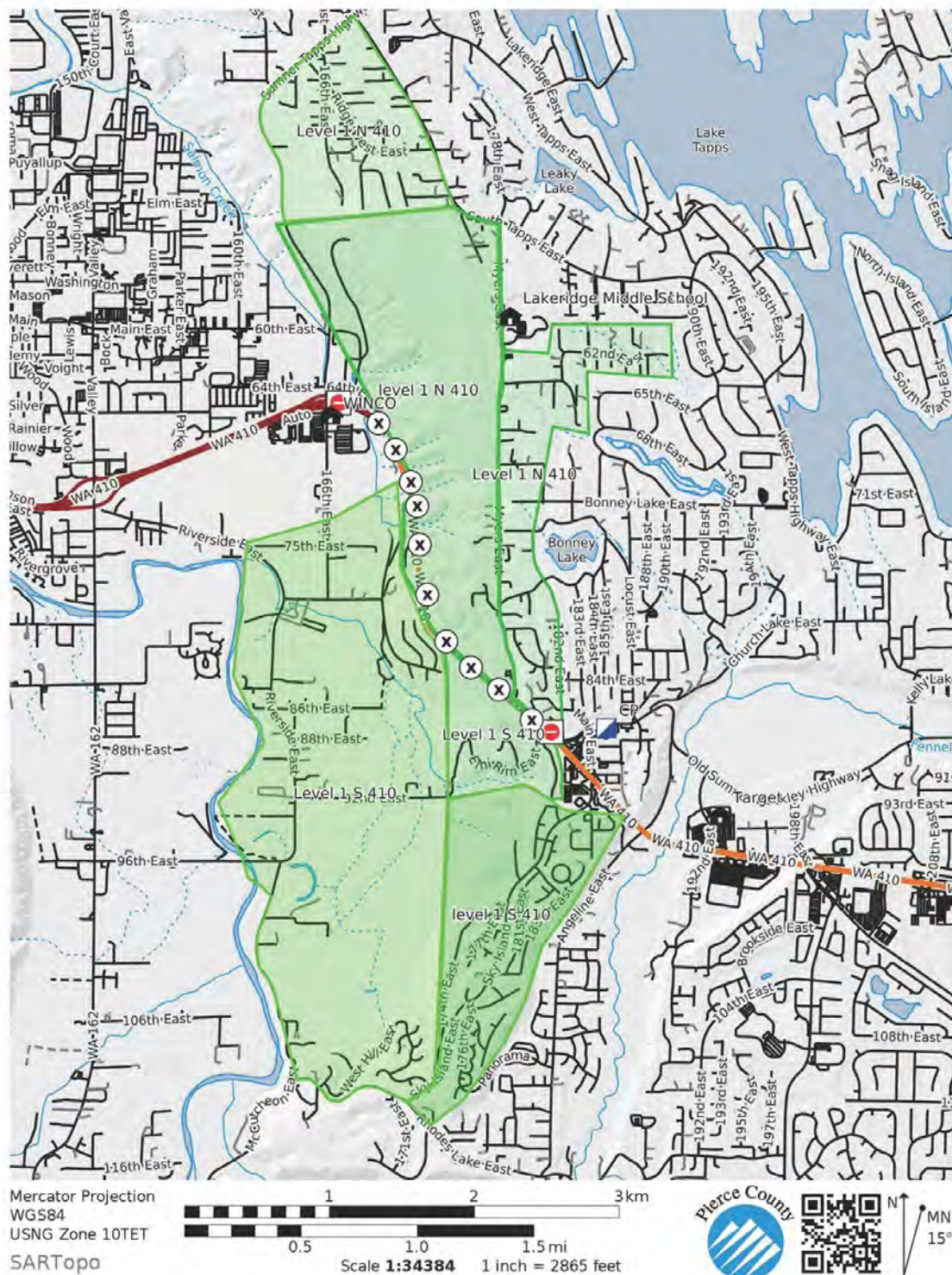
Several areas of Sumner have been mapped by the Washington State Department of Natural Resource in 2019 as wildland urban interface (WUI), specifically “intermix”. Intermix areas are those areas where structures intermingle with wildlands. To be considered intermix, a development must be surrounded on two or more sides by wildlands. While the WUI is not the same as wildfire risk, the WUI does show areas where development is located near burnable vegetated cover.

In Sumner, the intermix areas are found primarily along the east hillside (Exhibit 9-10). Intermix areas are also found on the west side of the city along West Valley Highway East and in the Sumner UGA east of the city. One area shown on State mapping, the valley floor within the MIC, is unlikely to pose a hazard per lack of trees.

While most of Sumner is not in the WUI, fires have affected the city in the past. In 2020, the Sumner Grade Fire prompted evacuations in parts of Sumner and surrounding areas (Exhibit 9-9).

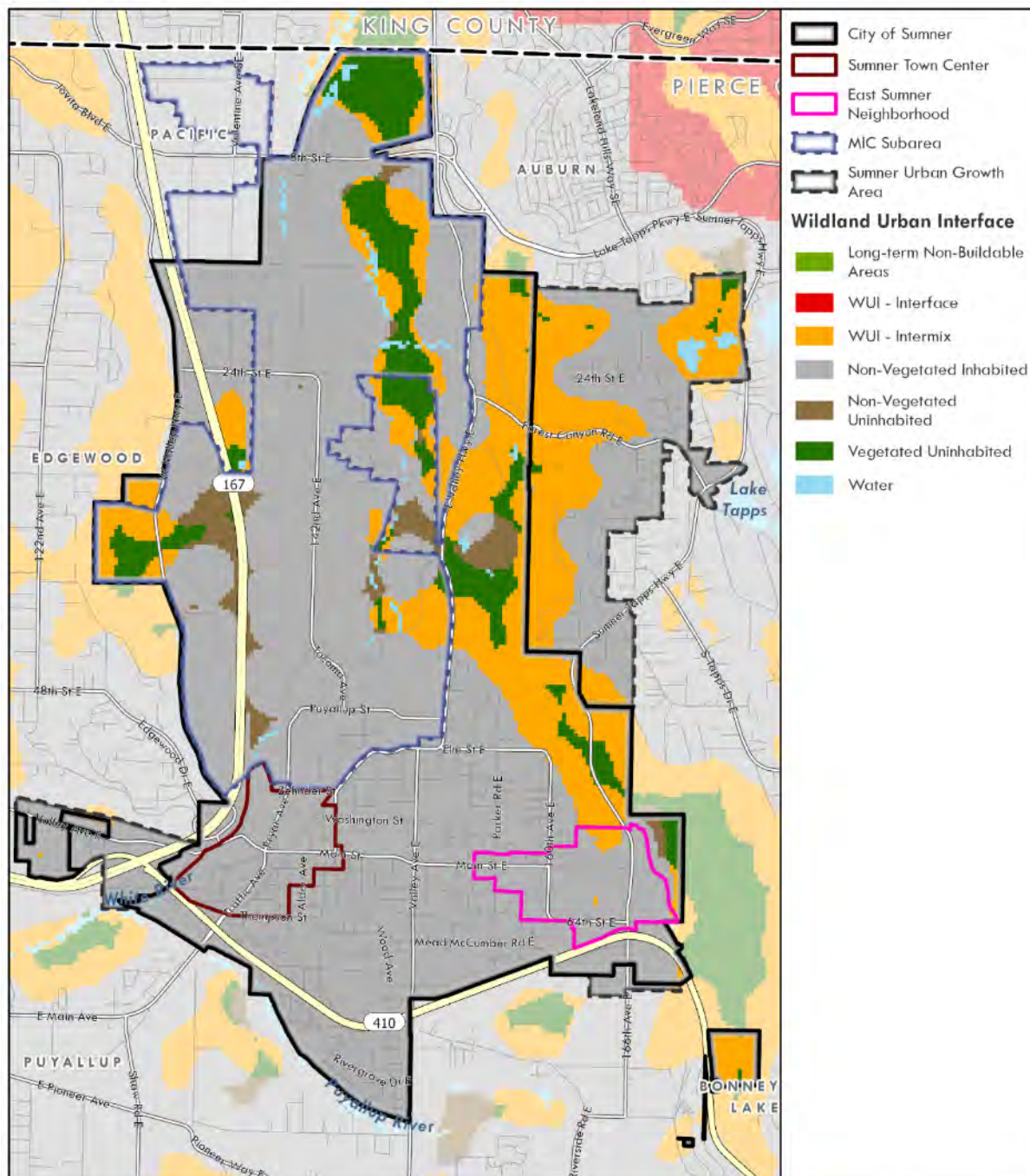
Exhibit 9-9: Sumner Grade Fire Evacuation Map (9/13/2020)EVACUATIONS LEVELS: **LEVEL 1** **LEVEL 2** **LEVEL 3**

EFFECTIVE 09/13/20 AT 6:00 PM



Source: Pierce County, 2020.

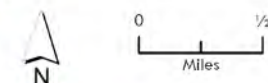
Exhibit 9-10: Wildland Urban Interface



CITY OF SUMNER

Wildland Urban Interface

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner 2023, BERK Consulting 2023.

9.3 Impacts

9.3.1 Thresholds of Significance

Impacts of the alternatives are considered significant if they would:

- Increase the exposure of people to risk of injury or substantial damage to structures and infrastructure due to a geologic hazard.
- Increase in the delivery of stormwater contaminants to fish-bearing streams.
- Increase the net loss of fish and wildlife habitat including wetlands, streams, and vegetation.
- Increase jobs and/or housing in designated wildland urban interface (WUI) areas with vulnerability to wildfires.

Related thresholds and analysis on tree canopy and wildfire risk are found in Chapter 3: Land Use.

9.3.2 Impacts Common to All Alternatives

Earth

Citywide

New development will occur under all alternatives. Most of the city is within seismic (including liquefaction) and volcanic (including lahar) hazard areas, thus new development would be exposed to these hazards. New development is within or abutting landslide or erosion hazard areas, and potentially vulnerable to a greater risk of damage from these hazards. Construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs. Growth and construction would not create or accelerate seismic or volcanic hazards. Future developments would need to comply with building, land use and critical areas regulations.

North Portion

The North Portion is primarily flat so there is low risk of erosion and landslides. Therefore, despite substantial job growth in the MIC in this area, and some housing growth outside of the MIC, in all alternatives, increased exposure to erosion and landslide risks is not expected to occur here.

East Portion

Housing and job growth is anticipated under all alternatives in the East Portion. This includes growth East of East Valley Highway and west of Sumner-Tapps Highway East, which is an area of steep slopes, which are susceptible to landslide and erosion. Development of these areas could increase the instability of these slopes and put people and property at an increased risk of landslide.

South Portion

Though it is not a focus of growth under any alternative, some housing growth is expected in the South Portion, between SR 410 and the Puyallup River. Similar to the North Portion this area is relatively flat and has limited susceptibility to landslide and erosion. Construction and development activities can increase the risk of erosion with the exposure of soils and removal of trees and shrubs.

West Portion

All alternatives include job and housing growth in the West Portion, with an emphasis on the Town Center. There are some steep slopes mapped along the White River, and development in these areas would increase the risk of exposure to erosion and landslides. This higher level of growth would put more people at risk of injury or substantial damage to structures and infrastructure from erosion and landslides.

Sumner UGA

In the UGA, new development within or abutting landslide or erosion hazard areas, would be potentially vulnerable to a greater risk of damage from these hazards.

Water Resources

Citywide

Housing, population, and job growth will occur under all alternatives. In general, population growth and development activities have direct and indirect impacts on local water quality. The increase in population, work force, and the resulting development activity to accommodate this growth could result in a higher potential for releases of pollutants into surface waterbodies. Increased traffic volumes produce more contaminants in stormwater that requires treatment prior to discharge. All alternatives will raise the number of vehicle trips and vehicle miles traveled (see Chapter 8: Transportation). Increased development and impervious surfaces often result in less vegetation coverage that can naturally filter runoff. This, in turn, leads to higher runoff volumes entering the surrounding rivers and streams and reduces groundwater recharge rates. The majority of the City of Sumner is within a critical aquifer recharge area and is therefore 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. Increased impervious surfaces and less vegetated cover can also increase temperature and decrease habitat quality in streams and wetlands.

North Portion

Job growth under all alternatives, which is focused in the North Portion in the MIC, could bring additional people and businesses to the North Portion. Much of this area is already developed, so impervious surface cover is unlikely to expand. The North Portion contains the White River, Sotain Creek, other streams and numerous wetlands which would be vulnerable to pollutants from stormwater and habitat loss.

East Portion

Salmon Creek, and a number of Type F and Type N streams flow to the White River through the East Portion of Sumner. Both types of streams provide valuable habitat to plant and animal species. There are also a number of mapped wetlands including riparian wetlands along Salmon Creek, which runs at the base of the slope through the East Portion. The East Portion would see housing and job growth under all alternatives, which could result in more impervious surfaces and impacts to water resources.

South Portion

The South Portion is all within close proximity of the Puyallup and White Rivers, which would receive any stormwater carrying pollutants from the South Portion. The South Portion is not a focus area for growth under any alternative but will see some housing growth which could result in some increase in impacts to water resources.

West Portion

The West Portion includes both the White River and Type F streams which would be vulnerable to pollutants carried by stormwater. All alternatives include job and housing growth in the West Portion, especially in the Town Center. This area is already highly developed; however, some increase of impervious surface would be expected.

Sumner UGA

Some new housing and job growth would occur under all alternatives in the Sumner UGA, which could have impacts to water resources through the creation of more impervious surfaces.

Plants and Animals

Citywide

All alternatives provide opportunities for development within currently vegetated areas, thereby all have the potential to impact habitats, including streams, riparian areas, wetlands, tree canopy, and open space.

Vegetation

Any form of development would directly affect vegetation by physically removing trees, shrubs, and non-woody plants, whether native or landscaped. Vegetation provides a variety of functions including fish and wildlife habitat, intercepting sediment, stabilizing slopes, temperature reduction, providing culturally significant resources, and contributing to aesthetics. Removal of trees and tree canopy cover, in particular, would result in loss of these beneficial effects. Growth and new development will occur under all alternatives. This can include infill development on existing lots and in existing neighborhoods, such as building ADUs or homes on vacant lots, new subdivisions, and redeveloping larger low density residential properties. Site development and redevelopment will, in many cases, result in removal of

trees. Additionally, vegetation disturbances would likely lead to increased establishment of non-native and invasive plants, which tend to establish quickly and colonize areas where soils have been disturbed.

Fish and Wildlife Habitat

Development of vacant or larger low density properties under all alternatives would lead to habitat loss, fragmentation, and reduced habitat connectivity. This further reduces the biodiversity of the area. Development and increases in impervious surface also reduce quality of aquatic habitat by increasing peak flows, reducing low flows, introducing pollutants, increasing water temperatures, and reducing the amount of shade. Development may also result in conversion of wetlands or streams and thus complete loss of those habitats that support fish and wildlife.

Impacts to aquatic habitat can be minimized with compliance with regulations for all development projects. This includes, but is not limited to adhering to buffer requirements, complying with allowable in-water work windows, and meeting stormwater requirements, complying with state and federal requirements regarding fish, wildlife, and waters of the state/US.

The White River and a number of tributaries such as Salmon Creek, support habitat for fish including anadromous salmon habitat. The White and Puyallup Rivers are shorelines of the state and regulated under the Shoreline Master Program (SMP), which is not subject to periodic update as part of this review.

North Portion

The area west of West Valley Highway is partially forested, has two non-fish bearing stream mapped, and is located above a large wetland complex. Existing vegetated areas are wetlands, streams, or their buffers, which are protected under existing critical areas regulations. The White River is regulated under the SMP. The North Portion of the city currently has approximately 12% canopy cover. Expected development under all alternatives is primarily due to job growth in the MIC and located on previously developed land with large amounts of impervious surface and little to no trees.

East Portion

Type F (fish bearing) and Type N (non-fish bearing) streams flow to the White River through the East Portion of Sumner. Both types of streams provide valuable habitat for plant and animal species. There are also a number of mapped wetlands including along Salmon Creek, which runs at the base of the slope through the East Portion. The eastern half of the East Portion, there are large, forested areas with some wetlands zoned for LDR which could result in the loss of wetlands and tree canopy if developed. The East Portion has between 11 and 15% canopy cover. Housing and job growth is expected to occur in the East Portion under all alternatives which could result in impacts to plant and animal habitat.

South Portion

With the exception of small areas of wetlands in already developed areas, the South Portion does not contain mapped wetlands north of the Puyallup River. Development near the Puyallup River would need to comply with the existing SMP. The South Portion has higher tree canopy coverage than other areas at

approximately 20 percent. The South Portion is not a focus for growth in any alternative, but would see some housing growth, which could result in impacts to tree canopy.

West Portion

In the West Portion of Sumner, which is already highly developed, there are few to no mapped wetlands. Development is likely to take place along the White River, likely involving replacement/redevelopment of previously developed properties, resulting in new, larger structures with some increase of impervious surface.

Due to the proximity of construction to the White River, there is an increased risk of pollutants, debris, or fill material, which are harmful to fish, entering the river during construction. With the exception of the riparian area of the White River, the West Portion does not contain a large quantity of trees. Existing tree canopy coverage is approximately 12 to 19% in the West Portion. Based on the small quantity of trees outside of the White River riparian area, the impact to tree canopy cover is expected to be minimal.

Sumner UGA

The UGA includes areas of forested habitat, as well as wetlands and streams including a stream along Forest Canyon Road that provides habitat for salmonids. Both fish bearing and non-fish bearing streams provide valuable habitat for plant and animal species. In the UGA, there are large, forested area with some wetlands zoned for LDR which could result in the loss of wetlands and tree canopy if developed.

The upper section of the diversion (or Tailrace Canal) which returns diverted water back into the White River from Lake Tapps is also located in this area under the transmission lines. The transmission corridor is managed for tree height, which provides opportunity for invasive species. However, it will remain relatively undeveloped under all alternatives and thus provides habitat for some wildlife.

Some job and housing growth will occur in the Sumner UGA under all alternatives, which could have impacts to tree canopy and habitat.

Vulnerability to Wildfire

Citywide

All alternatives increase housing and jobs in Sumner and in WUI intermix areas. This is likely to result in more population located in areas that could potentially be vulnerable to wildfire.

North Portion

There are several areas of this North Portion including the MIC that are expected to see job growth under all alternatives that may overlap with WUI in some areas at the western and eastern forested slopes. While some job growth is anticipated in a remaining portion of the former Sumner Meadows Golf Course, it is not located in or adjacent to forested hillsides.

East Portion

All alternatives assume some amount of job growth from commercial and mixed uses located in areas east of Valley Avenue. Housing growth is also expected under the alternatives in the East Portion, which borders the WUI intermix areas near Sumner-Tapps Highway East and East Valley Highway East and generally along the eastern forested slopes at the edge of the city. In addition, this portion contains forested publicly-owned watersheds, which are particularly vulnerable to wildfire impacts affecting the broader population.

South Portion

The South Portion mostly does not include intermix areas, except for a small area towards Bonney Lake that is separated from the rest of the city. This area is not expected to see significant job or housing growth.

West Portion

The West Portion does not include any WUI intermix areas.

Sumner UGA

Under all alternatives, some growth is expected to occur in the Sumner UGA. The part of the UGA immediately east of the city includes large areas of forested hillside located in the WUI intermix. This area was affected by a severe wildfire event, the Sumner Grade Fire, in September 2020. All alternatives could expose more residents and workers to wildfire vulnerability.

9.3.3 Alternative 1 (No Action)

Earth

Under this alternative, no changes to the zoning map or land use would occur. No updates would be made to the Comprehensive Plan Environmental Element or the Critical Areas Ordinance. It still assumes growth and any development would be at risk of damage from geologic hazards as described in Impacts Common to All Alternatives.

Water Resources

Since this alternative maintains the existing Comprehensive Plan policies, land use, and zoning, the impacts would be consistent with those identified under Impacts Common to All Alternatives. Under this alternative, growth will still occur, particularly in the Town Center, East Sumner, and the MIC. Water quality will be affected by normal growth rates. All approved development has incorporated appropriate stormwater treatment measures such as LID per SMC 13.48 into their design and no substantial impacts are anticipated. There would be no updates to the critical areas code which would result in less protection for critical areas, primarily streams.

Plants and Animals

Impacts under the No Action alternative are similar to those described under Impacts Common to All Alternatives. Much of the growth under Alternative 1 is focused in Town Center, the MIC, and East Sumner, which are already highly developed, which makes Alternative 1 less likely to have impacts to wetlands, streams, and fish and wildlife habitat than the other alternatives. However, no updates would be made to the Comprehensive Plan Environmental Element or the critical areas regulations. Regulations within the City regarding fish and wildlife and their habitats would remain the same. Updates to the critical areas regulations under Alternatives 2 and 3 would increase buffer widths for streams; without these updates, there could be development closer to streams and result in more impacts to these habitats.

Vulnerability to Wildfire

Impacts for Alternative 1 are similar as described under Impacts Common to All Alternatives. Alternative 1 has the same job growth but less housing growth than Alternatives 2 and 3, resulting in comparatively less activity in intermix areas. Much of the housing growth under Alternative 1 is focused in the Town Center area, which does not overlap with intermix areas. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 1 is expected to have the least impacts related to wildfire vulnerability compared with Alternatives 2 and 3.

9.3.4 Alternative 2

Earth

Impacts citywide would be similar to those described in Impacts Common to All Alternatives; however, with increased densities allowed in LDR, MDR and HDR zones and the rezone of the Cava gravel mine allowing more development, more people and structures would be exposed to seismic, volcanic, erosion and landside hazards.

The Cava gravel mine site would not be reclaimed under Alternatives 1 and 3. Changing the zoning for the Cava gravel mine site to MDR from LDR in Alternative 2 would create the potential for increased development of an area with steep slopes and a risk of landslide and erosion. Development of steep slopes and removal of trees has the potential to increase instability of slopes and create or accelerate the risk of landslides. However, reclamation of the mine site, which has exposed soils, may reduce risk of landslides by conversion to impervious or vegetated surfaces through development.

More growth under Alternative 2 is also anticipated around East Sumner as a result of changes in housing types and maximum densities. These changes would increase populations in this area that are subject to potential geologic hazards such as seismic and volcanic hazards. However, the development of these areas would not create or accelerate these hazards.

In addition, Alternative 2 proposes housing growth in the East Portion, including higher density residential development at the Cava mine site, west of East Valley Hwy East. This hillside area has low, or no liquefaction areas and is outside the volcanic hazard area but is susceptible to erosion and landslides.

Thus, there is less risk from seismic and volcanic hazards but more risk from erosion or landslides in this area.

Alternative 2 also includes slightly more housing growth in the South Portion than Alternative 1. Impacts in this area would be similar to those described under Alternative 1, with a slightly higher risk to people and structures.

Impacts in the West Portion would be similar to those described under Alternative 1; however, growth would be greater under Alternative 2 as a result of increased densities allowed in LDR, MDR, and HDR zoning designations. The higher intensity land use will increase populations in this area that is at risk from seismic and volcanic hazards.

Water Resources

In the current plan area, impacts would be similar to those identified under Impacts Common to all Alternatives. Alternative 2 includes an increase in units allowed per lot in LDR and MDR zones. This would lead to increases in impervious surfaces, but no additional pollution-generating surfaces are immediately proposed. Appropriate stormwater treatment measures will need to be evaluated and implemented if the changes should lead to an increase in parking lots or other pollution generating surfaces. The majority of the development anticipated under Alternative 2, with the exception of the Cava gravel mine site, is anticipated to occur in already-developed areas. Population increases anticipated can also directly and indirectly contribute to the release of pollutants to waterbodies as described in Impacts Common to All Alternatives.

The greatest impacts under Alternative 2 would be in the East Portion. The change to MDR zoning at the Cava gravel mine site will likely lead to an increase in impacts compared to Alternative 1 and 3 since it involves changes to the zoning density in a previously mostly undeveloped forested area and would lead to increases in impervious surfaces. Appropriate stormwater treatment measures will need to be evaluated and implemented if the rezoning should lead to an increase in parking lots or other pollution generating surfaces. Any fill of wetlands in the Cava gravel mine site would reduce the area's ability to reduce runoff and remove pollutants. Development of any form would have direct impacts on vegetation through the physical removal of trees, shrubs, and non-woody plants whether it native or landscaped. Removal of the forested area would increase runoff and stream temperatures. The development of the Cava mine site and the anticipated growth in the East Portion would bring additional population to this area.

Plants and Animals

Alternative 2 plans for more housing growth citywide than Alternative 1, which could result in greater impacts to plants and animals than those described under Impacts Common to All Alternatives. New developments, which could take advantage of maximum density and housing type changes modifications in LDR, MDR, and HDR, and allowances for ADUs, would result in the removal of trees from lots that contained single-family homes or other low density housing types. This could result in a decrease in tree canopy and associated habitat. Effects of increasing the density of previously developed properties would be similar to those described under Impacts Common to All Alternatives. Much of the

additional housing growth in Alternative 2, like Alternative 3, is located in the East and West Portions of the city.

Alternative 2 also includes housing growth on the Cava gravel mine site. The Cava gravel mine is a large, mined area surrounded by detention ponds, forested area, and wetlands. While the site used for gravel mining has been cleared and graded and contains little to no trees or habitat, the surrounding areas provide a large area of forested habitat. Development of the forested area around the Cava gravel mine site would likely disturb and remove valuable habitat and connectivity for species. Reclamation of the Cava site could improve habitat over the existing exposed gravel site. Under Alternative 2, the critical areas regulations would be updated, with the main change being an increase in the stream buffer for non-fish bearing streams. This buffer increase aims to reduce the detrimental effects of development on stream habitats for fish and wildlife. Larger buffers help reduce the amount of pollutants entering a stream, increase recruitment of wood for habitat, and help maintain stream temperature by providing shade.

Vulnerability to Wildfire

Housing and job growth in WUI intermix areas is similar as described under Impacts Common to All Alternatives. However Alternative 2, like Alternative 3, assumes more housing growth overall than Alternative 1, which leads to greater growth in intermix areas. This is particularly true in the East Portion of the City, especially for the site of the current Cava Gravel Mine, which is within a WUI intermix area. Some of this area, however, may already have reduced vegetation due to the nature of the mining activity, and future redevelopment may include developer design provisions for wildfire defensible space. Alternative 2 redesignates the site from Low Density Residential to Medium Density Residential. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 2 is expected to have greater impacts related to wildfire vulnerability than Alternatives 1 and 3.

9.3.5 Alternative 3

Earth

Impacts would be similar to those described in Alternative 2, except impacts would be distributed differently throughout the city, as the Cava mine area would not be reclaimed under Alternative 3, but more growth is expected by using different incentives and mandates.

The Cava gravel mine site would not be reclaimed under Alternative 3. This would result in less risk of destabilizing erosion and landslide hazard areas in the Cava mine area and fewer people and structures at risk of landslide and erosion hazards than that under Alternative 2.

Elsewhere in the City, impacts would be similar as described in Alternative 2.

Water Resources

In the current plan area, impacts would be similar to those identified under Alternative 2, except Alternative 3 does not include zoning changes to the Cava gravel mine site.

Under Alternative 3, there is anticipated to be less creation of impervious surface than Alternative 2 and more than Alternative 1. Alternative 3 focuses on development and redevelopment in areas that include existing development, and therefore utilizes existing impervious surface, whereas Alternative 2 includes development at the Cava gravel mine site, which is mostly undeveloped. This will result in less development in this area and possible impervious surfaces under Alternative 3 than that described under Alternative 2.

Other citywide impacts are expected to be similar to those described under Alternative 2.

Plants and Animals

Impacts under Alternative 3 are similar to those described in Alternative 2, except for impacts on the Cava gravel mine site, which would not be reclaimed under Alternative 3. As Alternative 3 plans for the same overall growth as Alternative 2, and in turn is expected to have greater impacts than Alternative 1, Alternative 3 does not include the mine site used for housing. Instead, housing growth elsewhere in the city is slightly higher. Impacts to tree canopy and other vegetation could therefore be more dispersed under Alternative 3 than Alternative 2, and unlikely to disturb the forested area near the mine site. Like Alternative 2, under Alternative 3, the critical areas regulations would be updated, and stream buffers increased for non-fish bearing streams. Larger buffers help reduce the amount of pollutants entering a stream, increase recruitment of wood for habitat, and help maintain stream temperature by providing shade.

Vulnerability to Wildfire

Housing and job growth in intermix areas is similar as described under Impacts Common to All Alternatives. However Alternative 3, like Alternative 2, assumes more housing growth overall than Alternative 1, which leads to greater growth in intermix areas. While Alternative 3 does not include the same density increases on the current Cava gravel mine site as Alternative 2, it does see greater housing growth in the East Portion of the city than Alternative 1, especially along East Valley Highway East. This area overlaps with some intermix areas. In all Alternatives, publicly-owned watersheds located on the eastern hillside would be vulnerable to wildfire. Alternative 3 is expected to have greater impacts related to wildfire vulnerability than Alternative 1, but less than Alternative 2.

9.4 Mitigation Measures

9.4.1 Incorporated Plan Features

Earth

- No specific incorporated plan features.

Water Resources

- Alternatives 2 and 3 include updated critical areas regulations based on best available science, which could better protect water resources than existing code.
- Alternatives 2 and 3 add new comprehensive plan policies and policy updates related to the environment and climate change, including policies to better protect vegetated stream and wetland buffers and to restore ecosystems.

Plants and Animals

- Updates to the critical area regulations would revise stream buffers and other regulations to consider best available science, which would improve protections for plants and animals.
- Alternatives 2 and 3 include new and revised policies in support of tree planting and enhancing the urban tree canopy. They also include a new Climate Change Element that includes policies in support of wetland, floodplain, and general ecosystem protection.

Vulnerability to Wildfire

- Alternatives 2 and 3 include climate resilience policies relating to wildfire risk mitigation, including adopting land use standards and connecting residents to information about construction and defensible space around structures. Both Alternatives contain policy support for managing public watersheds for resistance to wildfires.

9.4.2 Regulations and Commitments

Earth

- The City has adopted the International Building Code (SMC 15.08.010)
- Critical areas regulations provide restrictions and regulations on certain types of development and provide notices and reporting requirements for development within landslide and erosion hazard areas, seismic hazard areas, and volcanic hazard areas (SMC 16.05, 16.50, 16.52, and 16.54).
- The 2020-2025 Pierce County Hazard Mitigation Plan includes an addendum for Sumner-specific strategies, which address a range of hazards including geologic hazards.
- 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.

Water Resources

- The City's critical area regulations (SMC 16.40-16.56) provide provisions for the protection of critical aquifer recharge areas, wetlands, and streams and their buffers. SMC 16.05 provides regulations relating to the control of erosion and sedimentation to reduce sediment pollution from construction activity. SMC 16.48 regulates development and land use in aquifer recharge areas while SMC 16.46 provides the regulations for development in or near wetlands and requirements for mitigation if filling of wetlands should occur.

- Water quality protection is also enacted by SMC 13.48: stormwater management regulations. These regulations “establish minimum requirements and procedures to control the adverse impacts associated with increased stormwater runoff and water quality degradation for all sites located within the city...” These regulations also adopt the use of the:
 - 2019 Ecology Stormwater Management Manual for Western Washington
 - 2019 – 2024 NPDES Western Washington Phase II Municipal Stormwater Permit, - Minimum Technical Requirements for New Development and Redevelopment
 - 2012 Puget Sound Partnership Low Impact Development Technical Guidance Manual for Puget Sound
- City of Sumner Development Specifications and Standard Details
- The Comprehensive Plan incorporates goals and policies that protect water quality as required by the Washington State Growth Management Act (GMA)
- The City of Sumner updated and adopted a revised Shoreline Master Program (SMP) in July 2020. It was approved by Ecology on June 26, 2020, and was effective as of July 9, 2020. The three basic goals of the Shoreline Management Act are to accommodate reasonable and appropriate shoreline use, protect environmental resources, and encourage public access. Additional measures that protect or restore surface water bodies are included in this document.
- Other federal and state regulations in effect to protect water quality are the Safe Drinking Water Act and the EPA’s NPDES Phase II regulations for stormwater management. The Safe Drinking Water Act requires public water system wells to be protected from potential sources of contamination. The EPA authorized the Washington State Department of Health to implement this rule by establishing a Wellhead Protection Program for all current wellhead sources (such as the South Well, Sumner, Weber/Crystal, and County springs). The wellhead protection zones are the 10-year time travel boundary that represents the maximum distance around a pumping well from which a hypothetical contaminant in the groundwater could travel to the well in a 10-year period. The City currently publishes an annual water quality report that summarizes test results of the wells and groundwater sources.
- A reclamation plan would be developed to achieve target post-mining land use on the Cava mine site when mining operations are completed. The plan would likely include plans for final slopes, drainage patterns, site hydrology, the degree of removal of mining-related structures, contamination, and water management of the site. The plan would also likely include steps to prevent air and water pollution and would take climate change into consideration.

Plants and Animals

- Sumner has partnered with local Tribes and agencies to restore habitat and floodplain along the White River.
- The adopted Shoreline Master Program regulates development within shoreline areas.
- Compliance with the National Flood Insurance Program (NFIP) Biological Opinion. The biological opinion required changes to the implementation of the NFIP in order to meet the requirements of the Endangered Species Act (ESA) in the Puget Sound watershed.

- The City's Critical Areas Ordinance (SMC 16.40-16.56) regulates impacts to wetlands, streams, fish and wildlife habitat conservation areas, critical aquifer recharge areas, and geologically hazardous areas, including erosion and landslide areas.
- The City of Sumner has stormwater regulations that implement the National Pollutant Discharge Elimination System (NPDES) permit requirements.
- SMC 18.41 requires maintaining at least 10% of a development site as landscaping.
- Sumner's Forestry and Parks Commission advises the City on issues related to urban forestry and is responsible for developing and implementing the Urban Forestry Strategy Plan. The Commission also ensures the City maintains its Tree City USA status.
- SMC 12.42 includes regulations for planting, preservation, and maintenance of trees on City-owned lands and public right-of-way.
- For Alternative 2, a reclamation plan would be developed to achieve target post-mining land use. The plan would include plans for final slopes, drainage patterns, site hydrology, the degree of removal of mining-related structures, contamination, and water management of the site. The plan would include steps to prevent air and water pollution and would take climate change into consideration.

Vulnerability to Wildfire

- Sumner is included in Pierce County's 2020 Hazard Mitigation Plan. Sumner-specific strategies include several related to fire mitigation, ongoing emergency operations reviews, and public education on fire safety.
- The City should implement a plan to manage the forested hillsides in the public watershed for climate resiliency and controlled fuel load.

9.4.3 Other Potential Mitigation Measures

Earth

- No additional potential mitigation measures.

Water Resources

- No additional potential mitigation measures.

Plans and Animals

- The City could conduct a Tree Canopy Assessment to better understand canopy loss in specific areas of the city and identify strategies to address canopy loss.
- The City could consider development of a tree ordinance designed to protect, enhance, or replace trees located on private property.

Vulnerability to Wildfire

- The City could apply the Wildland Urban Interface Code as part of its building code adoption (see RCW 19.27.560) and/or incorporate the defensible space guidelines into its landscaping code.

9.5 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 there. Implementing building codes and critical areas regulations will reduce potential risks. Implementation and updates to the Hazard Mitigation Plan will direct early notification of earthquakes and volcanic eruptions. There are no significant unavoidable adverse impacts related to other geologically hazardous areas.

Water Resources

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 all alternatives propose a considerable amount of new development, especially Alternatives 2 and 3, new development is expected to be contained to less than one hundredth of a percent of the White River watershed and would be insignificant.

Plants and Animals

All future development would likely have some impact, direct or indirect, to plants, animals and their habitat. Much of the plan area development and infrastructure improvements proposed under all alternatives are within areas that have been previously disturbed by agricultural activity or are in areas of residential development and the increased densities proposed under Alternatives 2 and 3 would not likely create a significant adverse impact to plants and animals or tree canopy cover. However, there would be a decrease in canopy cover under both Alternative 2 and 3 with an increase in housing density. Under Alternative 2, the reclamation and development of the Cava gravel mine site and surrounding forested areas would further impact tree canopy from parts of the area that have not been disturbed by mining and a significant impact would be anticipated.

Vulnerability to Wildfire

All alternatives anticipate job and housing growth and will have associated impacts related to wildfire vulnerability, however, expected impacts can be mitigated through mitigation measures outlined above. No significant impact is expected.

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11 Abbreviations and Acronyms

AADT - annual average daily traffic

ADU - Accessory Dwelling Unit

City - City of Sumner

CPPs - Countywide Planning Policies

CTR - commute trip reduction

DNR - Washington State Department of Natural Resources

DNS - determination of non-significance

Ecology - Washington State Department of Ecology

EIS - environmental impact statement

EMS - emergency medical services

EPA - U.S. Environmental Protection Agency

EPF&R - East Pierce Fire & Rescue

ESA - federal Endangered Species Act

FCC - Federal Communications Commission

FEMA - Federal Emergency Management Agency

FHWA - Federal Highway Administration

FTE - full-time equivalent

GC - General Commercial

GHG - greenhouse gas

GMA - Washington State Growth Management Act

gpd - gallons per day

gpm - gallons per minute

HOT - high occupancy or toll lane

HOV - high occupancy vehicle

HUD - U.S. Department of Housing and Urban Development

IC - Interchange Commercial

LDR - Low Density Residential

LID - low impact development

LOS - level of service

MDR - Medium Density Residential

MFTE - multifamily tax exemption

mg - million gallons

mgd - million gallons per day

MIC - Manufacturing/Industrial Center

mph - miles per hour

NFIP - National Flood Insurance Program

NMFS - National Marine Fisheries Service

NPDES - National Pollutant Discharge Elimination System

OFM - Washington State Office of Financial Management

OSPI - Washington State Office of the Superintendent of Public Instruction

PCLS - Pierce County Library System

PMUD - Planned Mixed Use Development

Ppm - parts per million

PSCAA - Puget Sound Clean Air Agency

PSE - Puget Sound Energy, Inc.

PSRC - Puget Sound Regional Council

RCW - Revised Code of Washington

SEPA - State Environmental Policy Act

SMC - Sumner Municipal Code

SR - state route

TAZs - transportation analysis zones

TDM - transportation demand management

TIP - transportation improvement plan

TMDLs - total maximum daily loads

TSMO - Transportation System Management and Operations

UGA - urban growth area

VMT - vehicle miles traveled

vpd - vehicles per day

WAC - Washington Administrative Code

WDFW - Washington Department of Fish and Wildlife

WRIA - water resource inventory area

WSDOT - Washington State Department of Transportation

WUTC - Washington Utilities and Transportation Commission

WWTP - wastewater treatment plant

12 Distribution List

12.1 Federal Agencies

Federal Emergency Management Agency

National Marine Fisheries Services, Habitat Division

U.S. Department of Agriculture – Natural Resources Conservation Service

U.S. Army Corps of Engineers, Seattle District

U.S. Environmental Protection Agency, Environmental Evaluation Branch

U.S. Fish and Wildlife

12.2 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

12.3 Tribes

Puyallup Tribe

Muckleshoot Tribe

12.4 Regional Agencies

Puget Sound Regional Council

Puget Sound Clean Air Agency

12.5 Counties

Pierce County, Planning and Land Services

Economic Development Board for Tacoma and Pierce County

Tacoma-Pierce County Health Department

12.6 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

12.7 Special Districts, Transportation, and Utilities

Burlington North Santa Fe Railroad

Cascade Water Alliance

Century Link

Dieringer School District

Pierce College

Pierce Conservation District

Pierce Transit

Puget Sound Energy

Sumner-Bonney Lake School District

Union Pacific Railroad Company

Washington Utilities & Transportation Commission

Williams Northwest Pipeline

12.8 City of Sumner

East Pierce Fire and Rescue

Finance (Capital Facilities)

Parks and Recreation

Police

Public Works

Sumner City Council

Sumner Planning Commission

12.9 Boards and Associations

Alderton-McMillin Community Planning Board

Puyallup River Watershed Council

Puyallup/Sumner Chamber of Commerce

Sumner Main Street Association

Master Builders Association

12.10 Community Organizations

Forterra

Futurewise

Audubon Society

Trout Unlimited

12.11 Newspapers

Bonney Lake and Sumner Courier-Herald

12.12 Citizens and Property Owners

The City is distributing notices to interested citizens.

Appendices

Appendix A: Scoping Information

Appendix B: Supporting Analysis for HB 1220 Requirements

Appendix C: Climate Analysis Findings

Appendix D: Public Participation Summary

Appendix A: Scoping Information

Contents:

- Determination of Significance and Request for Comments on Scope of Environmental Impact Statement
- SEPA Scoping Fact Sheet
- Scoping Comment Letter: Puget Sound Energy
- Scoping Comment Letter: WSDOT



Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Sumner 2024 Comprehensive Plan Update

Date of Issuance: May 18, 2023

Lead Agency: City of Sumner

Agency File Number: SEPA-2023-0003

Contact Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390
(253) 299-5520
annsi@sumnerwa.gov

Description of Proposal

The City of Sumner is required to update its Comprehensive Plan by December 31, 2024 to meet the requirements of the Washington State Growth Management Act and other regional policies. As part of the update, the City will amend all its plan elements and related plans and necessary implementing development regulations, including the Transportation Master Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

The Comprehensive Plan Environmental Impact Statement (EIS) will include environmental analysis of three plan alternatives and identification of impacts and mitigation measures. The EIS alternatives will consider a range of approaches to distributing Sumner's growth.

Location of Proposal

City of Sumner and Potential Annexation Areas within the Urban Growth Area.

Determination of Significance

The City of Sumner has determined that this proposal is likely to have a significant adverse impact on the environment. The City will prepare an environmental impact statement (EIS) as required under RCW 43.21C.080(2)(c).

The SEPA scoping period will seek input from the community on the topics and alternatives to be evaluated in the EIS. The EIS will analyze one No Action and two Action Alternatives that meet regional and state planning requirements and vary the number and location of housing and jobs. Further details on the alternatives and the EIS process can be found at <https://connects.sumnerwa.gov/planning-summers-future>.

The lead agency has identified topic areas for possible analysis in the EIS, including the following:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics
- Aesthetics

- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

Scoping

Agencies, affected tribes, and members of the public are invited to comment on the proposed scope of the EIS. Comments will be accepted on the proposed growth alternatives, EIS topic areas for analysis, probably significant adverse impacts, and mitigation measures. The 21-day EIS public scoping period begins at 5:00 pm PST on May 18, 2023 and ends at 5:00 pm PST on June 8, 2023. All scoping comments must be submitted in writing by this date.

Comments may be submitted by email or by mail (email is preferred). Please include your contact information in your comment (including a valid mailing or email address; an address is required to be considered an official party of record).

Email:

annsi@sumnerwa.gov

Mail:

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

Appeal process: There is no administrative appeal of the determination of significance for a legislative action, per SMC 16.04.185.

Responsible Official

Ryan Windish
Community & Economic Development Director
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

SIGNATURE:



DATE SIGNED:

May 8, 2023

DATE ISSUED:

May 18, 2023

SEPA Scoping Fact Sheet

Sumner 2024 Comprehensive Plan Update

Why is Sumner updating the Comprehensive Plan?

Sumner is required to have and maintain a comprehensive plan under the Washington State Growth Management Act. The Sumner Comprehensive Plan includes a long-term vision for the city, community values, and goals and policies to guide decisions by staff and elected officials. A periodic update of the plan is required by December 31, 2024. This update is an opportunity for the City to address new state requirements and to plan for growth expected over the next 20 years.

The City will also update related plans and regulations alongside the Comprehensive Plan, including the Transportation Master Plan, Capital Facilities Plan, and City of Sumner Zoning Code (Title 18).

What is an Environmental Impact Statement?

An Environmental Impact Statement (EIS) is a document that provides environmental information about a proposal before a decision is made. An EIS is required, under the State Environmental Policy Act (SEPA), where the proposal is likely to have a significant environmental impact.

An EIS provides an opportunity for the public, tribes, and government agencies to comment on proposals. In an EIS, multiple alternative scenarios relating to the proposal, or “alternatives”, are evaluated. An EIS considers existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

What alternatives will be studied in the EIS?

Three alternatives will be studied in the EIS:

- Alternative 1 will be the No Action alternative. In this alternative, policies and development regulations remain the same, and growth occurs in line with the housing and job targets allocated by Pierce County.
- Alternatives 2 and 3 are Action Alternatives. Both Alternatives 2 and 3 are anticipated to include changes to policies and development regulations to meet regional and state planning requirements, including new requirements for affordable housing and “middle housing” alternatives to traditional single-family homes. Alternative 2 would assume that Sumner will grow to the housing and job targets allocated by Pierce County, while Alternative 3 would assume that growth would be in line with recent growth trends and plans and may exceed the adopted targets.

	Alternative 1 (No Action)	Alternative 2	Alternative 3
Updated policies	No Policies and development regulations remain the same	Yes Policies and development regulations change to meet regional and state planning requirements	Yes Policies and development regulations change to meet regional and state planning requirements
Growth (Population and Employment)	Growth meets the targets allocated by the County	Growth meets the targets allocated by the County, with amount and type of growth directed by new policies	Growth continues along recent trends and existing plans and may exceed the targets allocated by the County
Affordable and Middle Housing	No changes to existing regulations	Regulations are updated to meet new state requirements for affordable and middle housing	Regulations are updated to meet state requirements for affordable and middle housing

What topics will be analyzed in the EIS?

The following topics are proposed for review in the EIS:

- Natural Environment (earth, water, plants, and animals)
- Land Use and Socioeconomics
- Aesthetics
- Transportation
- Housing
- Public services (police, fire and emergency medical services, parks, and schools)
- Utilities (stormwater, water, and sewer)

For each topic, the EIS will describe existing conditions, potential impacts of alternatives, mitigation measures to address these impacts, and potential significant, unavoidable adverse impacts.

What is scoping and how do I comment on the scope of the EIS?

Scoping is the period when the lead agency (City of Sumner) determines the scope of the EIS, including the topics and alternatives to be studied. Scoping provides the public, tribes, government agencies, and other interested parties with the opportunity to submit written comments and assist the lead agency in identifying potential concerns.

The scoping period for the Sumner Comprehensive Plan EIS is 21 days long and goes from 5:00pm PST on May 18, 2023 through 5:00 pm PST on June 8, 2023.

Comments may be submitted by email or by mail (email is preferred). Please include your contact information in your comment (including a valid mailing or email address; an address is required to be considered an official party of record).

Email:

annsi@sumnerwa.gov

Mail:

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

What happens after scoping?

After scoping, the City will finalize the alternatives and topics to be evaluated. The City will prepare a Draft EIS in 2023 and early 2024, alongside the development of the Comprehensive Plan. A comment period will follow the issuance of the Draft EIS in early 2024. The City will use feedback from the comment period to select a Preferred Alternative for further analysis in the Final EIS. The Preferred Alternative will be based on direction from the Planning Commission and City Council and evaluated in the Final EIS. The Comprehensive Plan and Final EIS are expected to be adopted in late 2024.



June 8, 2023

Ann Siegenthaler, Senior Planner
City of Sumner Community Development Department
1104 Maple Street, Suite 250
Sumner, WA 98390

Re: City of Sumner 2024 Comprehensive Plan Periodic Update
Determination of Significance – Scoping Notice

Dear Ms. Siegenthaler:

This letter is in response to the City of Sumner's request for comments pertaining to the Determination of Significance (DS) issued on May 18, 2023 for the periodic update to the Comprehensive Plan. This periodic update is being conducted in accordance with the requirements of the Revised Code of Washington, specifically 36.70A and the 43.21C.

Puget Sound Energy (PSE) supports the City's issuance of the DS. As recognized by the City, this determination will require an Environmental Impact Statement (EIS) for the 10-year update to the Comprehensive Plan. The City's EIS will address potential impacts and mitigation measures for the three plan alternatives. PSE believes that each of the growth alternatives will have unavoidable impacts to electric and natural gas facilities and services. These impacts may or may not be determined to have significant adverse impact. All three growth alternatives should identify potential mitigations measures to address existing and future electric and natural gas facilities and services.

We have reviewed the City's Comprehensive Plan Elements document dated June 2023. The document identifies potential amendments to goals and policies in the Comprehensive Plan. These are outlined under the following sections: Values; Vision; Plan Monitoring and Amendment; Community Character; Governance and Permit Process; Family and Human Services; and Economic Development and Employment. These goals and policies should be reviewed for any potential impacts affecting electric and natural gas systems.

Ann Siegenthaler

June 8, 2023

Page Two

How will the Comprehensive Plan and EIS integrate implementation of the State's Clean Energy Transformation Act (CETA) through the development of a Climate Change and Resiliency Element with other elements in the Comprehensive Plan?

How will the Comprehensive Plan and EIS address the City's implementation of Transportation Electrification and Building Electrification? These energy strategies have potential impacts to both electric and natural gas transmission and distribution facilities. Such potential impacts and mitigation measures should be identified and evaluated as part of the EIS alternatives.

For information about PSE's efforts to address clean energy and climate initiatives, we encourage the City to review the following documents:

- PSE Integrated Resource Plan (IRP) – 25 year Long-range Plan
- PSE Clean Energy Action Plan (CEAP) – 10 year Strategy Plan
- PSE Clean Energy Implementation Plan (CEIP) – The CEIP builds on the vision established within the Integrated Resource Plan and the Clean Energy Action Plan. The CEIP acts as a roadmap for implementing clean energy actions, programs and investments over the next 4 years. On June 6, 2023 the Washington Utilities Transportation Commission (WUTC) conditionally approved PSE's initial 2021 CEIP. PSE will be addressing these conditions through ongoing CEIP amendment processes.

PSE would like to thank the City for the opportunity to provide comments at the Scoping phase of the update process. We would like to keep working with the City as the Comprehensive Plan moves forward through the participation processes at the Planning Commission and City Council.

Should there be any questions or information that we can provide to assist the City, please do not hesitate to contact me at (206) 604-3103 or at amy.tousley@pse.com. To establish PSE as an official Party of Record, please use the following PSE office address: 2711 Pacific Avenue S.E., Olympia WA 98501 for future notices issued under RCW 43.21C. Thank you.

Sincerely,

Amy L. Tousley

Amy L. Tousley
Senior Municipal Liaison Manager

Cc: Ryan Windish, Sumner Department of Community Development
Dave Andersen, WA Department of Commerce
Rich Doenges, WA Department of Ecology



**Washington State
Department of Transportation**

Olympic Region
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Olympia, WA 98504-7440
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TTY: 1-800-833-6388
www.wsdot.wa.gov

June 8, 2023

Ann Siegenthaler, Senior Planner
City of Sumner
1104 Maple Street, Suite 250
Sumner, WA 98390

Dear Ms. Siegenthaler:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to review and comment on the “Determination of Significance and Request for Comments on Scope of Environmental Impact Statement (EIS)” for the City of Sumner’s 2024 Comprehensive Plan Update. Alignment between local, regional, and state planning efforts is vital to advance shared interests in the comprehensive planning process.

WSDOT offers the following input in support of the City’s efforts.

Land Use Alternatives

WSDOT supports policies and plans that accommodate projected growth consistent with principles of compact, urban, transportation efficient development. WSDOT encourages the city to explore a range of land use alternatives that include elements to manage vehicle demand and minimize the need for costly roadway capacity expansion.

Transportation Alternatives

WSDOT encourages that transportation alternatives for the Comprehensive Plan Update begin from a foundational perspective of reducing vehicle travel demand and the need for additional capital investments through transportation-efficient land use strategies and related demand management policies. When considering options for addressing level of service deficiencies, WSDOT encourages consideration of a tiered approach, as follows:

- Begin with application of transportation system management and operations strategies to maximize efficient and safe use of current facilities.
- Consider targeted capital investments on the local transportation system to improve network connectivity and safety for all users.

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- Address remaining deficiencies with targeted capital investments on the state highway system, with a financing plan that recognizes contributors to the underlying level of service deficiencies.

EIS Analysis Scope

WSDOT requests that the Transportation Element and EIS provide thorough analysis and documentation of the “estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions” (RCW 36.70a.070(6)(a)(ii)). WSDOT has a particular interest in the following Transportation Element requirements:

- Multimodal level of service standards for all locally owned arterials, locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas, and active transportation facilities.
- Multimodal level of service standards for state highways to gauge system performance.
- Specific actions and requirements for bringing into compliance transportation facilities or services that are below an established multimodal level of service standard.
- Forecasts of multimodal transportation demand and needs for at least ten years based on the adopted land use plan to inform the development of a transportation element that balances transportation system safety and convenience to accommodate all users of the transportation system.
- Identification of state and local system needs to equitably meet current and future demands.
- A transition plan for transportation as required in Title II 29 of the Americans with Disabilities Act of 1990.

State-owned facilities identified in the Plan need to be consistent with the statewide multimodal transportation plans as required under Chapter 47.06 RCW. These statewide plans include, but are not limited to, the WSDOT Highway System Plan, WSDOT Active Transportation Plan, Washington State Strategic Highway Safety Plan, and public transportation, freight, and rail plans.

Other Relevant WSDOT Priorities

WSDOT encourages consideration of the following statewide Legislative priorities during development of the Comprehensive Plan Update and the EIS:

- HB 1220: WSDOT supports the intent of HB 1220 to explicitly address the housing and transportation needs of low, very low, and extremely low-income households. WSDOT encourages the City to identify transportation policies and investments that will address transportation challenges faced by these lower income households wherever they are located in the planning area.
- Complete Streets: In 2022, the Washington State Legislature passed [Senate Bill 5974](#), the Move Ahead Washington package. It directs WSDOT to incorporate the principles of Complete Streets in most state transportation projects. While the statutory requirement is specific to WSDOT, we encourage our local partners to consider

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Complete Streets principles as a tool for managing vehicle travel demand and a potential level of service standard. More information on this new requirement, including staff contacts, can be found on WSDOT's [Complete Streets](#) webpage.

- **Vehicle Miles Traveled (VMT):** RCW 47.01.440 establishes statewide targets for reducing VMT per capita, and WSDOT is currently responding to a [legislative proviso](#) to help advance these goals. Local decisions and the partnership between local jurisdictions and state agencies are critical ingredients. Together we can reduce VMT per capita and help advance this work through your plan updates.
- **HB 1181:** This new law adds climate change and resiliency goals to the Growth Management Act (GMA) along with commensurate mandatory elements for Comprehensive Plan updates. Importantly, HB 1181 provides an explicit requirement for addressing the VMT reduction targets of RCW 47.01.440 within the Comprehensive Plan update. HB 1181 further expands mandatory elements of Transportation Element to include multimodal travel demand, multimodal level of service, and transportation system safety. WSDOT is reviewing these recent statutory changes and will provide further guidance on our implementation and review procedures. We request that the Comprehensive Plan update and EIS fully address the HB 1181 requirements and intent.
- **SSSB 5412:** This new law provides a SEPA categorical exemption for most residential development subject to several important requirements. Those requirements include demonstrating that the proposed project is consistent with the Comprehensive Plan and development regulations and preparing an environmental analysis that “analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.” SSSB 5412 allows a Comprehensive Plan or similar system-level plan to provide this environmental analysis, subject to requirements that WSDOT be consulted “on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary for impacts to transportation facilities.” WSDOT is preparing guidance for determining that a Comprehensive Plan update and EIS are sufficient for the purposes of this Categorical Exemptions. WSDOT requests that the EIS scoping anticipates an expansive multimodal transportation analysis to allow for potential project-level Categorical Exemptions.

WSDOT Resources

WSDOT offers resources to assist local land use and transportation planners. These include, for example, guidance on state project information to include in your travel demand model updates, transportation funding sources, and crash data. Local agencies can also find links to GMA training opportunities, best practices in building transportation efficient communities, and pertinent concurrency and SEPA guidance. A complete list of resources can be accessed at: <https://wsdot.wa.gov/engineering-standards/planning-guidance/land-use-transportation-planning>.

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WSDOT's [Community Planning Portal](#) may be particularly helpful for local jurisdictions. The portal includes data on the state transportation system often needed to complete the transportation element inventory required by the Growth Management Act. In addition to the data included in the portal, local planners can add their own data to ArcGIS Online and create custom reports.

Engagement & Coordination

WSDOT recognizes alignment between local, regional, and state planning efforts is vital to advance shared interests in the performance of a safe, efficient multimodal transportation system. Please reach out if you would like to discuss opportunities for ongoing engagement and coordination, as well as technical assistance available during your plan updates.

We also ask that all planning related documents (i.e., scoping documents, draft plans, annual amendments, EIS documents, etc.) be submitted to orplanview@wsdot.wa.gov. In addition, please add this address to your agency distribution list for all future planning work.

Thank you again for the opportunity engage in the planning process in review of the EIS scope for the 2024 Comprehensive Plan Update. We look forward to continuing our productive partnership.

Sincerely,



George Mazur, P.E.
Multimodal Planning Manager

GM:yl

cc: Valerie Smith, Washington State Department of Commerce
Paul Ingram, Puget Sound Regional Council

Appendix B: Supporting Analysis for HB 1220 Requirements

Introduction

This document provides supporting analysis for HB 1220 requirements in the Sumner Comprehensive Plan periodic update. This supporting analysis is in addition to related discussion in the Draft Environmental Impact Statement (DEIS), including demographic data, discussion on displacement, housing capacity findings by income band, and evaluation of consistency with state housing requirements.

The analysis in this document includes:

- Additional data on racially disparate impacts, displacement, and exclusion in housing
- A summary of policy analysis findings for racially disparate impacts, displacement, and exclusion in housing
- Method and assumptions details for the housing capacity analysis by income band (findings are described in the Housing section of the DEIS).
- Completed Department of Commerce “adequate provisions” checklists for housing production and affordability

Executive Summary of Findings

This analysis finds the following conclusions:

- Not unlike other communities in the Puget Sound, racially disparate impacts, displacement, and exclusion in housing appear to be present in Sumner, particularly around homeownership and housing cost burden. Housing cost burden is also higher for renter households. These impacts are particularly present for non-white households. This includes Hispanic or Latino households. The burden is also likely affecting Black or African American householders, American Indian and Alaska Native householders, Native Hawaiian and Other Pacific Islander householders though Census data reliability is a factor.
- Based on a review of policies some provisions could be a barrier to allowing opportunities for homeownership or affordable housing. This could include provisions that limit housing choices like middle housing, or that apply vague language that would be difficult to determine how to meet the policy intent (e.g. words like harmony, character, or similar). Changes should be made to specific adopted policies to address racially disparate impacts, displacement, and exclusion in housing (and such changes are proposed with the Draft Plan)

- Based on a review of housing capacity analysis by income levels, as referenced in DEIS Chapter 6: Housing, Alternatives 2 and 3 have adequate capacity to meet housing needs by income band, while Alternative 1 (No Action) does not.
- Changes to Sumner’s policies and code are needed with the periodic update to ensure adequate provisions for housing affordability (and such changes are proposed with the Draft Plan). This includes policy and code elements identified as possible means to address housing needs in Alternatives 2 and 3, such as affordability incentives or mandatory affordability in some zones, allowing two units per residential lot, allowing two accessory dwelling units per lot, allowing triplexes and fourplexes on larger lots in Low Density Residential (LDR) zones, allowing multiplexes and small apartments in Medium Density Residential (MDR) and High Density Residential (HDR) zones, raising the maximum density in MDR zones, and providing policy support for religious organizations building affordable apartment housing.

Background: Racially Disparate Impacts, Displacement, and Exclusion

Data Analysis

The following data provides context to the policy analysis findings below and proposed comprehensive plan amendments to address racially disparate impacts, displacement, and exclusion. Additional demographic data is available in DEIS Chapter 4: Population and Employment.

According to American Community Survey (ACS) 5-year estimates for 2022, approximately 74% of the Sumner population identify as white and not Hispanic or Latino¹ and 26% identify as persons of color (Exhibit 1, Exhibit 2).

Sumner’s Black or African American, American Indian and Alaska Native, Asian, and Native Hawaiian and Other Pacific Islander populations are each relatively small at 1-2% of the total population. 11% of the Sumner population identify as two or more races. 18% of the population are Hispanic or Latino.

Exhibit 1: Sumner: Race and Ethnicity (2022)

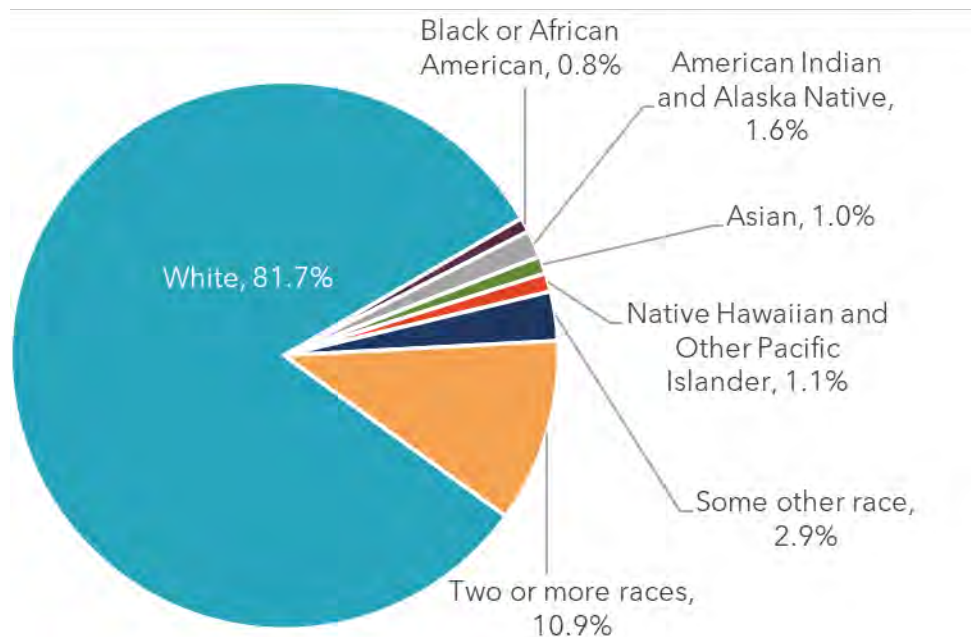
Race or Ethnicity	Number	Percent
Total population	10,589	100.0%
One race	9,440	89.1%
White	8,646	81.7%
Black or African American	90	0.8%

¹ Race and ethnicity are considered separate and distinct identities. The ACS and the Census ask separate questions for race and for Hispanic or Latino origin.

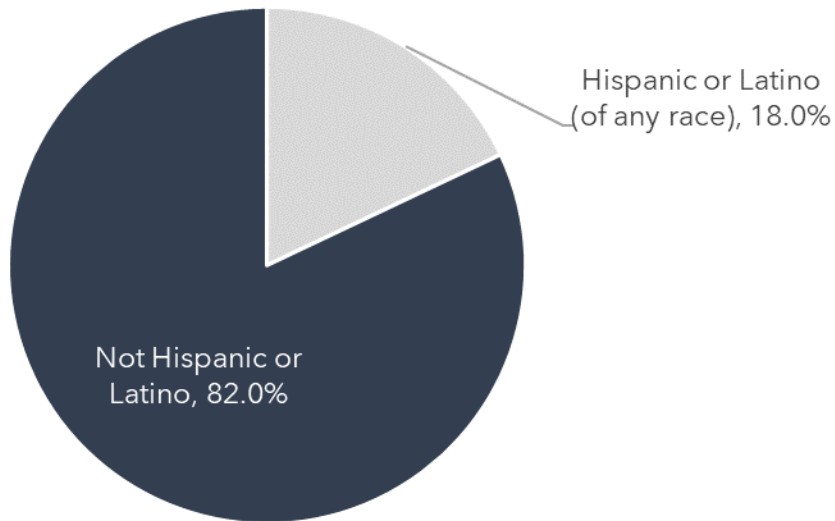
Race or Ethnicity	Number	Percent
American Indian and Alaska Native	171	1.6%
Asian	109	1.0%
Native Hawaiian and Other Pacific Islander	116	1.1%
Some other race	308	2.9%
Two or more races	1,149	10.9%
Hispanic or Latino (of any race)	1,901	18.0%
White and not Hispanic or Latino	7,822	73.90%

Source: ACS 2022 5-year estimates

Exhibit 2: Sumner: Race Chart (2022)

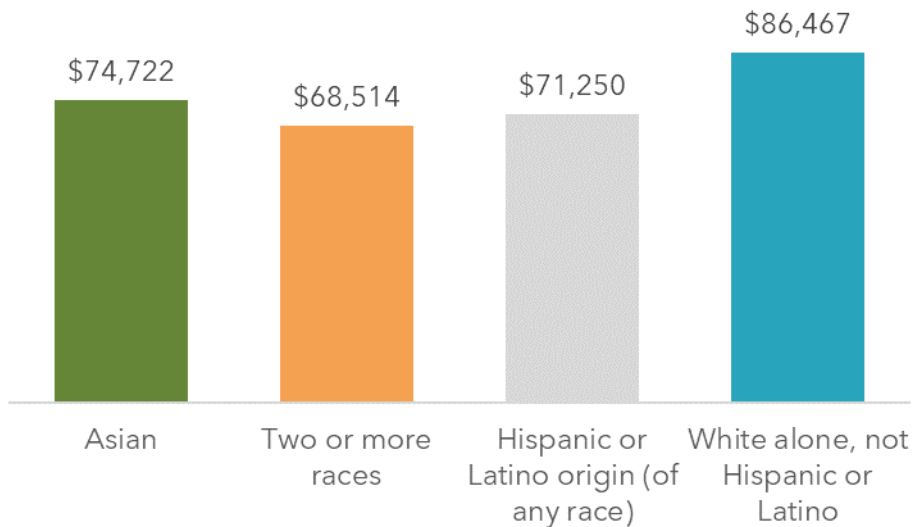


Source: ACS 2022 5-year estimates

Exhibit 3: Sumner: Hispanic or Latino Ethnicity (2022)

Source: ACS 2022 5-year estimates

Median household income in Sumner varies by the race and ethnicity of the householder, as shown in Exhibit 4. Of the race and ethnicity categories for which data is available, households with a white, not Hispanic or Latino householder have the highest median income at \$86,467. Other categories have lower median household incomes (\$74,722 for Asian householders, \$68,514 for householders with two or more races, and \$71,250 for Hispanic or Latino householders).

Exhibit 4: Sumner: Median Household Income by Race (2022)

Source: ACS 2022 5-year estimates

Note: Data is not available for median household income for some race categories, as the sample size is too small for the ACS to provide estimates. This includes Black or African American, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander groups.

Approximately 86.1% of the population 5 years and over speaks only English at home, while 13.9% speak a language other than English at home (Exhibit 5). 6.7% of the population over 5 years old speaks English less than “very well”. Spanish is the most commonly spoken language at home other than English (9.8% of the population), and some of the population speak other Indo-European languages (2.0%), Asian and Pacific Islander languages (1.6%), or other languages (0.6%) at home. Almost half of the population that speaks Spanish at home speaks English less than “very well” (4.6% of the total population).

Exhibit 5: Sumner: Language Spoken at Home (2022)

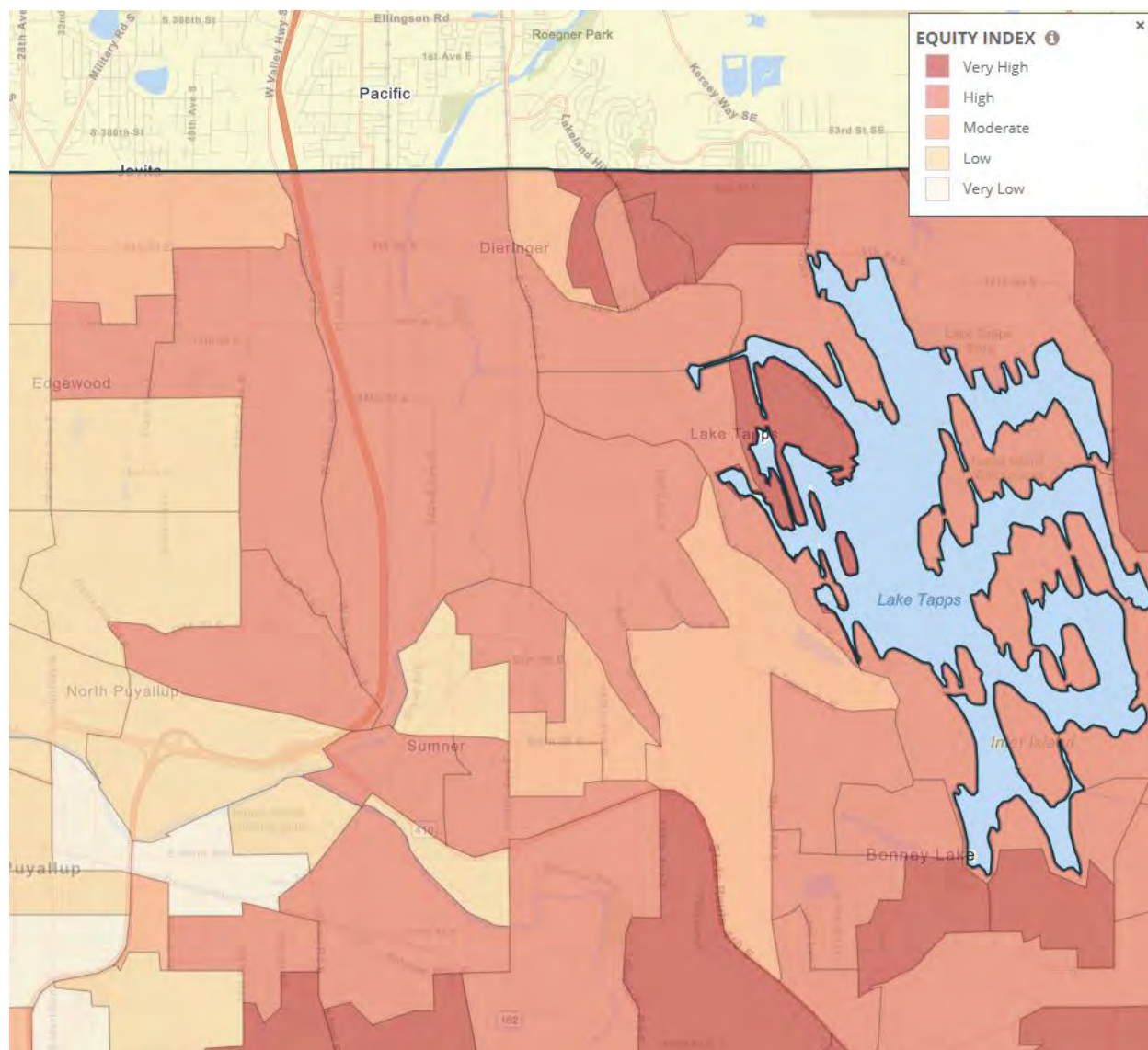
	Estimate	Percent
Population 5 years and over	9,875	
English only	8,507	86.1%
Language other than English	1,368	13.9%
Speak English less than "very well"	660	6.7%
Spanish	966	9.8%
Speak English less than "very well"	459	4.6%
Other Indo-European languages	193	2.0%
Speak English less than "very well"	129	1.3%
Asian and Pacific Islander languages	154	1.6%

	Estimate	Percent
Speak English less than "very well"	43	0.4%
Other languages	55	0.6%
Speak English less than "very well"	29	0.3%

Source: ACS 2022 5-year estimates

Pierce County has developed a countywide Equity Index that averages accessibility, livability, education, economic, and environment subindices (Exhibit 6). "Very high" equity index indicates higher community conditions and "Very low" indicates comparatively lower community conditions. Much of Sumner is shown with high scores, but several areas on the east side of the city are considered "moderate" and an area north of Town Center and area south of SR 410 have low scores.

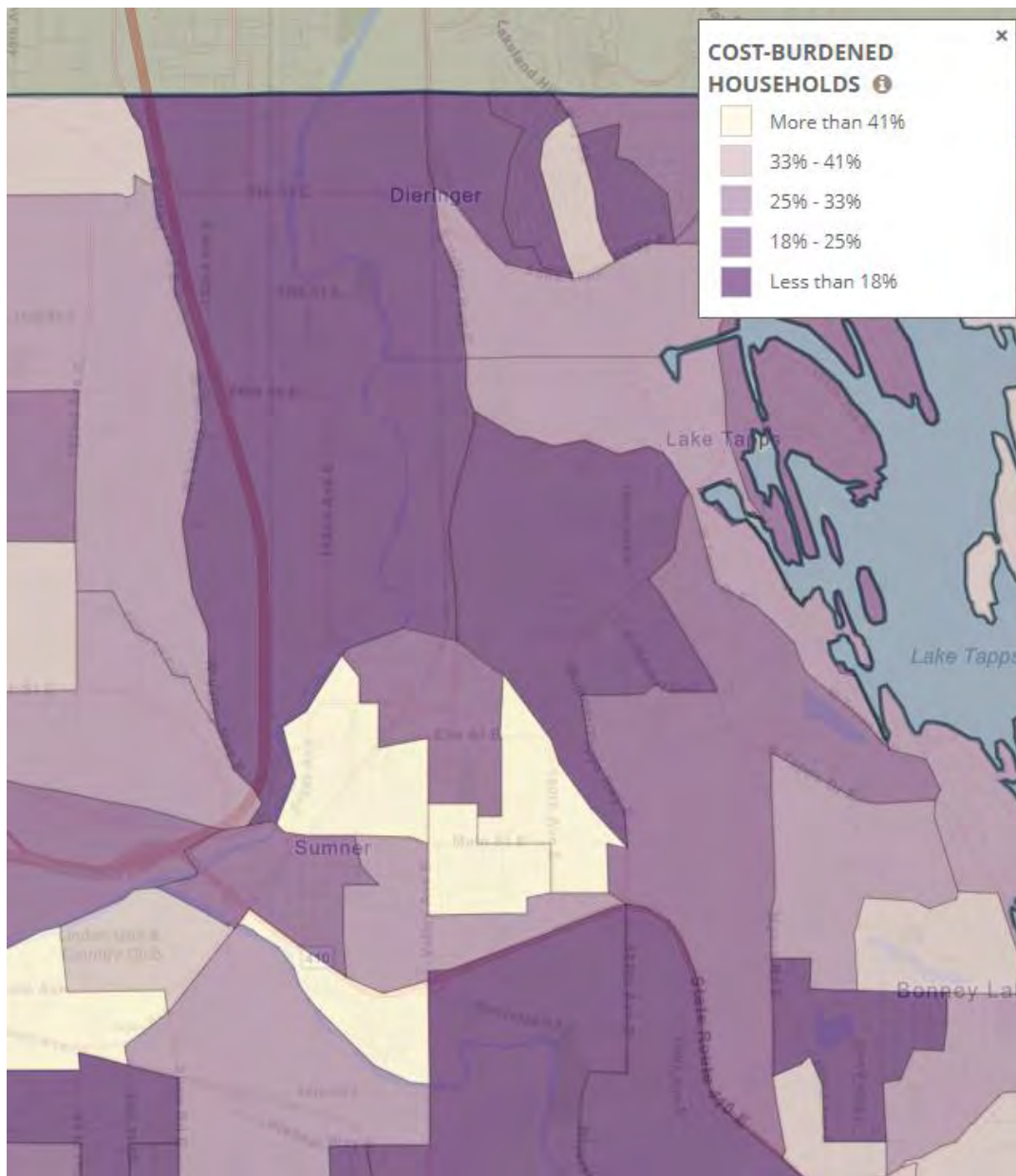
Exhibit 6: Sumner Vicinity: Pierce County Equity Index (2020)



Source: Pierce County Equity Index 2023

The Pierce County Equity Index tool also maps cost-burdened households, including both owner and renter households (see Exhibit 7). A household is considered cost burdened when it spends 30% or more of its income on housing costs. In several block groups in Sumner, including one north of Town Center, two around East Sumner, and one south of SR-410, more than 41% of households are cost burdened.

Exhibit 7: Sumner Vicinity: Cost Burdened Households Map (2020)



Source: Pierce County Equity Index 2023 (cost burden data from 2020)

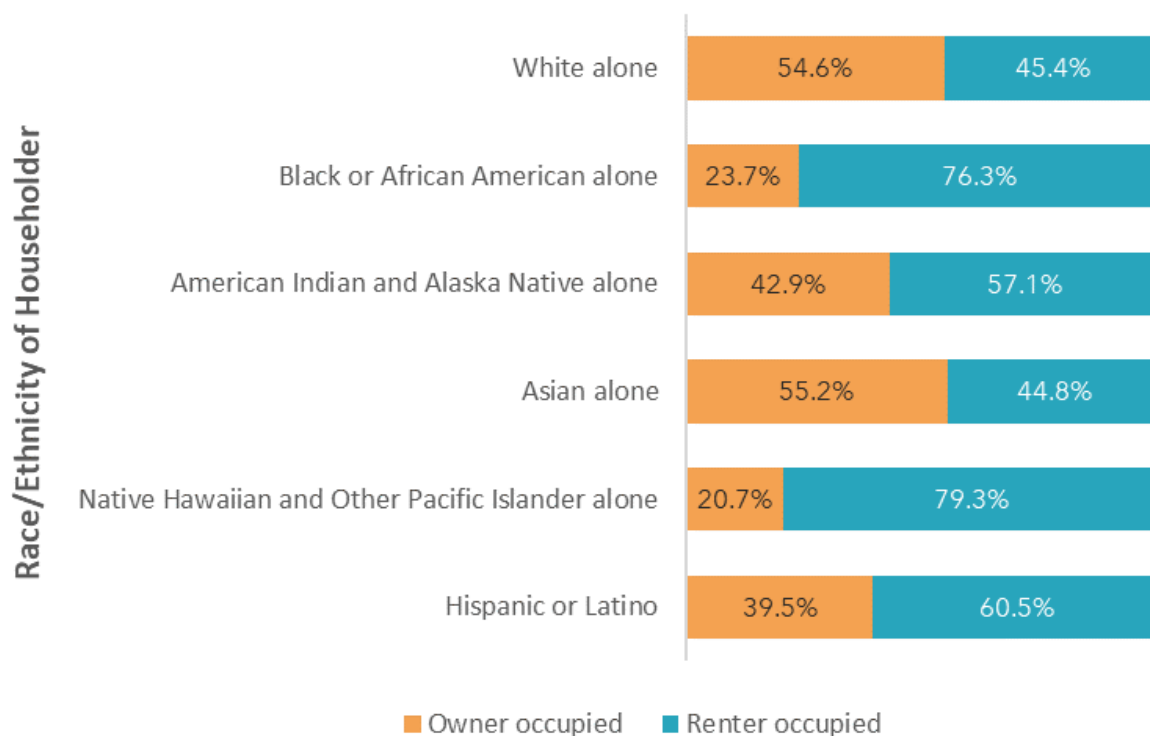
The 2020 Census provides data on housing tenure by race and ethnicity of the householder (Exhibit 8). The data shows that households with a white or Asian householder are mostly owner-occupied (54.6%

and 55.2% respectively), while households with a Black or African American householder, American Indian and Alaska Native householder, or Native Hawaiian and Other Pacific Islander householder are more likely to be renter occupied (76.3%, 57.1% and 79.3% respectively). Households with a Hispanic or Latino householder are also more likely to be renter-occupied (60.5%). This data reveals a disparity in homeownership rates by race and ethnicity.

In Pierce County as a whole, households with a white, Asian, or American Indian and Alaska Native householder are more likely to be owner-occupied than renter-occupied (67.7%, 64.4%, and 51.7%, respectively). Households with a Black or African American householder or Native Hawaiian and Other Pacific Islander householder are more likely to be renters (61.7% and 66.7%, respectively). Households with a Hispanic or Latino householder are also more likely to be renter-occupied than owner-occupied (54.1% renters compared to 45.9% owners). These are similar homeownership rates by race and ethnicity as seen in the data for Sumner.

As discussed in DEIS Chapter 6: Housing, most of the city's housing stock is single-family homes (56.5%). The rental vacancy rate is estimated at 3.4 percent.

Exhibit 8: Sumner: Housing Tenure by Race and Ethnicity (2020)



Source: Census 2020

2020 data from the US Department of Housing and Urban Development reveals additional disparities in housing cost burden (Exhibit 9 and Exhibit 10). Households that spend more than 30% of their income on housing costs are considered cost-burdened, with those spending more than 50% considered severely cost burdened.

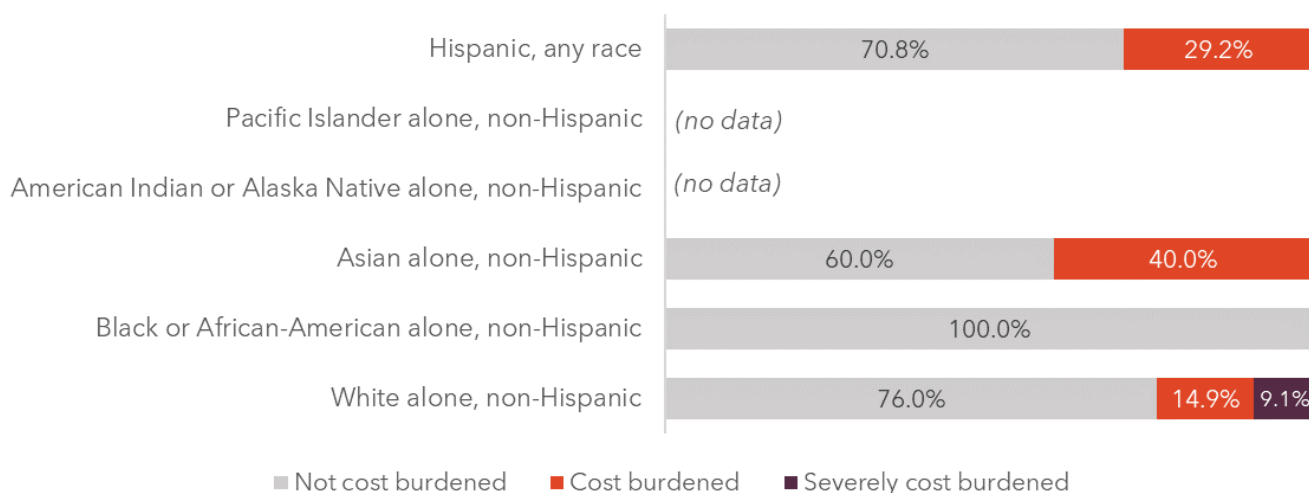
Most households with white non-Hispanic householders are not cost burdened (76.0% of owner households and 54.9% of renter households). This is similar for households with an Asian householder (60.0% of owner households and 66.7% of renter households are not cost burdened).

Households with a Hispanic householder are less likely to be cost burdened if owner occupied (70.8% not cost burdened) than if renter occupied (41.0% not cost burdened). While 100.0% of owner-occupied households with Black or African-American householders are not cost burdened, 100.0% of renter-occupied households are cost burdened or severely cost-burdened. Data for other race categories is limited.

Within the context of tenure by race (Exhibit 8), households with a Black or African American householder or Hispanic or Latino householder are both more likely to be renters, and if renters, are likely to be cost-burdened to some extent.

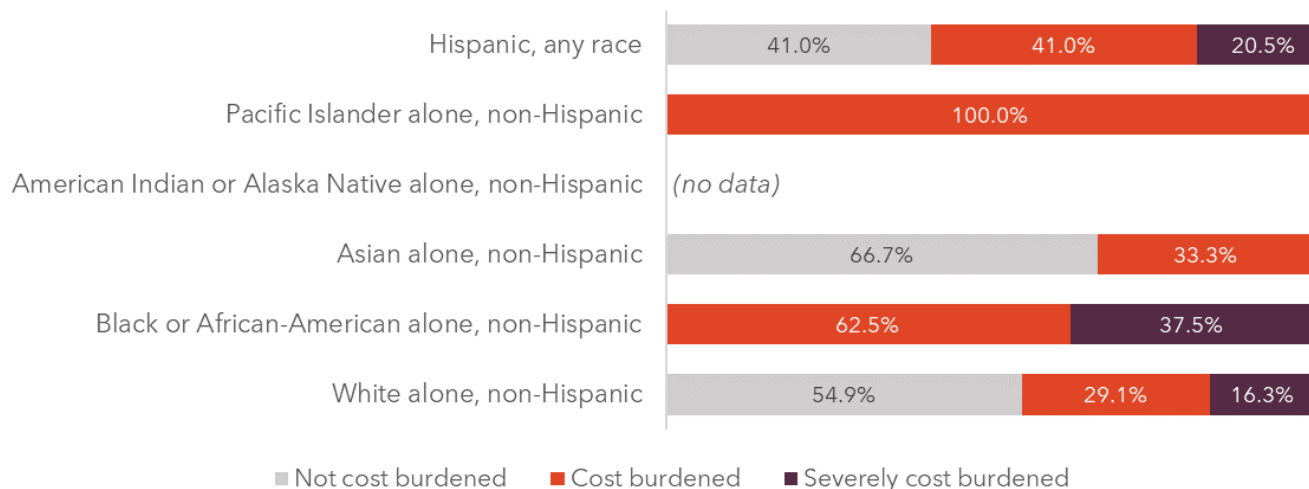
Across the race and ethnicity categories, owner households are less likely to be cost burdened. This suggests some correlation between homeownership and financial stability.

Exhibit 9: Sumner: Cost Burden by Race and Ethnicity - Owner Households (2020)



Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2016–2020

Note: Sample sizes for some categories (Asian Alone, Black or African-American, Pacific Islander, and American Indian or Alaska Native) are small and margins of error can affect reliability of the data.

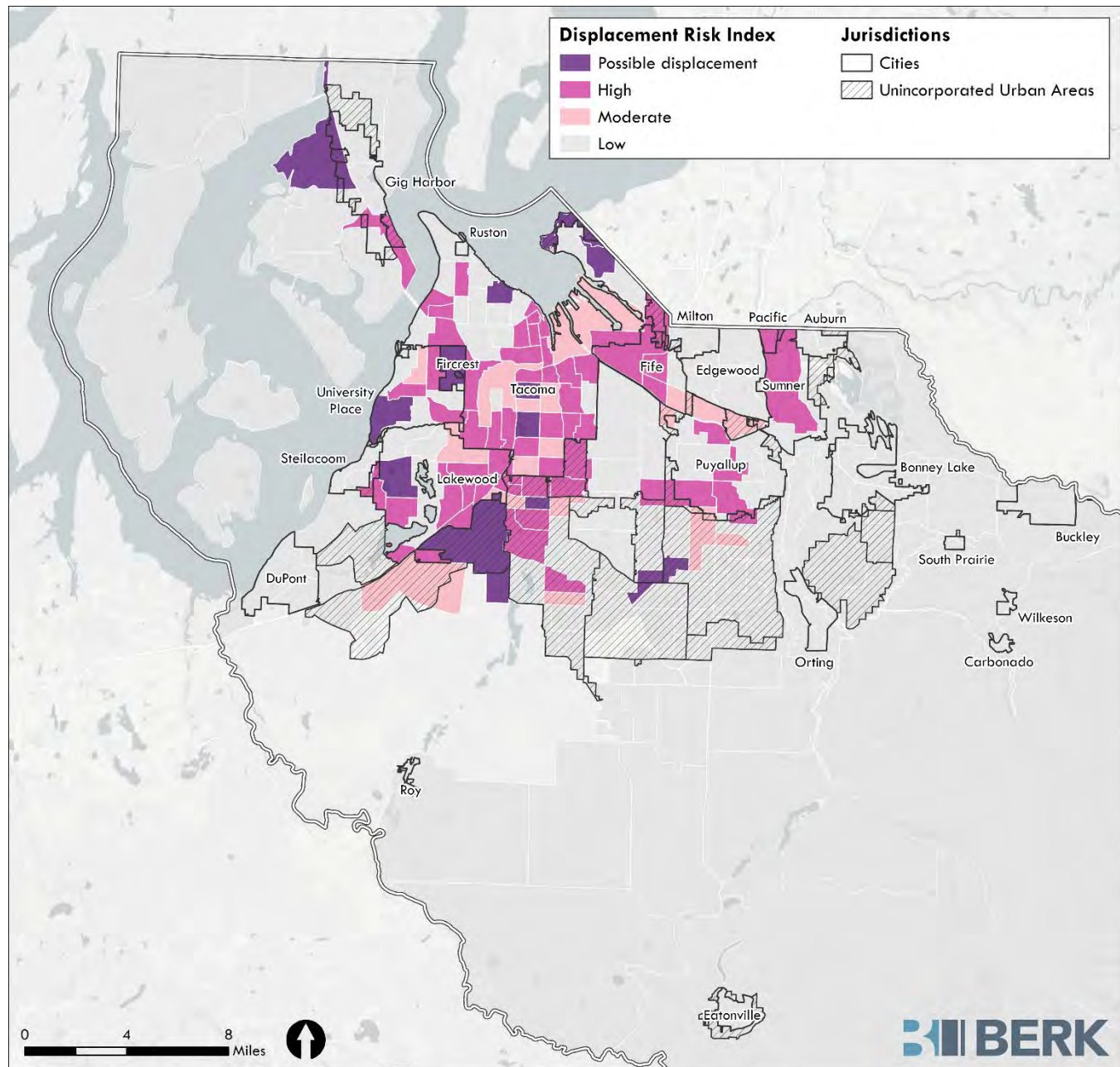
Exhibit 10: Sumner: Cost Burden by Race and Ethnicity - Renter Households (2020)

Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2016–2020

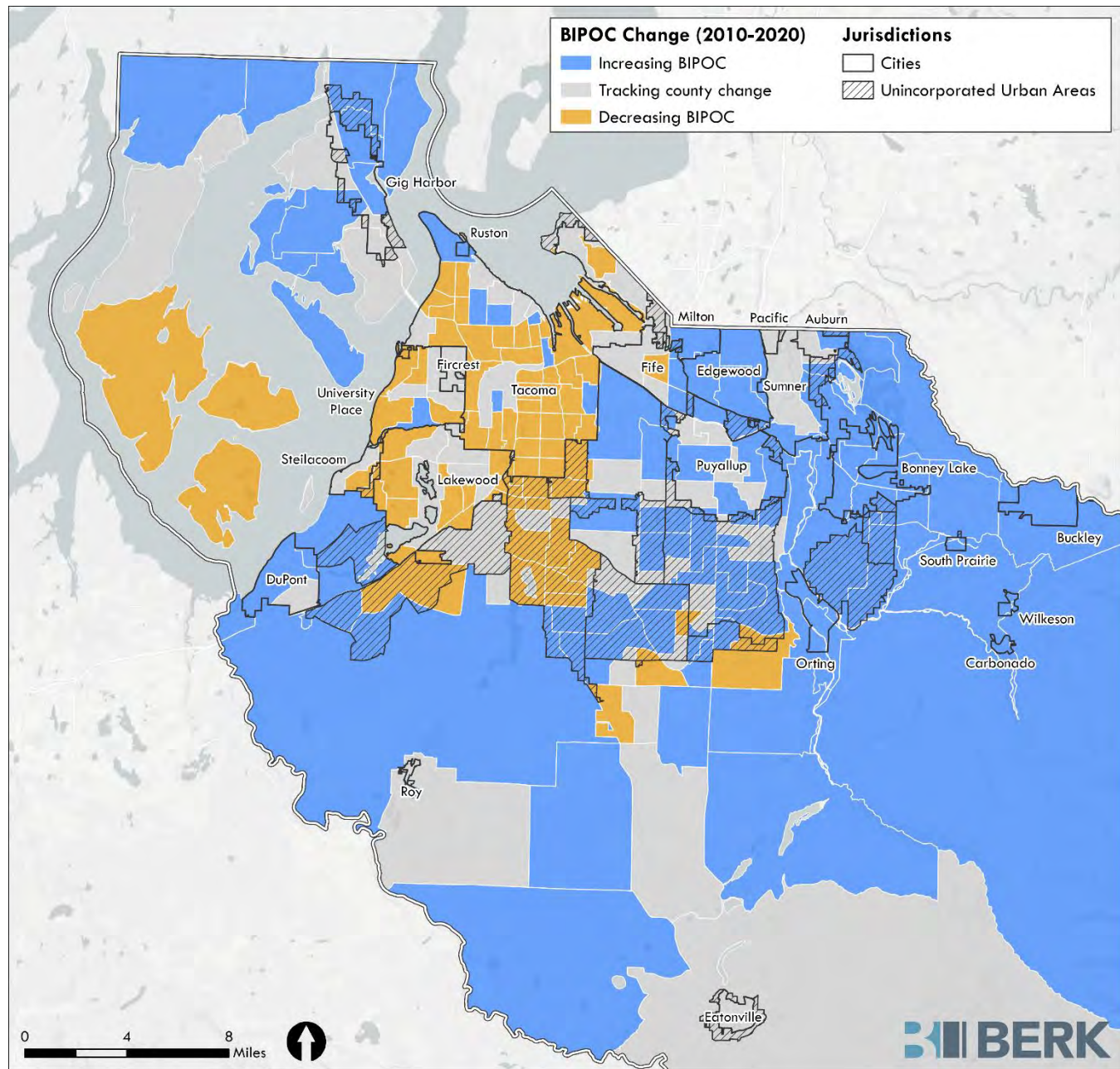
Note: Sample sizes for some categories (Asian Alone, Black or African-American, Pacific Islander, and American Indian or Alaska Native) are small and margins of error can affect reliability of the data.

Countywide mapping on displacement risk and demographic change also provide context for housing issues in Sumner. Displacement risk is considered to be high in most of Sumner, relative to other parts of Pierce County (Exhibit 11). However, most of Sumner saw a similar change in the Black, Indigenous, and Persons of Color (BIPOC) population to Pierce County as a whole from 2010-2020, and BIPOC populations increased faster than the countywide rate in areas to the south and at the edges of the city (Exhibit 12). This suggests that, while displacement risk is high, Sumner has not seen much recent displacement of BIPOC populations when compared with other parts of the county.

Exhibit 11: Displacement Risk in Pierce County (Index [Data](#) from 2010, 2015, 2020 and 2021)

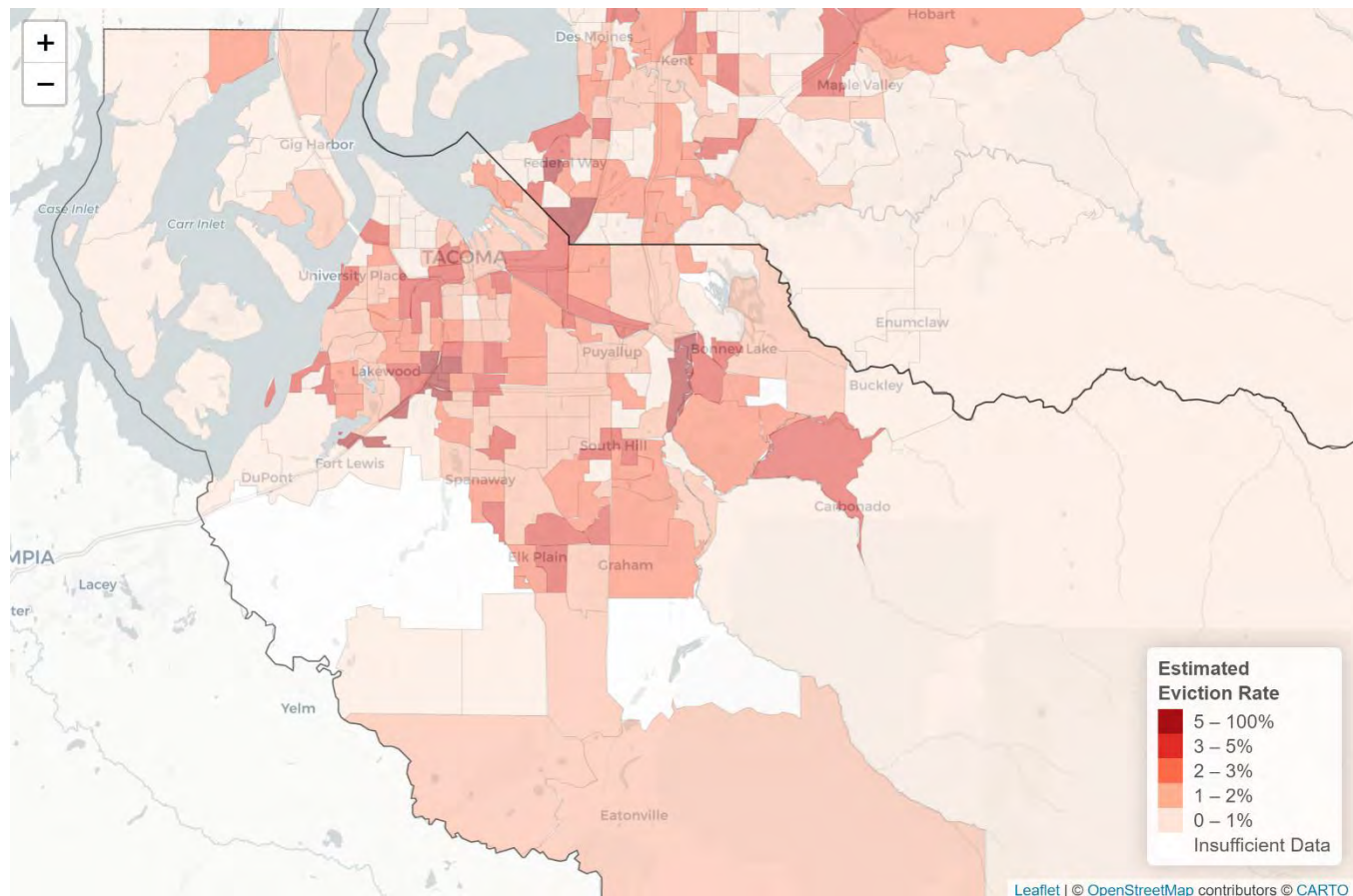


Source: Washington State Department of Commerce 2023; BERK 2023.

Exhibit 12: BIPOC Change Score with Displacement Risk in Pierce County (2020)

Source: Washington State Department of Commerce 2023; BERK 2023.

Eviction rate mapping from the University of Washington (2017) also shows Sumner as having a relatively low eviction rate when compared with other parts of Pierce County (Exhibit 13).

Exhibit 13: Estimated Eviction Rates in Pierce County by Census Tract, 2017

Source: [The Evictions Study](#), University of Washington, 2017

Key Issues

Overall, the data suggests that the key issues in Sumner relating to racially disparate impacts are the racial and ethnic disparities in housing cost burden and homeownership, particularly for Black or African American and Hispanic or Latino households. While displacement indicators do not suggest high rates of displacement in recent years, displacement risk going forward is considered high in certain areas, per mapping from the Washington State Department of Commerce, and should also be addressed through policy decisions. Recent zoning changes in Town Center, specifically, to allow for higher densities could encourage development in this area, which could result in displacement of some single-family dwellings. With 6.7% of the population speaking English less than “very well”, the City should also strive to provide information relating to housing resources in multiple languages, particularly Spanish.

Policy Analysis

To review the Housing Element and related elements of the Comprehensive Plan, a series of evaluation questions were designed to identify policies and regulations that result in racially disparate impacts (RDI) and displacement and exclusion of housing. Key overarching questions, as described in the Commerce guidance for RDI review, include:

- Is the policy effective in accommodating needed housing?
- Does the policy contribute to racially disparate impacts? Displacement? Or exclusion in housing?
- Who benefits and who is burdened by the policy?
- Does the policy increase displacement risk? If so, can this be mitigated through policies or actions?
- Does the policy provide vulnerable communities protection from displacement?

Each policy in the Housing Element, Land Use Element, and Community Character Element is reviewed using the criteria shown below. Policies evaluated as “C” or “A” are addressed in the Recommendation section.

The policy analysis has informed the preliminary drafts of the updated Comprehensive Plan elements and discussion with the Planning Commission.

Exhibit 1: Policy Evaluation Framework

Criteria	Evaluation
The policy is valid and supports achieving the GMA goal for housing. There is a need for the policy and/or it addresses identified racially disparate impacts, displacement, and exclusion in housing.	“S” Supportive
The policy can help achieve the GMA goal for housing but may be insufficient or does not specifically address racially disparate impacts, displacement, and exclusion in housing.	“A” Approaching
The policy may challenge the jurisdiction’s ability to achieve the GMA goal for housing. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution and burdens imposed by the policy.	“C” Challenging
The policy does not affect the jurisdiction’s ability to achieve GMA goal housing and has no influence or impact on racially disparate impacts, displacement, or exclusion.	“NA” Not Applicable

Housing Element

Exhibit 14 applies the evaluation framework across the adopted Housing policies in the 2022 Plan, to inform the periodic update process.

The Housing Element evaluation highlighted some changes that could increase inclusion and reduce disparate impacts, such as:

- Adding policies in support of housing diversity and anti-displacement
- Adjusting wording of some policies, such as “protection,” “single-family neighborhoods,” “character of existing neighborhoods,” and “appropriate”
- Add language on accommodating housing needs of all income levels
- Adding language to emphasize affordable senior housing
- Remove language that implies connections between multifamily housing and crime

Exhibit 14: Findings for Housing Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
Goal HS 1 Encourage the maintenance and preservation of existing housing stock and residential neighborhoods.	A	This policy supports housing preservation, which could inherently prefer single family homes over other housing types. Other policies in the Housing element should support housing diversity to mitigate this.	Rewritten to focus on investment in neighborhoods and rehabilitation of housing. (Goal 1)
Pol. HS 1.1 Encourage private reinvestment in older residential neighborhoods and private rehabilitation of housing, such as temporarily waiving permit fees, completing public works projects, etc.	A	Antidisplacement policies should be added elsewhere in the housing element to mitigate any potential impacts of reinvestment in older neighborhoods.	Changed to focus on potentially waiving fees for low-income housing rehabilitation projects (Policy 1.1). New policy 1.2 added to encourage rehabilitation instead of demolition where feasible. New antidisplacement policies also added (Goal 6).
Pol. HS 1.2 Support the revitalization of older neighborhoods by keeping the	S	This policy is strong and supports existing housing and upkeep. Older neighborhoods with older buildings may also be more affordable, so investment in	Changed to focus on equitable investment in municipal infrastructure. (Policy 1.3)

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
streets and other municipal systems in good repair.		municipal systems in these areas could have positive equity impacts.	
Po. HS 1.3 In cooperation with the County and Puget Sound Energy, promote the use of weatherization programs in existing housing.	A	There are a few more programs (energy efficiency, upgrades); suggest looking into additional resources in addition to weatherization programs.	Revised to emphasize support for households with lower incomes and seniors, and to call out specific types of assistance beyond weatherization.
Pol. HS 1.4 In order to balance the protection of viable neighborhoods and the need to provide for a range of housing to all life stages and economic segments, allow for accessory units in single-family neighborhoods.	A	This policy would be a better fit under Goal HS2, since it is not directly related to maintenance and preservation. The term “protection of viable neighborhoods” is unclear and could be replaced with more specific wording. Though the policy supports the use of ADUs, the policy could be rewritten to be more supportive of a variety of housing types or a new policy could be added on this topic. Consider changing language to low-density residential areas instead of single-family neighborhoods (this term can be exclusionary and does not accurately describe neighborhoods that allow single-family units in addition to ADUs and other housing types)	Removed this policy and replaced with a new policy to allow for two ADUs per lot (Policy 2.5.5). New policy added to support ADU development (Policy 2.5.6).
Pol. HS 1.4.1 Maintain Design Guidelines to ensure new multi-family is consistent with the character of existing neighborhoods. Maintain design standards for neo-traditional single-family developments.	C	Design Guidelines can be coded and limit growth and increase displacement risk. Consider removing the requirements for future development to match existing features of single-family developments. Consider changing language to low-density housing instead of single-family, as low-density neighborhoods also now include duplexes (per HB1110 requirements). The language requiring consistency with “character of existing	Removed, redundant with design guidelines policies in Community Character.

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
		neighborhoods" is vague and could be exclusionary.	
Pol. HS 1.4.2 Allow for accessory dwelling units in low density residential districts.	A	This policy is repetitive with 1.4. It, or a new policy, could be more inclusive of increasing different forms of density housing such as townhouses, mix of duplexes, triplexes, fourplexes, cottage housing, courtyard apartments, in addition to accessory dwelling units.	Revised to allow two units per lot (Policy 2.5.5). Other policies focus on other housing types.
Pol. HS 1.4.3 Review development regulations for obstacles to permitting accessory dwelling units	S	Identifying and lowering unnecessary burdens and barriers in permitting can increase housing stock and limit displacement.	N/A
Pol. HS 1.5 Accommodate local non-profit housing agencies' efforts to purchase and rehabilitate housing to meet affordable housing needs and special needs of the community.	S	Policy reflects the need for more affordable housing and acknowledges the different needs of the community.	N/A
Pol. HS 1.6 Multi-family housing outside the Town Center area and outside the ESUV should be "ground related" (individual housing unit entries are on the first floor and allows direct access to private ground-level usable open space). Examples of ground-related dwellings include single-family detached, single family semi-attached, cottages, tandem houses, and townhouses. This does not include mixed use commercial/residential buildings or "housing for the aged" such as	A	Though the policy encourages more diversified housing, limiting multi-family outside of the Town Center to ground-related middle housing types and excluding apartments of any kind could be prohibitive, as apartments are most likely to serve lower income levels. Consider revising to include small apartment buildings in the MDR zone (per the EIS action alternatives)	Removed this policy.

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
assisted living facilities, continued care communities, board and care homes, hospices or nursing homes.			
Goal HS 2 Provide a range of housing types for all life stages and economic segments of the Sumner community.	S	This policy meets the criteria of the housing element rubric by supporting equitable access to housing. It also aligns with new requirements in HB1220, to plan for housing at all income bands.	N/A
Pol. HS 2.1 Strive to meet the City's fair share of housing needs by planning that 25% of the growth population allocation is satisfied through affordable housing.	N/A	This policy is no longer relevant due to changes in state law.	Removed this policy.
Pol. HS 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.	N/A	This policy is no longer relevant due to changes in state law.	Removed this policy.
Pol. HS 2.2 Plan for an adequate supply of land in appropriate land use designations and zoning	A	This policy should be updated to include language on accommodating housing needs of all income levels. Unclear what "in appropriate land use designations"	Removed use of "appropriate" and added focus on all income bands (Policy 2.5).

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
categories to accommodate projected household growth		means, it could be used to justify the exclusion of moderate and high density housing and, by extension, people with household needs not met by low density housing. Consider removing “appropriate” and specifying, or removing this clause entirely.	
Pol. HS 2.2.1 Through the Comprehensive Plan, Zoning Code, and Subdivision code, and Design Guidelines allow for a variety of housing types and lot configurations including multi-family housing, mixed use development, cluster development, zero-lot line and similar subdivisions, planned unit development, and non-traditional housing forms such as adult family homes.	A/S	This policy is strong and meets the criteria of the housing element rubric. It could be revised to include mention of middle housing.	Updated to reflect latest Growth Management Act languages (includes duplexes, triplexes, and townhomes). (Policy 2.5.1)
Pol. HS 2.2.2 Allow for a variety of lot sizes in low density residential districts including a percentage of lots larger and smaller than the minimum lot size.	S	This policy supports a variety of lot sizes, which can result in a variety of housing options at different costs.	N/A
Pol. HS 2.2.3 Allow for accessory units in low density residential districts.	A	To align with HB 1337, this could be updated to say “two accessory dwelling units per lot”.	Revised to allow for two ADUs per lot (Policy 2.5.5)
Pol. HS 2.2.4 Participate in the development of data for buildable lands analysis as required by the Growth Management Act.	S	Buildable lands analysis helps the city plan to accommodate an adequate supply of housing at all income levels.	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
Pol. HS 2.2.5 Incorporate reasonable measures as necessary to accommodate the projected population growth.	S	This policy aligns with the buildable lands analysis process.	N/A
Pol. HS 2.3 Encourage a variety of housing available to all economic segments of the community.	A	The policy could be more specific and actionable, perhaps by including wording such as “through tools such as incentives”	Consolidated into another policy (2.5).
Pol. HS 2.3.1 Review the Zoning Code, Subdivision Code, Building Codes, and other development-control ordinances to identify and remove excessive, duplicative, or unnecessary regulations. The analysis shall consider in particular lot width, access widths, street improvement standards, parking, common service lines as well as other issues.	A	This policy supports housing affordability by reducing costs of development. Consider adding more examples for the analysis based on the Commerce guidance for “Adequate Provisions”, such as permitted housing types, minimum lot sizes, maximum densities, and setbacks.	Updated to address unclear regulations and to consider unit type allowances; lot, site, and building dimensions.
Pol. HS 2.3.2 Review the City's administrative procedures and streamline the permit process for affordable housing developments.	S	This policy supports housing affordability by reducing the costs, including time costs, of development.	Revised to support permit process for housing generally with affordable housing as a priority. (Policy 2.5.10)
Pol. HS 2.3.3 Consider implementing strategies such as an inclusionary housing program, minimum densities, density bonuses, adaptive re-use, and others to promote affordable housing.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 2.3.4 Promote the development of senior housing	A	Housing types for seniors are needed. However, this policy could be improved by including wording about affordability of	No changes made, but other policies address affordability (Policy 2.1)

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
units in proximity to needed services.		these senior housing units, to mitigate potential displacement impacts of low-income and BIPOC communities.	
Pol. HS 2.3.5 Provide for transit and pedestrian improvements to support special needs populations.	S	This policy meets the criteria listed in the rubric.	Revised to include older adults, lower income, and residents with limited access to a car (Policy 2.3).
Pol. HS 2.3.6 Consider participation in the preparation of applications for federal or state housing funds.	A	This policy could include County and more specific language on housing funds, for example, to expand programs that facilitate home ownership by low and moderate income families or provide assistance for repair, rehabilitation, energy efficiency, and weatherization.	Revised to stronger language ("participate, where appropriate") (Policy 2.5.12). Other policies revised to focus on programs for home repairs and upgrades.
Pol. HS 2.3.7 Identify and catalogue real property owned by the City that is no longer required for its purposes and is suitable for the development of affordable housing for very-low to moderate income households. The inventory shall be provided to the state Department of Commerce annually in accordance with state law.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 2.4 Provide for a jobs and housing relationship that satisfies the local need for housing and affordability	S	This policy is strong and meets the criteria of the housing elements rubric.	N/A
Pol. HS 2.5 Promote fair and equal access to housing for all persons in accordance with state law.	S	This policy could call out specific protected classes at risk of displacement and be more explicit about ensuring equal access to these residents. (e.g., without	Added specific step to connect residents to information on tenant protections (Policy 2.9).

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
		regard to special need, race, creed, color, national origin, religion, sex, family status, or disability, sexual orientation, or the presence of any sensory, mental, or physical disability, participation in Section 8 voucher program or other similar government housing subsidy programs.	
Pol. HS 2.6 Make a biennial report to the City Council and the Pierce County Regional Council regarding the progress made in meeting community housing needs	S	This is supportive of the City meeting community housing needs.	Revised for latest language in GMA (Policy 2.10)
Pol. HS 2.7 The Town Center will contain “transition areas” that will be at reduced height (maximum 3 stories) to create more compatible transition between traditionally single-family residential zones and areas with increased height	A	Consider changing single-family to “low-density residential”.	Changes to “low-density residential”, other updates for clarity (Policy 4.4).
Pol. HS 2.8 Provide incentives for developing senior housing in the downtown such as permit fee waivers and reductions, parking requirement reductions, and multi-family tax exemptions	A	Policy should be reviewed to remove the word “downtown” as this is no longer a defined area in Sumner. The policy could be improved by emphasizing affordable senior housing.	Removed “downtown” (Policy 2.2). Other policies focus on affordable housing.
Pol. HS 2.9 Establish programs focused on promoting good management and reducing criminal activity in multi-family developments and areas. This could include crime free/resistant housing programs and “safe	C	This policy implies a connection between multifamily housing and criminal activity, which may be discriminatory. This policy should be removed. It could be replaced with a more general policy on safety in residential areas throughout the city.	Revised to remove implied connection between multifamily housing and criminal activity. Rephrased to promote safety and deter vandalism in residential neighborhoods generally (Policy 1.4).

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
street” concepts in multi-family design and maintenance.			
Goal HS 3 Encourage energy efficiency in housing developments.	S	Energy efficient buildings can help reduce energy costs for residents over time. However, implementing energy efficiency upgrades (or energy efficient new construction) can be expensive and raise housing costs. Therefore such policies should be combined with those supportive of subsidized energy efficiency upgrades and anti-displacement policies.	N/A
Pol. HS 3.1 Promote the use of energy conservation features in the design of all new residential structures.	S	Energy efficient buildings can help reduce energy costs for residents over time.	Revised for more specifics on how to encourage energy efficiency (Policy 3.1)
Pol. HS 3.2 Promote higher density and infill developments that are located near major transportation links such as the Sumner Commuter Rail Station.	S	This policy is strong and meets the criteria of the housing element rubric.	N/A
Pol. HS 3.3 Continue to enforce State Energy Code requirements.	N/A		N/A
Pol. HS 3.4 Establish standards for street widths, landscaping, and parking lots to reduce heat loss or provide shade.	S	Reducing heat from paved areas can lower energy costs for household cooling.	N/A
Pol. HS 3.5 Review and update codes as necessary regarding solar energy.	N/A		N/A
Pol. HS 3.6 Recognize and support energy conservation and efficiency programs.	A	Could have more acknowledgement and specifics to programs focused on energy	No change made, but other policies discuss programs for energy efficiency for lower income households.

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
		efficiency upgrades for LMI households etc.	
Goal HS 4 Provide for a variety of housing types and densities in the town center in close proximity to the rail station	S	This policy encourages transit-oriented development and diversified housing types.	N/A
Pol. HS 4.1 Promote the construction of housing stock in the Town Center by at least 500-1000 dwelling units by 2035.	A	This policy supports housing development in an area with good access to services and transit. It could be combined with policies to ensure affordability of some of these units in Town Center.	No changes made. Other policies address affordability.
Pol. HS 4.2 Adopt greater height limit, 5-6 stories, for development at higher density in West Sumner and west of the White River to promote re-development of the area for transit-oriented development	S	This policy encourages housing supply and has specificity.	N/A
Pol. HS 4.3 Adopt greater height limits, 4-5 stories, east of the BNSF Railroad with a transition area to single-family residential at a maximum of 3 stories as appropriate.	S	This policy encourages housing supply and has specificity.	Revised policy 4.4 updates the “transition area” to a transition to low density residential zones.
Pol. HS 4.4 Encourage land assembly allowing for feasible and attractive housing or mixed housing/commercial developments. Waive permit fees associated with lot consolidation such as lot line adjustments. Facilitate matching compatible	S	Supporting land assembly can make housing development more feasible and attractive to developers, which can support the creation of more housing.	N/A

2022 Policy	Evaluation	Rationale	Relevant changes in Draft Plan (2024)
owners that can work jointly to consolidate and sell/develop.			
Pol. HS 4.5 Prohibit garden style apartments in the Town Center that would promote surface parking.	A	This policy is not prohibitive as long as the City allows other multifamily housing types.	No changes made. Other multifamily housing types are allowed in many other areas.
Pol. HS 4.6 In order to promote redevelopment prohibit new single-family residential development and limit expansion.	S	This policy is supportive of the development of higher density housing types, which are more affordable than new single-family units.	N/A
Pol. HS 4.7 Adopt a Multi-family Tax Exemption allowance per RCW 84.14 that would create substantial incentives for re-development in the Town Center by providing property tax relief for qualified multifamily and affordable housing developments for 8-12 years	S	This policy meets the criteria of the Housing Supply element rubric.	Revised to provide options for mandatory affordability and creating other incentives. (Policy 4.8)

Land Use Element

Using a similar rubric, Land Use Element adopted policies (2022 plan) were examined to inform the periodic update. Exhibit 15 applies the evaluation framework across policies in the existing Sumner Comprehensive Plan's Land Use Element.

The Land Use Element evaluation identifies some policy revisions that could increase inclusion and reduce disparate impacts, such as:

- Clarifying vague or subjective language, such as "orderly development," "appropriate transitions," or "attractive"
- More specificity around compatibility and buffering, to ensure that multifamily housing is not stigmatized

Exhibit 15: Findings for Land Use Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Relevant Changes in Draft Plan (2024)
Goal LU 1 Provide for orderly development within the Sumner community.	A	This overarching goal could be more specific and clear. "Orderly development" is vague.	Revised to remove "orderly development" and emphasize variety of land uses while preventing adverse impacts (Goal 1).
Pol. LU 1.1 Ensure appropriate transitions between land uses so that more intensive uses do not adversely impact adjacent uses.	A	This policy could be revised for clarity to focus on incompatibility rather than intensity (which could be used to exclude certain housing types).	No changes made. As written, the existing policy does not preclude more intense uses; but encourages transitions (e.g. buffers).
Pol. LU 1.1.1 Maintain the design guidelines and ordinances to achieve compatible and attractive new residential, commercial, and industrial uses.	A	Design Guidelines can hinder new construction if overly complex and restrictive.	No changes made. City to consider complexity of design guidelines as needed.
Pol. LU 1.1.2 Maintain zoning and subdivision regulations to ensure adequate setbacks, landscaping, and buffering are required where land use conflicts and impacts may occur.	A	Ensure zoning and subdivision regulations do not hinder density and diversity of housing types.	No changes made. Implementing regulations to be adjusted as needed.
Pol. LU 1.2 Encourage infill development on vacant properties with existing public services and public utilities, and new development in areas with existing or planned public facilities.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.2.1 Review existing capital facility plans and update them as necessary to ensure compatibility with land use plans.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.2.1 Review and develop incentive based programs that	S	This policy meets the criteria of the land use element rubric.	N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Draft Plan (2024)
would facilitate the development of vacant properties to leverage economic development potential.			
Pol. LU 1.3 Through the Land Use Plan and Community Character Element, strive to balance residential, commercial, industrial and public land uses.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.3.1 Annually review development regulations to remove unnecessary requirements and to balance environmental protection, public participation, and housing and economic development goals.	S	This policy meets the criteria of the land use element rubric.	N/A
Pol. LU 1.4 Where appropriate, prepare subarea plans to implement the Land Use and Community Character Elements and ultimately integrate these plans into the Comprehensive Plan as a whole. Subarea plans shall specify in more detail the allowable uses, design themes, buffering, and protection of sensitive areas and resources.	N/A	This policy implements the Land Use and Community Character policies.	N/A
Pol. LU 1.5 Integrate existing neighborhood plans and design strategies into the Comprehensive Plan.	N/A	This policy depends on development of neighborhood plans: specific policies may exacerbate racially disparate impacts.	N/A
Pol. LU 1.6 Implement the land use map and accompanying designation descriptions as	N/A		N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Draft Plan (2024)
presented in the section titled "Land Use Designations" and Figure 3 titled "Comprehensive Plan Land Use Map" through the adoption and maintenance of the Zoning Map.			
Pol. LU 1.7 Ensure new development is consistent with the policies of this Plan through implementation of regulations, programs, and project specific review.	N/A		N/A
Pol. LU 1.8 Coordinate with adjacent jurisdictions and Pierce County through joint planning to ensure service provision and development is consistent with the goals of this Plan.	N/A		N/A
Pol. LU 1.8.1 In accordance with the Countywide Planning Policies promote and participate in joint planning of unincorporated lands within the Sumner Urban Growth Boundary as shown on Figure 3.	S	To mitigate potential racially disparate impacts, incorporate principles of anti-displacement, and encourage affordable housing, the joint planning process can work towards more inclusive and equitable urban growth.	N/A
Pol. LU 1.8.2 Request joint planning of lands immediately adjacent to the City limits and the Sumner Urban Growth Boundary including land south of SR-410 and along SR-162. See Figure 1.	S	Collaboration in planning can provide opportunities to address housing needs.	N/A
Pol. LU 1.8.3 Joint planning would be completed prior to any modification of the Sumner Urban	N/A		N/A

2022 Policy	Evaluation	Rationale	Relevant Changes in Draft Plan (2024)
Growth Boundary and following review of growth demands and capacity.			
Pol. LU 1.9 Consider annexing unincorporated lands addressed in the Sumner Comprehensive Plan and located within the Sumner Urban Growth when initiated by a private party and in order to resolve service conflicts and avoid creating unincorporated “islands”.	N/A		N/A
Pol. LU 1.10 Ensure newly annexed lands are zoned in conformance with the Sumner Comprehensive Plan Land Use Plan Map.	N/A		N/A
Pol. LU 1.10.1 A subarea plan should be required prior to any large annexation of the Urban Growth Area or request for expansion of the Urban Growth Areas to ensure that newly annexed areas are compatible with and do not adversely affect rural land uses.	N/A	This policy relates more to protection of rural areas.	N/A
Pol. LU 1.11 Support the Town Center Plan area as a “Countywide Center” as it relates to transportation funding.	S	In combination with policies in the Housing element to increase transit-oriented development, investments in transportation can improve resident access to opportunity.	N/A

Community Character Element

The Community Character Element evaluation (2022 adopted plan) highlighted some overall adjustments that could increase inclusion and reduce disparate impacts (see Exhibit 16), such as:

- Amending vague language around community identity, neighborhood character, small town atmosphere, design, and character
- Amending “single-family character” language and preservation throughout
- Promoting low-density residential areas as locations where affordable and varied housing can be constructed
- Using clear standards and definitions for “quality” and “healthy” homes
- Ensuring design review promotes healthy quality housing, while not stifling development and further housing stratification
- Where it is relevant, include mention of multifamily and mixed-use residential/commercial areas

Exhibit 16: Findings for Community Character Element (2022 Comprehensive Plan)

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Goal CC 1 Maintain and enrich Sumner's quality of life encompassed in its friendly, small town atmosphere.	A	Vague language could impede new forms of housing.	Added language to emphasize that higher densities be allowed near services, so the policy is more balanced.
Pol. CC 1.1 Encourage development which enhances the human, pedestrian scale, creating a sense of community and place.	N/A	Does not necessarily conflict with higher density housing types.	N/A
Pol. CC 1.2 Endeavor to maintain a complete community, consistent and compatible in character and design, containing housing, shops, work places, schools, parks, civic facilities, and community services essential to the daily life of residents.	A	Language around character and design could impede housing types, depending on how it is implemented through regulations.	No changes made. Regulations to be revised as needed to ensure a mix of housing types are feasible throughout the city.

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Pol. CC 1.3 In concert with the Sumner citizens and business community, maintain design guidelines and a design code, as appropriate, which address streetscape, landscape, and building design. Materials and methods of construction should be specific to the region, exhibit continuity of history and culture, and compatibility with the climate, protect historic and archaeological resources, and promote the community's character and identity.	A	Vague language on promoting community identity could create barriers, depending on implementation.	Language changed to be more flexible: instead of protecting community character "reflect the historic context" (Policy 1.3).
Pol. CC 1.4 Implement and maintain a Zoning Code which implements the comprehensive plan and community vision.	S	Consistency between Zoning Code and comprehensive plan provides foundation for effective housing policy.	N/A
Pol. CC 1.5 Encourage in the community a continuous commitment to maintaining Sumner's character and quality of place, including land conservation and stewardship, wise management of streetscapes and public viewsheds, property maintenance, and historic preservation.	A	Vague language around character and quality of place could impede new forms of housing.	Language changed to focus more specifically on how resource conservation etc. enhance the character and sense of place (instead of referencing maintaining character more generally). (Policy 1.5)
Pol. CC 1.6 Implement design guidelines that discourage the use of franchise and corporate architecture that detracts from Sumner's unique sense of place.	N/A	Franchise and corporate architecture generally refer to commercial, not residential, buildings.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Pol. CC 1.7 Preserve the single-family residential scale and historic character of existing residential streetscapes through various means such as floor area ratio and setback requirements.	C	Preserving the single-family residential scale and historic character could lead to exclusion in housing. Consider striking the language of single-family and use “low-density residential” instead.	Rephrased to maintain “small-scale” residential rather than specifically single-family (Policy 1.6).
Goal CC 2 The Sumner community should be designed so that housing, jobs, daily needs, and other activities are within easy walking distance of each other.	S	This policy supports residents’ access to housing, jobs, services, and other opportunities, and promotes health.	N/A
Pol. CC 2.1 Establish Urban Villages in the Planning Area. A mix of uses shall be allowed. Area plans shall be prepared to indicate in more detail allowable uses, design themes, buffering, public spaces, etc.	N/A	This generally implements the concept of urban villages.	N/A
Pol. CC 2.2 Define neighborhoods and districts by walking distance to neighborhood centers and other community facilities.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	Policy removed but other policies carry forward similar objective.
Pol. CC 2.3 Together with Pierce Transit and other agencies explore the feasibility of transit for Sumner that is cost effective and is based on, a network of transit stops and a transit system in the neighborhoods and districts, consistent with the Community Linkages Map, connecting to the commuter rail stations, and neighborhoods.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Pol. CC 2.4 Through the use of form-based code, street and design standards promote pedestrian and bicycle friendly streets with trees and other amenities that enhance the streetscape.	S	Form-based codes can offer developers more flexibility and could therefore result in more housing and housing variety.	New policy language added at new 2.5 to prioritize accessible sidewalks, and equitable distribution of streetscape amenities.
Pol. CC 2.5 Encourage a mix of residential-scale civic, commercial, and service uses in neighborhood centers. Small community parks or greens shall be established where appropriate.	S	This policy meets the criteria of the community character element rubric.	Some updates to emphasize walking distance and for clarity (Policy 2.3.1).
Pol. CC 2.6 In recognition of the need for a variety of housing, allow through the Comprehensive Plan and Zoning Code a mix of residential uses as appropriate to the neighborhood character.	A	This policy encourages an increase in housing stock through diversity of housing types. However, "as appropriate to the neighborhood character" is vague and can limit housing development.	Minor changes (new Policy 2.4.) clarify that a mix of housing would be tailored to particular neighborhoods (e.g. targeted higher density areas) but does not preclude other housing types.
Pol. CC 2.7 In conjunction with the Sumner School District, and the Dieringer School District, encourage the location of schools within walking distance of a majority of the population they are intending to serve.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 2.8 Create unique and safe walking and pedestrian crossings at major intersections through street and crosswalk design and incorporation of art.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Goal CC 3 Reinforce the downtown as the town center and commercial and cultural center of Sumner	S	This policy meets the criteria of the rubric.	N/A
Pol. CC 3.1 Plan for the downtown as Town Center and the community core encouraging a combination of commercial, civic, cultural, recreational, and residential uses.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 3.2 In cooperation with Pierce Transit and the Sound Transit, establish the Downtown as the intra-community transit hub and Town Center.	S	This policy meets the criteria of the community character element rubric.	N/A
Pol. CC 3.3 Continue design review process for new and expanded uses. Any future amendments to the design regulations shall include consultation with Sumner Downtown Association, Sumner Historical Society, other civic groups, and citizens.	A	This policy could be a barrier depending on how burdensome the design standards are for developers.	Minor wording changes (Policy 3.3) encourage consultation with stakeholders in developing Design Guidelines, but do not add permit steps for developers.
Pol. CC 3.4 Through the Comprehensive Plan and Zoning Code and form based code, ensure a central role of the historic central business district, and limit competitive uses as appropriate.	A	Consider how "Competitive" is implemented (for example, does it refer to industrial uses, which may have impacts to other uses?)	N/A. The central business district is now part of Town Center Plan which allows unlimited housing density and commercial uses but prohibits "competitive" uses like industrial.
Pol. CC 3.5 Subject to a form-based code and design review,	S	This policy meets the criteria of the community character element rubric.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
encourage infill residential development in the Downtown, such as “mixed use buildings” (multifamily units above ground-floor commercial), and “mixed use developments” (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core.			
Pol. CC 3.6 Work with stakeholders to visually and functionally link the Main Street Corridor from Highway 167 to the Urban Village.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 3.7 The City should, in partnership with the Sumner Downtown Promotion Association, actively recruit and promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in Downtown away from Main Street and Alder Avenue and designated Activity Centers.	S	Mixed use buildings generally provide medium/high density housing units, which may be more likely to serve lower income bands than low density types.	N/A
Pol. CC 3.8 Allow and encourage activities catering to a range of ages, interests, ethnicities, and other diverse attributes.	S	This promotes access to services and amenities.	Combined with policy above (3.6).

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Pol. CC 3.9 Encourage more housing in and near Downtown to strengthen Downtown businesses, take advantage of the commuter train, offer a range of housing in the community, and provide an active, social character.	S	This promotes housing development and access to services.	N/A
Pol. CC 3.10 Allow dining and other retail activities in the street right-of-way where adequate public sidewalk widths are found and explore the potential for seating space in the form of "parklets" in the right of way and in alleys were appropriate.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.11 Provide for community festivals, outdoor markets, performing arts, or other community events for all ages to promote business and activities in the Downtown.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.12 Ensure Downtown is clean, safe, and convenient.	S	This supports neighborhood safety.	N/A
Pol. CC 3.13 Enhance "wayfinding" to and throughout Downtown. Have signs on the State routes, at gateways into Downtown, landmarks, public spaces, public parking and other areas.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.14 Improve existing public parking lots with signage,	N/A	Does not directly relate to housing.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
landscaping, lighting, and drainage.			
Pol. CC 3.15 Provide and fund maintenance of Public Restroom facilities for the Downtown Business District.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.16 Maintain a high quality and attractive appearance. Work with Sumner Downtown Promotion Association and others to seasonally decorate Downtown with decorations, hanging baskets, lights, etc.	N/A	Does not directly relate to housing.	N/A
Pol. CC 3.17 Prohibit franchise architecture within the Town Center and regulate design through form-based code and design and development guidelines.	N/A	Franchise architecture generally relates to commercial buildings rather than housing.	N/A
Pol. CC 3.18 Discourage, and in some cases prohibit, drive-thru businesses in the Town Center to encourage pedestrian oriented design and uses.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 3.19 Through the use of form-based code require new development within the Town Center to provide pedestrian amenities such as landscaping, plazas and fountains and buffer where appropriate.	A	This could impose additional costs on housing development in the Town Center. Engagement with developers would help ensure regulations are not overly prescriptive.	None. This could be adjusted through future engagement with developers if needed.
Pol. CC 3.20 Adopt a "form-based code" in the Town Center to	A	This policy supports a form-based code, which offers predictability to developers,	None

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.		which saves time and costs in housing development.	
Pol. CC 3.21 Development along Traffic Avenue should be in a range of 4-6 stories and be of a mid-rise urban style and provided for underbuilding parking.	S	This supports medium/higher density housing.	N/A
Pol. CC 3.22 The height in the Historic Subdistrict should be 3-4 stories to protect and preserve the small town character and scale of Main Street and reduce conflicts with adjacent residential uses.	S	This supports medium/higher density housing.	N/A
Pol. CC 3.23 Ensure that adequate off-street parking is provided for multi-family development that is reflective of the transit-oriented nature of the Town Center Plan area without requiring expensive construction of parking that exceeds demand.	S	Parking requirements can be cost prohibitive to development.	N/A
Pol. CC 3.24 Every 5 years following adoption of the Town Center Plan conduct a study reviewing parking utilization and parking issues and make policy adjustments as needed.	S	Depending on findings, studies could indicate that less parking is needed, which could lift the parking cost burden for housing development.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Goal CC 4 Establish a community entry statement into and out of Sumner.	N/A	Does not directly relate to housing.	N/A
Pol. CC 4.1 Through street standards, design guidelines, and land use regulations, promote all entrances to the City, including Traffic Avenue and Valley Avenue, 160th Street as gateways to the community. The character of the Avenues shall be a boulevard with 64 median or other treatments. Gateway design standards for community entrances shall be applied.	N/A	Does not directly relate to housing.	N/A
Pol. CC 4.2 Require pedestrian and bicycle oriented amenities and facilities at existing civic and community uses.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 4.3 Subject to a form-based code and design review, encourage infill residential development in the Downtown, such as "mixed use buildings" (multifamily units above ground-floor commercial), and "mixed use developments" (combination mixed use buildings and separate residential buildings on the same parcel), in order to allow for an active community core."	S	This supports more housing development and higher densities.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Goal CC 5 Provide for open space and recreation and protect sensitive areas from degradation.	S	Access to open space and recreation is essential for the wellbeing of all residents.	N/A
Pol. CC 5.1 In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complement's the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.	S	This policy is unlikely to be prohibitive, as long as the City is taking advantage of SEPA opportunities to offer flexibility.	N/A
Pol. CC 5.2 Promote the preservation of the natural terrain, drainage, and vegetation of the community.	N/A	This policy is standard and unlikely to have significant impacts to housing.	N/A
Pol. CC 5.3 Provide appropriate infrastructure to ensure environmental quality.	N/A	This policy is standard and unlikely to have significant impacts to housing.	N/A
Pol. CC 5.4 Promote the efficient use of renewable resources, water and energy through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling.	N/A	This policy is to "promote" not "require", so is unlikely to impose additional development costs.	N/A
Pol. CC 5.5 Promote adequate provision of peripheral and internal open space and recreation uses through implementation of the Parks and Open Space plan.	N/A	This policy is to "promote" not "require", so is unlikely to impose additional development costs.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Pol. CC 5.6 Encourage tree planting in the Town Center along sidewalks and in public open spaces.	N/A	This policy is to “encourage” not “require”, so is unlikely to impose additional development costs.	N/A
Pol. CC 5.7 Expand Heritage Park to a full block.	N/A	Does not directly relate to housing.	N/A
Pol. CC 5.8 Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.	N/A	Does not directly relate to housing.	N/A
Pol. CC 5.9 Continue to provide and fund maintenance of Public Restroom facilities for the historic Downtown Business District.	N/A	Does not directly relate to housing.	N/A
Goal CC 6 Promote a compatible and varied mix of land uses.	S	Encouraging land use variety could support more housing variety.	N/A
Pol. CC 6.1 Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other.	S	This supports variety in housing. While it imposes some style guidelines, it does not impose requirements.	N/A
Pol. CC 6.2 Where appropriate, utilize subarea planning to ensure that newly annexed and developed areas promote a walkable, transit friendly neighborhood with a varied mix of land uses and are compatible with surrounding areas	S	This supports a variety in the long-term city housing stock.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Goal CC 7 Promote the movement of people and goods and lessen the reliance on the automobile.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 7.1 Streets should be designed to accommodate vehicles and emergency access, but not at the expense of pedestrians. Community streets, pedestrian paths, and bike paths should contribute to a system of fully-connected and interesting routes to all destinations. Their design should encourage pedestrian and bicycle use and discourage high speed traffic. The commuter traffic network should be focused around regional transit and freeway travel.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 7.2 To lessen strip-commercial development and continued reliance on the automobile in new developments, encourage a balance of uses along the East Main Street. Certain highway oriented uses which rely on the private automobile for their primary source of access shall be limited. Front-yard parking shall be prohibited and interconnection of all parking lots shall be required. Infill multi-family developments may be allowed, including units	S	This supports multi-family development.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
above ground-floor commercial uses.			
Pol. CC 7.3 Pedestrian-friendly streets with shade trees as well as landscaped boulevard medians shall be included in street standards for employment areas where practicable.	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A
Pol. CC 7.4 Prepare and implement a local street plan to promote a grid pattern and alleys.	S	A grid pattern can help ensure regularity in lot shapes, which could make them more feasible to develop within setback and other standards.	Policy rewritten but intent is similar (Policy 7.7).
Pol. CC 7.5 Strive for continuity in the sidewalk system that links new development to the existing sidewalk network. This may include pedestrian routes through a development for more direct access to transit stops.	S	This could offer flexibility to developers in how they implement sidewalk/connectivity standards while meeting community needs.	Policy removed and consolidated with another (Policy 7.2).
Pol. CC 7.6 Enhance circulation in Downtown by implementing the Sumner Transportation Plan. Circulation improvements should enhance auto and non-motorized travel and provide landscaping and gateway features: Improve the gateway Wood Avenue and Main Street intersection, Further promote travel modes by commuter rail and bus and explore additional alternative modes;	S	This policy could result in lower parking needs and therefore lower costs for developers if regulations are changes to reflect needs.	N/A

2022 Policy	Evaluation	Rationale	Changes in Draft Plan (2024)
Complete the nonmotorized trail system along the White/Stuck River.			
Goal. CC 8 Promote the development of a Manufacturing/Industrial Center and insure integration and compatibility of this area with adjacent neighborhoods and encourage pedestrian and transit connectivity and access.	N/A	Does not directly relate to housing.	N/A

Housing Capacity Analysis by Income Band

Chapter 6: Housing of the Sumner Comprehensive Plan DEIS includes the results of the housing capacity analysis by income band for each growth and comparison to targets. The following provides background on how the capacity analysis was performed.

Findings

The housing capacity analysis found that Alternative 1 (No Action) does not have adequate capacity for all income bands due to a capacity deficit for the 0-80% AMI category. Alternatives 2 and 3 do provide adequate capacity for all income bands. More details are included in DEIS Chapter 6: Housing.

Alternatives

As described in DEIS Chapter 2: Alternatives, Alternative 1 is the No Action Alternative, which carries forward the existing Comprehensive Plan and regulations and distributes growth according to current plans and capacity. Alternative 1 plans for 1,985 housing units from 2020-2044. Alternatives 2 and 3 are the Action Alternatives, each with a different combination of policies aimed at achieving housing capacity for all income bands. Both Action Alternatives Plan for 3,000 housing units from 2020-2044.

Steps

The housing capacity analysis followed the following steps:

- Used 2021 Pierce County Buildable Lands Report data (2020) as a base
- Updated parcel status (built out/underutilized/vacant) based on permit data from 2020-2023 and staff input on future pipeline projects
- Applied density, market factor, and housing type assumptions by zone for each alternative and categorized by affordability level (see Exhibit 17)
- Manually adjusted specific parcels with church property bonuses, potential rezone of Cava mine site from LDR to MDR, and allowances for triplexes and fourplexes on large lots in the LDR zone
- Summarized capacity by income band

Assumptions

Assumptions applied in the capacity analysis are as follows in Exhibit 17, Exhibit 18, Exhibit 19, Exhibit 20, and Exhibit 21.

Exhibit 17: Market Factor Assumptions

Zone	Vacant Market Factor	Underutilized Market Factor
CBD	10%	40%

Zone	Vacant Market Factor	Underutilized Market Factor
GC	10%	40%
HDR - NORTH OF E MAIN	20%	40%
HDR - SOUTH OF E MAIN	20%	40%
IC	0%	0%
LDR-12	10%	20%
LDR-4	10%	20%
LDR-6	10%	20%
LDR-72	10%	20%
LDR-85	10%	20%
M1	0%	0%
M2	0%	0%
MDR - NORTH OF E MAIN	20%	40%
MDR - SOUTH OF E MAIN	20%	40%
NC	10%	40%
TC-3	10%	40%
TC-4	10%	40%
TC-5	10%	40%
TC-6	10%	40%
NC - EAST SUMNER OVERLAY	10%	40%
GC - EAST SUMNER OVERLAY	10%	40%
MDR - EAST SUMNER OVERLAY	20%	40%
HDR - EAST SUMNER OVERLAY	20%	40%

Notes: Market Factor was based on assumptions from the 2021 Buildable Lands Report, with some adjustments to underutilized market factor based on increased development interest in recent years.

Source: 2021 Buildable Lands Report for Pierce County and BERK 2023.

Zones were generally categorized for affordability according to Commerce guidance for “moderate cost communities” (see Exhibit 18 and Exhibit 19).

Exhibit 18: Housing Type Affordability Assumptions

Housing Type	Affordability Level
Low Density (detached single-family)	Higher Income (>120% AMI)
Moderate Density (townhomes, duplexes, multiplexes)	Moderate Income (>80-120% AMI)
Low-Rise (walk-up apartments, condos), 2-3 floors)	Low Income (0-80% AMI)
Mid-Rise (apartments, condos over 2-3 floors)	Low Income (0-80% AMI)
ADUs	Low Income (>50-80% AMI)

Source: Commerce, 2023.

Exhibit 19: Zone Affordability Assumptions

Zone	Alternative 1	Alternative 2	Alternative 3
CBD	0-80% AMI	0-80% AMI	0-80% AMI
GC	0-80% AMI	0-80% AMI	0-80% AMI
HDR – NORTH OF E MAIN	80-120% AMI	0-80% AMI	0-80% AMI
HDR – SOUTH OF E MAIN	0-80% AMI	0-80% AMI	0-80% AMI
IC	N/A	N/A	N/A
LDR-12	120%+ AMI	80-120% AMI	80-120% AMI
LDR-4	120%+ AMI	80-120% AMI	80-120% AMI
LDR-6	120%+ AMI	80-120% AMI	80-120% AMI
LDR-72	120%+ AMI	80-120% AMI	80-120% AMI
LDR-85	120%+ AMI	80-120% AMI	80-120% AMI
M1	N/A	N/A	N/A
M2	N/A	N/A	N/A
MDR – NORTH OF E MAIN	80-120% AMI	0-80% AMI	0-80% AMI
MDR – SOUTH OF E MAIN	0-80% AMI	0-80% AMI	0-80% AMI
NC	0-80% AMI	0-80% AMI	0-80% AMI
TC-3	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*
TC-4	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
TC-5	80-120%+ AMI*	80-120%+ AMI*	80-120%+ AMI*
TC-6	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
HDR – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
MDR – EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*

Zone	Alternative 1	Alternative 2	Alternative 3
NC - EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*
GC - EAST SUMNER OVERLAY	80-120%+ AMI*	10% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*	20% of capacity affordable to 0-80% AMI, remaining affordable to 80-120%+ AMI*

Notes: *Town Center and East Sumner zones, despite allowing multifamily development, are assumed to provide capacity for 80-120%+ AMI because new developments in these areas typically serve higher incomes. In Alternatives 2 and 3 a portion of the capacity in these zones is considered affordable to lower income bands based on incentives or mandatory affordability.

Source: BERK 2023.

Assumed densities for each zone are outlined in Exhibit 20. Alternative 1 density assumptions are based on those used in the 2021 Buildable Lands Report. Assumptions in Alternatives 2 and 3 are based on proposed code changes and the densities of recently permitted development projects in those zones.

Exhibit 20: Density Assumptions

Zone	Alternative 1	Alternative 2	Alternative 3
CBD	25	25	25
GC	25	25	25
HDR - NORTH OF E MAIN	12	20	15
HDR - SOUTH OF E MAIN	12	20	15
IC	0	0	0
LDR-12	4	5	5
LDR-4	5	7	7
LDR-6	5	7	7
LDR-72	5	7	7
LDR-85	5	7	7
M1	0	0	0
M2	0	0	0
MDR - NORTH OF E MAIN	12	20	15
MDR - SOUTH OF E MAIN	12	20	15
NC	25	25	25
TC-3	76	76	76

Zone	Alternative 1	Alternative 2	Alternative 3
TC-4	76	90	90
TC-5	76	76	76
TC-6	76	90	90
HDR - EAST SUMNER OVERLAY	12	28	28
MDR - EAST SUMNER OVERLAY	12	26	26
NC - EAST SUMNER OVERLAY	25	26	26
GC - EAST SUMNER OVERLAY	25	26	26

Source: 2021 Buildable Lands Report for Pierce County and BERK 2023.

Notes: Differences from Alternative 1 are in bold.

Other assumptions for each alternative include ADU capacity, density bonuses for religious properties, rezones, units planned, and housing types in the LDR, MDR, and HDR zones (Exhibit 21). These assumptions align with the policies built into each alternative.

Exhibit 21: Housing Capacity Assumptions by Alternative

	Alternative 1	Alternative 2	Alternative 3
Percent of single family parcels with ADU "capacity"	5%	10%	15% [^]
Church density assumption	None	40 dua Serve less than 50% AMI	40 dua Serve less than 50% AMI
Rezones	None	Cava mine site rezoned MDR	None
Units planned for (2020-2044)	1,985*	3,000*	3,000*
LDR housing types	No changes	Duplexes allowed; fourplexes on larger lots allowed where one is designated affordable	Duplexes allowed; fourplexes on larger lots allowed
MDR / HDR housing types	No change	Low-rise apartments/multiplexes allowed throughout	Low-rise apartments/multiplexes allowed throughout

Notes: *900 units have been built since 2020 or are in the future permit pipeline. These units are expected to serve 80-120%+ AMI.

^ Newest guidance from the Department of Commerce recommends that ADU capacity analysis assume no more than 10% of eligible lots. The Preferred Alternative ADU capacity analysis in the FEIS will not exceed 10% of eligible lots.

Source: BERK 2023.

Commerce “Adequate Provisions” Checklists

The following analysis is based on a review of the code, staff input from conversations with developers and experience reviewing proposals, and code comparison findings.

Moderate Density housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the clarity of development regulations for middle housing.	None.
Prohibiting some moderate density housing types, such as: ▪ Duplexes ▪ Triplexes ▪ Four/five/six-plexes ▪ Townhomes ▪ Cottage housing ▪ Live-work units ▪ Manufactured home parks	Yes.	LDR currently does not allow any middle housing types (though it does allow for ADUs). MDR and HDR allow townhomes, duplexes, manufactured home parks, and cottage housing. They also allow multiplexes where created by zero lot line subdivision.	Allow duplexes in LDR zones per HB1110 (proposed in Alternatives 2 and 3). Allow multiplexes / small apartments in MDR/HDR (proposed in DEIS Alternatives 2 and 3).
High minimum lot sizes	No.	Minimum lot sizes for middle housing types (where allowed) are the same or less restrictive than for single-family.	None.
Low maximum densities or low maximum FAR	Yes.	The MDR zone allows only 15 dwelling units per acre, which	Raise the maximum density in MDR to better

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		could make it challenging to accommodate some middle housing types on some development sites, even though they are allowed (for example, townhomes or duplexes).	accommodate middle housing (proposed in DEIS Alternatives 2 and 3).
Low maximum building heights (Guidance from Commerce middle housing model ordinance suggests 35 feet or higher)	No.	The LDR zone currently has a maximum height of 30 feet. MDR/HDR have 35-ft height, 45 ft in ESUV/HDR and mixed use buildings, and there is no height limit in TCC zone.	None.
Large setback requirements	Yes.	LDR rear and street side yard setbacks are larger than recommended in the Commerce model ordinance.	Consider changing the street side yard setback from 12 to 5 and the rear yard setback to 20.
High off-street parking requirements	Yes.	Parking requirements are within state regulations (for example, no off street parking required for ADUs within a half mile of the transit station). Middle housing types require the same or less parking per unit (depending on unit size) than single family detached housing. Current code does put the onus on the property owner to prove, with a parking study, that no on-site parking is needed when within a half mile of transit. This is in conflict with HB1110, which puts the onus on the city to prove that parking is needed if not waiving parking minimums	Remove requirement for property owners within half mile of transit to prove no parking is needed on-site. Apply current code provisions for senior housing and Town Center parking reductions to other housing/areas.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		outright in these areas near transit.	
High impervious coverage limits (lot coverage)	Yes.	Maximum lot coverage in MDR and some LDR zones is 35%. The Commerce model ordinance recommends no less than 40%. Maximum lot coverage in HDR is 45%.	Raise the maximum lot coverage in MDR and some LDR zones to 40%.
Lack of alignment between building codes and development codes	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with alignment between building codes and development codes.	None.
Other (for example: complex design standards, tree retention regulations, historic preservation requirements)	Yes.	Developers have given feedback on design standards being overly complex. The city does not have tree retention regulations except for in public spaces. Preservation of historic buildings downtown is encouraged in design guidelines but not required.	Consider reviewing design standards for clarity or provide handouts and continue the no-cost pre-application process to help applicants navigate the regulations. Draft plan policies would require DAHP review for older buildings but no required mitigation.
PROCESS OBSTACLES			
Conditional use permit process	No.	There is no conditional use permit required for any middle housing type in the LDR, MDR, or HDR zones.	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Design review	No.	Administrative design review is required for all duplex, multiplex, and townhome development, but design review is only required for single-family detached where there is a 10-lot subdivision occurring. Developer input during the HAP process did not identify design review for middle housing as a barrier.	None. Administrative design review for middle housing is specifically allowed under HB 1110.
Lack of clear and accessible information about process and fees	No.	Fees are displayed on the city website. Process for different projects is in Chapter 18.56 SMC. The City has a self-service platform through which applicants can apply for permits and pay invoices.	None.
Permit fees, impact fees and utility connection fees	Yes.	Building permit fees are based on value of construction and are likely to be lower per unit for middle housing. Impact ("mitigation") fees are lower for multifamily, duplexes & Zero Lot Line projects than single-family units per unit. ADU fees are one-half of single-family. Input from Public Works staff indicates that Sumner fees are generally low compared to other cities. However, developer sentiment generally suggests that impact fees and connection fees may still be a barrier to affordability.	Exempt ADUs and/or affordable senior housing (proposed under DEIS Alternatives 2 and 3). Consider reducing fees for all multiplexes, townhomes and other middle housing.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Processing times and staffing challenges	Yes.	The Housing Action Plan (2021) identified “improve the permit process” as a key strategy.	Implement steps identified in the HAP (create permit process fast track program, etc.), Code update 2023 streamlined process for Zero Lot Line Subdivisions. In future per HAP should raise upper threshold for short plat to 9 units, raise SEPA exemption levels for minor new construction
SEPA process	Yes.	The City has already undertaken planned actions in Town Center and East Sumner, which simplifies the SEPA process for developers. However, the Housing Action Plan (2021) identifies raising SEPA exemption levels for minor new construction as a strategy.	Raise SEPA exemption levels for minor new construction.
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			
Lack of large parcels for infill development	Yes.	There is a lack of larger parcels in the city as it is largely built out.	The HAP identifies use of publicly owned land as an incentive for rent-restricted affordable housing. The City could consider assembling publicly-owned parcels for housing development if appropriate surplus property arises.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Environmental constraints	No.	There are some areas of steep slopes and wetlands but most parcels are not affected, particularly parcels that are close to services and transit that would be suitable for affordable housing.	None.

Low-Rise or Mid-Rise housing barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
DEVELOPMENT REGULATIONS			
Unclear development regulations for Low Rise/Mid-Rise housing (i.e. apartments up to 3 stories)	Yes	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the clarity of development regulations. However, staff have heard from developers that some codes, such as Town Center, may be challenging to interpret.	Review development regulations for clarity, or provide materials to help applicants navigate the regulations; continue the no-cost pre-application consultation opportunity.
High minimum lot sizes	No.	Minimum lot sizes are not particularly high (5,000 s.f. per building site in MDR/HDR, including in East Sumner overlay).	None.
Low maximum densities or low maximum FAR	Yes.	Maximum density in MDR (outside of East Sumner) is 15, which may make it difficult to accommodate low-rise apartments where currently allowed.	Revisit maximum density in all MDR areas of the city.
Low maximum building heights	No.	Maximum heights are 35 feet in MDR/HDR, 35-45 feet in East Sumner, and 4-6 stories in the Town Center.	N/A
Large setback requirements	No.	Front yard setback is 10 feet in MDR, 20 feet in HDR. Rear yard setback is 25 feet in MDR, 20 feet in HDR. Side yards for multifamily are 15-25 feet depending on adjacent zone.	N/A

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
		Setbacks in Town Center vary by district but are minimal and in some places include a maximum setback.	
High off-street parking requirements	No.	Multifamily dwellings are required to have one space per studio, one and a half spaces for each one or two bedroom units, and two spaces for three or more bedroom units. Visitor parking is required at one space per five units. In the Town Center Plan area, the part of Sumner with the best access to transit. 1.25 spaces are required for each unit. This may be reduced to 0.85 spaces per unit where within ¼ mile of the Sumner Sounder Station, on-street parking is available, and a parking study shows that proposed parking will meet market demand of the development. Single-family units are required to provide two spaces per unit, which is more than multifamily units with two or fewer bedrooms.	To respond to new State guidelines, code will be updated for ADUs and dwellings near the high capacity transit station.
High impervious coverage limits (building coverage)	Yes.	Maximum lot coverage is 45% in HDR and 35% in MDR. Maximum coverage in the Town Center ranges from 70-100%.	Apartments are currently allowed south of E Main in MDR, and a maximum lot coverage of 35% may make this challenging to achieve.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Lack of alignment between building and development codes	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with alignment between building codes and development codes.	None.
Other (for example: ground floor retail requirements, open space requirements, complex design standards, tree retention regulations, historic preservation requirements)	No.	No ground floor retail requirements. Minimum open space for multifamily is 50 square feet of private open space and 200 square feet of common open space per unit. Design review standards are applied to multifamily development but design review has not been raised by developers as a barrier in HAP engagement. The city does not have tree retention regulations except for in public spaces. Preservation of historic buildings in the historic district is encouraged in design guidelines but not required. Draft plan policies would require DAHP review but no required mitigation.	None.
PROCESS OBSTACLES			
Conditional use permit process	No.	Low-rise and mid-rise buildings are not conditional uses in any zone.	N/A

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Design review	Yes.	All low-rise and mid-rise apartment/condo developments are required to go through design commission review to ensure they fit the city's multifamily design guidelines.	Consider updating design guidelines to more specific, quantitative requirements.
Lack of clear and accessible information about process and fees	No.	Fees are displayed on the city website. Process for different projects is in Chapter 18.56 SMC. The City has a self-service platform through which applicants can apply for permits and pay invoices.	None.
Permit fees, impact fees and utility connection fees	No.	Building permit fees are based on value of construction and are likely to be lower per unit for low and mid-rise housing. Impact ("mitigation") fees are less expensive for multifamily than single-family units per unit.	None.
Process times and staffing challenges	Yes.	The Housing Action Plan (2021) identified "improve the permit process" as a key strategy.	Implement steps identified in the HAP (for example, create permit process fast track program)
SEPA process	No.	Housing Action Plan (2021) engagement, including developer engagement, did not find issues with the SEPA process for low-rise and mid-rise development.	None.
LIMITED LAND AVAILABILITY AND ENVIRONMENTAL CONSTRAINTS			

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barrier.
Lack of large parcels for infill development	Yes.	There is a lack of larger parcels in the city as it is largely built out.	The HAP identifies use of publicly owned land as an incentive for rent-restricted affordable housing. The City could consider assembling publicly-owned parcels for housing development if appropriate surplus property arises.
Environmental constraints	No.	There are some areas of steep slopes and wetlands but most parcels suitable for higher density housing or affordable housing are not affected.	None.

Supplementary barrier review checklist for PSH and emergency housing

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
Spacing requirements (for example, minimum distance from parks, schools or other emergency/PSH housing facilities) ²	Yes.	Code currently does not allow emergency shelter, emergency housing, PSH, or transitional housing within a half mile of any other facility of these types.	Proposed code would Revise spacing requirements to 880 feet, based on Commerce guidance.
Parking requirements	No.	Parking requirements are the same as required for housing types of similar scale and for hotels/motels. Through the conditional use permit process parking needs for the project would be established.	None.
On-site recreation and open space requirements	No.		None.
Restrictions on support spaces, such as office space, within a transitional or PSH building in a residential zone			None
Arbitrary limits on number of occupants (in conflict with RCW 35A.21.314)	Yes.	The code currently limits PSH and transitional housing to one family per dwelling unit. Emergency shelters and emergency housing are limited to no more than five families or 20 occupants, whichever is fewer.	Proposed code would revise maximum occupants to tie to building/fire code, per Commerce guidance.

² Note that RCW 35A.21.430 expressly states requirements on occupancy, spacing, and intensity of use may not prevent the siting of a sufficient number of permanent supportive housing, transitional housing, indoor emergency housing or indoor emergency shelters necessary to accommodate each code city's projected need for such housing and shelter under RCW 36.70A.070(2)(a)(ii). The restrictions on these uses must be to protect public health and safety.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
Requirements for PSH or emergency housing that are different than the requirements imposed on housing developments generally (in conflict with RCW 36.130.020)	Yes.	The code currently limits PSH and transitional housing to no more than 10 housing units per parcel in LDR, MDR, and HDR. Maximum is 25 dwelling units per acre in commercial districts.	Proposed code sets occupancy limits to align with building/fire code, and establishes spacing limits at 880 feet per state guidelines
Other restrictions specific to emergency shelters, emergency housing, transitional housing and permanent supportive housing	No.	None.	N/A

Accessory dwelling unit barrier review checklist

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
DEVELOPMENT REGULATIONS			
- Consistent with HB 1337 (2023) - Must allow two ADUs on each lot in urban growth areas; - May not require the owner to occupy the property, and may not prohibit sale as independent units, but may restrict the use of ADUs as short term rentals; - Must allow an ADU of at least 1,000 square feet; - Must set parking requirements based on distance from transit and lot size; - May not charge more than 50% of the impact fees charged for the principal unit; - Must permit ADUs in structures detached from the principal unit; - May not restrict roof heights of ADUs to less than 24 feet, unless that limitation applies to the principal unit; - May not impose setback requirements, yard coverage limits, tree retention mandates, restrictions on entry door locations, aesthetic requirements, or requirements for design review for ADUs that are more restrictive than those for principal units; - Must allow an ADUs on any lot that meets the minimum lot size required for the principal unit; - Must allow detached ADUs to be sited at a lot line if the lot line abuts a public alley, unless the city or county routinely plows snow on the public alley; - Must allow conversions from existing structures, even if they violate current code requirements for setbacks or lot coverage; and - May not require public street improvements as a condition of permitting ADUs.	Yes.	Existing code does not meet HB1337 requirements relating to owner occupancy, allowing both attached and detached ADUs, building height, setbacks, building entrance, and design standards.	Code revisions to bring the SMC in line with HB1337 requirements.
Unclear development regulations	No.	This has not been raised as an issue by applicants. The City also has a page on its website	None.

Barrier	Is this barrier likely to affect housing production? (yes or no)	Why or why not? Provide evidence.	Actions needed to address barriers.
		to direct applicants to the right permits for ADUs and next steps.	
Large setback requirements	Yes.	Setbacks could be more flexible where abutting an alley and where more restrictive than principal unit for side yards.	Code revisions to bring setbacks in line with HB1337 requirements.
Off-street parking requirements	Yes.	Parking requirements are generally in line with HB1337, except in that the code puts the onus on the property owner to demonstrate that an ADU within one half-mile of the Sumner transit station has adequate street parking if not providing off-street parking.	Remove requirement for property owner of ADU within one half mile of the Sumner transit station to provide on street parking is available.
Other (for example: burdensome design standards, tree retention regulations, historic preservation requirements, open space requirements, etc.)	Yes.	Administrative design review is required for ADUs where it is not required for infill detached single-family.	Revise code to remove design review requirement for ADUs where there is no review for detached single family.
PROCESS OBSTACLES			
Lack of clear and accessible information about process and fees	Yes.	More clarity could be added for impact fees (currently some are in SMC and some on city permit website)	Consider adding summary of fees that apply to ADUs on permits webpage; continue no-cost pre-application consultations.
Permit fees, impact fees and utility connection fees that are not proportionate to impact	No.	ADU fees are half of single family.	The City could consider exempting ADUs from some fees.
Processing times and staffing challenges	Yes.	The Housing Action Plan (2021) identified "improve the permit process" as a key strategy.	Implement steps identified in the HAP (for example, create permit process fast track program)

Checklist for local option tools for addressing affordable housing funding gaps

Local option tools for addressing affordable housing funding gaps*	Implementation status	Plans for implementation
Housing and related services sales tax (RCW 82.14.530)	Adopted. Chapter 3.22 SMC.	N/A
Affordable housing property tax levy (RCW 84.52.105)	N/A	N/A
REET 2 (RCW 82.46.035) – GMA jurisdictions only and only available through 2025	N/A	N/A
Affordable Housing Sales Tax Credit (RCW 82.14.540) – was only available to jurisdictions through July 2020	N/A	N/A
Lodging Tax (RCW 67.28.150 and RCW 67.28.160) to repay general obligation bonds or revenue bonds	N/A	N/A
Mental Illness and Drug Dependency Tax (RCW 82.14.460) – jurisdictions with a population over 30,000	Not applicable (Sumner does not have a population over 30,000)	N/A
Donating surplus public lands for affordable housing projects (RCW 39.33.015)	Not adopted.	The City does have public land that could be considered in the future for affordable housing.
Impact fee waivers for affordable housing projects (RCW 82.02.060)	Adopted for school impact fees.	N/A
Application fee waivers or other benefits for affordable housing projects (RCW 36.70A.540)	N/A	N/A
Multifamily Tax Exemption (MFTE) with affordable housing requirement (RCW 84.14)	MFTE available in Town Center and East Sumner (market rate or affordable).	All EIS alternatives plan to continue or expand the MFTE program.
General funds (including levy lid lifts to increase funds available)	N/A	N/A

* Some tools may be unavailable for certain jurisdictions. For example, only GMA jurisdictions can use REET 2, or the surrounding county may have already implemented the housing and related services sales tax. See MRSC's summary of [Affordable Housing Funding Sources](#) for more details and the Association of Washington Cities (AWC)/MRSC booklet on [Homelessness & housing toolkit for cities](#) (2022).

Appendix C: Climate Analysis Findings

Background

House Bill 1181 (2023) added new requirements to the Growth Management Act on planning for climate change. The City must include policies in the comprehensive plan (in a greenhouse gas emissions reduction sub-element and resiliency sub-element) that “reduce overall greenhouse gas emissions” and “enhance resiliency to and avoid the adverse impacts of climate change.” Commerce has provided guidance on how to meet the new requirements, including criteria for screening adopted and proposed policies. Sumner has until 2029 to meet the new requirements and is including some policy changes to address these topics in the 2024 periodic update. Further work to ensure consistency with the requirements may be completed from 2024-2029.

Sumner has existing policies throughout the adopted plan that address climate resiliency and emissions reduction. New and revised policies are included in the Draft Comprehensive Plan (2024). The Draft Comprehensive Plan also includes a new Climate Change element that maps to the relevant policies elsewhere in the plan.

Climate Impacts in Sumner

Sumner and the rest of Pierce County are expected to be impacted by climate change in the 20-year planning period. The Pierce County Climate Vulnerability Assessment, based on data from the University of Washington Climate Impacts Group, found that by the 2040-2069 period (compared to the 1980-2009 period), Pierce County could expect:

- An average 12% increase in the maximum daily precipitation with the 2-year storm¹
- Median change in average temperature in the June-August period of 6.3 degrees Fahrenheit
- Higher number of high fire danger days (ranges from 6-14 additional days throughout the County)
- Increase in number of days above 90 degrees Humidex² of about 19.8 days.

Climate Impacts Group mapping³ also shows:

- Sumner is at a higher risk for heat waves than some other parts of Pierce County (Exhibit 2).

¹ A two-year storm is a storm that has a ½ (or 50%) probability of occurring in any one-year period.

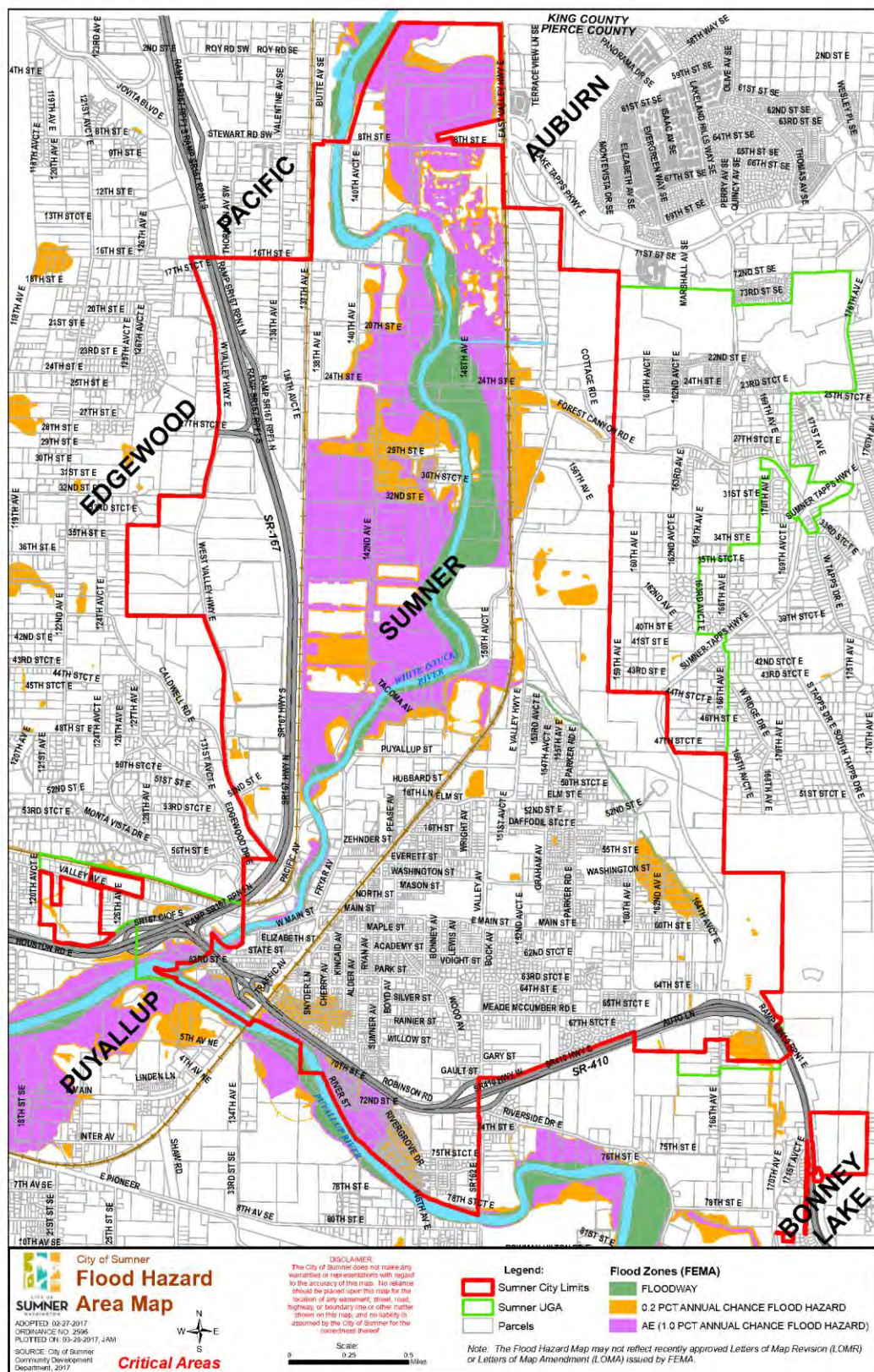
² Humidex is an index used to describe how hot weather feels to the average person, considering the temperature and the humidity.

³ data.cig.uw.edu/climatemapping/

- In Sumner, the White River could see a 30% increase and the Puyallup River could see a 25% increase in their peak streamflows when comparing the 1980-2009 average and the 2040-2069 predicted average. This indicates a higher potential for flooding and a larger area of flooding during peak flows (see existing Floodplain Map in Exhibit 1)

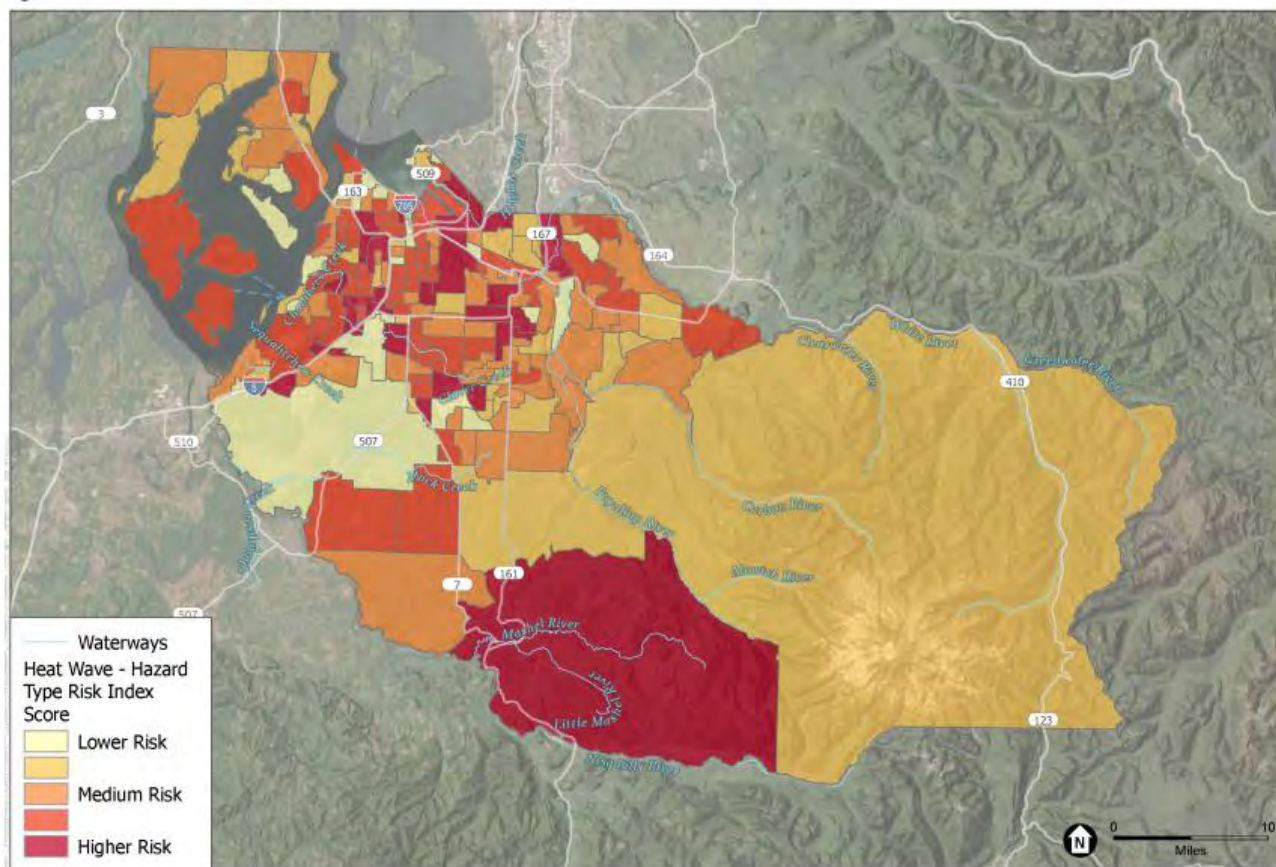
Some portions of the city are also at higher risk of wildfires. These areas, on the east and west sides of Sumner, are categorized as “intermix”, where structures or developments are surrounded on two or more sides by wildlands (Exhibit 3).

Exhibit 1: Flood Hazard Area Map



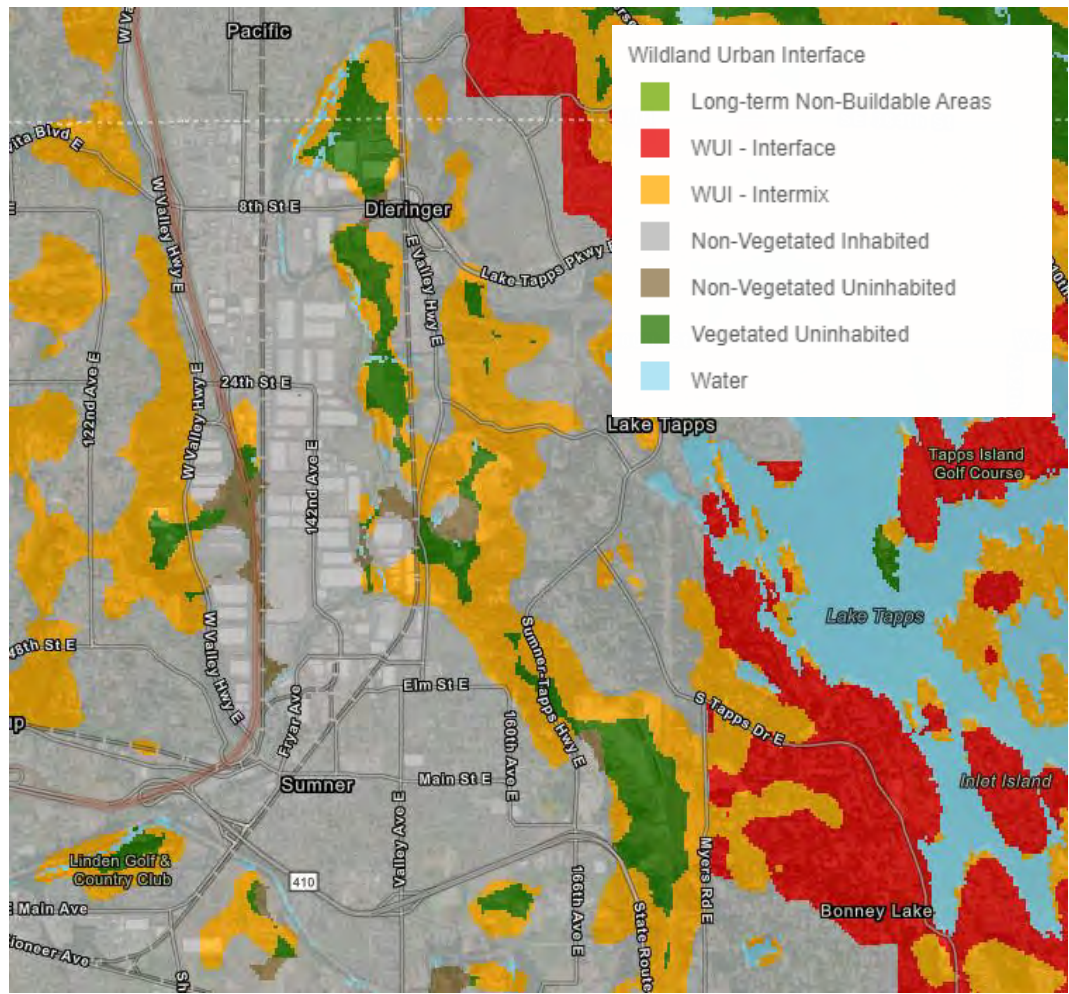
Source: City of Sumner, 2017

Exhibit 2: Heat Wave Risk Index



Source: Pierce County Climate Vulnerability Memo 2022; Maxar 2021; Pierce County 2022; Pierce County/ESA 2023; FEMA 2023

Exhibit 3: Wildland Urban Interface (Department of Natural Resources)



Source: Washington State Department of Natural Resources, 2019.

Existing Policies

Adopted policies in the 2022 Comprehensive Plan were screened based on the Commerce guidance.

Resiliency

The Commerce guidance requires that jurisdictions include policies relating to climate resiliency for each of the following sectors:

- Agriculture and food systems⁴
- Buildings and energy
- Cultural resources and practices
- Economic development
- Emergency management
- Health and wellbeing
- Ecosystems
- Transportation
- Waste management
- Water resources
- Zoning and development

Sumner’s adopted policies already include policies that are likely to improve climate resiliency for most of these sectors. However, the City does not have any existing policies related to the resiliency of agriculture and food systems or economic development. There are also opportunities for stronger policies for some topics and for integration of relevant policies from the Sumner portion of the Pierce County Hazard Mitigation Plan (2020). Below is a review of adopted policies (2022), followed by an analysis of 2024 proposed new/revised policies to address opportunities and gaps.

Exhibit 4: Resiliency Policy Analysis

Sector	Adopted Policies (2022)
Agriculture and food systems	▪ None
Buildings and energy	▪ Meet LEED silver certification for major construction of City facilities (Capital Facilities 2.1) ▪ Encourage land conservation and stewardship (Community Character 1.5) ▪ Enforce State Energy Code (Housing 3.3) ▪ Support energy efficiency and conservation programs (Housing 3.6) ▪ Support tree planting along streets and parking lots (Utilities 4.5)
Cultural resources and practices	▪ Protect shoreline areas with historic and cultural values (Shorelines 7) ▪ Protect anadromous fisheries (Environment 3.8)
Economic development	▪ None

⁴ Food systems refer to the range of actors involved in food including food producers, processors, distributors, sellers, and consumers. While Sumner does not have much agriculture, other components of the food system are relevant and should be made more resilient through policy.

Sector	Adopted Policies (2022)
Emergency management	▪ Maintain Emergency Management Plan (Family and Human Services 2.1.8) ▪ Education on natural hazards and notification systems (Environment 2.1)
Health and wellbeing	▪ Encourage tree planting in Town Center (Community Character 5.6) ▪ Programs for emergency and temporary housing (Family and Human Services 2.2) ▪ Minimize potential for loss of life and damage from White River and Puyallup flooding (Environment 2.2) ▪ Protect community from flooding (Shoreline Goal 8) ▪ Protect hillsides from landslide failures (Environment 2.5) ▪ Reduce erosion impacts (Environment 2.6) ▪ Urban forestry strategy (Parks 2.2; Environment 3.3)
Ecosystems	▪ Wetland protection (Parks 1.8, 2.8, 2.13, 2.14; Environment 1.4.5, 2.2.4, 3.2) ▪ Protect wildlife areas (Environment 3.1, 3.11) ▪ Implement ordinances that protect streams, habitat, wetlands (Capital Facilities 1.7.5)
Transportation	▪ Policy support for transit shelters (Transportation 5.4) ▪ Incentives for low impact development (Transportation 6.5) ▪ Align transportation facilities away from environmentally sensitive areas (Transportation 6.1)
Waste management	▪ Promote natural drainage (Community Character 5.4) ▪ Eliminate development of new septic systems and community sewage systems (Capital Facilities 1.8.2) ▪ Support recycling through curbside program, education, using recycled products (Capital Facilities 1.9.1) ▪ Reduce waste in accordance with Solid Waste Plan (Capital Facilities 1.9.2) ▪ Seek funding for stormwater improvements (Capital Facilities 1.7.3) ▪ Ensure stormwater infrastructure is properly maintained and operated (Capital Facilities 1.7.6)
Water resources	▪ Development regulations and surface water quality management plan (Environment 1.4) ▪ Education on surface water quality impact reduction (Environment 1.4.3) ▪ Implement regulations to prevent groundwater quality degradation (Environment 1.5.1)

Sector	Adopted Policies (2022)
	▪ Seek to expand watershed protection by acquiring land (Capital Facilities 1.6.4) ▪ Develop wellhead and groundwater protection program (Capital Facilities 1.6.6) ▪ Require new development to provide for facilities that reduce water quality/quantity impacts (Capital Facilities 1.7.2)
Zoning and development	▪ Standards for streets/parking to reduce heat and provide shade (Housing 3.4) ▪ Parks and open space development in Town Center (Community Character 5.8) ▪ Require trees and vegetated barriers between busy roadways and schools/residential areas (Environment 1.1.7) ▪ Low impact development in city facilities (Environment 1.4.8) ▪ Encourage low impact development in private projects (Environment 1.4.7, 1.4.9) ▪ Identify changes to development regulations to promote low impact development (Environment 1.4.10)

Emissions Reduction

The Commerce guidance requires the City to consider its key emissions sources and include policies that reduce those emissions. The Pierce County Communitywide Geographic Greenhouse Gas Emissions report (2022) confirmed that the following sources are relevant in Pierce County:

- Electricity/Heating/Cooling
- Transportation
- Solid Waste / Landfill / Wastewater
- Natural Gas / Propane Transport and Non-heating Uses
- Industrial Processes
- Land Use / Tree Loss / Agriculture (note: agriculture is not a major use in Sumner, so agriculture is not a likely source of emissions)

Existing Sumner policies address most of these sources, however, some specific policies could be added relating to transportation, industrial processes, and natural gas / propane transport and non-heating uses (assumed to be mostly related to industrial processes).

Exhibit 5: Emissions Reduction Policy Analysis

Sector	Adopted Policies (2022)
Electricity/Heating/Cooling	▪ Promote efficient use of renewable resources, energy efficient building design (Community Character 5.4) ▪ Promote use of energy conservation features in new construction (Housing 3.1) ▪ Enforce State Energy Code (Housing 3.3) ▪ Support energy efficiency and conservation programs (Housing 3.6) ▪ Incorporate green development practices into all City construction (Environment Goal 2) ▪ Meet LEED silver certification for major construction of City facilities (Capital Facilities 2.1) ▪ Leverage City's purchasing power to expand markets for green building products (Capital Facilities 2.2)
Transportation	▪ Support for bicycle and pedestrian infrastructure and transit (Transportation, Community Character; multiple policies) ▪ Encourage pedestrian scale development and mixed uses, walkability (Transportation, Community Character; multiple policies) ▪ Programs to reduce transportation system demands through HOV lanes, flexible work schedules and remote work, transportation demand management, commute trip reduction (Transportation 5.8) ▪ Support vehicle emissions testing, air quality studies, cleaner burning fuels (Transportation 6.3) ▪ Consider environmental impacts in development and operation of transportation system (Transportation 6.1) ▪ Support locating schools within walking distance of service population (Community Character 2.7) ▪ Require pedestrian and bicycle amenities at neighborhood centers and civic and community uses (Community Character 4.2) ▪ Promote higher densities near transit (Housing 3.2, Housing Goal 4) ▪ Encourage alternative modes of transportation (Environment) ▪ Encourage alternative fuels and electric vehicles (Environment)
Solid Waste / Landfill / Wastewater	▪ Promote recycled construction materials (Environment 1.8) ▪ Support recycling through curbside program, education, and using recycled products for City purposes (Capital Facilities 1.9.1) ▪ Implement policies for waste reduction in accordance with Solid Waste Plan (Capital Facilities 1.9.2)
Natural Gas / Propane Transport and Non-heating Uses	▪ None

Sector	Adopted Policies (2022)
Industrial Processes	▪ Encourage “clean” industries (Economic Development 1.7)
Land Use / Tree Loss / Agriculture	▪ Encourage tree planting in Town Center (Community Character 5.6) ▪ Urban forestry strategy (Parks and Open Space 2.2 / Environment 3.3)

Gaps and Opportunities

Resiliency

- No policies that address agriculture and food systems. Agriculture has little presence in Sumner, but the City should still consider policies related to food system resiliency
- No policies specific to economic development resiliency
- No policies relating to fire risk
- Opportunity to strengthen cultural resources resiliency
- Opportunity to add policies for human health and well-being (related to air pollution, cooling, and extreme heat) and emergency management
- Opportunity to emphasize tree planting as a resilience measure
- Opportunity to strengthen transportation system resiliency
- Opportunity to add emphasis on resilience to flooding and water quality impacts
- Opportunity to bring relevant policies from Hazard Mitigation Plan into the comprehensive plan

Emissions Reduction

- Opportunities to increase emissions reductions from transportation
- Opportunities to further encourage walkability and more density in some neighborhoods with access to services
- Opportunity to clarify the connection of tree planting to air quality and carbon emissions
- Opportunity to emphasize energy efficiency of new development and retrofitting existing buildings
- Opportunity to encourage sustainable industrial processes
- Opportunity to encourage renewable energy use
- Opportunity to further encourage materials recycling

Proposed Policies

The following policies are included in the draft 2024 Comprehensive Plan in the relevant elements:

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Capital Facilities 15.2.2	Encourage the use of low impact development (LID) and stormwater best management practices to manage stormwater runoff where feasible.	New	X		
Capital Facilities 15.4	Review, develop, and implement design and development standards to meet the City's goals to improve water quality and reduce flooding, as well as reflect the requirements and manuals of state and federal agencies, as appropriate.	Revised	X		
Capital Facilities 16.1	Support recycling within the community through a curb-side program, education and using recycled products for City purposes wherever feasible.	Adopted	X	X	
Capital Facilities 16.2	Implement programs for waste reduction in accordance with the adopted Solid Waste Plan	Adopted	X		
Capital Facilities 3.0	Consider the impacts of climate change and incorporate climate resiliency measures in capital facilities projects.	New	X	X	
Capital Facilities 3.1	Reduce the City's carbon footprint by incorporating, where practicable, green development practices in all buildings the City constructs, remodels and renovates.	Revised		X	
Capital Facilities 3.10	Install generators for all identified critical facilities without adequate generators.	New	X		Yes
Capital Facilities 3.11	Construct a floodwall or setback levee on the Puyallup River in the Rivergrove Drive neighborhood in order to reduce the flooding on adjacent properties.	New	X		Yes
Capital Facilities 3.2	The City should meet a LEED® Silver certification for new construction or additions or major renovations of City facilities over 5,000 gross square feet in area only when long term economic benefits may be realized, including the reduction of operating costs, enhanced asset value, optimized building performance and a healthier workplace for its employees.	Revised	X	X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Capital Facilities 3.3	Implement energy-saving technologies in all City facilities as facilities are built or remodeled, such as energy efficient lighting, water-conserving appliances.	New	X	X	
Capital Facilities 3.4	Leverage the City's purchasing power related to capital improvement projects to help expand the markets for green building products, including recycled-content materials and clean, renewable energy technologies.	Adopted		X	
Capital Facilities 3.5	Initiate programs to replace and upgrade stormwater systems to accommodate future increased conveyance requirements due to climate change and urban flooding.	New	X		
Capital Facilities 3.6	Support the planting of trees along street edges and parking lots and large expanses of asphalt to create a pleasing environment and to increase energy efficiency by reducing heat absorbed by asphalt that increases ambient temperatures.	Adopted	X	X	
Capital Facilities 3.8	Facilitate the conversion to cost-effective and environmentally sensitive alternative technologies and energy sources.	Adopted		X	
Community Character 1.1	Encourage development that enhances the human/pedestrian scale, creating a sense of community and place.	Adopted		X	
Community Character 1.5	Encourage in the community a commitment to natural resource conservation and stewardship, management of attractive streetscapes, property maintenance, and historic preservation, which enhance Sumner's community character and sense of place.	Revised	X		
Community Character 2.3	Identify for each neighborhood center a walking distance area. A walking distance area is indicated by a circle with a radius of generally 1,500 feet (one-quarter mile) and an estimated walking time of approximately 5 minutes.	New		X	
Community Character 2.5	Through the use of form-based code, street and design standards, promote pedestrian and bicycle friendly streets with trees and other amenities that enhance the streetscape.	Adopted		X	
Community Character 2.6	Create unique and safe pedestrian crossings at major intersections through street and crosswalk design and incorporation of art.	Revised		X	
Community Character 2.7	In conjunction with the Sumner-Bonney Lake School District, and the Dieringer School District, encourage the location of schools within	Revised		X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	walking distance of a majority of the population they are intending to serve.				
Community Character 3.2	In cooperation with Pierce Transit and Sound Transit, establish the Town Center area as the intra-community transit hub.	Revised		X	
Community Character 3.6	The City should, in partnership with the downtown business association(s) and Chamber of Commerce, actively recruit and promote pedestrian-oriented retail, service, and mixed uses. Uses that require outdoor storage, provide offsite services, or have little walk-in trade as primary parts of their businesses should be oriented to secondary locations in the Town Center, away from Main Street and Alder Avenue and designated Activity Nodes.	Revised		X	
Community Character 5.4	Promote the efficient use of renewable resources, water and energy through the use of natural drainage, indigenous landscaping, energy efficient siting and building construction, and recycling.	Adopted	X	X	
Community Character 5.6	Encourage tree planting in the Town Center and along major community streets and in public open spaces.	Revised	X	X	
Community Character 5.7	Maintain Sumner's Tree City USA designation through supporting the urban forestry program for maintaining and restoring tree canopy throughout the city.	New	X	X	
Community Character 5.9	Acquire and improve small parcels of land for developing parks and open spaces in the Town Center.	Adopted	X		
Community Character 7.0	Promote the movement of people and goods and lessen the reliance on the automobile.	Adopted		X	
Economic Development and Employment 1.7	Encourage industries and industrial processes that are sustainable and environmentally responsible and that contribute to the local community.	Revised		X	
Economic Development and Employment 5.0	Improve the resiliency of the local Sumner economy to climate change and reduce its carbon emissions where practicable.	New	X	X	
Economic Development and Employment 5.4	Support the resilience of the local food economy by encouraging farmers' markets and expanding community gardening opportunities on private development sites and non-profit agency sites.	New	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Economic Development and Employment 5.5	Promote purchasing from local businesses to support economic development and reduce emissions associated with the transportation, production, and distribution of goods.	New		X	
Environment 1.10	Maintain a program of street tree planting to boost carbon sequestration, improve air quality, and counter heat island effects, particularly in overburdened communities.	New	X	X	
Environment 1.7	Develop a continuing program to assist the public with preventing storm damage through the proper use of vegetation and trimming of dangerous limbs.	New	X		Yes
Environment 1.8	Work with Pierce County to continue education programs related to winter preparedness as part of their preparedness education program.	New	X		Yes
Environment 1.9	Expand public education campaigns regarding fire safety, including information on wildfire hazards and protecting homes.	New	X		Yes
Environment 10.0	Establish regulations and processes to allow and streamline permits for new energy technologies, such as battery storage facilities, small- and large-scale solar facilities, and similar alternative technologies.	New		X	Yes
Environment 10.1	Explore ways to streamline and reduce costs in the permitting process for residential-scale solar facilities.	New		X	
Environment 2.1	In order to reduce emissions and reliance on the automobile as the primary method of transportation, encourage alternative modes of transportation.	Revised		X	
Environment 2.5	Support infrastructure, codes and permit processes that encourage alternative fuels and electric vehicles.	Revised		X	
Environment 5.1	Implement development regulations and a surface water quality management plan to protect water quality.	Adopted	X		
Environment 5.11	Identify and evaluate potential changes to land use development regulations and building codes to support and promote low impact development.	Adopted	X		
Environment 5.2	Maintain regulatory requirements for adequate vegetated stream buffers to protect functions and values such as temperature reduction,	New	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	as well as filtration and attenuation (slow release) of surface water runoff.				
Environment 5.3	Protect wetlands and wetland buffers to protect functions and values, such as flood attenuation, through water storage and water filtration.	New	X		
Environment 5.5	Work with other agencies to educate the general public and developers on the potential surface water quality degradation resulting from development and human activity and how to reduce impacts.	Adopted	X		
Environment 5.7	Continue to implement wetland regulations as an essential part of water quality protection	Revised	X		
Environment 5.8	Continue to be a leader in developing and implementing state-of-the-art stormwater management techniques including low impact development.	Adopted	X		
Environment 5.9	Incorporate low impact development principles and practices into the design, construction and operation of all city facilities and city-funded projects when economically feasible.	Revised	X		
Environment 6.1	Implement regulations to prevent groundwater quality degradation	Adopted	X		
Environment 6.3	Collaborate with adjacent jurisdictions and agencies within watersheds of the White and Puyallup Rivers to protect groundwater resources which support the Sumner water supply.	Adopted	X		
Environment 6.4	Protect trees and vegetation in areas that contribute groundwater discharge and recharge.	New	X		
Environment 7.1	Work with other agencies to develop and implement inclusive public education and notification systems related to geologically hazardous areas.	Revised	X		
Environment 7.2	Minimize the potential for loss of life and damage to public and private investments resulting from flooding in special flood hazard areas, such as along the White (Stuck) and Puyallup Rivers.	Revised	X		
Environment 7.2.5	Acquire property that is located within flood prone areas as necessary to implement flood protection projects and plans.	New	X		Yes
Environment 7.2.6	Continue and expand public education related to floods.	New	X		Yes

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Environment 7.3	Implement and enforce the wetlands and floodplain regulations to retain the existing flood storage capacity.	New	X		Yes
Environment 7.4	Seek mitigation projects to increase flood storage as necessary to meet the adopted level of service for stormwater and flood conveyance.	New	X		Yes
Environment 7.5	In partnership with tribes, Pierce County, and private business, plan and develop a flood protection and habitat restoration area on 170 acres of city owned property generally east of the White River and south of Stewart Road.	New	X		Yes
Environment 7.6	Work with surrounding jurisdictions including the Dieringer and Sumner-Bonney Lake School Districts; East Pierce Fire and Rescue, Pierce County, and nearby cities and towns to coordinate and collaborate where possible on the creation and implementation of appropriate flood hazard mitigation measures.	New	X		Yes
Environment 7.7	Continue to update and implement floodplain development regulations which limit the opportunity for new homes and businesses to be constructed in flood hazard areas through the City's Flood Damage Prevention Ordinance, Critical Areas Regulations and Shoreline Master Program.	New	X		Yes
Environment 7.8	Continue to include and update mitigation requirements in floodplain development regulations which can significantly reduce the potential for flooding to negatively impact drinking water sources, pipelines, septic systems, sewer lines, and water lines that intersect flood hazard areas.	New	X		Yes
Environment 8.3	Maintain an urban forestry strategy to encourage the planting of trees on public and private property.	Adopted	X	X	
Environment 8.3.2	Incorporate climate resilience strategies into the City's urban forest management, such as increasing citywide species diversity, native or climate resilient species, and increasing tree planting in areas with low canopy cover.	New	X		
Environment 8.3.3	Manage City watershed lands on forested hillsides to improve climate resiliency and resistance to extreme events such as wildfires.	New	X		
Environment 8.5	Work with other agencies and the public to support restoration of the White River and its tributaries including Salmon Creek, and continue	Revised	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	to support and implement the White River Restoration Project, to restore salmon habitat and reduce flood risks.				
Environment 8.6	Give priority consideration to conservation and protection measures that preserve and enhance areas where anadromous fisheries and endangered, threatened, and sensitive species have a primary association.	Revised	X		
Environment 9.0	Reduce greenhouse gas emissions and encourage energy efficiency.	New		X	
Environment 9.1	Encourage, through incentives and technical support, energy conservation, energy efficiency, efficiency in building materials and site design, and the application of sustainable, or “green” design practices in all public and private development including large commercial and industrial projects, residential subdivisions, and infrastructure such as streets, within the City.	Revised	X	X	
Environment 9.2	Identify and evaluate potential changes to land use and development regulations to support and promote energy efficient, sustainable and green development.	Revised	X	X	
Environment 9.2.1	Ensure that the Sumner design guidelines and zoning regulations have the flexibility to accommodate, and provide incentives for, the installation of green energy features.	New			
Environment 9.2.2	Require street trees and on-site landscaping in all new developments.	New	X		
Environment 9.3	Require proposed rezones that significantly increase vehicle miles traveled to conduct a greenhouse gas emissions analysis and to propose mitigation.	Revised		X	
Environment 9.4	Promote a healthy and sustainable environment in terms of air quality and climate, energy resources, and active lifestyles by using prudent building design and construction methods such as recycled construction materials, reducing space heating and electricity usage, reducing water consumption and waste generation, and encouraging alternative travel modes such as transit, walking, and biking.	Adopted	X		
Environment 9.5	Consider adopting City purchasing policies that prioritize sustainable and recycled products.	New		X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Family and Human Services 1.3	Support local food banks and other no-cost food support programs by disseminating information, creating supportive development regulations and fees, and pursuing funding sources.	New	X		
Family and Human Services 2.1.5	Maintain a Comprehensive Emergency Management Plan.	Adopted	X		
Family and Human Services 2.2.1	Support programs, partnerships and regulations that promote develop adequate access to emergency and temporary housing.	Revised	X		
Family and Human Services 2.4.4	Develop response and recovery procedures that speak to the specific needs of the population served by the Sumner Senior Center.	New	X		Yes
Family and Human Services 5.4	Complete and expand the Sumner trail system and look for areas to partner with others on additional recreational facilities.	Revised		X	
Family and Human Services 5.5	Ensure parks and recreation facilities are distributed equitably throughout the community and accessible within walking distance of most residences.	New	X		
Family and Human Services 5.6	Maintain a safe, attractive, interconnected sidewalk system to increase neighborhood walkability and connections to services.	New		X	
Family and Human Services 6.0	Support programs and services that advance climate resiliency and emergency preparedness in the community	New	X		
Family and Human Services 6.1.1	Identify indoor recreation facilities and potential refuges with the YMCA, School District, Senior Center and other partners.	New	X		
Family and Human Services 6.1.2	Provide for tree canopy and shade elements in parks and public lands.	New	X		
Family and Human Services 6.1.3	Enhance shoreline public access as a refuge from heat island effects, while protecting natural functions/features.	New	X		
Family and Human Services 6.2	Ensure that parks and recreation facilities serve as refuges during extreme heat, cold, and smoke events.	New	X		
Governance and Permit Process 1.7	Ensure that City government sets the example for compliance and innovation in its own operations and facilities with regard to water and energy efficiency, sustainable building design, low impact development, noise and glare reduction, water and air quality, and accessibility for people with disabilities.	Revised	X	X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Historic and Cultural Resources 1.1.4	Require developers to immediately stop work and notify the City, DAHP, the Puyallup Tribe, and the Muckleshoot Tribe if any artifacts of possible historic, cultural, or archeological value are uncovered during excavation.	New	X		
Historic and Cultural Resources 1.2	Work with tribes, agencies and property owners to encourage measures that protect, enhance, and restore ecosystems that could be adversely impacted by climate change, in order to make available cultural foods and other resources for indigenous tribes.	New	X		
Historic and Cultural Resources 1.8	Protect or adapt significant historic sites prone to floods, extreme snow events, and other hazards worsened by climate change through building retrofits, green infrastructure, and other strategies.	New	X		
Housing 3.0	Encourage energy efficiency in housing developments.	Adopted		X	
Housing 3.1	Encourage, through incentives and technical support, energy conservation, energy efficiency in building materials and site design, and the application of sustainable, or “green” development practices.	Revised		X	
Housing 3.2	Reduce reliance on automobiles by promoting higher density and infill developments that are located near major transportation links such as the Sumner Commuter Transit Station, and by supporting a network of transit stops connecting neighborhoods to the station.	Revised		X	
Housing 3.3	Continue to enforce the energy efficiency requirements in the State Energy Code and other Washington State building codes.	Revised	X	X	
Housing 3.4	Establish standards for street widths, landscaping, and parking lots to reduce heat loss or provide shade.	Adopted	X	X	
Housing 3.4.1	Adopt flexible street standards to allow for narrower streets in appropriate locations to reduce pavement area.	New	X	X	
Housing 3.5	Recognize and support energy conservation and efficiency programs.	Adopted		X	
Housing 3.6	In cooperation with the County, Puget Sound Energy, and other providers, promote programs that help minimize utility costs for residents, particularly seniors and households with lower incomes, such as bill assistance, permitting and fee assistance, weatherization programs, pipe repairs, and installation of energy efficient heating and cooling appliances in existing housing.	Revised	X	X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Land Use 4.1	Implement the Town Center Subarea Plan (TCP) and Form-Based Code, to support dense, mixed-use development and walkable neighborhoods near the transit center.	New		X	
Land Use 6.3	Ensure that adequate landscape screening and trees are provided around sources of significant noise and air pollutants that may affect schools and neighborhoods.	New	X		
Land Use 6.4	Mitigate the environmental health effects of climate change, including air quality, stormwater, and heat impacts, through the acquisition of parks and open space and tree planting, prioritizing overburdened communities.	New	X		
Land Use 6.5	Engage with the community on the topic of climate impacts and adaptation strategies.	New	X		
Land Use 6.6	Support energy efficiency and upgrade programs that reduce health risks for vulnerable populations due to extremes of heat and cold.	New	X		
Land Use 6.7	Adopt land use standards and connect residents to informational resources to mitigate wildfire risk.	New	X		
Land Use 6.8	Study the potential impacts of a citywide tree retention program on climate resilience and housing development.	New	X		
Land Use 6.9	Support small-scale agricultural uses in residential developments, and local community gardens sponsored by public agencies, non-profit organizations, and private development.	New	X		
Parks 1.12	Develop and implement an internal bicycle and pedestrian circulation plan.	Adopted		X	
Parks 1.13	Establish park and trail levels of service provided in the Parks & Trails Plan.	Adopted		X	
Parks 1.8	Recognize the critical and unique environmental features in the community such as wetlands, streams, riparian corridors, significant archaeological and historic properties, and hillsides within park facilities.	Adopted	X		
Parks 2.0	Preserve, protect, and enhance significant open space.	Adopted	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Parks 2.1	Control development and activity on hillside areas in order to preserve their aesthetic qualities, reduce impacts on the valley, protect habitat, and protect sensitive areas from degradation.	Adopted	X		
Parks 2.10	Establish an open space standard of 35% for the entire City. Land use regulations and other programs should be developed to maintain this standard on a city-wide level. Open space includes areas that are public parks, cemeteries, critical areas and buffer areas, restricted steep slope areas, public lands such as watersheds, excess right-of-way, floodway, and river and buffers.	Adopted	X		
Parks 2.11	Seek broad and creative funding for open space protection and the furtherance of these goals and policies, including grants, utility funds, loans, conservation futures, bond levies, donations, impact fees and any other available sources.	Adopted	X		
Parks 2.13	Seek to acquire the most significant parcels of property in order to protect hillside amenities, wetlands, farmlands, river and stream corridors, and other critical open spaces.	Adopted	X		
Parks 2.14	Through implementation of the State Shoreline Management Act and City environmental regulations, protect wetlands, riparian corridors, streams and wildlife areas.	Adopted	X		
Parks 2.15	Coordinate open space programs with the other Plan policies to protect plant and wildlife habitat.	Adopted	X		
Parks 2.16	Implement the components of the open space strategy provided in the Parks and Open Space Plan.	Adopted	X		
Parks 2.17	Regularly seek public input to maintain a prioritized list of open space acquisition sites.	Adopted	X		
Parks 2.18	Provide protection of natural amenities such as riparian corridors and vital open spaces for enjoyment by workers and to enhance the work and business environment.	Adopted	X		
Parks 2.2	Adopt an urban forestry program to encourage the preservation and planting of trees on public and private property	Adopted	X		
Parks 2.4	In conjunction with other jurisdictions, implement land use and other techniques to ensure the protection of environmentally sensitive lands, provide permanent protection of agricultural lands of long- term	Adopted	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	commercial significance, and protect the open space character of the valley between Sumner and Orting.				
Parks 2.6	Develop a trail system connecting to regional trails to the north, east, south, and west for recreation and transportation purposes.	Adopted		X	
Parks 2.7	Retain, whenever financial feasible, City owned lands, including excess rights-of- way for open space purposes.	Adopted	X		
Parks 2.8	Implement flexible zoning and land use regulation techniques to encourage creative development which maximizes protection of critical areas, habitat, water quality, and open space.	Adopted	X		
Parks 2.9	Work with other jurisdictions to establish open space corridors and linkages with other significant regional open spaces including the valley hillsides, Puyallup/White River corridors, stream corridors and the valley south of the City.	Adopted	X		
Parks 3.0	Promote use of alternative transportation modes by providing an interconnected system of pedestrian and bicycle facilities.	Adopted		X	
Parks 3.1	Ensure design standards for principal and minor arterials include provisions for travel by pedestrians and bicyclists, based on the Parks and Trail Plan and the Sumner Transportation Plan. Consider roadway designs that increase pedestrian and bicycle comfort. Examples include but are not limited to:	Adopted		X	
Parks 3.2	Design and construct collector roads and local streets to facilitate access and circulation by pedestrians and bicyclists within the neighborhoods and provide connections to schools, parks, community facilities, transit, and commercial districts. Require development proposals to provide convenient non-motorized connections where feasible.	Adopted		X	
Parks 3.3	Ensure sidewalks are provided on both sides of all City streets unless special circumstances, such as topography or environmental constraints, make it cost prohibitive as determined by the Public Works Director.	Adopted		X	
Parks 3.4	Pursue the construction of interim asphalt walkways/sidewalks along city streets that are used by a considerable number of children walking to/from school. Interim asphalt walkways/sidewalks should include, but not be limited to, Parker Road, Elm Street, and 160th	Adopted		X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	Street E. The construction of interim walkways/sidewalks is not intended to preclude future full street improvements.				
Parks 3.5	Construct a system of separated, multi-purpose trails to serve transportation and recreation needs of the community. It should also connect with adjacent communities to facilitate regional connectivity. The trail system and connections to the arterial, collector, and other pedestrian and bicycle facilities should be made consistent with the Parks and Trail Plan. The City may identify measures to ensure comfort and safety of bicyclists and pedestrians through design, speed limits, or other measures.	Adopted		X	
Shoreline 6.0	Preserve, protect, and restore to the greatest extent feasible the physical, biological, and visual attributes of the shoreline environment.	Adopted	X		
Shoreline 7.0	Identify, preserve, protect, and restore shoreline areas having historical, cultural, educational, or scientific values.	Adopted	X		
Shoreline 8.0	Protect the City of Sumner from losses and damage created by flooding.	Adopted	X		
Transportation 1.5	Adopt construction guidelines that will reduce the potential failure of key bridges and transportation routes.	New	X		Yes
Transportation 10.0	Establish a transportation system with minimal environmental impact and energy consumption that provides for a high quality of life to be enjoyed by the residents.	Revised		X	
Transportation 10.1	Incorporate environmental factors into transportation decision-making, including attention to human health and safety by designing transportation facilities within the Sumner UGA minimizing adverse environmental impacts resulting from both their construction and operation.	Revised	X		
Transportation 10.3.1	Support and implement projects that promote cleaner burning and alternative fuels such providing electric vehicle charging infrastructure.	New		X	
Transportation 10.3.1	The City shall: Support vehicle emissions reduction and cleaner burning fuels programs	Revised		X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
	Coordinate with Sound Transit and other jurisdictions on Commute Trip Reduction (CTR) programs for major employers in the Sumner planning area Require air quality studies of new major developments likely to have significant impacts created by site-generated traffic Promote other TDM Programs Work with the private and other public sectors to introduce cleaner burning fuels for the existing motorized fleet, and vehicles powered by alternate fuel sources Support and implement projects that promote cleaner burning and alternative fuels such providing electric vehicle charging infrastructure.				
Transportation 10.4	Promote, through regulations and incentives, the use of low impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems. Low impact development should be included in new transportation projects where possible.	Revised	X		
Transportation 10.5	Increase the resilience of the transportation system and support security and emergency management to protect the transportation system against disaster, develop prevention and recovery strategies, and plan for coordinated responses.	Revised	X		
Transportation 10.6	Reduce greenhouse gases by expanding the use of conservation and alternative fuel sources and by reducing vehicle miles traveled by increasing alternatives to driving alone.	Revised		X	
Transportation 10.7	Convert public fleets to zero-emission vehicles.	New		X	
Transportation 10.8	The City should promote and allow telework wherever possible	New		X	
Transportation 10.9	Expand public electric vehicle charging stations and encourage and incentivize private electric vehicle charging stations.	New		X	
Transportation 3.4	Work in conjunction with the County to continue its Bridge Retrofit Program.	New	X		Yes

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Transportation 6.0	Promote the design of multimodal transportation facilities that support local and regional growth centers by providing an interconnected system of pedestrian and bicycle facilities.	Revised		X	
Transportation 6.3	Ensure design standards for the transportation system facilitate and encourage access and circulation by pedestrians and bicyclists, and provides connections to schools, parks, community facilities, transit and commercial districts.	Revised		X	
Transportation 6.4	Development proposals shall provide for convenient non-motorized connections where feasible, commensurate with the scale and occupancy of the development.	Revised		X	
Transportation 6.7	Construct a separate system of multi-purpose trails to serve transportation and recreation needs of the community. Connect the system with adjacent communities to facilitate regional connectivity. Implement the trail system and connections to the arterial, collector, and other pedestrian and bicycle facilities per the Sumner Parks and Trails Plan.	Revised		X	
Transportation 7.2	Continue working with transit providers to expand and enhance bus transit service and a regional park-and-ride system that serves regional destinations and neighborhoods and employment areas of Sumner.	Revised		X	
Transportation 7.5	Support construction of improved pedestrian and bicycle connections with local and regional transit service. Work to provide pedestrian safety improvements along arterials and bike lockers and facilities at transit connections.	Revised		X	
Transportation 8.0	Promote programs that reduce the demand on the transportation system.	Revised		X	
Transportation 8.1	Encourage the use of high occupancy vehicles (HOV) programs – buses, carpools, and vanpools – through both private programs and under the direction of Pierce Transit and Sound Transit	Revised		X	
Transportation 8.2	Promote the use of transit, carpools, or vanpools.	Revised		X	
Transportation 8.3	Promote reduced employee travel during the daily peak travel periods through flexible work schedules and programs for telecommuting or at an alternate work site closer to home.	Revised		X	

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Transportation 8.4	Encourage employers to provide TDM measures in the workplace through such programs as preferential parking for HOVs, transit pass subsidies, improved access for transit vehicles, and employee incentives for using HOVs.	Revised		X	
Transportation 8.5	Implement the provisions of the State Commute Trip Reduction Act.	Adopted		X	
Transportation 8.6	Consider pricing programs as an option for reducing reliance on single-occupancy vehicle (SOV) travel.	New		X	
Transportation 8.7	Incentivize transit oriented and higher density land uses that encourage walking or biking near transit stations.	New		X	
Utilities 1.0	Facilitate the development of natural gas and alternative energy utilities at the appropriate levels of service to accommodate the growth that is anticipated to occur in Sumner.	Revised		X	
Utilities 1.4	Facilitate conversion from natural gas to cost-effective and environmentally sensitive alternative technologies and energy sources.	New		X	
Utilities 1.4.1	Review design and development standards to determine improvements to encourage alternative energy sources.	New		X	
Utilities 1.4.2	Develop strategies to enhance existing public education and outreach campaigns to promote sustainable practices and alternative energy.	New		X	
Utilities 1.4.3	Promote existing state-level policies and initiatives, funding programs, and incentive programs for renewable energy technologies.	New		X	
Utilities 4.1.2	Support programs that assist low-income households with utility-related home repairs, weatherization, and other energy-efficient improvements to owner-occupied and rental housing.	New	X		
Utilities 6.2	Prioritize utilities-related actions to ensure adequate service and minimal service disruptions for historically underserved populations.	New	X		
Utilities 6.4	Ensure that the City's Emergency Response Plan is coordinated with regional jurisdictions and utility providers to include local measures for communicating and addressing utility outages and emergencies.	New	X		

Policy # (Draft 2024 Plan)	Policy Text	Adopted / New / Revised	Resiliency	Emissions Reduction	Adapted from Hazard Mitigation Plan (2020)
Utilities 7.1	Prioritize the provision of cost effective, energy-efficient new technologies to underserved populations.	New	X		

Other Requirements

HB 1181 includes the following additional requirements to be incorporated in the comprehensive plan update. Sumner covers these requirements in the draft Comprehensive Plan and related documents.

Exhibit 6: HB 1181 Other Requirements

Element	Change	New or Amended?	Additional Actions
Land Use	Designate green spaces, urban and community forests within the urban growth area.	New	None; parks plan and urban forestry strategy already meet this.
Land Use	Give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.	New	None; policy review above and proposed policies within the chapters address this topic.
Land Use	Should consider urban planning approaches that reduce per capita vehicle miles traveled within the jurisdiction, but without increasing greenhouse gas emissions elsewhere in the state.	New	None; policy review above and proposed policies within the chapters address this topic.
Land Use	Must reduce and mitigate the risk to lives and property posed by wildfires by using land use planning tools, which may include, but are not limited to adoption of portions or all of the wildland urban interface code developed by the international code council or developing building and maintenance standards consistent with the Firewise USA program or similar program designed to reduce wildfire risk, reducing wildfire risks to residential development in high risk areas and the wildland urban interface area, separating human development	New	Added policy on wildfire mitigation.

Element	Change	New or Amended?	Additional Actions
	from wildfire prone landscapes, and protecting existing residential development and infrastructure through community wildfire preparedness and fire adaption measures.		
Capital Facilities	Include inventory of green infrastructure owned by public entities.	New	Included in Capital Facilities Plan
Transportation	Include estimated multimodal level of service impacts to state-owned transportation facilities resulting from land use assumptions to assist in monitoring the performance of state facilities, to plan improvements for the facilities, and to assess the impact of land-use decisions on state-owned transportation facilities.	Amended; 'Multimodal level of service' replaced 'traffic.'	Included in Transportation Plan
Transportation	Include inventory of active transportation facilities.	New	Included in Transportation Plan
Transportation	Include multimodal level of service standards for locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system and success in helping to achieve the goals of this chapter consistent with environmental justice.	Amended; bold text added.	Included in Transportation Plan
Transportation	For state-owned transportation facilities, multimodal level of service standards for highways, as prescribed in chapters 47.06 and 47.80 RCW, to gauge the	Amended; added multimodal	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
	performance of the system. The purposes of reflecting multimodal level of service standards for state highways in the local comprehensive plan are to monitor the performance of the system, to evaluate improvement strategies, and to facilitate coordination between the county's or city's six-year street, road, active transportation , or transit program and the office of financial management's ten-year investment program. The concurrency requirements of (b) of this subsection do not apply to p. 13 E2SHB 1181.SL transportation facilities and services of statewide significance except for counties consisting of islands whose only connection to the mainland are state highways or ferry routes. In these island counties, state highways and ferry route capacity must be a factor in meeting the concurrency requirements in (b) of this subsection.	and active transportation.	
Transportation	Include specific actions and requirements for bringing into compliance transportation facilities or services that are below multimodal level of service standard.	Amended; added multimodal. Removed 'locally owned' descriptor for transportation facilities.	Included in Transportation Plan
Transportation	Include forecasts of multimodal transportation demand and needs within cities and urban growth areas, and forecasts of multimodal transportation demand and needs outside of cities and	Amended; bold text added. 'Multimodal transportation'	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
	urban growth areas, for at least ten years based on the adopted land use plan to inform the development of a transportation element that balances transportation system safety and convenience to accommodate all users of the transportation system to safely, reliably, and efficiently provide access and mobility to people and goods. Priority must be given to inclusion of transportation facilities and services providing the greatest multimodal safety benefit to each category of roadway users for the context and speed of the facility.	replaced 'traffic.'	
Transportation	Identification of state and local system needs to equitably meet current and future demands. Identified needs on state-owned transportation facilities must be consistent with the statewide multimodal transportation plan required under chapter 47.06 RCW. Local system needs should reflect the regional transportation system and local goals, and strive to equitably implement the multimodal network.	Amended; bold text added.	Included in Transportation Plan
Transportation	Include a transition plan for transportation as required in Title II of the Americans with Disabilities Act of 1990 (ADA). As a necessary step to a program access plan to provide accessibility under the ADA, state and local government, public entities, and public agencies are required to perform self-evaluations of their current facilities, relative to accessibility requirements of the ADA.	New	Sumner adopted a transition plan in 2016. The City has applied for a Commerce Climate Grant to do an update of the plan as part of meeting HB 1181 requirements.

Element	Change	New or Amended?	Additional Actions
	The agencies are then required to develop a program access plan, which can be called a transition plan, to address any deficiencies. The plan is intended to achieve the following: (I) Identify physical obstacles that limit the accessibility of facilities to individuals with disabilities; (II) Describe the methods used to make the facilities accessible; (III) Provide a schedule for making the access modifications; and (IV) Identify the public officials responsible for implementation of the transition plan.		
Transportation	If probable funding falls short of meeting the identified needs of the transportation system, including state transportation facilities , a discussion of how additional funding will be raised, or how land use assumptions will be reassessed to ensure that level of service standards will be met.	Amended; added state transportation facilities	None.
Transportation	Active transportation component to include collaborative efforts to identify and designate planned improvements for active transportation facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles.	Amended; 'active transportation' replaced 'pedestrian and bicycle.'	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
Transportation	After adoption of the comprehensive plan by jurisdictions required to plan or wo choose to plan under RCW 36.70A.040, local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a locally owned or locally or regionally operated transportation facility to decline below the standards adopted in this transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development. These strategies may include active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, and other transportation systems management strategies. For the purpose of this subsection (6), “concurrent with the development” means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years. If the collection of impact fees is delayed under RCW 82.02.050(3), the six-year period required by this subsection (6)(b) must begin after full payment of all impact fees is due to the county or city. A development proposal may not be denied for causing the level of service on a locally owned or locally or regionally operated transportation facility to	Amended; bold text added.	Included in Transportation Plan

Element	Change	New or Amended?	Additional Actions
	decline below the standards adopted in the transportation element of the comprehensive plan where such impacts could be adequately mitigated through active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, or other transportation systems management strategies funded by the development.		
Park & Recreation	Include an evaluation of tree canopy coverage within the urban growth area.	New	Tree canopy impacts are described in the EIS. The City has also applied for a Commerce Climate Grant to do a tree canopy assessment.

Appendix D: Public Participation Summary

This Appendix contains a summary of the various outreach efforts the City conducted during the 2024 Comprehensive Plan Update, and the types of community comments/responses.

- **Sumner Connects web page**
 - Information posted regarding the overall process, what the Comprehensive Plan is.
 - Information and frequent updates posted starting in January 2023.
 - Materials for Planning Commission review posted prior to meetings.
- **City e-News and social media**
 - Periodic updates in monthly e-News
- **City Newsletter “Community Connections” (printed, direct delivery)**
 - Winter 2023 article explaining the Comprehensive Plan and opening for submitting proposed changes.
 - Summer 2023 short description & link to project page
 - Fall 2023 project update
 - Winter 2024 project update
- **Distribution of informational flyer**
 - Direct mail and delivery to agencies and service providers June 2023
- **City of Sumner Open House events - Flyers and Display Board**
 - Spring Open House April 2023
 - Fall Open House October 2023
 - Spring Open House April 2024
- **Public meetings and hearing notices**
 - Planning Commission and City Council meetings discussing the Comprehensive Plan were open to the public and accessible virtually.
 - Notices published in newspaper and on City website for public hearings
 - Notices published for SEPA Environmental reviews during the Plan adoption process

In addition to the above outreach efforts, the City hosted several community events where the Sumner community had an opportunity to voice concerns and priorities. While these were separate events not connected to the Comprehensive Plan update, the events

provided additional insights into community concerns and priorities that can inform policymakers. General community events are listed below

1. 2022 City Budget Survey

In the results of the online 2022 Budget Survey, the community identified the following priorities (with 1 being most important)

- 1 Ensuring prompt police response time
- 2 Maintaining streets
- 3 Managing growth
- 4 Maintaining parks, trails & open space
- 5 Protecting the environment
- 6 Promoting traffic, bike & pedestrian safety
- 7 Attracting the right mix of new businesses
- 8 Expanding parks & adding amenities
- 9 Preparing for natural disasters.

2. Youth Forum(s) January 2023, March 2023, Elhi Hill January 2023:

- Common themes expressed were the need for more recreation facilities, more public transportation, more activities for teens.

3. Community Summit(s)

April 18, 2023

- Flyers were provided with information on the Comprehensive Plan and the website link

4. Communities for Families (CFF)

May 2023, June 2023

- Flyers were provided with information on the Comprehensive Plan and the website link
- This event features numerous service providers.

5. Senior Center Meet-the-Mayor session

July 2023: Some of the priority needs/concerns expressed were:

- Need affordable senior housing
- Need better transit
- Need better traffic control, speed enforcement, safe crossings

City of Sumner Transportation Plan

January 6, 2025



Consultant Team
Transpo Group

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Executive Summary

The Transportation Plan provides the link between the Land Use Element and the transportation facilities and services needed to support growth during the next twenty years. This is accomplished by identifying capacity, operational, and safety improvements along City roadways and by addressing multimodal needs such as transit, pedestrian, and bicycle facilities.

The City has identified a range of goals and policies to implement the Transportation Plan efficiently and effectively. The goals and policies are outlined elsewhere, in the Transportation Element of the Comprehensive Plan. The Transportation Element strives to emphasize the importance of pedestrians and bicycles and prioritizes the creation of a network of multimodal transportation.

Inventory of Existing Transportation System

An inventory of the existing Sumner transportation system was conducted in Spring and Summer 2023. The inventory covers the street system, traffic volumes, traffic operations, traffic safety, transit and rail service, and pedestrian and bicycle facilities. The inventory is used in updating the City's travel demand model to determine the future traffic conditions for this Transportation Plan.

Street System. The street system inventory includes discussion of Sumner roadway functional classifications, which is the hierarchy of roadways in the city. The classifications act as a guide for future development of the street system. Sumner also has adopted a formal truck route plan to manage truck traffic within its city limits.

Daily and weekday PM peak hour traffic volumes were also reviewed to understand the amount of vehicle traffic carried on the city streets. Daily traffic volumes have grown; however, the City's weekday PM peak hour traffic volumes have changed less than 1 percent per year since the 2015 Transportation Plan was completed and along some roadways traffic volumes have decreased. Since the COVID-19 pandemic travel patterns have changed with more people working from home or having flexible work hours such that they may not commute during the evening period.

Traffic Volumes and Operations. Traffic volumes were used to evaluate traffic operations for Sumner's key intersections. Traffic operations analysis provides a quantitative method for evaluating existing and future transportation conditions. The nationally recognized Highway Capacity Manual (HCM) level of service (LOS) method is used to evaluate intersection operations of Sumner facilities. Five intersections do not meet the currently adopted LOS standard during the weekday PM peak hour operating at LOS E or F. The poor operations are known issues at the SR 162 and SR 410 WB Ramps and the East Valley Highway/Forest Canyon Road E intersection due regional traffic impacts. The existing traffic operations are considered in developing the transportation improvement program documented in Chapter 5 of this Plan.

Traffic Safety. Citywide collision records for the last 5-years (2018-2022) are used to identify potential safety issues for vehicles, pedestrians, and cyclists. Of the 21 serious injury and fatal crashes, over 20 percent involved pedestrians and about 5 percent involved bicyclists. The most frequently reported collision type was rear-end crashes, which often occur in congestion or stop-and-go traffic. The review of

traffic safety is used to inform decisions related to street and intersection improvements documented in Chapter 5 of this Plan.

Transit and Rail Service. Sumner is currently not served by Pierce Transit, which limits transit options and accessibility within the city. The only transit stop in the city is at the Sumner Sounder Train Station and is served by Sound Transit. Sound Transit's Sounder S line offers commuter rail service between Lakewood and downtown Seattle with stops in Tacoma, Puyallup, Sumner, Auburn, Kent, and Tukwila. The transportation improvement program documented in Chapter 5 of this Plan considers the need to collaborate with Pierce Transit on potential future transit service based on anticipated growth of the city.

Freight Train Traffic. Sumner has Burlington Northern Santa Fe (BNSF) and Union Pacific (UPRR) lines. There are currently 71 trains that run through Sumner on the BNSF tracks and 10 trains on the UPRR line daily. Based on a review of Washington State's Joint Transportation Committee Road-Rail Safety Study Crossing Analysis, additional trains are anticipated in the future along the BNSF and UPRR lines in Sumner.

Pedestrian and Bicycle Facilities. The city is striving to create a fully integrated transportation system and recognizes the need to prioritize locations where it expects heavy non-motorized use, such as routes connecting residential areas to recreational facilities and schools, and places of employment. Sidewalks are located intermittently around the city, mostly along arterial roadways located within Sumner's downtown and nearby neighborhoods. There are limited formal bicycle facilities in Sumner. To prioritize the pedestrian and bicycle system for Sumner, Chapter 4 describes recommended level of service (LOS) guidelines.

Transportation Demand Management. The City of Sumner has adopted a Commute Trip Reduction (CTR) program. The CTR program establishes goals consistent with State legislation.

Technology. Transportation System Management and Operations (TSMO) is an integrated approach to optimize the performance of existing infrastructure by implementing multimodal, intermodal, and often cross-jurisdictional systems, services, and projects. Most of the city's current transportation infrastructure is outdated and there are limited abilities to provide TSMO without future upgrades. In addition, electric vehicles are also considered transportation technology. There is no City-provided charging infrastructure in the right-of-way or on City-owned properties (e.g., public parking lots).

[Travel Forecasts and Alternatives Evaluation](#)

Sumner's Transportation Plan is developed based on the evaluation of the existing and future transportation system needs. Travel forecasts were developed by updating the Sumner's travel demand model based on the 20-Year land use plan. The model is a tool that converts existing and future land uses into trips. Four land use alternatives were evaluated to identify transportation needs for vehicles, bicycle, and pedestrian modes including updates to the transportation programs and improvement projects. Recommendations are made to update the vehicle LOS policy and adopt a new pedestrian and bicycle LOS policy. The future needs for the transportation system are identified by evaluating the level of service (LOS) for vehicles, pedestrians, and bicycles. The outcome of the analysis is a list of programs and projects to support the Sumner 20-Year growth plan.

Transportation Improvement Program

The alternatives analysis, financing, and goals and policies were used to develop a comprehensive transportation improvement program (TIP) for the City. The program addresses existing and forecast needs within the 20-year planning horizon. Key recommendations for the Sumner transportation improvement program are:

1. Monitor the transportation system against the Transportation Plan.
2. Add a signal replacement program to the maintenance and operations program.
3. Explore additional transit service for Sumner including getting involved in the Pierce Transit long-range planning efforts.
4. If public transit service is provided within Sumner in the future, the City should adopt a transit LOS.
5. Adopt the non-motorized system and LOS standards.
6. Adopt the list of multimodal transportation improvements and continue to monitor the establishment LOS by mode to ensure the improvements continue to support the goals and policies.

The list of 20-Year improvements is provided in Exhibit 5-5 beginning on page 50.

Finance and Implementation

The GMA requires the Transportation Plan to include a multi-year financing plan based on the identified needs in the transportation improvement program. The financing plan for the Transportation Plan provides a basis for the City's annual Six-Year Transportation Improvement Program (TIP).

Finance. Key funding sources for the city include fees and taxes, grants, partnerships with other agencies, developer funding improvements and transportation impact fees (TIFs).

Part of the finance strategy is to update the transportation impact fee. The update recommends eliminating the current TIF approach with three districts and having one fee schedule for the entire city to simplify the structure and make the fee equitable throughout the city. The fee update, including non-motorized transportation improvements, is \$7,452 per weekday PM peak hour vehicle trip. Staff will review and recommend options for the City Council to determine what fee is ultimately selected. The remaining funds not covered by the TIF, or other revenue sources would be made up with sources like grants.

Reassessment. The funding strategy is partially based on grants and other outside funding that the city does not control. The city may be able to shift revenues from other funding programs to address specific needs as yearly budgets are prepared or consider other revenue options such as increasing the vehicle license tab fee. The City is committed to reassessing their transportation needs and funding sources each year as part of their annual Six-Year Transportation Improvement Program (TIP). This allows the city to match the financing program with the shorter-term improvement projects and funding.

Implementation. Implementation includes coordination with developers and partnering with other agencies to construct the transportation improvement projects. Partnering with other agencies and use of grants will be especially critical in the implementation of safety, capacity, and operational improvements along SR 167 and SR 410. This may include re-prioritizing roadway projects as new

funding sources become available or by focusing on areas most impacted by new development. The City will also continue to review strategies for phasing improvements allowing funding to be spread over a longer period. In addition, the city will need to review, maintain, and update its Concurrency Management Program, Transportation Impact Fee, and other development review processes to account for the revised multimodal LOS standards and assure that the impacts of growth are mitigated, and transportation improvements are completed concurrent with new development.

Consistency with Other Agencies

The GMA works to increase coordination and compatibility between the various agencies that are responsible for the overall transportation system. As part of the Transportation Plan, consistency with nearby transportation agencies is reviewed including Washington State Department of Transportation (WSDOT), Pierce County Sound Transit, Auburn, Pacific, Edgewood, and Puyallup. The Plan is consistent with nearby agencies and the city is committed to continuing to partner with these agencies to improve transportation for the community.

1. Introduction

The City of Sumner adopted its first Transportation Plan in January 1993. In 1994, the City adopted a Comprehensive Plan consistent with the Growth Management Act (GMA) and the Transportation Plan was updated in 2002 and 2015. Amendments to the 2015 Transportation Plan were adopted in 2017, 2019, and 2020.

The Transportation Plan provides the link between the Land Use Element and the transportation facilities and services needed to support growth during the next twenty years. This is accomplished by identifying capacity, operational, and safety improvements along City roadways and by addressing multimodal needs such as transit, pedestrian, and bicycle facilities. The Transportation Plan reflects the interdependence of transportation and land use and is influenced by choices made as part of the Land Use Element. Conversely, land uses are similarly influenced by choices and policies made in the Transportation Plan.

The Transportation Plan implements the City's Transportation Element, which is a key component of the City's Comprehensive Plan which works hand-in-hand with other Comprehensive Plan Elements. The Transportation Element identifies the City of Sumner's goals and policies for transportation as well as the City's future transportation system and facilities, level-of-service (LOS) standards, and concurrency monitoring system. Future land uses proposed as part of the Land Use Element are used to develop transportation strategies and to identify necessary transportation facilities (roadways, sidewalks, trails, bike lanes, etc.). Similarly, the Capital Facilities Element and the City's ongoing Transportation Improvement Program (TIP) present specific facility recommendations based on the Transportation Plan and Transportation Element.

The Plan update includes an inventory of existing transportation facilities and services, development and analysis of 2044 travel forecasts, evaluation of needs and deficiencies, identification of transportation system improvements consistent with goals and policies, and financing strategies. The Plan update also addresses requirements for a concurrency program and the multimodal transportation impact fee (TIF) program.

Growth Management Act

The Transportation Element was developed in accordance with the Washington State Growth Management Act (GMA). The GMA requires that the following topics be addressed within the Transportation Plan:

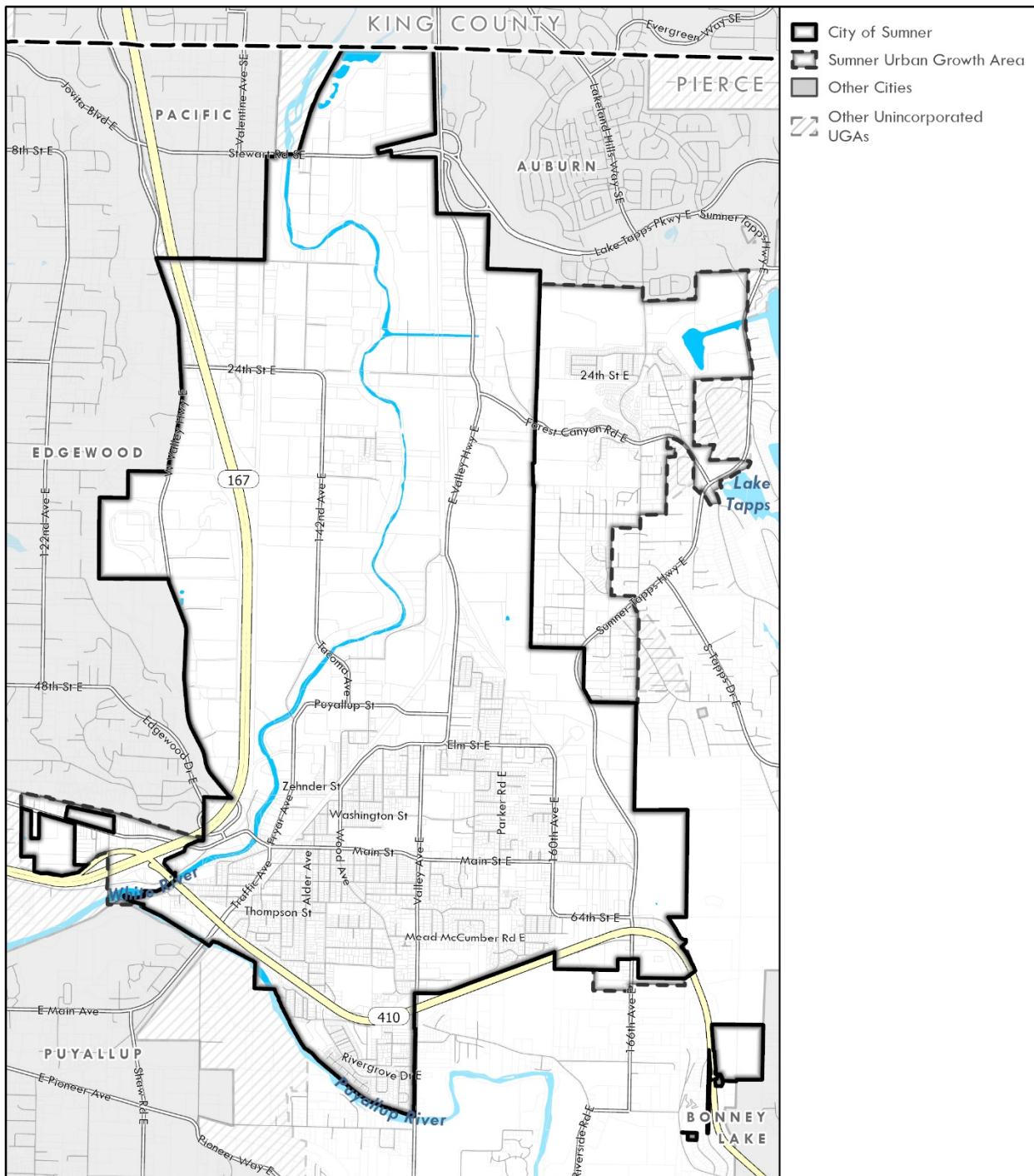
- Land use assumptions used in estimating travel demand.
- Facility and service needs, including an inventory of air, water, and ground transportation facilities and services, transit alignments, general aviation/ airport facilities, and state-owned transportation facilities within the city's jurisdictional boundaries.
- Level of service (LOS) standards to gauge the performance of the system.

- Identification of actions and requirements needed to bring existing facilities and services up to standard.
- Forecasts of future traffic based on the land use plan.
- Identification of improvements and programs needed to address current and future transportation system deficiencies, including Transportation Demand Management strategies.
- A realistic multi-year financing plan that is balanced with the adopted level of service standards and the land use element.
- An explanation of intergovernmental coordination strategies and regional consistency.
- Local transportation elements must also include the following:
 - Estimated traffic impacts to State-owned transportation facilities resulting from land-use assumptions.
 - LOS for state-owned transportation facilities.
 - Identification and assessment of GMA concurrency and the applicability to highways of statewide significance.
 - A pedestrian and bicycle component that includes collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles.

Study Area

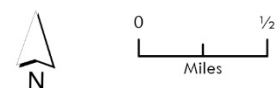
The study area includes all areas within Sumner City limits and Urban Growth Area (UGA). The UGA has been delineated with Pierce County, consistent with the requirements of the GMA. The transportation planning study area is shown in Exhibit 1-1. The city lies adjacent to the UGAs of the City of Pacific and City of Auburn (north) and the City of Edgewood (west). Unincorporated areas of Pierce County also surround portions of Sumner.

Exhibit 1-1. Study Area



CITY OF SUMNER

Transportation Plan Study Area



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

2. Goals and Policies

The City has identified a range of goals and policies to implement the Transportation Plan efficiently and effectively. The goals and policies are outlined elsewhere in the Transportation Element of the Comprehensive Plan. The Transportation Element strives to emphasize the importance of pedestrians and bicycles and prioritizing the creation a network of multimodal transportation-related improvements and policies to ensure that vehicle traffic can coexist with the community's need for a safe and comfortable active transportation environment. It also recognizes the need for the City to work with other transportation service providers to plan, design, fund, and implement transportation projects and programs to serve the community.

The goals and policies provide a framework for decision making related to transportation projects and programs. The transportation goals and policies cover the following elements:

7. Citywide Transportation Goal
8. Public Involvement
9. Agency Coordination
10. Transportation System Mobility and Efficiency
11. Subarea Plans Transportation and Circulation System
12. Pedestrians and Bicycles
13. Commuter Rail and Transit
14. Commute Trip Reduction and Transportation Demand Management (TMD)
15. Equity in Transportation-Related Decisions
16. Land Use and Environmental Considerations
17. Program Financing and Implementation

The transportation goals and policies will be used by the City in deciding how to secure and use funding, decisions related to new land use development applications, and coordination with other City planning objectives.

3. Inventory of Existing Transportation System

The transportation system within the City of Sumner includes streets and highways, pedestrian and bicycle facilities, and transit and rail service. An inventory of the existing transportation system was conducted in Spring and Summer 2023. This transportation system inventory and associated analyses provide a baseline for the existing transportation system and aid in identifying key transportation issues addressed in the update of the Plan. The inventory covers the street system, traffic control, traffic volumes, traffic operations, traffic safety, transit and rail service, and pedestrian and bicycle facilities. The inventory is used in updating the City's travel demand model to determine the future traffic volume forecasts for the 2023 Sumner Transportation Plan.

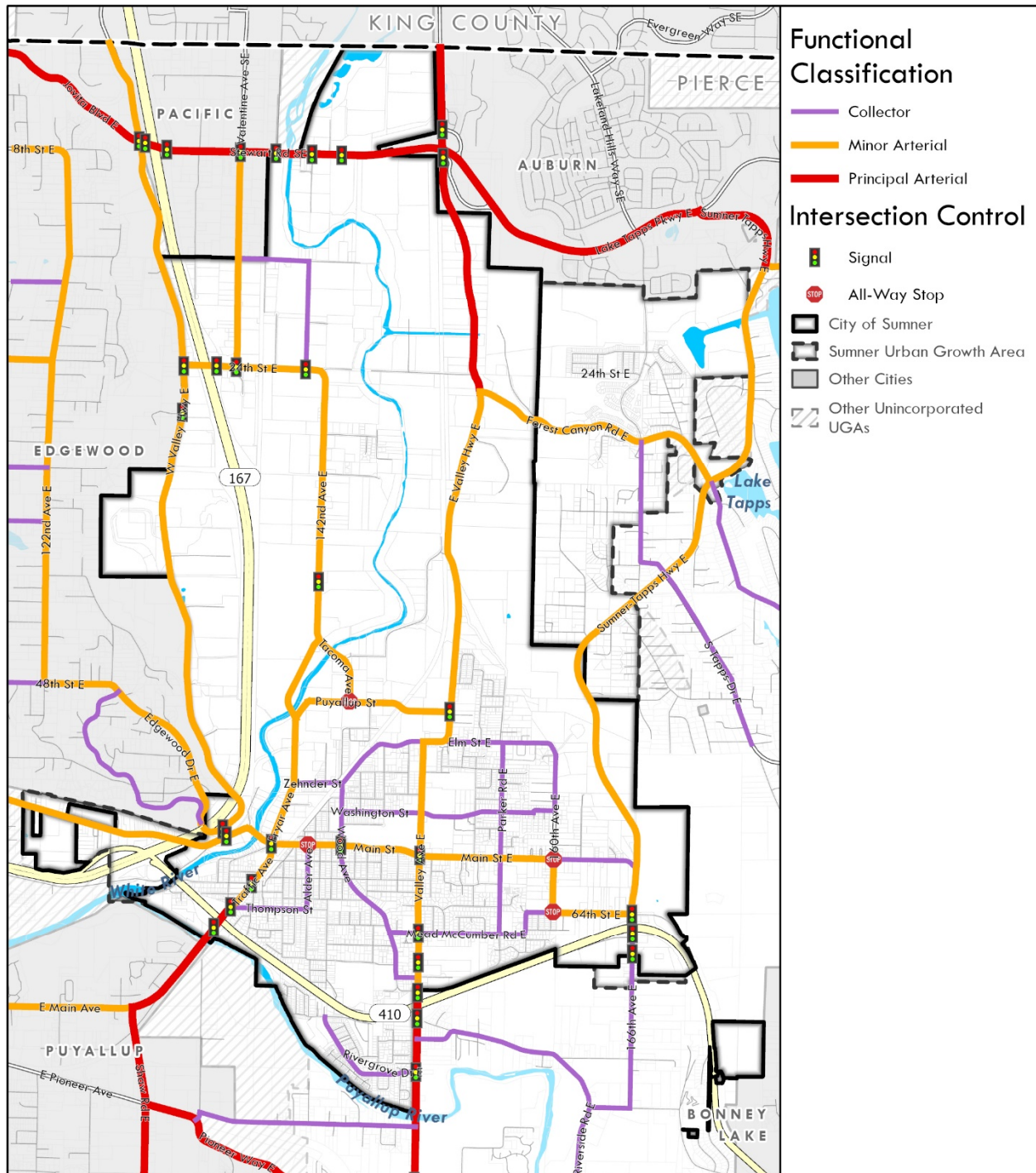
Freeways, Arterials, and Collectors

Exhibit 3-1 summarizes the existing traffic control and functional classification of the city street system. Roadway functional classification provides for a hierarchy of roadways. These classifications also act as a guide for future development of the overall street system. The city's functional classifications include principal arterials, minor arterials, collectors, and local streets. Arterial streets serve higher traffic volumes and may have few access points. Collector streets link arterials and local streets and may provide access to individual parcels. Collectors are also vital in connecting the residential areas to the central business district and are excellent candidates for multimodal facilities. Local streets provide neighborhood circulation and access to individual parcels.

The city also has two freeways, State Route (SR) 167 and 410 that run through it. The State has designated SR 167 as a Highway of Statewide Significance (HSS). HSS facilities provide and support transportation functions that promote and maintain significant statewide travel and economic linkages. Improvement plans for this HSS facility are developed from a statewide perspective. This planning includes policy development and accompanying funding support to represent a broad range of interests that depend on the facility. Because of its designation as an HSS facility, the State has the authority of setting the level of service (LOS) standards for SR 167. SR 410 is a State Highway of Regional Significance. LOS standards for SR 410 are established by the Puget Sound Regional Council (PSRC), in consultation with WSDOT.

Exhibit 3-2 provides a summary of the key characteristics of the roadway serving Sumner.

Exhibit 3-1. Existing Traffic Control and Functional Classification



CITY OF SUMNER

Existing Traffic Control and Functional Classification

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Map Date: February 2024

Exhibit 3-2. Characteristics of Key Roadways Serving Sumner

Roadway	Classification	Jurisdiction	Number of Travel Lanes	Posted Speed Limit	Parking?	Sidewalks?	Bicycle Facilities?
North-South Roadways							
SR 167	Freeway	WSDOT	4	60 mph	No	No	No
Valley Avenue	Minor/Principal Arterial ¹	Sumner	2 to 3	25 mph	No	Yes	Yes
Traffic Avenue	Minor Arterial ²	Sumner	4 to 5	25 mph	No	Yes	No
Fryar Avenue	Minor Arterial	Sumner	3	25 mph	No	Yes	Yes
142nd Avenue E	Minor Arterial	Sumner	5	35 mph	No	Yes	No
136th Avenue E	Minor Arterial	Sumner	3	30 mph	No	Yes	No
East Valley Highway	Minor Arterial ³	Sumner	2 to 3	25 mph	No	No	No
West Valley Highway	Minor Arterial	Sumner	2 to 4	35 mph	No	Yes	No
Sumner-Tapps Highway	Minor Arterial	Sumner	2	45 mph	No	No	No
Cannery Way (formerly Bridge Street)	Minor Arterial	Sumner	2	25 mph	No	Yes	No
Valley Avenue E	Minor Arterial	Sumner	2	25 mph	No	No	No
160th Avenue E	Minor Arterial ⁴	Sumner	2	25 mph	Yes	No	No
Sumner Heights Drive	Collector	Sumner	2	25 mph	No	Yes	No
Alder Avenue	Collector	Sumner	2	25 mph	Yes	Yes	No
Wood Avenue	Collector	Sumner	2	25 mph	Yes	Yes	No
158th Avenue E	Collector	Sumner	2	25 mph	No	Yes	No
Parker Road	Collector	Sumner	2	25 mph	No	Yes	No
East-West Roadways							
SR 410	Freeway	WSDOT	4	55 mph	No	No	no
24th Street E	Minor Arterial	Sumner	2 to 5	35 mph	No	Yes	No
Main Street	Minor Arterial	Sumner	2	25 mph	Yes	Yes	No
Stewart Road	Principal Arterial	Sumner	2-5	35 mph	No	Yes	No
Puyallup Street	Minor Arterial	Sumner	2	25 mph	No	Yes	No
Forest Canyon Road	Minor Arterial	Sumner	2	25 mph	No	No	No
64th Avenue E	Minor Arterial	Sumner	2	25 mph	Yes	Yes	No
Zehnder Street	Collector	Sumner	2	25 mph	No	Yes	No
Thompson Street	Collector	Sumner	2	25 mph	Yes	Yes	No
Elm Street	Minor Arterial Collector ⁵	Sumner	2 to 3	25 mph	No	Some ⁶	No

Roadway	Classification	Jurisdiction	Number of Travel Lanes	Posted Speed Limit	Parking?	Sidewalks?	Bicycle Facilities?
Meade-McCumber Road	Collector	Sumner	2	25 mph	Yes	Yes	No
Washington Street	Collector	Sumner	2	25 mph	No	Yes	No
Rivergrove Drive	Collector	Sumner	2	25 mph	Yes	Yes	No
Riverside Drive	Collector	Sumner	2	35 mph	No	No	No

Note: WSDOT = Washington State Department of Transportation; mph = miles per hour

1. Principal arterial south of SR 410
2. Principal arterial south of Thompson Street
3. Principal arterial north of Forest Canyon Road
4. Collector north of Main Street E
5. Minor Arterial between Valley Avenue and East Valley Highway and Collector Arterial from Valley Avenue and Wood Avenue and East Valley Highway and 160th Avenue E.
6. Elm Street does not have sidewalks on portions between Valley Avenue and Wood Avenue

Traffic Volumes

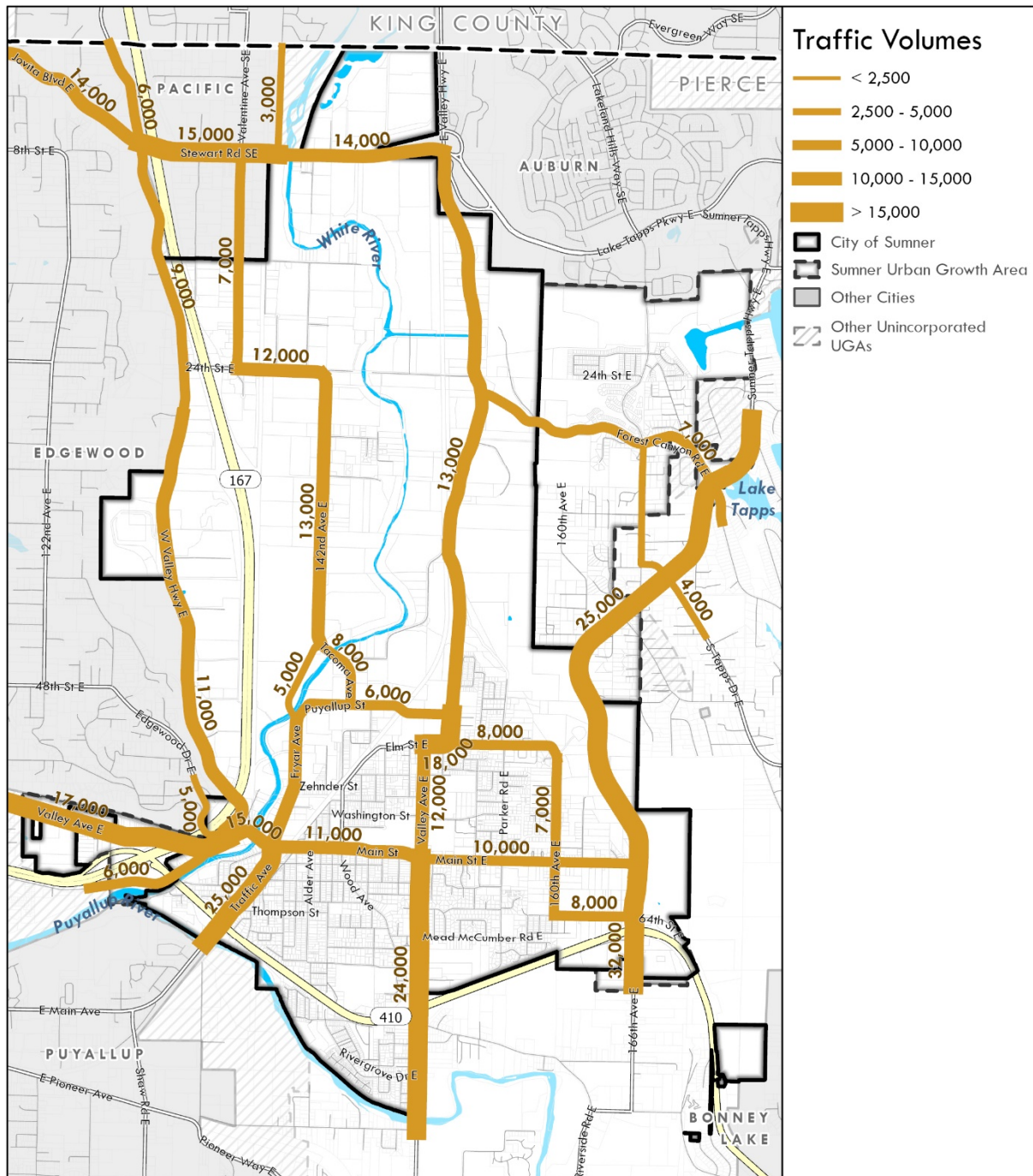
Daily traffic volumes were provided by the city and weekday PM peak hour traffic volumes were generally collected in February and November 2023 by IDAX at key intersections throughout the city. Exhibit 3-3 illustrates the average daily traffic volumes along key streets serving the city. Exhibit 3-3 shows daily traffic volumes along Valley Avenue E (SR 162) and Sumner-Tapps Highway within the City. Main Street in the Town Center area has about 11,000 vehicles per day while Stewart Road in the industrial area has about 14,000 vehicles per day.

Exhibit 3-4 summarizes the rates of growth along Sumners major corridors compared to 2014/2013 PM peak hour traffic volumes.

As shown on Exhibit 3-4, the weekday PM peak hour traffic growth was largest at intersections serving the northern part of the city industrial areas, where most of the growth has been concentrated over the past ten years. The largest increase in weekday PM peak hour traffic volumes occurred at the intersection of 142nd Avenue and 24th Street E, where traffic increased by 5 percent annually. At the access ramps to SR 167, traffic volumes have grown modestly between one tenth of a percent to 1.5 percent annually. The City's lowest growth in volumes occurred along the SR 162/Valley Avenue corridor. This pattern of little to no change in traffic volumes is thought to be a result of changing patterns in weekly commuter patterns. Since the COVID-19 pandemic travel patterns have changed with more people working from home or having more flexible hours when they may not commute daily or during the evening period.

Overall, the City's traffic volumes have changed less than 1 percent per year since the 2015 Transportation Plan was completed.

Exhibit 3-3. Existing Daily Traffic Volumes



CITY OF SUMNER

Daily Volume Bandwidth

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



0 1/2
Miles



CITY OF
SUMNER
WASHINGTON

Map Date: February 2024

Exhibit 3-4. Weekday PM Peak Hour Roadway Volumes and Annual Growth¹

Roadway	Cross-Street	2013/2014 PM Peak Volumes	2023 PM Peak Volumes	PM Peak Annual Growth Rate
W Valley Hwy E	Jovita Blvd	1,880	2,020	0.80%
SR 167 SB Ramps	Stewart Rd SE	1,550	1,770	1.50%
SR 167 NB Ramps	Stewart Rd SE	1,770	1,790	0.10%
140th Ct E2	Stewart Rd SE	1,250	1,550	2.40%
West Valley Hwy	24th St SE	1,160	1,350	1.70%
SR 167 NB Ramps	24th St SE	1,200	1,290	0.80%
136th Ave E2	24th St E	1,260	1,580	2.60%
142nd Ave E2	24th St E	790	1,230	5.00%
East Valley Hwy	Forest Canyon Rd	1,460	1,520	0.50%
West Valley Hwy	SR167 SB Ramps	1,060	1,240	1.80%
142nd Ave E	Costco Access	-	940	-
West Valley Hwy E	42nd St E	630	590	-0.70%
Tacoma Ave	Puyallup St	813	860	0.70%
East Valley Hwy	Puyallup St	1,500	1,490	-0.10%
East Valley Hwy	Elm St	1,430	1,430	-0.10%
Valley Ave	Elm St	1,140	1,120	-0.20%
Fryar Ave	Zehnder Ave	1,040	1,090	0.60%
West Valley Hwy	Sumner Heights Dr E	880	820	-0.80%
Valley Ave E	Sumner Heights Dr E	1,240	1,180	-0.60%
Traffic Ave	Main St	2,070	2,070	0.00%
Alder Ave	Main St	880	750	-1.90%
Wood Ave	Main St	1,170	980	-1.90%
Valley Ave	Main St	1,970	1,806	-1.00%
Parker Rd	Main St	1,070	970	-1.20%
160th Ave (Van Tassel Rd)	Main St (60th St E)	1,050	1,090	0.40%
Sumner-Tapps Hwy (166th Ave E)	Main St (60th St E)	1,650	1,550	-0.70%
Traffic Ave	Maple St	1,430	1,500	0.60%
Traffic Ave	SR 410 WB Ramps (Thompson St)	2,300	2,500	0.90%
Traffic Ave	SR 410 EB Ramps	2,160	2,690	2.50%
Valley Ave	Meade Mc Cumber Rd E	1,490	1,440	-0.40%

Roadway	Cross-Street	2013/2014 PM Peak Volumes	2023 PM Peak Volumes	PM Peak Annual Growth Rate
Parker Rd	Meade Mc Cumber Rd E	250	350	3.70%
160th Ave E	64th St E	500	630	2.50%
Sumner- Tapps Hwy (166th Ave E)	64th St E	1,900	2,060	0.90%
Sumner-Tapps Hwy E (166th Ave E)	SR 410 WB Ramps	1,960	2,010	0.30%
Sumner-Tapps Hwy (166th Ave E)	SR 410 EB Ramps	1,780	1,680	-0.60%
Valley Ave	Gary St	1,480	1,450	-0.20%
SR 162	SR 410 WB Ramp	1,920	1,770	-0.90%
SR 162	SR 410 EB Ramp	2,090	2,150	0.30%
SR 162	74th St E	1,770	1,920	0.90%
SR 162	Rivergrove Dr	1,590	1,530	-0.40%

Note:

1. PM Peak Volumes rounded to the nearest tenth.

Truck Traffic

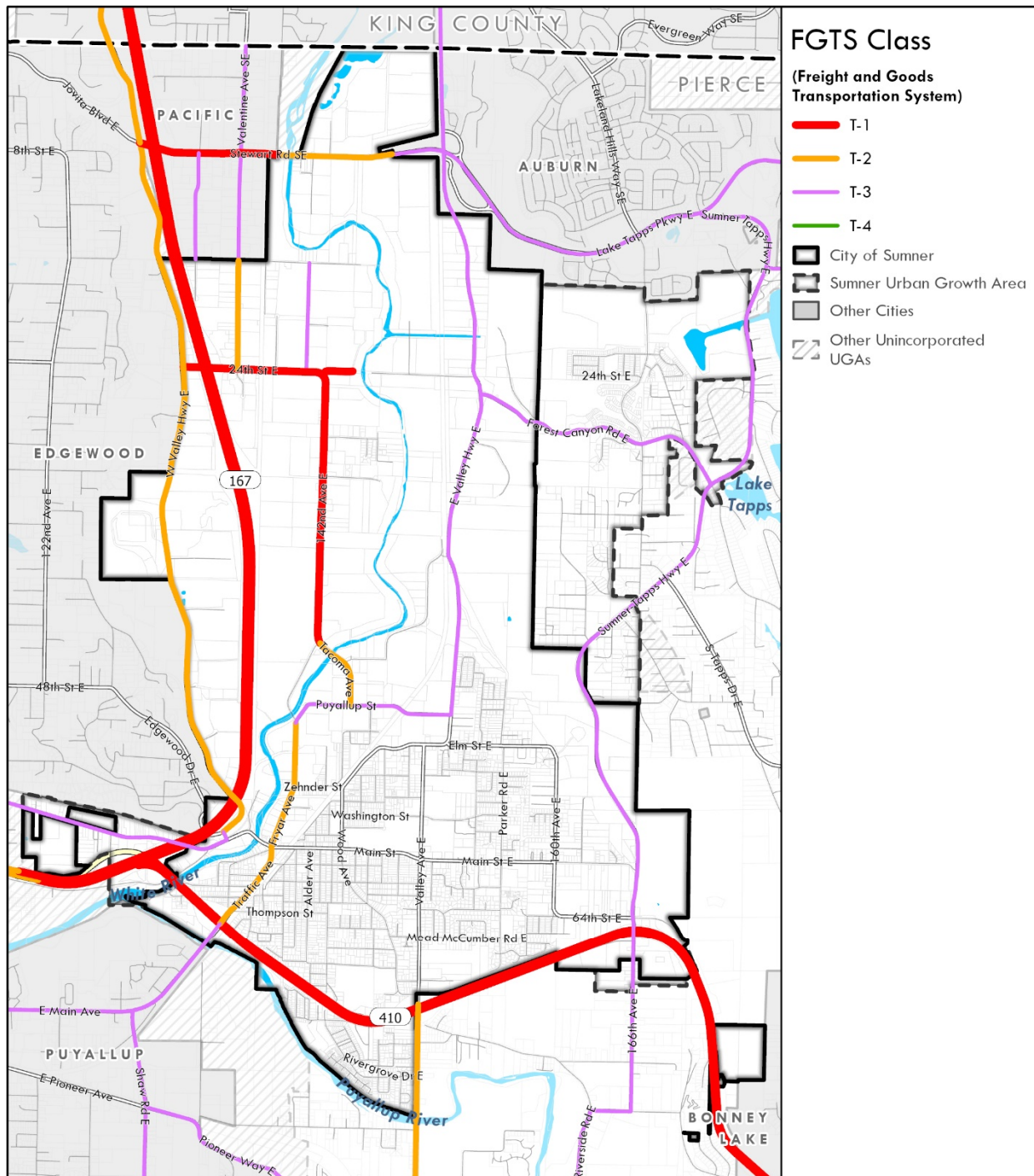
The availability of industrial land and its proximity to the SR 167, SR 410, I-5 freeway corridors has made Sumner an attractive place for trucking-related developments such as warehousing and distribution centers.

Sumner has adopted a formal truck route plan to manage truck traffic within its city limits. Exhibit 3-5 illustrates the existing truck routes. Existing truck traffic is routed around the perimeter of the residential and commercial sections of Sumner. Truck traffic entering and exiting Sumner from the industrial areas to the north is served by the two SR 167 interchanges at Stewart Road and 24th Street E.

Sumner's warehouse and industrial area generates heavy truck traffic volumes on 136th Avenue E and Stewart Road on movements to and from SR 167. Heavy truck traffic is significant not only because of its impact on traffic flow but because of the impact on parking and the structure of the roadways. There are limited places where truck parking is allowed and some areas along truck routes have not been designed sufficiently for trucks.

Several roadways within the city are classified as T-2 or T-1 level roadways in the Washington State Freight and Goods Transportation System (FGTS). These roadways carry between 4 and 10 million tons (T-2) or more than 10 million tons (T-1) per year, depending on their classification. Sumner roadways classified as T-1 include 142nd Avenue E from Tacoma Avenue to 24th Street E, and 24th Street E from West Valley Highway to 142nd Avenue E. The City's T-2 designated truck routes include Traffic Avenue from SR 410 to Main Street, Fryar Avenue from Main Street to Puyallup Street E, West Valley Highway from Sumner Heights Drive to 16th Street E, and Stewart Road from Butte Avenue SE to the City Limits.

Exhibit 3-5. Existing Truck Routes



CITY OF SUMNER

Existing Truck Routes

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Traffic Operations

Traffic volumes were used to evaluate traffic operations in Sumner. Traffic operations analysis provides a quantitative method for evaluating existing and future transportation conditions. The City's operational standard is presented along with the analysis methodology. A discussion of existing traffic operations is also provided.

Analysis Methodology

Traffic operations were evaluated for the existing year (2023) based on the level of service (LOS) methodologies of the Highway Capacity Manual (HCM) (Transportation Research Board). The HCM is a nationally recognized and locally accepted method of measuring traffic flow and congestion. Criteria range from LOS A, indicating free-flowing conditions with minimal vehicle delays, to LOS F, indicating extreme congestion with long vehicle delays. At signalized intersections, LOS is measured in terms of average delay per vehicle. At unsignalized intersections, LOS is measured in terms of the average vehicle delay and is typically reported for the worst traffic movement instead of for the whole intersection. Appendix A includes an in-depth discussion of LOS.

Intersection LOS analysis was performed for major intersections within the study area based on 2023 conditions. Like the scope of the previous study in 2015, 43 intersections were selected for analysis, based on location and likelihood that they might be impacted by future growth. Turning movement counts collected in February and November 2023 were used in this analysis.

The study area current LOS standards are set by Sumner, Pacific, and WSDOT. The current adopted LOS standards set by each jurisdiction are summarized below:

- City of Sumner¹
 - LOS D all intersections except as specifically noted
 - Exception to the LOS D standard are:
 - Traffic Avenue/Main Street/Fryar Avenue (LOS F)
 - Main Street/Alder Avenue (LOS F)
 - Valley Avenue East/Main Street (LOS F)
 - West Valley Highway East/Valley Avenue/Sumner Heights Drive (LOS F)
- City of Pacific
 - LOS D (Butte Avenue SE/Stewart Road SE)
- WSDOT/PSRC²
 - LOS D for Highways of Statewide Significance (HSS) in urban areas
 - LOS C for Highways of Statewide Significance (HSS) in rural areas
 - LOS D for Regional Significance State Highways (RSSH), Tier 2

¹ 2015 Sumner Transportation Plan

² Level of Service Standards for Washington State Highways, 2010

Because SR 167 is a designated HSS, the State requires local jurisdictions to adopt this LOS standard for HSS facilities in their Comprehensive Plans. For non-HSS facilities, the State requires that an agency coordinate with WSDOT in establishing a LOS standard for those facilities. SR 410 and SR 162 are not HSS-designated facilities. Puget Sound Regional Council (PSRC) has adopted LOS standards for regionally significant state highways or state transportation facilities that are non-HSS such as SR 410 and SR 162. SR 162 and SR 410 both Tier 2 RSSH. Based on the PSRC tiered LOS system, both SR 410 and SR 162 have an adopted LOS D standard. SR 410 is also part of the National Highway System within the City.

Sumner has significant regional traffic that diverges onto the local roadway system due to congestion on the regional network. Exhibit 3-6 illustrates the existing weekday PM peak hour LOS at the study intersections. Existing traffic operations were analyzed based on the procedures documented in the Highway Capacity Manual 6th Edition or 2000 when the 6th Edition method is unable to evaluate the operations. The analysis uses Synchro 11.0 for signalized and stop controlled intersections. Detailed LOS and delay summary is provided in Appendix B.

Generally, traffic operations have remained consistent over the last 10 years. Four intersections do not meet the currently adopted LOS standard during the weekday PM peak hour operating at LOS E or F including:

- Stewart Rd SE/Butte Ave SE (LOS F) - unsignalized (signal being installed)
- E Valley Hwy E/Forest Canyon Rd E (LOS F) - unsignalized
- Sumner-Tapps Hwy E/SR 410 WB Ramps (LOS F) - unsignalized
- Valley Ave/74th St E (LOS F) - unsignalized

Stewart Road/Butte Avenue SE is in the City of Pacific and there is an improvement project to signalize this intersection that will be completed by the end of 2023.

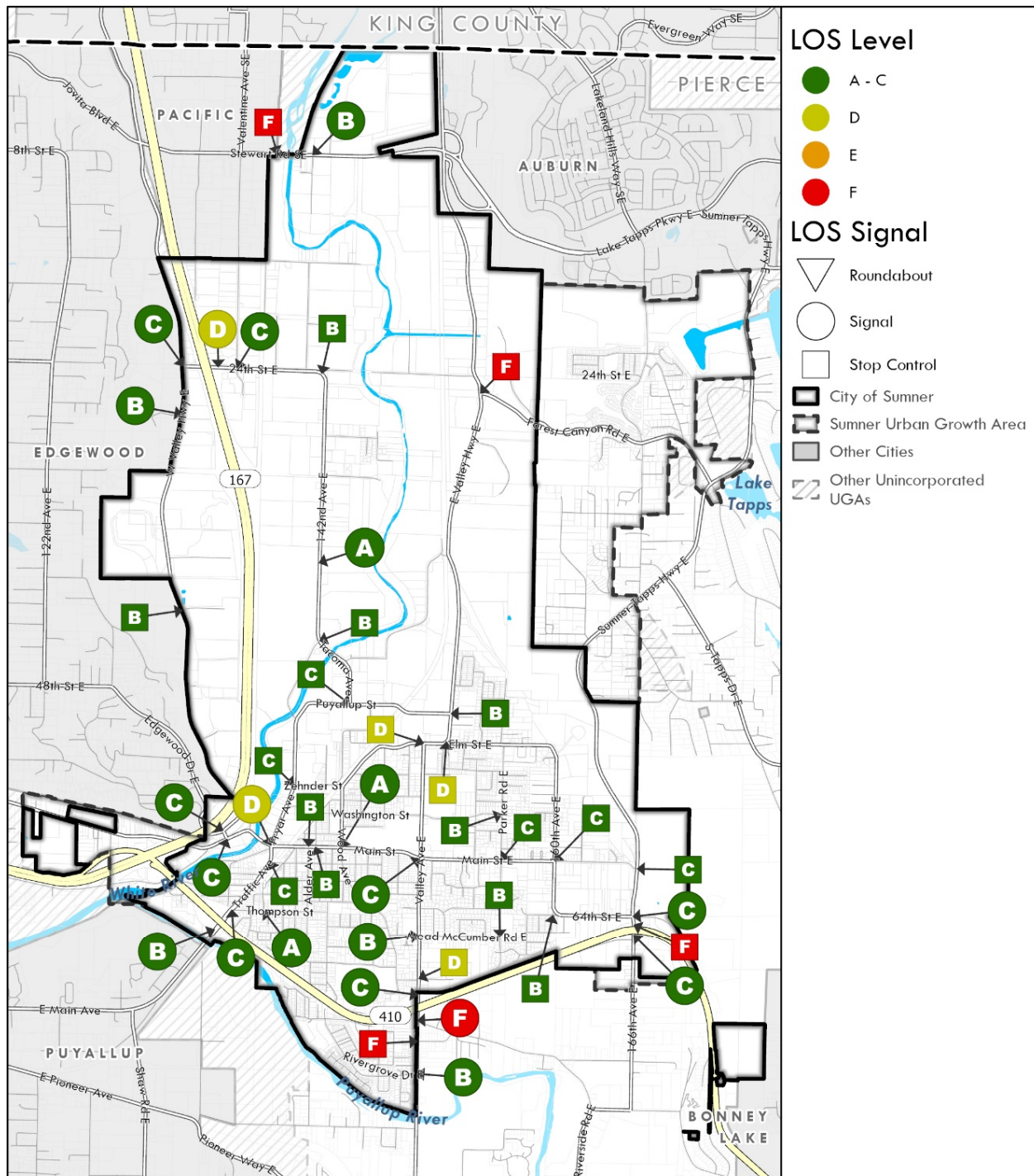
Exhibit 3-7 provides a comparison between 2015 and 2023 LOS, delay, and worst movements at the study intersections not meeting the adopted LOS standard or showing a trend towards increased delay. Poor operations are known issues at the SR 162 and SR 410 WB Ramps and the East Valley Highway/Forest Canyon Road E intersection. The City of Sumner's 6-Year Transportation Improvement Program 2024-2029 includes improving the Stewart Road SE/Butte Avenue SE intersection. The city is currently installing a new signal and adding turn lanes at the Stewart Road SE/Butte Avenue SE intersection.

In addition, two intersections currently meet adopted LOS standards yet show a trend (more than one LOS difference) toward increased delay and are included in the summary table. The intersections showing a negative trend in operation are:

- SR 167 NB Ramps/ 24th Street E - signalized
- Sumner-Tapps Highway E/64th Street E - signalized

The city has identified improvements at the Sumner-Tapps Highway E/64th Street E intersection as part of improvements at the SR 410/166th Avenue E/Sumner-Tapps Highway interchange.

Exhibit 3-6. Existing Weekday PM Peak Hour Level of Service



CITY OF SUMNER

Existing Weekday PM Peak Hour Level of Service

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: February 2024

Exhibit 3-7. 2015 and 2023 Weekday PM Peak Hour Level of Service Comparison

Intersection		2015 PM Peak Hour			2023 PM Peak Hour		
Major Rd	Minor Rd	LOS ¹	Delay ²	WM ³	LOS ¹	Delay ²	WM ³
Stewart Rd	Butte Ave SE	Not Studied in 2015			F	186	SB
East Valley Hwy E	Forest Canyon Rd	D	29	WB	F	327	WB
Sumner-Tapps Hwy E	SR 410 WB Ramps	F	>50	WB	F	61	WB
Valley Ave	74th St E	C	19	WB	F	110	EB
SR 167 NB Ramps	24th St E	A	7	-	D	36	-
Sumner Tapps Hwy E	64th St E	A	9	-	C	22	-

Notes:

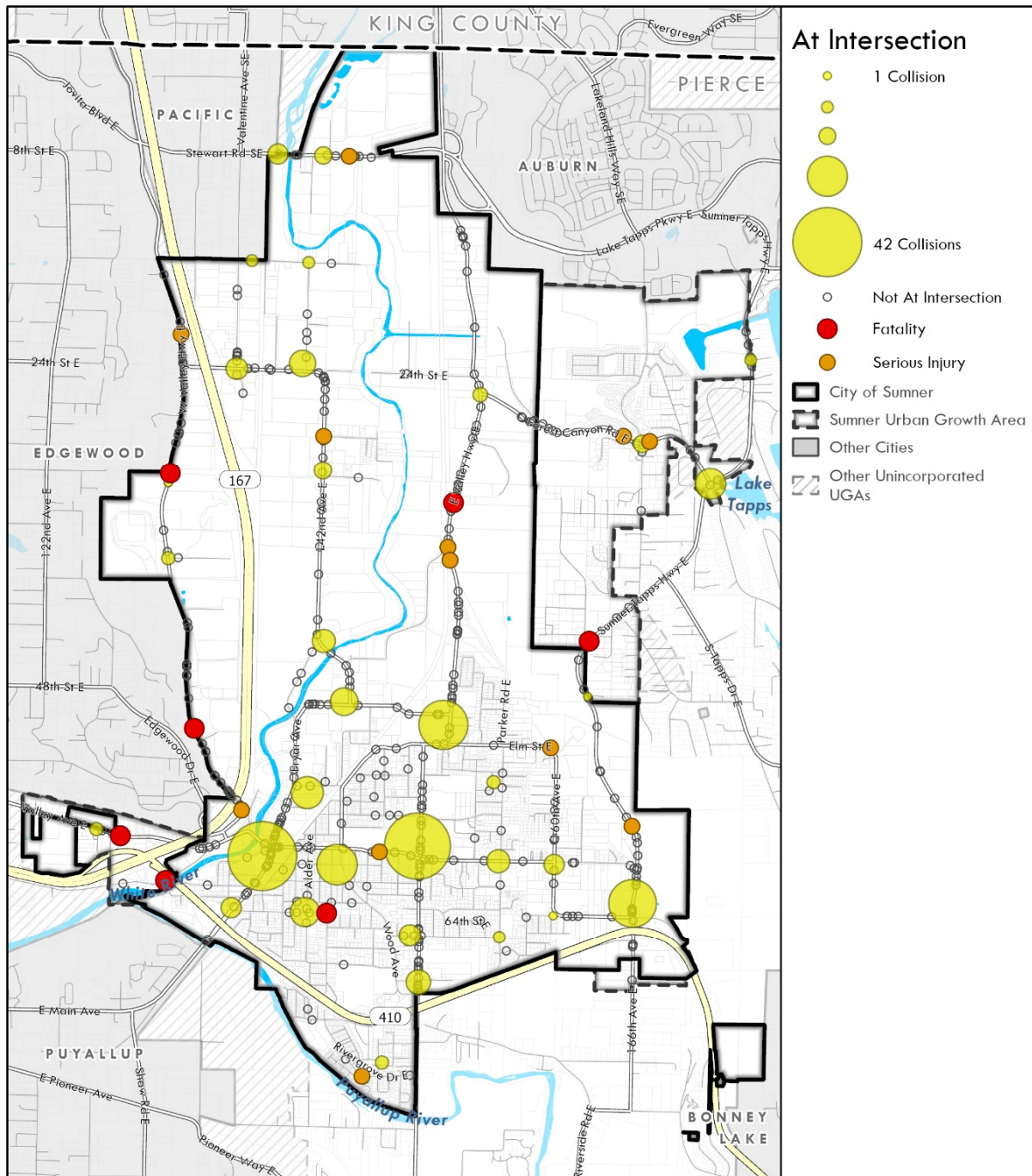
1. LOS = level of service based on the Highway Capacity Manual (HCM)
2. Average delay in seconds per vehicle.
3. WM means worst movement and SB means southbound, WB means westbound, NB means northbound, EB means eastbound.

Traffic Safety

A review of citywide collision records was completed to identify potential safety issues for vehicles, pedestrians, and cyclists. The traffic safety analysis included collision data for a five-year period from January 1, 2018 through December 31, 2022. This information was provided by WSDOT for SR 162, SR 167, SR 410, and all roadways within City limits. A map of Sumner's Collision History is shown on Exhibit 3-8.

Four (4) fatalities and 17 serious injury crashes occurred over the 5-year period. The number of collisions occurring at locations in the city are generally low to moderate with a moderate concentration of collisions occurring along Main Street, Traffic Avenue and 166th Avenue E/Sumner Tapps Highway.

Exhibit 3-8. Sumner 5-Year (2018-2022) Collision History



CITY OF SUMNER

Sumner 5-Year (2018-2022) Collision History

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

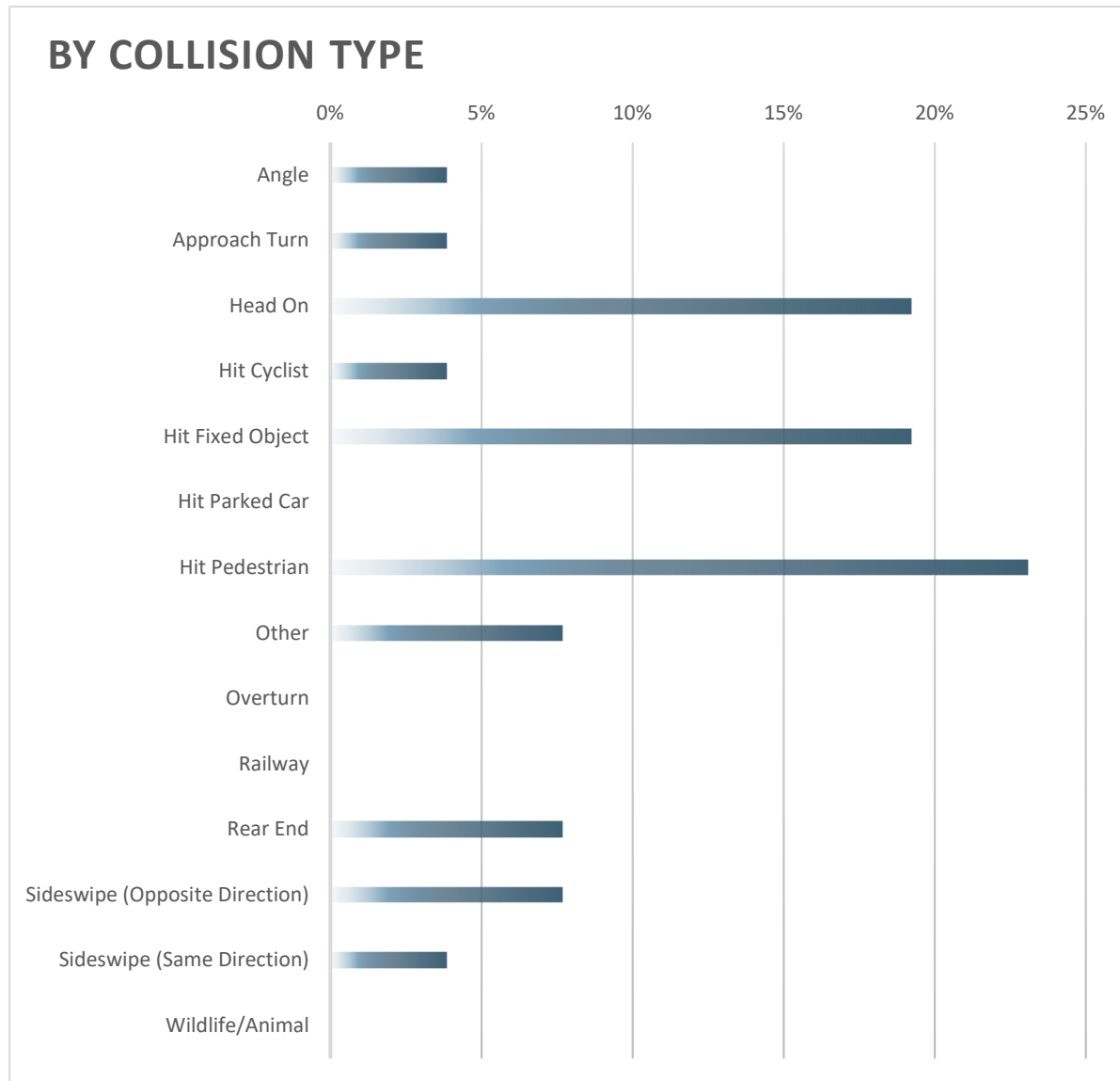


CITY OF
SUMNER
WASHINGTON

Map Date: February 2024

A total of 1,603 collisions over the five-year period were recorded. Of these, 21 crashes resulted in a serious injury or fatal (SIF) outcome. Exhibit 3-9 shows the collision types for fatal and serious injury collisions. Of the serious injury and fatal crashes, over 20 percent involved pedestrians and about 5 percent involved bicyclists. Intersection improvements identified to address operations or safety are identified in Chapter 5.

Exhibit 3-9. Fatal and Serious Injury Collision Types



The most frequently reported collision type was rear-end crashes, which often occur in congestion or stop-and-go traffic. Rear-end crashes accounted for approximately 40 percent of all the crashes in the five-year period.

Transit Service and Rail Service

Transit Service

Sumner is currently not served by Pierce Transit, which limits transit options and accessibility within the city. The only transit stop in the city is at the Sumner Sounder Train Station and is served by Sound Transit. Exhibit 3-10 illustrates the bus Sound Transit bus routes, which are described below.

Sound Transit Route 578 provides service between Seattle to Puyallup. This service is intended to be a Sounder train shadow and currently runs with one stop at the Sumner train station, stops in Puyallup, and Federal Way, and three stops in Seattle. Service is provided between 6 a.m. and 12 a.m. on weekdays. The route operates on 60-minute headways on weekdays and weekends.

Route 596 provides shuttle service between Bonney Lake Park and Ride and the Sumner Sounder Station. The route operates on 25-minute headways on weekdays and there is no weekend service. This route is scheduled in coordination with the train schedule to shuttle commuters to and from the Bonney Lake Park and Ride. Service is provided between 5 a.m. and 8 p.m. on weekdays.

The City of Sumner is currently operating a "last mile" shuttle service pilot project from the Sumner Sounder Station to businesses in the Manufacturing/Industrial Center (MIC) that operates during the commuter train service times. The single 14-passenger shuttle offers service for a paid fare of \$3 per ride and is often partially subsidized by the employer.

Pierce County also provides Beyond the Borders Connector, a local on-demand bus service, which helps eligible residents access public transportation, medical services, employment, shopping, and social activities. There is no cost to riders. Use of the service is unlimited, and riders can get on and off at all stops throughout the community and ride multiple times each day.

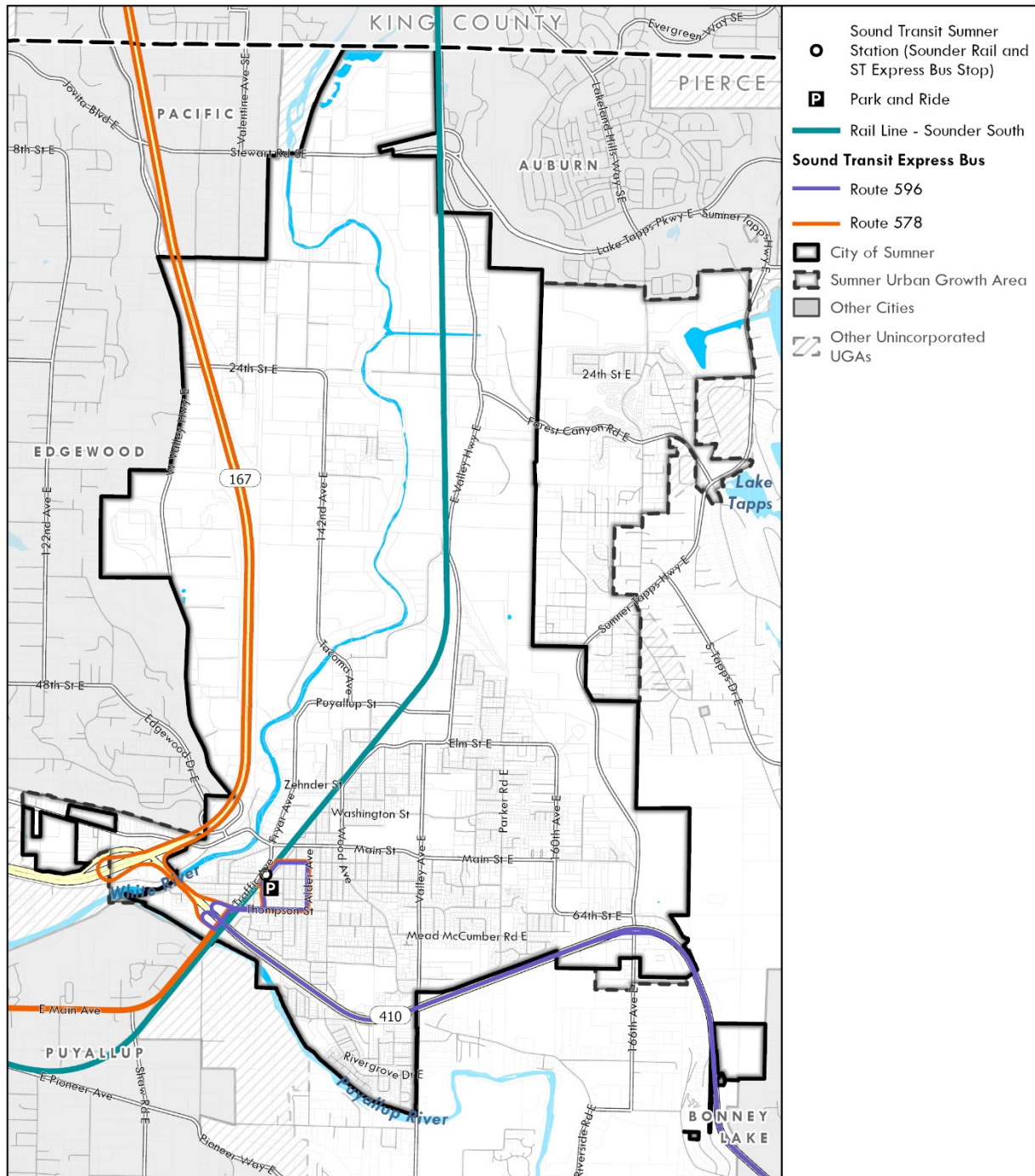
Commuter Rail Service

Sound Transit's Sounder S line offers commuter rail service between Lakewood and downtown Seattle with stops in Tacoma, Puyallup, Sumner, Auburn, Kent, and Tukwila. The Sounder service shares the Burlington Northern Santa Fe (BNSF) tracks. The Sumner Station is located south of Maple Street between Narrow and Traffic Streets in downtown Sumner. There are currently three morning and ten afternoon trains southbound and ten morning trains and three afternoon trains northbound serving the Sumner Station during the commute hours. According to Sound Transit, 130 total parking spaces are available near the Sumner commuter rail station with an additional 500 parking spaces proposed as part of Sound Transit's Sumner Access Improvement Project parking garage.

Sound Transit's ridership dramatically decreased during the pandemic in 2020 and continues to slowly recover. Although the Sounder ridership is over 3 million riders less per year compared to 2019, the Sound Transit's Transit Transportation Development Plan 2023-2028 indicates service saw nearly double the ridership in 2022 compared to 2021. Daily boardings continue to increase with the S Line, which serves Sumner, having an average of 6,500 daily boardings as of June 2023³.

³ Sound Transit Ridership Report accessed June 2023 <https://www.soundtransit.org/ride-with-us/system-performance-tracker/ridership>

Exhibit 3-10. Existing Transit Service



CITY OF SUMNER

Existing Transit Service

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Map Date: February 2024

Freight Train Traffic

The BNSF railroad lines run north-south through the City of Sumner. The Union Pacific (UPRR) line is located on the west side of the White (Stuck) River, paralleling SR 167. The BNSF rail line is located on the east side of the White (Stuck) River and runs through downtown Sumner paralleling Traffic Avenue. Sound Transit's Sounder Service uses BNSF tracks. There are currently 71 trains that run through Sumner on the BNSF tracks and 10 trains on the UPRR line daily. The projected rail use by 2035 is 102 on the BNSF tracks and 27 on the UPRR tracks.⁴

Pedestrian and Bicycle Facilities

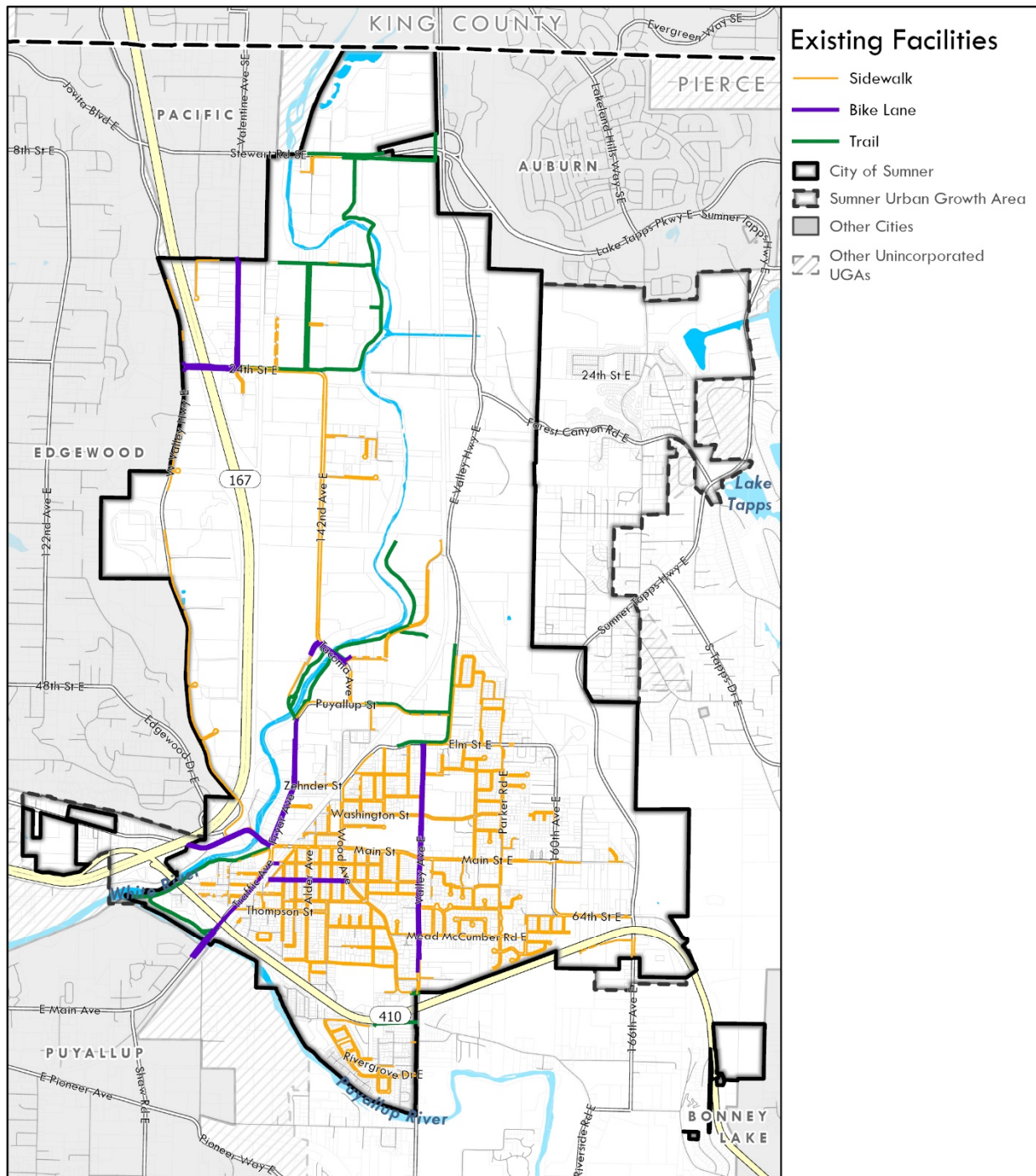
Continuity in pedestrian and bicycle access within the city provides for increased safety, comfort, and ease for residents and recreational users. The city is striving to create a fully integrated system for these modes of transportation and recognizes the need to prioritize locations where it expects heavy non-motorized use, such as routes connecting residential areas to recreational facilities and schools, and places of employment.

Exhibit 3-11 illustrates the current non-motorized system within the city. The city's existing transportation system was historically designed and constructed for vehicular traffic. The existing system provides access for people on foot, bike, or other modes primarily with sidewalks, bike lanes, and off-street trails. Sidewalks are located intermittently around the city, mostly along arterial roadways located within Sumner's downtown and nearby neighborhoods.

There are limited formal bicycle facilities in Sumner. For the most part, bicyclists share the road with motorized traffic or use paved roadway shoulders, where available. Formal bike lanes are present along Valley Avenue, Fryar Avenue and Academy Street.

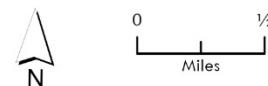
⁴ State of Washington Joint Transportation Committee Road-Rail Safety Study Crossing Analysis ([Joint Transportation Committee Road-Rail Study Crossing Analysis \(transpogroup.com\)](https://transpogroup.com)) accessed November 2023.

Exhibit 3-11. Existing Non-Motorized Facilities



CITY OF SUMNER

Existing Non-Motorized Facilities



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Map Date: February 2024

Transportation Demand Management

The City of Sumner has adopted a Commute Trip Reduction (CTR) program. The CTR program establishes goals consistent with State legislation. The individual demand management strategies that are typical elements of the CTR and Transportation Demand Management (TDM) programs are different for employment and residential developments.

Manufacturing and Industrial Center (MIC) and Town Center Subarea Plans described TDM strategies to reduce employment and residential drive-alone trips, including shuttles and transit options, improving bicycle and pedestrian connectivity and incentive programs led by employers. In 2023 the City of Sumner began a shuttle pilot program, BusUp, in partnership with employers in the MIC to provide a “last mile” service from the downtown transit station to the MIC.

Technology

Transportation System Management and Operations (TSMO) is an integrated approach to optimize the performance of existing infrastructure by implementing multimodal, intermodal, and often cross-jurisdictional systems, services, and projects. TSMO seeks to operate the existing transportation system as safely and efficiently as possible, often maintaining or even regaining previous capacity levels and improving safety performance levels. In practice, TSMO is applied on a corridor or in a region as a series of operational strategies.

Most of the city’s current transportation infrastructure is outdated and there are limited abilities to provide TSMO without future upgrades. The city is currently looking into investments in fiber optic systems and will be considering what upgrades are needed and to leverage the fiber project to allow for TSMO.

In addition, as the use of electric vehicles (EVs) continues to grow within transportation systems, it becomes essential to establish an accessible EV charging infrastructure. Currently, there is no City-provided charging infrastructure in the right-of-way or on City-owned properties (e.g., public parking lots).

4. Travel Forecasts and Alternatives Evaluation

Sumner's Transportation Plan is developed based on the evaluation of the existing transportation system and future transportation system needs based on planned future growth. GMA requires that the transportation planning horizon be at least ten years in the future. The City of Sumner selected a 2044 horizon year. Year 2044 provides a long-range look at the transportation system needed to support anticipated growth in the city and other communities in northern Pierce County. Travel forecasts have been developed and analysis has been conducted for average weekday conditions during the PM peak hour. The weekday PM peak hour generally has the highest overall traffic volumes in the community and thus provides the basis for identifying capacity related improvement needs.

Primary analyses of the 2044 traffic forecasts were initially based on the following travel forecasting assumptions:

- Committed Improvement projects in Sumner's current Transportation Improvement Program (TIP)
- Improvement projects in available transportation plans from adjacent jurisdictions
- Puget Sound Regional Council's (PSRC) Transportation Vision 2050 Update Regional Capacity Projects List (as of May 2022)
- WSDOT's 2023-2026 Statewide Transportation Improvement Program
- Sumner's forecast land use data (for four alternatives)
- PSRC 2050 Land Use Targets forecasts and regional trip end data from the 2050 regional travel demand model.

Based on these assumptions, travel forecasts were developed using Sumner's travel demand model. The model is a tool that is used to convert existing and future land uses into trips. The following provides an overview of the land use assumptions, travel demand model, and the alternatives analysis. The travel forecasts provide a technical basis for identifying the transportation improvement projects in the transportation systems plan.

Land Use Data

A strong relationship exists between land use and the transportation facilities necessary to provide mobility within the community. Future transportation improvements recommended in the Transportation Plan have been defined to support the Land Use Element of the Comprehensive Plan.

2044 forecasts of land use growth throughout the city and its Urban Growth Area (UGA) were developed for four land use alternatives. The alternatives were prepared to evaluate different levels, types, and allocation of growth in the city. Alternative 1 is consistent with development levels evaluated as part of the 2015 Comprehensive Plan and serves as a baseline or benchmark for understanding the other alternatives. Alternatives 2 and 3 have the same levels of development but allocated differently

throughout the city. Alternatives 2 and 3 represent growth beyond what was planned for in 2015. The Preferred Alternative is similar to Alternative 1 in terms of land use development levels.

Exhibit 4-1 summarizes 2044 additional growth land use data by alternative as allocated to the:

- Town Center
- Manufacturing and Industrial Center (MIC)
- Other Areas inclusive of East Sumner, South Sumner, and the Urban Growth Area (UGA)

Exhibit 4-1. 2044 Land Use Growth Allocation by Alternative

Land Use by Subarea	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Housing Units				
Town center	1,245	1,245	1,309	1,245
MIC	0	0	0	0
Other	740	1,755	1,691	740
Total	1,985	3,000	3,000	1,985
Jobs				
Town center	330	330	330	330
MIC	3,900	3,900	3,900	3,900
Other	1,083	1,083	1,083	1,083
Total	5,313	5,313	5,313	5,313

Source: BERK Consulting, 2024

As shown in Exhibit 4-1, the number of jobs is the same across the four alternatives. Alternatives 2 and 3 would both increase the number of housing units by 1,015 units, but those would be allocated the growth to different areas of the city.

Exhibit 4-2 provides a summary of the total anticipated housings units and jobs under existing conditions and each Alternative.

Exhibit 4-2. Total Land Use by Alternative

Land Use by Subarea	Existing	Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
Housing Units	5,272	6,356	7,371	7,371	6,356
Jobs	23,262	24,919	24,919	24,919	24,919

Source: BERK Consulting, 2024

As shown in Exhibit 4-2, Alternative 1 and the Preferred Alternative would have the same level of development with an increase of 1,084 housing units and 1,657 jobs. The difference between the two Alternatives is the allocation of the jobs and housing throughout the City.

In addition to Alternative 1 and the Preferred Alternative two Alternatives were evaluated which represent more of an increase in housing and jobs. Alternative 2 and 3 show over 7,300 housing units and 24,900 jobs within the city and surrounding study area by 2044. Representing an increase of 2,099 housing units and 1,657 jobs over the current condition. The primary difference between Alternative 2 and 3 is the concentration of housing units located east of E Valley Highway E south of Forest Canyon Road E under Alternative 2.

Travel Forecasting Model

A travel demand forecasting model was developed to assist in defining future transportation system needs. The model uses the VISUM software package and forecasts weekday PM peak hour traffic volumes based on the 2044 land use alternatives. The model study area includes a portion of the City of Pacific and parts of Pierce County just beyond the city limits.

The model was calibrated to match existing base year traffic volumes (2023) and then used to develop a baseline 2044 traffic forecast. City, County, and State transportation improvement projects likely to be funded and built by 2044 were included in the future baseline model and are described below. The 2044 baseline model only included city projects that are in design, construction, or recently built. The 2044 travel forecasts were used to identify future transportation needs.

Transportation Network Assumptions Used in the Model

Exhibit 4-3 summarizes the future baseline transportation improvement projects that were assumed to be completed as part of the baseline 2044 transportation system modeling. The projects listed in the exhibit are planned improvements with either full or partial funding and would be completed before 2044 by Sumner or other agencies. It is noted that the Butte Avenue SE/Stewart Road SW and Main Street/Wood Avenue intersection improvements have already been completed but were under construction during the period of the existing inventory data gathering. Projects that are not fully funded are also identified in the transportation improvement plan (Chapter 5) and included in the strategy for finance and implementation (Chapter 6).

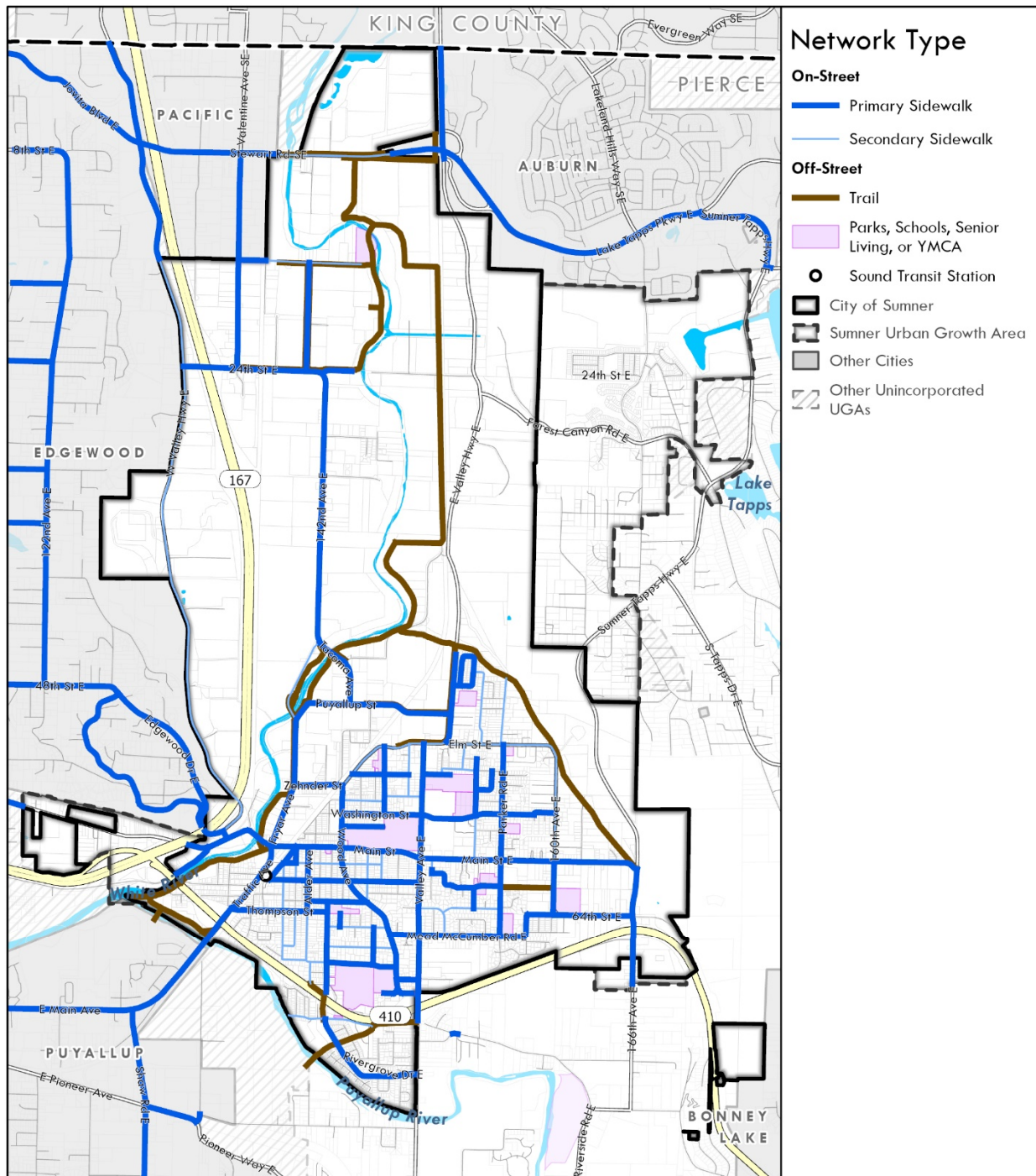
Exhibit 4-3. 2044 Baseline Transportation Improvements

Location	Project Description
SR 167: SR 410 to City of Auburn	Add southbound high occupancy or toll (HOT) lane
Butte Avenue SE/Stewart Road SW	Construct a traffic signal with additional capacity including: -Northbound and southbound left-turn lanes -Eastbound left-turn lane and right-turn lane
Stewart Road SW: Butte Avenue SE to 140th Avenue Court E	Widen to 5 lanes including a center two-way left-turn lane

Location	Project Description
Main Street/Wood Avenue	Pedestrian and signal improvements
SR 410 WB Ramps/166th Avenue E	Construct roundabout
SR 410/SR 162 Interchange	Construct roundabouts
64th Street/164th Avenue E	Construct roundabout
Sumner Tapps Highway/60th Street E	Construct signal. Remove eastbound left-turning movement restrictions
166th Avenue E: SR 410 Ramps to 64th Street E	Widen to 4 to 5 lanes
SR 167/I-5 Connection: Puyallup to Fife	Construct remaining 4 miles of SR 167 between Meridian and I-5

As part of the Baseline Transportation Improvements, the city also defined a desired future 2044 pedestrian and bike network as shown on Exhibits 4-4 and 4-5. This desired non-motorized network follows locations where heavy non-motorized use is expected, such as routes connecting residential areas to recreational facilities and schools, and places of employment. Trails are included in both the pedestrian and bike network since these are used by both pedestrians and bicyclists, and these trails help complete the network.

Exhibit 4-4. Future Pedestrian Network

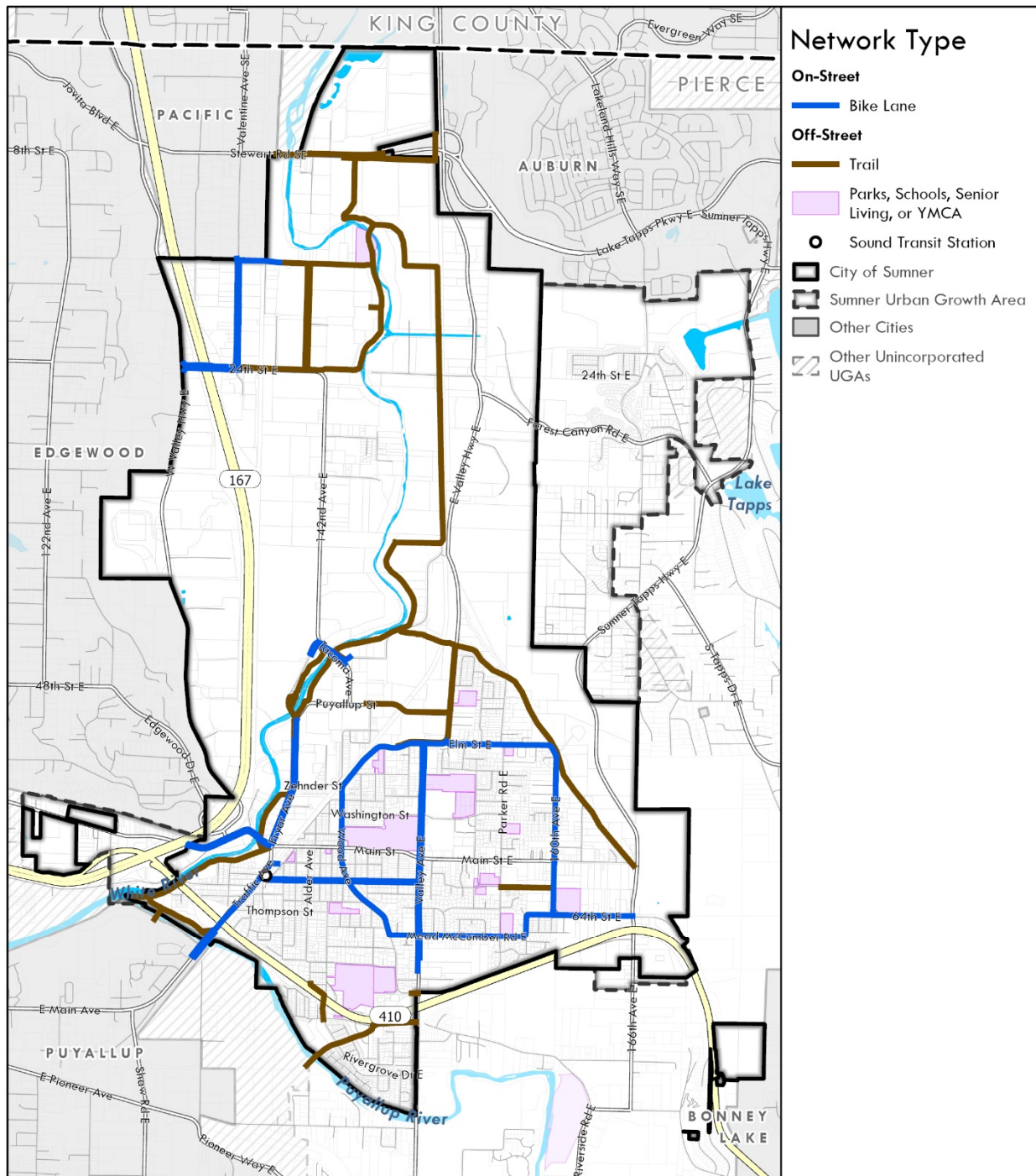


CITY OF SUMNER Future Pedestrian Network



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Exhibit 4-5. Future Bike Network



CITY OF SUMNER Future Bike Network



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Alternatives Analysis

The alternative analysis is based on the four alternatives described in the EIS and Land Use Element of the Comprehensive Plan. It is used to identify transportation needs for Sumner and develop the framework for the transportation network and ultimately the transportation improvement plan. The evaluation is completed using the City's travel demand model to forecast transportation demands as well as the identified future pedestrian and bike networks and then applying the level of service (LOS) standards to determine transportation needs for vehicle, bicycle, and pedestrian modes. The results of the alternatives analyses are used to develop a recommended 2044 transportation network with improvements.

Traffic Forecasts

Trip generation was developed through the modeling process, which converts estimates of housing and employment (by category) into daily person trips by trip purpose for each Traffic Analysis Zone (TAZ). The daily person trips are then converted into weekday PM peak hour vehicle trips based on factors from the PSRC regional travel demand model. Exhibit 4-6 summarizes the weekday PM peak hour trip generation for the alternatives.

Exhibit 4-6. Weekday PM Peak Hour Vehicle Trips by Alternative

Alternative 1	Alternative 2	Alternative 3	Preferred Alternative
12,544	13,626	13,542	12,550

Source: Transpo Group, 2023

The additional housing and employment under Alternatives 2 and 3 result in 8 to 9 percent more weekday PM peak hour trips generated compared to Alternative 1 (no action). Alternative 3 trip generation is slightly less than Alternative 2 (i.e., 0.6 percent or 84 vehicle trips less). As described previously, Alternatives 2 and 3 represent the same level of development but differ slightly in the allocation of the development.

Similarly, Alternatives 1 and the Preferred Alternative represent the same level of development but in the allocation of the development within the City. The Preferred Alternative is anticipated to result in a similar number of trips as Alternative 1.

The remainder of the alternatives analysis related to the assessment of vehicle needs focusses on Alternatives 1 and 2 representing the no action/Preferred Alternative and action conditions. Because Alternative 2 trip generation is only 84 weekday PM peak hour vehicle trips higher than Alternative 3 and this difference is very small considering it is distributed throughout the entire city transportation system, the resulting analysis of transportation needs is essentially the same for the two action alternatives. Similarly, the Preferred Alternative is 6 weekday PM peak hour vehicle trips higher than Alternative 1. As such, the findings and recommendations for Alternative 3 are anticipated to be the same as Alternative 2, and Alternative 1 the same as the Preferred Alternative.

The weekday PM peak hour traffic forecasts and average annual growth rate for the 2044 alternatives are summarized in Exhibit 4-7 for key intersections.

Exhibit 4-7. Alternative 1 and 2 Weekday PM Peak Hour Traffic Volumes

Intersection	2023 Existing	2044 Alternative 1		2044 Alternative 2	
	PM Peak Volumes	PM Peak Volumes	Average Annual Growth	PM Peak Volumes	Average Annual Growth
Stewart Road SE/Butte Avenue SE	1,675	2,315	2%	2,375	2%
E Valley Highway E/Forest Canyon Road E	1,525	1,860	1%	1,970	1%
Puyallup Street/Tacoma Avenue	860	1,090	1%	1,155	1%
E Valley Highway E/Elm Street E	1,425	1,710	1%	1,795	1%
Valley Avenue/Elm Street E	1,120	1,280	1%	1,330	1%
Sumner Heights Drive E/W Valley Highway E	820	1,085	1%	1,110	1%
Traffic Avenue/Main Street	2,080	2,520	1%	2,610	1%
Alter Avenue/Main Street	750	910	1%	955	1%
Valley Avenue/Main Street	1,810	2,235	1%	2,340	1%
Parker Road E/Main Street E	960	1,270	1%	1,310	1%
160th Avenue E/Main Street (60th Street E)	1,085	1,540	2%	1,605	2%
Sumner-Tapps Highway E/SR 410 WB Ramp	1,675	1,985	1%	2,025	1%
Valley Avenue/SR 410 EB Ramp	2,150	2,965	2%	3,025	2%
Valley Avenue/74th Street E	1,915	2,545	1%	2,590	1%

Source: Transpo Group, 2023

As shown in Exhibit 4-7, the average annual growth rate at the studies intersections is approximately 1 to 2 percent per year with both Alternatives 1 and 2. The growth overall represents an increase over existing traffic volumes at key study intersections of between 160 to 815 weekday PM peak hour trips under Alternative 1 and 205 to 875 PM peak hour trips under Alternative 2 by 2044. Alternative 2 results in approximately 25 to 100 more weekday PM peak hour trips at the study intersections compared to Alternative 1.

The growth in traffic volumes anticipated with both the alternatives will result in additional traffic congestion along city streets assuming similar driving behaviors as today. As traffic volumes increase, the number of hours during the day when congestion is experienced may also increase. A review of the roadway system capacity for Sumner shows that the existing streets are designed to handle this increase

in traffic volumes and maintain adopted LOS. Additional analysis is completed in the subsequent section to determine if improvements are needed to intersections with the growth in vehicle traffic projected with the Alternatives.

Level of Service Standards and Analysis

Multimodal level of service standards are required for non-motorized transportation facilities, locally owned arterials, and transit routes that serve urban growth areas, to serve as a gauge to judge system performance, and to help achieve the statewide goal of environmental justice. LOS standards establish the basis for the concurrency requirements in the GMA and are used to evaluate impacts as part of the State Environmental Protection Act (SEPA). Agencies are required to show concurrency—i.e., to “adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a transportation facility to decline below the standards adopted in the transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with development” (RCW 36.70A.070(6)(b)). Setting the LOS standard is an essential component of regulating development and identifying planned improvements for inclusion in the Transportation Plan.

The following sections describe the methodology for determining LOS by mode and provide an analysis of the 2044 forecasts for Sumner.

Vehicle

Level of service is both a qualitative and quantitative measure of roadway and intersection operations. Vehicle level of service uses an “A” to “F” scale to define the operation of roadways and intersections as follows:

LOS A: Primarily free flow traffic operations at average travel speeds. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Control delays at intersections are minimal.

LOS B: Reasonably unimpeded traffic flow operations at average travel speeds.

LOS C: Stable traffic flow operations. However, ability to maneuver and change lanes may be more restricted than in

LOS B, and longer queues may contribute to lower-than-average travel speeds.

LOS D: Small increases in traffic flow may cause substantial increases in approach delays and decreases in speed.

LOS E: Significant delays in traffic flow operations and lower operating speeds.

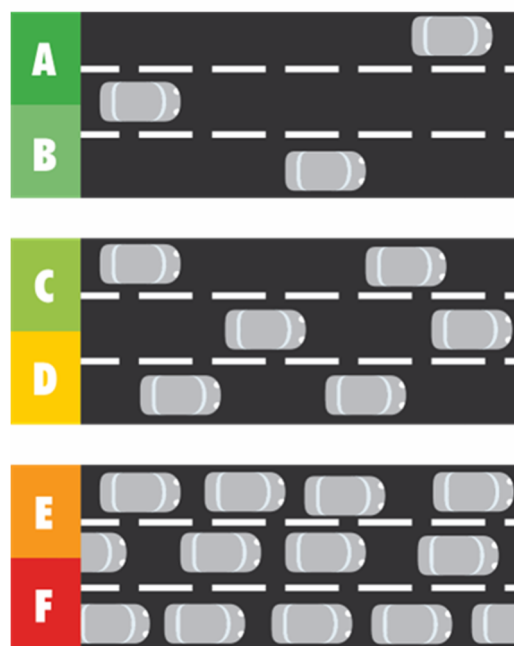


Exhibit 4-8. Illustration of Vehicle LOS

LOS F: Traffic flows at extremely low speeds. Intersection congestion is likely, with high delays and extensive vehicle queuing.

As described in Chapter 3, there are adopted LOS standards for the facilities serving Sumner.

Sumner LOS Standards

Sumner has established intersection LOS standards. The standards are applied to the weekday PM peak hour and to other time periods as appropriate based on the type and location of development. The LOS standards are:

- **Signalized, Roundabout, and All-way Stop Controlled Intersections**
 - LOS D based on average performance of all movements consistent with the current HCM method
 - Exception is LOS F at Traffic Avenue/Main Street/Fryar Avenue, Main Street/Alder Avenue, Valley Avenue East/Main Street, West Valley Highway East/Valley Avenue/Sumner Heights Drive
- **Two-way, Stop Controlled, Unsignalized Intersections**
 - LOS D or better based on the average delay per vehicle for each approach or separate traffic movement at the intersection using the latest HCM method
 - Exception allows left turns and through movements on side streets intersecting with arterials to operate below the adopted LOS D standard when the LOS affects relatively low traffic volumes and may not meet warrants for traffic signals.

State Highway LOS Standards

The City of Sumner is served by SR 167 and SR 410. SR 167 is classified as a Highway of Statewide Significance (HSS). Per WSDOT's Highway Systems Plan, the LOS standards for HSS facilities are set forth by State law. State law sets LOS D for HSS facilities in urban areas and LOS C for HSS facilities in rural areas. Since SR 167 is located within the Sumner urban area, the LOS D standard applies. GMA concurrency requirements do not apply to HSS facilities, per State legislation.

SR 410 is a State Highway of Regional Significance, Tier 2. The level of service standard for regionally significant state highways in the central Puget Sound region is set by PSRC in consultation with WSDOT and the region's cities and counties. PSRC established LOS D for SR 410 in Sumner. PSRC notes that it will measure the level of service for regionally significant state highways on a one-hour PM peak period basis. Furthermore, PSRC notes that local agencies will need to decide whether to apply concurrency to state highways of regional significance.

Traffic Operations

Traffic operations were evaluated based on intersection operations and the HCM methodology consistent with the existing conditions analysis. Intersection improvements were assumed based on the transportation improvement list outlined at the beginning of this. Traffic signal timing was optimized for each alternative in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes.

Overall, the analysis finds that most of the study intersections operate at LOS D or better during the weekday PM peak hour with the projected growth under the alternatives. Exhibit 4-9 summarizes the existing, Alternative 1, and Alternative 2 operations at intersections where further review and potential improvements may be needed. The key finding of the analysis is that the city should consider potentially changing the adopted LOS standards. The 2015 Comprehensive Plan LOS policy changed the LOS standard to F at several intersections where operations were forecast to be LOS F with little or no feasible improvement projects. Due to shifts in traffic patterns and decreases in traffic volumes, operations at some intersections have improved. In addition, feasible improvements can be identified at intersections that are projected to operate at LOS E or F. A summary table of all the study intersection LOS and delay for Alternatives 1 and 2 is provided in Appendix B. As described previously, the trip generation for Alternatives 2 and 3 is similar with Alternative 2 being slightly higher. Similarly, Alternative 1 and the Preferred Alternative are similar. As such, intersection operations between Alternatives 2 and 3 and Alternative 1 and the Preferred Alternative are anticipated to be the same and would in the same recommended improvements.

Exhibit 4-9. Weekday PM Peak Hour LOS Summary

Intersection	Current LOS Standard	2023 Existing			2044 Alternative 1			2044 Alternative 2		
		LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	D	F	186	SB	C	33	-	D	36	-
E Valley Highway E/Forest Canyon Road E	D	F	>180	WB	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	D	C	19	-	F	84	-	F	106	-
E Valley Highway E/Elm Street E	D	D	30	NBL	F	57	NBL	F	64	NBL
Valley Avenue/Elm Street E	D	D	31	NBL	E	43	NBL	E	45	NBL
Sumner Heights Drive E/W Valley Highway E	F	C	29	-	D	41	-	D	43	-
Traffic Avenue/Main Street	F	D	43	-	E	58	-	E	60	-
Alder Avenue/Main Street	F	B	11	-	B	14	-	B	15	-
Valley Avenue/Main Street	F	C	23	-	C	32	-	D	37	-
Parker Road E/Main Street E	D	C	24	SB	F	56	SB	F	66	SB
160th Avenue E/Main Street (60th Street E)	D	C	16	-	E	47	-	F	56	-
Sumner-Tapps Highway E/SR 410 WB Ramp	D	F	61	WB	A	7	0.54	A	8	0.55
Valley Avenue/SR 410 EB Ramp	D	F	80	-	B	12	0.87	B	13	0.88
Valley Avenue/74th Street E	D	F	110	EB	F	>180	EB	F	>180	WB

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections.

As shown in Exhibit 4-9, the following intersections are anticipated to improve with the action Alternatives compared to existing conditions during weekday PM peak hour with the planned and funded improvements:

- **Stewart Road SE/Butte Avenue SE** - Completion of the traffic signal is anticipated to improve operations to LOS D
- **Sumner-Tapps Highway E/SR 410 WB Ramp** - The planned roundabout results in LOS A conditions
- **Valley Avenue/SR 410 EB Ramp** - The planned roundabout results in LOS B conditions

There are currently three intersections (Sumner Heights Drive E/W Valley Highway E, Alder Avenue/Main Street, and Valley Avenue/Main Street) that have a LOS F standard but are forecast to operate at LOS D or better with the alternatives during the weekday PM peak hour. One intersection, Traffic Avenue/Main Street, has a LOS F standard but is forecast to operate at LOS E.

The remaining intersections summarized in Exhibit 4-9 are forecast to degrade below LOS D during the weekday PM peak hour with the alternatives. Most of the poor intersection operations during the weekday PM peak hour under the Alternatives is projected along E Valley Highway and Valley Avenue. This is consistent with the observed regional cut-through traffic, which avoids congestion along SR 167 and uses routes through Sumner. Other intersections impacted by shifts in traffic and growth in the City of Sumner are the Parker Road E/Main Street E and 160th Avenue E/Main Street E intersections. Potential improvements at these intersections and the Traffic Avenue/Main Street intersection are discussed in Chapter 5.

Pedestrian

Non-motorized transportation LOS standards were developed based on the future network presented previously on Exhibit 4-4. The pedestrian network has been identified through a series of Primary or Secondary Routes. Corridors identified as Primary or Secondary Routes are not indicative of a hierarchy or priority for future non-motorized transportation sidewalk facility development, rather they are used to make a distinction between routes that are more regional or that extend completely through the community (primary), and those that serve to make the second leg of the journey to connect to destinations, extend into neighborhoods, or complete a loop (secondary).

The sidewalk LOS standards shown in Exhibit 4-10 emphasize system completion of sidewalks, pathways, or multi-use trails on arterial and collector roadways. The LOS designations are shown in green, orange, and red.

A green LOS indicates a facility meets adopted roadway standards. An orange LOS indicates a facility has sidewalks on only one side of the roadway, when both sides are the standard. A red LOS indicates no designated facilities are provided for sidewalk users and is considered unacceptable.

Exhibit 4-10. Pedestrian LOS Standard

LOS	Primary Route	Secondary Route
	Meets City standards, facilities on both sides	Meets City standards, facilities on one or both sides
	Facilities exist, but only on one side	N/A
	No facilities exist, does not meet standards	No facilities exist, does not meet standards

Source: Transpo Group, 2023

The City has established level of service standards for its pedestrian network based on the methodology in Exhibit 4-10 and the future network identified on Exhibit 4-4. A green LOS is the standard for secondary routes, while an orange LOS is the standard for primary routes. The city utilizes these standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the Sumner land use plan.

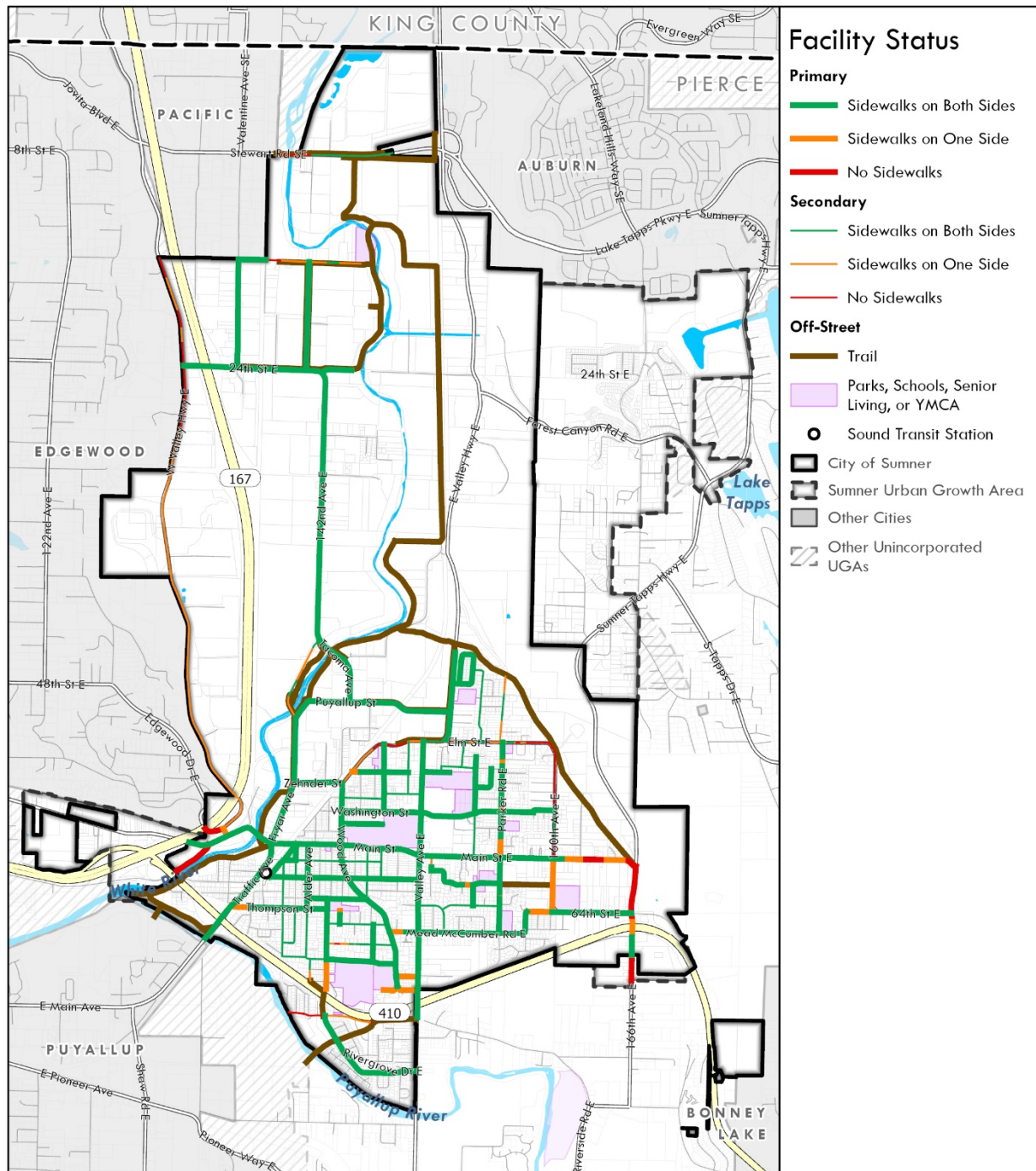
Applying the standards described above, the pedestrian LOS analysis is shown on Exhibit 4-11. The LOS is determined by comparing the 2044 future pedestrian network to the existing, planned, and funded pedestrian network. The pedestrian LOS analysis shows most of the future pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors such as Elm Street and 160th Avenue E that have missing sidewalks. The long-term project list identified in the Transportation Plan Chapter 5 would implement the orange LOS for primary routes and green LOS for secondary routes.

Bike

A future bike network was identified and is shown on Exhibit 4-5, presented previously. The bike LOS identified through an understanding of the availability of bike facilities along designated routes. Bike facilities could include sharrows, dedicated bike lanes, or protected bike lanes. A green LOS is the standard for the bike routes. Like the pedestrian LOS, Sumner utilizes these bike standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the City's land use plan.

The LOS analysis for the bike network is shown on Exhibit 4-12. The LOS is determined by comparing the 2044 future bike network to the existing, planned, and funded bike network. The bike LOS analysis shows that bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. The East Sumner Subarea Plan envisioned additional bike connectivity in this area as development occurred. The long-term project list identified in the Transportation Plan Chapter 5 would implement the green LOS for bike routes.

Exhibit 4-11. Future Pedestrian Level of Service



CITY OF SUMNER

Future Pedestrian Level of Service

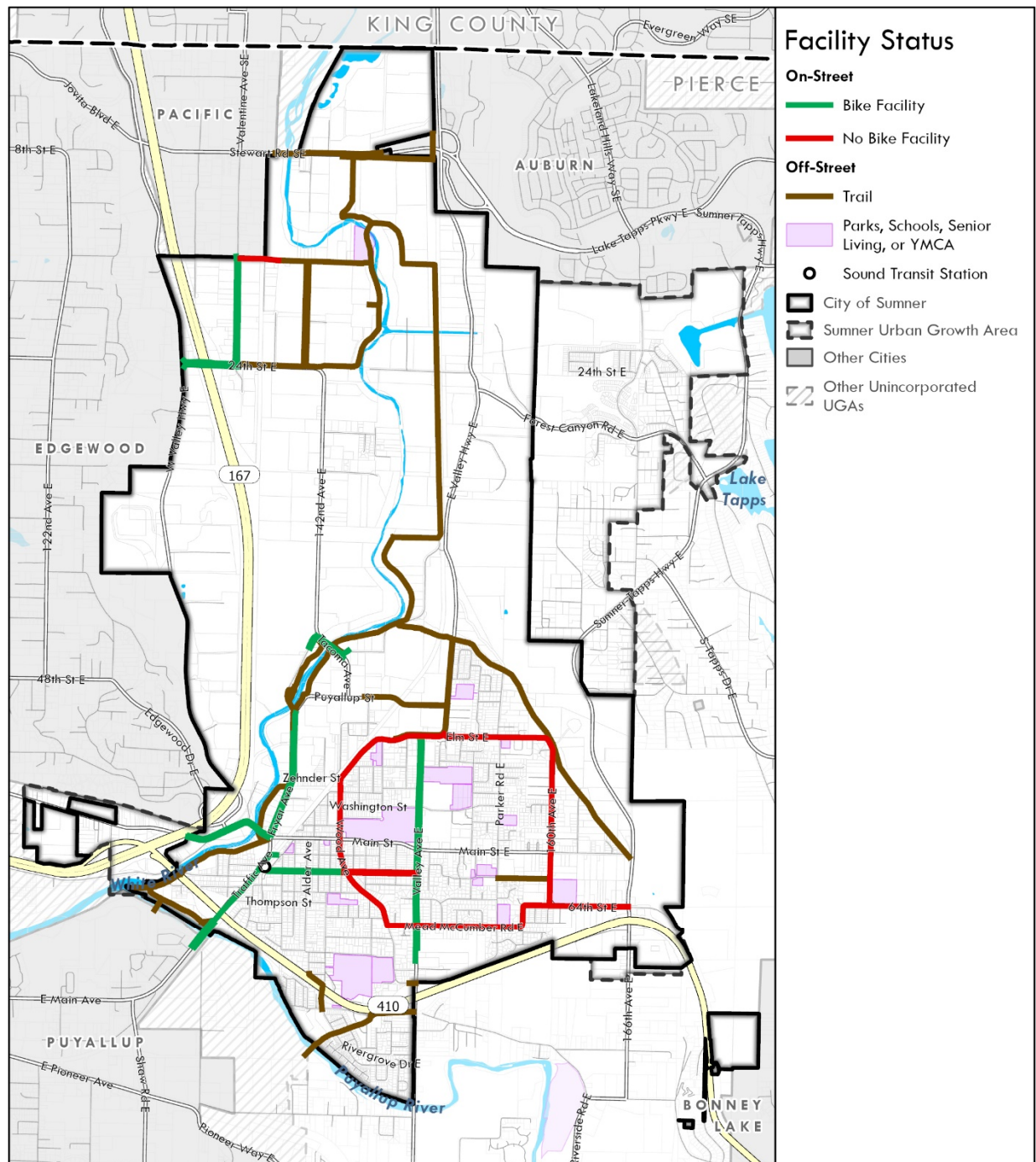


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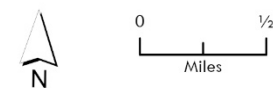
Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Exhibit 4-12. Future Bike Level of Service



CITY OF SUMNER Future Bike Level of Service



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

5. Transportation Improvement Program

The alternatives analysis, financing, and goals and policies were used to develop a comprehensive transportation improvement program (TIP) for the City. The program addresses existing and forecast needs through 2044 based on the projected growth in and around the City of Sumner. The transportation improvement program is organized by travel mode, although the improvement projects and programs may overlap between modes (e.g., sidewalks are included as part of a roadway widening project).

The Plan focuses on recommendations for five components of the transportation system:

- Streets and Highways
- Public Transit and Travel Demand Management
- Pedestrians and Bicycles
- Rail Service
- Air Transportation

Based on the plans/programs, goals, and policies for the five components, an overall multimodal long-range list of transportation projects is recommended to support the transportation needs within the 20-year horizon.

Recommendation 1: Monitor the transportation system against the Transportation Plan to track land use development against the progress of improvements to the transportation system as well as assist in updating the Transportation Improvement Program (TIP) and identifying budget needs.

Streets and Highways

Streets and highways serving the City of Sumner provide for the general movement of people and goods. They also serve other travel modes, including pedestrians and bicyclists. The street and highway element provides the core system of the Sumner Transportation Improvement Program. The key components of the street and highway element and recommendations are:

- Functional classification
- Design standards
- Truck routes
- Local Street
- Maintenance and operations - **Recommendation 2:** Add a signal replacement program to the maintenance and operations program.
- Neighborhood traffic control

Functional Classification

Roadway functional classification provides for a hierarchy of roadways. These classifications also act as a guide for future development of the overall street system. The classifications range from limited access freeways that support regional through traffic movements to local streets that primarily serve access to individual properties. The system is used to identify the desired function of each roadway regarding the type and level of traffic it would carry, design standards, and eligibility for a range of funding programs.

Exhibit 5-1 provides guidelines for the classifications used in the City of Sumner. There are no proposed changes to the guidelines from the 2015 Transportation Plan.

Exhibit 5-1. Functional Classification Guidelines

Classification	Definition	Typical Range of Daily Traffic Volumes ¹
Freeway/ Limited Access	Inter-regional divided highways connecting major activity centers. Typically, freeways have two or more lanes for traffic in each direction; access is limited to interchanges designed for higher speed merging/diverging traffic.	>30,000
Principal Arterial	Inter-community roadways connecting community centers or major facilities. Principal arterials are generally intended to serve predominantly "through" traffic with minimum direct service to abutting land uses. Spacing between parallel principal arterials is generally 2 miles or greater.	5,000 - 40,000
Minor Arterial	Provides intra-community travel for areas bound by the principal arterial system. Minor arterials serve trips of moderate length and provide more direct access to abutting properties than principal arterials. Spacing of minor arterials is typically less than 2 miles.	3,000 - 15,000
Collector	Provides for movement within a community, including connecting neighborhoods with smaller community centers. Collector arterials also provide connections to minor and principal arterials. Property access is generally a higher priority for collector arterials with a lower priority for through traffic movements. Spacing of collector arterials is generally 1 mile or less.	1,000 - 5,000
Local Access	The primary function of local/access streets is access to abutting properties. Local streets include a variety of designs and spacing depending on access needs.	0 - 1,000
Alley	Provide direct property access to residential or commercial properties. Also provide for service vehicles.	0 - 300

Notes:

1. Average daily traffic volumes.

Source: 2015 Sumner Transportation Plan

Washington State has also classified some highways that provide transportation functions that promote and maintain statewide travel and economic linkages as being of statewide significance or Highways of

Statewide Significance (HSS). In the Sumner planning area, SR 167 is designated as an HSS. Because of its designation as an HSS, the State is responsible for setting the level of service standard for the SR 167 freeway. Furthermore, the city cannot include SR 167 in its concurrency program.

Similarly, SR 410 is a State Highway of Regional Significance. Level of service standards for SR 410 are established by the Puget Sound Regional Council (PSRC), in consultation with WSDOT. The city also cannot include SR 410 in its concurrency program.

Exhibit 5-2 summarizes the functional classification plan for Sumner.

Design Standards

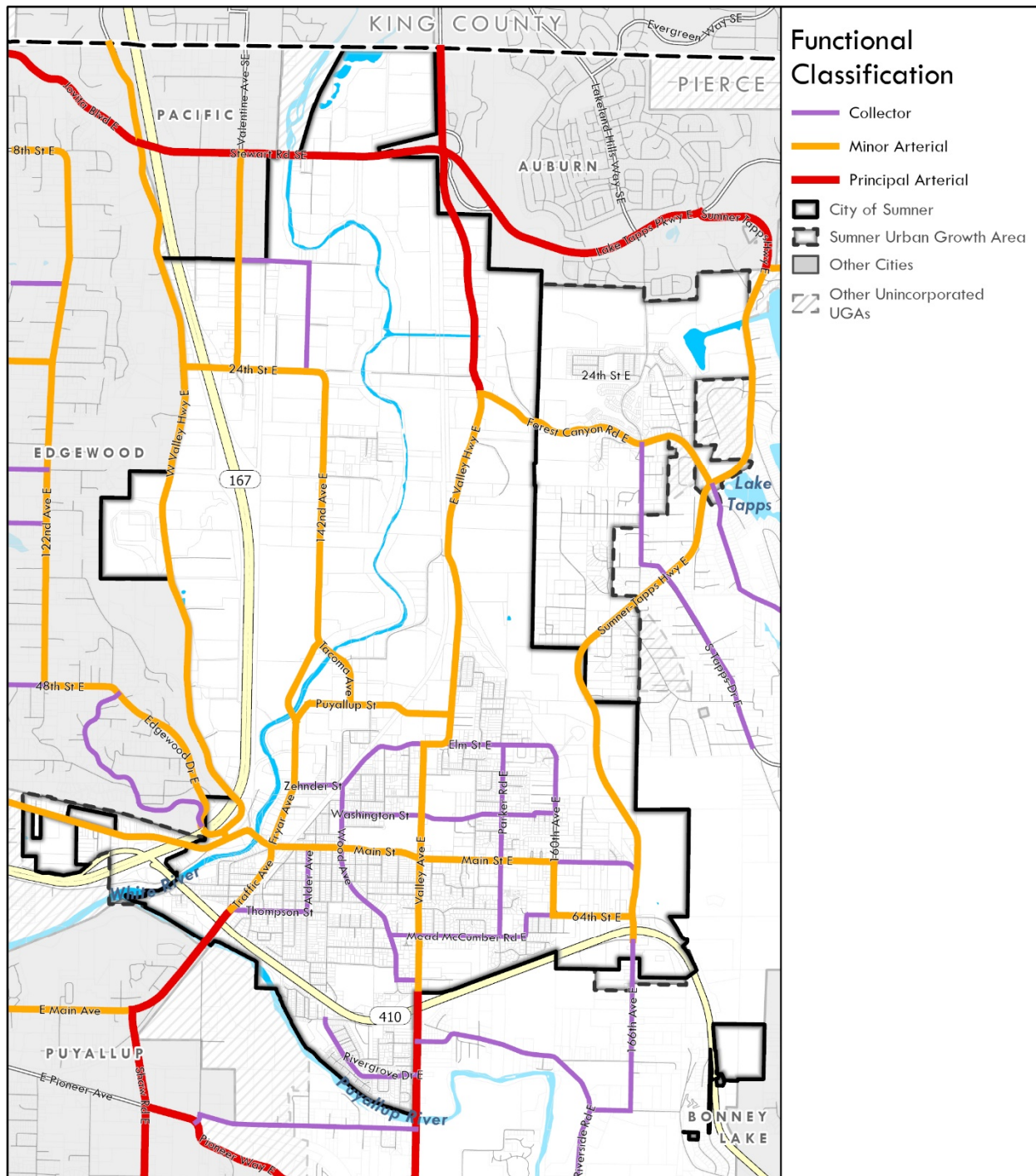
The City of Sumner continues to update Development Specifications and Standard Details (DSSD), which sets specific and consistent road design elements. To accommodate the different design needs in different parts of the City, the DSSD includes conceptual street standards. The design standards cover right-of-way needs, pavement width, type and width of pedestrian and bicycle facilities, and roadway and intersection radii.

The City has determined that one size and/or design does not fit all situations. For example, minor arterial needs in the industrial area require specific standards to accommodate trucks, while minor arterials serving the Town Center commercial district may require wider sidewalks to accommodate higher levels of pedestrian activity.

The standards support the City's goals in providing adequate facilities to meet the mobility and safety needs of the community, as well as complying with storm water management, sensitive areas, and other regulations. The standards are intended to assist design professionals and developers for all new and reconstructed roadways and right-of-way facilities, both public and private, within the City.

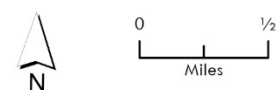
The City will continue to maintain and update the conceptual street design standards. The Development Specifications are refined periodically by the City to adhere to the guidelines, goals, and policies of this Transportation Plan and to meet current design practices.

Exhibit 5-2. Functional Classification Plan



CITY OF SUMNER

Functional Classification Plan



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Truck Routes

A significant amount of trucking activity occurs in the City consisting of distribution centers, warehousing, and light industrial activity located primarily in the northern part of the city. Trucks have a significant impact on traffic operations, safety, and roadway maintenance. They also impact air quality and noise levels in the City. The City has designated only principal arterials and minor arterials as truck routes. The design standards addressed in the previous section are defined to support truck use along freight routes and in industrial areas.

Exhibit 5-3 shows the truck routes for Sumner. The truck routes are the same as the 2015 Transportation Plan and would continue to support future transportation needs. The primary routes for trucks traveling through the city are the two state highways: SR 167 and SR 410. Secondary (T-2) truck routes include 142nd Avenue E, Puyallup Street, Fryar Avenue, Traffic Avenue. Other truck routes are E Valley Highway E, Forest Canyon Road, and Sumner-Tapps Highway E, which are classified as T-3. These routes provide connections from the surrounding land uses to the regional transportation system. Collectors and local streets are not to be used by freight trucks unless essential for access to a local origin/destination and travel is limited to the shortest practical travel route.

Collector and Local Streets

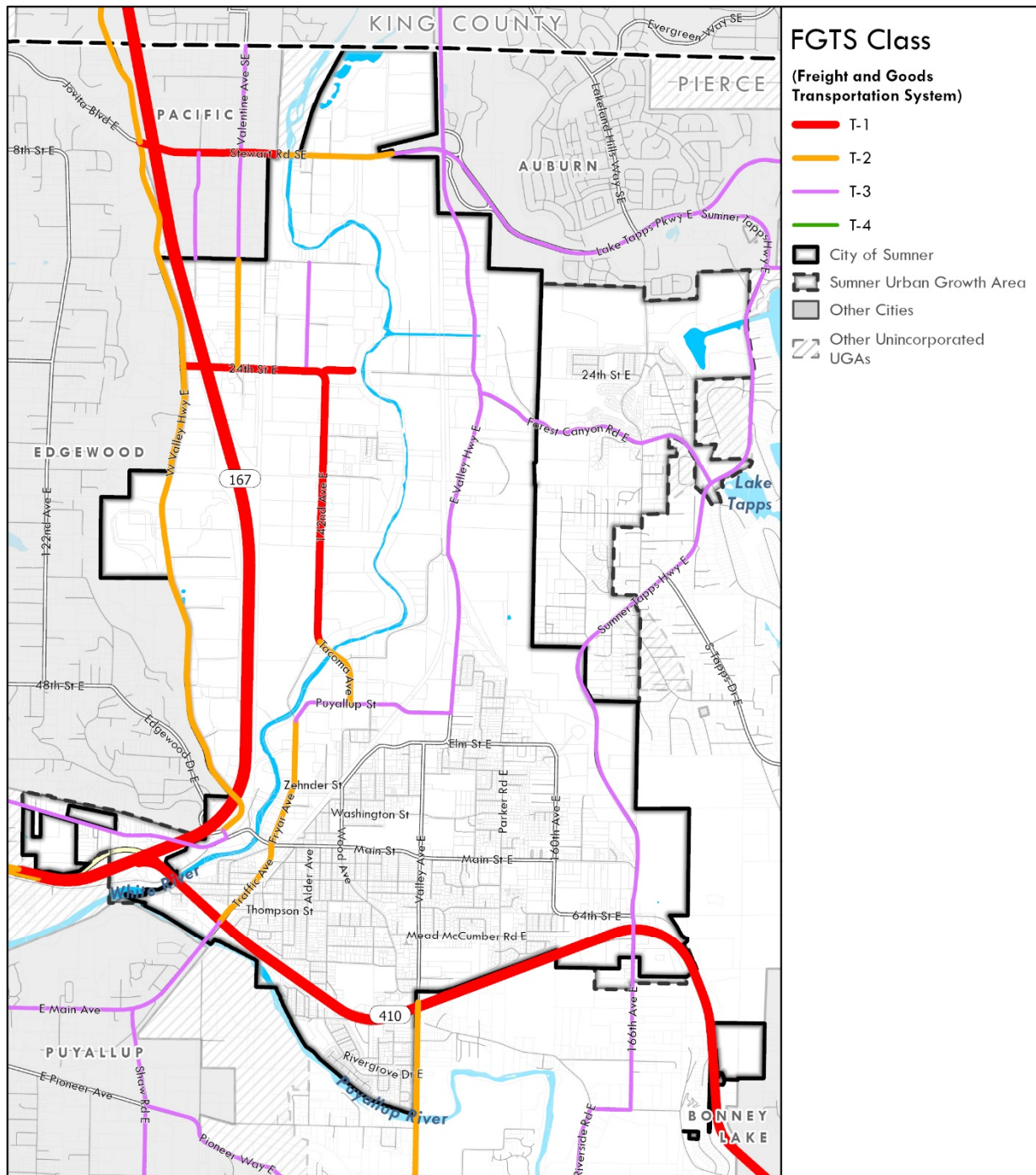
The goals and policies of this Transportation Plan emphasize expansion of the City's roadway network as a flexible grid. A grid is the most efficient arrangement of arterials and secondary access streets, and is intended to provide travel options for drivers, bicyclists, and pedestrians as well as reduce the practical distance and travel time between points in Sumner. Cul-de-sacs, dead-end streets, and loop roads create barriers in the network, increase travel distances, and, in residential areas, increase dependence on the automobile for daily activities.

The grid model differs in its application to various land uses. In residential areas, non-motorized movement must be accommodated, and the land is platted into smaller units. Therefore, the distance between streets should be smaller than in industrial areas, where efficient movement of vehicles, particularly freight vehicles, is emphasized and development generally occurs on large tracts of land.

The older residential neighborhoods in the vicinity of the downtown represent the general prototype for future residential development. Land is arranged into blocks of about 250 by 500 feet. This pattern should be maintained, to the extent practical, for future residential development. Blocks of this size encourage pedestrian movement and provide opportunities for alley access. In addition to the subdivision of land into a regular system of blocks, existing arterials should be extended to provide continuous transportation corridors and, where possible, to connect to other arterials. This benefits the community by reducing the volume of pass-through traffic on local streets.

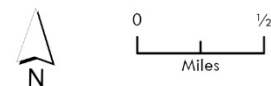
New local streets are not explicitly defined in the Transportation Plan and are assumed to be built according to developer mitigation requirements (e.g., construction of sidewalks or payment of impact fees at time of development). Local street system plans may be prepared as part of future neighborhood or subarea studies. For example, increased commercial and residential development within the Town Center or East Sumner subareas will need to be balanced with appropriate circulation corridors to allow alternate access routes and provide acceptable levels of vehicular and non-motorized transportation connectivity. The actual alignment of the future circulation corridors will be determined based on property boundaries, environmental impacts, and engineering considerations.

Exhibit 5-3. Truck Route Plan



CITY OF SUMNER

Truck Route Plan



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Maintenance and Operations Program

To maximize the use and efficiency of the existing and future transportation infrastructure, the City will continue with a comprehensive, systematic street maintenance program. The program will evaluate arterials and local roadways for pavement condition, signage, sight distance restrictions (such as vegetation blocking sight lines), trail maintenance and non-motorized facilities, and neighborhood safety impacts. Traffic control devices, including traffic signals, should be monitored, and serviced regularly. The program will also be used to evaluate speed limits based on functional classification, design, and roadway conditions.

The program should continue to use a Pavement Management System (PMS) to provide a consistent and systematic approach for identifying overlay projects each year. The PMS provides input regarding the need to rebuild existing streets or overlay. These programs should systematically cover all city arterials on a regular schedule with immediate response to potential safety issues that are observed.

In addition, the city should undertake a signal replacement program to review aging traffic control equipment and develop a systematic approach for upgrading and replacing signal systems or other related roadway technology. Replacing outdated equipment will ensure continued operations and allow for integration and communication to better manage traffic flows within the city, and to increase safety at crossings for pedestrians and bikes.

To assure that the existing and future transportation infrastructure is preserved in a cost-effective manner, the city will allocate annual budget resources to maintaining existing infrastructure. The city should develop a system to monitor traffic and land use changes, and to evaluate social and environmental justice impacts, for use in setting project priorities (see Recommendation 1 at the beginning of the chapter). The operations budget will need to provide time and staff resources to develop and submit grant applications and to coordinate with other jurisdictions.

Neighborhood Traffic Control

Providing safe and convenient local streets is an important element of the Transportation Plan. This includes keeping travel speeds at or below adopted/posted limits, improving safety for pedestrians and bicyclists, and minimizing the intrusion of non-local traffic on collectors and local streets. The Plan acknowledges that congestion on the arterial system can result in traffic diverting to collector and local access streets, resulting in undesirable impacts on neighborhoods. Much emphasis in the project list focuses on providing additional capacity to arterial streets and intersections. Until these and other improvements on the principal and minor arterials are implemented, some traffic may choose to divert onto neighborhood streets. Sumner should continue to implement neighborhood traffic control as an important element of the Transportation Plan.

Public Transit and Travel Demand Management

The City of Sumner recognizes the importance of transit and travel demand management programs as key elements of a multimodal transportation system. These programs build on regional programs and plans with some refinements to reflect the specific needs of the city. No changes are recommended

related to the travel demand management program. The transportation element includes policy related to exploring service with Pierce Transit and the transit plan included herein supports this direction.

Transit

Projects are incorporated into the overall TIP to support connectivity and access to transit. Transit objectives for Sumner focuses on multimodal connectivity to the Sounder Station. There is no public local transit service within the City. Consistent with the goals and policies of the Transportation Element, the city should explore local transit opportunities including coordinating with Pierce Transit to support the anticipated 20-year growth.

Recommendation 3: Explore additional transit service for Sumner.

- **North-South Transit Across County Line.** Continue to evaluate local routes or shuttle programs to provide north-south transit service between Sumner and the employment centers in the Green River Valley and the Sumner MIC.
- **Coordinate with Transit Agencies and Local Jurisdictions on Service.** The City of Sumner should also coordinate with transit agencies and work with other east Pierce County jurisdictions, such as Bonney Lake, to evaluate future transit routes to serve downtown Sumner and the region. The City of Sumner should participate in Pierce Transit's long-range planning efforts to ensure that policy is in place to move forward on studies and plans to return to the Pierce Transit benefit area if desired.
- **Evaluate Increased Service for Existing Routes.** Sound Transit Route 596 serves both Sumner and Bonney Lake but is only a weekday peak period route. Increased frequency of bus service between neighboring residential communities should be evaluated as Sumner is an employment center.
- **Coordinate with Regional Agencies.** In addition, the city should continue to coordinate with agencies on regional transit projects that serve the community. Successful use of transit and other HOV modes in the city is largely tied to the development of a regional system of HOV facilities and programs. Near the City, the Washington State Highway Statewide Improvement Program (2023-2026) identifies development of the SR 167 southbound high occupancy or toll (HOT) between Auburn and SR 410.

Recommendation 4: If public transit service is provided within Sumner in the future, the City should adopt a transit LOS.

Transportation Demand Management Program

Continued implementation of the Sumner TDM programs is recommended as part of the TIP. The goal of the TDM programs is to reduce the overall amount of travel by single occupant vehicles (SOVs) within the city. The City of Sumner TDM program builds on State, Pierce County, and other local legislation.

The Washington Commute Trip Reduction Law (RCW 70.94.521) requires TDM performance targets for firms with over 100 employees. The City of Sumner has adopted a CTR program. The CTR program establishes goals consistent with State legislation. The individual demand management strategies that are typical elements of the CTR and TDM programs are different for employment and residential developments. The key elements of a TDM program are listed below. These TDM elements should be

considered a starting point, and the city, employers or applicant may implement other measures to reduce reliance on SOV travel:

- Assign transportation coordinator
- Transit Incentives
- Parking Management
- Bike Racks and Facilities.
- Telecommuting
- Compressed Work Week
- Flexible Work Schedules
- Site and Street Design
- Rideshare and shuttle services
- Incentives
- Commuter information

Pedestrians and Bicycles

Bicycle, pedestrian, and trail facilities play a vital role in the city's transportation environment. The Sumner non-motorized transportation system is comprised of facilities that promote mobility without the aid of motorized vehicles. A well-established system encourages healthy recreational activities, reduces vehicle demand on roadways, and enhances safety within the community.

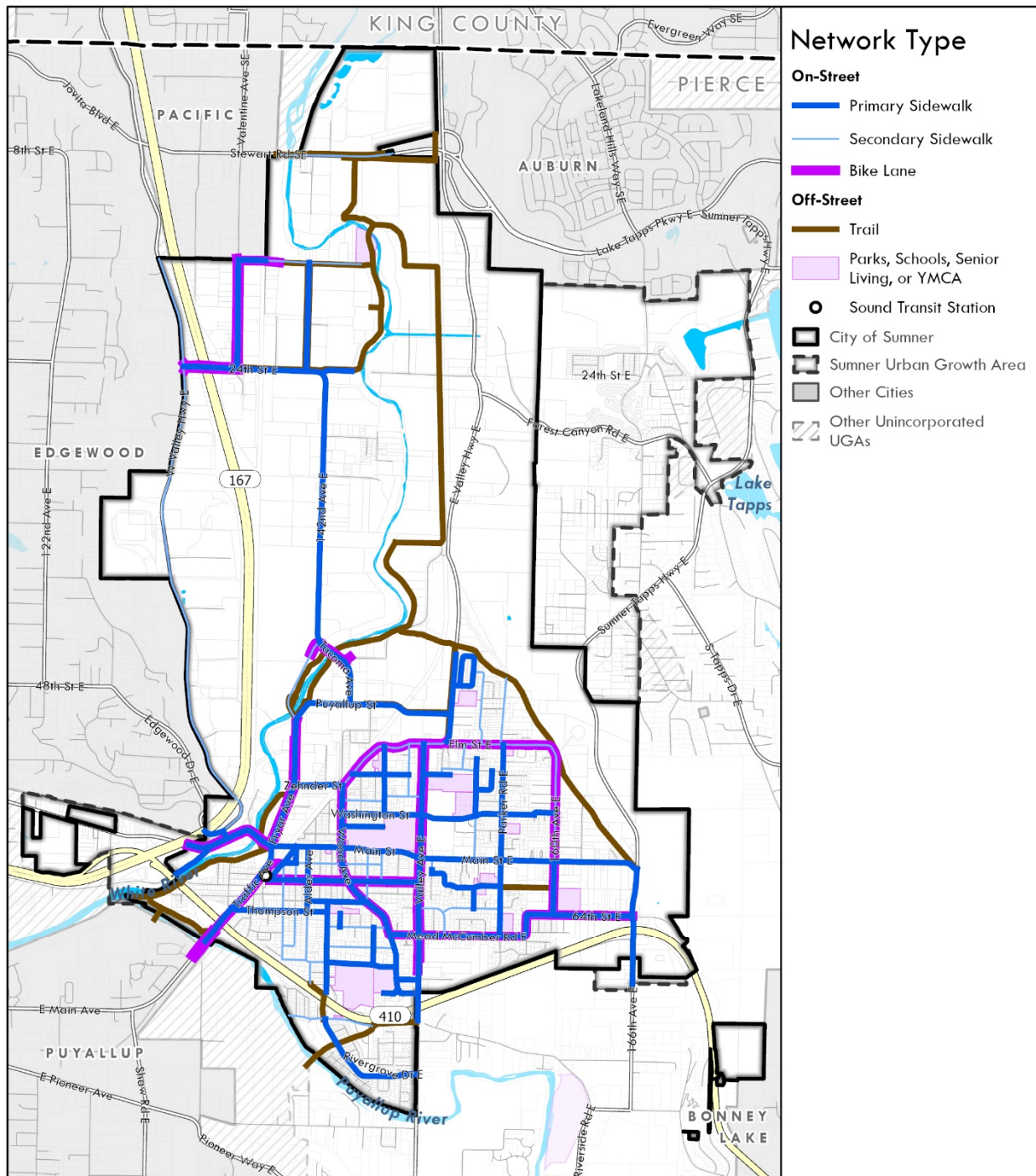
Recommendation 5: Adopt the non-motorized system and LOS standards. Monitor implementation and performance of the non-motorized system as an important component of the overall transportation system.

The pedestrian and bicycle network identified in the previous chapter was used to confirm specific LOS standards for non-motorized transportation facilities and to identify and develop the long-term non-motorized project list. The future non-motorized transportation system, shown in **Exhibit 5-4**, provides a comprehensive network of non-motorized transportation facilities for Sumner. The Plan shows the interconnected system of on-road and off-road facilities, which include sidewalks, pathways, shared-use trails, and bike facilities (e.g., bicycle routes, sharrows or bike lanes). The system is designed to facilitate non-motorized travel to key destinations within Sumner. The non-motorized projects to achieve the Plan are described in a subsequent section.

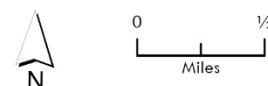
The non-motorized plan contains a series of primary or secondary sidewalk routes. Corridors identified as primary or secondary routes are not indicative of a hierarchy for future non-motorized transportation facility development, rather they are used to make a distinction between routes that are more regional or that extend completely through the community (primary), and those that serve to make the second leg of the journey to connect to destinations, extend into neighborhoods, or complete a loop (secondary).

Along with the project list, the City has established two sidewalk funding programs, the Sidewalk Maintenance Program and ADA Transition Plan, that will help maintain the existing sidewalk system by adding more wheelchair ramps and completing missing or damaged sidewalk sections. The City works with neighboring property owners on sidewalk construction and maintenance. The sidewalk funding programs help maintain and improve the existing sidewalks already found throughout the city.

Exhibit 5-4. Non-Motorized Plan



CITY OF SUMNER Non-Motorized Plan



Map Date: February 2024

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Freight Rail Service

The City of Sumner is traversed by both BNSF and UPRR railroad lines. These lines generally travel north-south. As described in the transit section, Sound Transit's Sounder commuter rail service provides public transit service from the Sumner Train Station on Traffic Avenue. Most of the use of the rail links is for regional freight movement through the city. The rail lines do not provide any significant local rail access for businesses in Sumner. There are no changes to freight rail as part of this Plan.

Air Transportation

There are no airports in the immediate Sumner planning area. Regional, national, and international air travel for Sumner is provided via Sea-Tac International Airport, located approximately 20 miles northwest of Sumner. The airport is accessed via SR 167 in Sumner. North of Sumner, Auburn Municipal Airport provides for local general aviation. It is accessed from Sumner via SR 167 or East Valley Highway. There are no changes to air transportation as part of this Plan.

Transportation Improvement Projects

Based on the existing and future transportation needs analysis and the proposed modal plans for the components described above, a list of multimodal transportation improvement projects was defined.

Recommendation 6: Adopt the list of multimodal transportation improvements and continue to monitor the establishment LOS by mode (such as the 6-year TIP) to ensure the improvements continue to support the goals and policies.

The improvements address safety, capacity, trail connections, expanded non-motorized transportation facilities, and roadway preservation needs. They also cover upgrades to existing roads and construction of new roadways and interconnected street systems to support the forecast economic development and growth in the city and its UGA. The roadway and intersection projects incorporate needs for pedestrians, bicyclists, and transit riders that will use the same corridors. The projects were categorized into three primary types:

- Spot or intersection improvements
- Roadway improvements
- Non-motorized improvements

Spot/Intersection Improvements

Spot or intersection improvements were identified where existing or forecast operational deficiencies are anticipated with growth in and around the City of Sumner. The projects are intended to improve operations at the identified intersections to meet the City's LOS standard. Some of the spot/intersection improvements were previously identified as a need in the 6-year transportation improvement program (TIP) and/or the 2015 Comprehensive Plan and should continue to be considered to support growth into 2044. There are also new intersection improvements identified to support the Sumner land use plan.

Roadway Improvements

The roadway improvements were previously identified as part of the 2023-2029 TIP and evaluation of the alternatives indicated continued need for the projects based on operations and safety, and completion of motorized and non-motorized networks. No new roadway improvement projects are proposed beyond what was already identified on the TIP.

Non-Motorized Improvements

While non-motorized improvements will be incorporated into both the spot/intersection and roadway improvements, separate non-motorized improvements have been identified. Non-motorized projects have been identified to increase accessibility and connectivity by completing missing links in the current trail, pedestrian, and bike system and to increase opportunities for alternative modes of transportation such as walking and biking and reducing reliance on SOVs. The non-motorized improvements include both projects that are already on the TIP as well as new improvements to support the Sumner land use plan.

A description and cost estimate for each project is presented in Exhibit 5-5. New projects are shown in bold in Exhibit 5-5. Exhibit 5-6 shows the location of each project. A map identification number is included in Exhibit 5-5 to assist in referencing the projects shown on Exhibit 5-6.

Planning level cost estimates were prepared for each project based on typical per unit costs, type of roadway and scope of the improvement. Where costs had been calculated as part of ongoing design projects or projects listed in the current City's 6-year TIP, the original estimate was adjusted for cost escalation or inflation, as needed. The cost estimates include allowances for right-of-way acquisition based on generalized needs to meet the City's Street standards. Construction costs were adjusted, as needed, to reflect any specific implementation issues, such as environmental impacts or impacts on adjacent properties.

Exhibit 5-5. 20-Year Transportation Improvement Projects and Costs

Map ID ¹	Title and Location	Description	Project Cost ²
SP1	E Valley Highway E/Forest Canyon Road E	Construction of a new signal or roundabout	\$3,000,000
SP2	Puyallup Street/Tacoma Avenue and overlay	Plane, repair, and overlay, complete intersection channelization improvements, add an eastbound left-turn pocket on Puyallup Street at Tacoma Avenue. Add	\$2,600,000

Map ID ¹	Title and Location	Description	Project Cost ²
	Puyallup Street to White River Bridge (WSDOT SUM-30)	a signal at the Puyallup Street/Tacoma Avenue intersection	
SP3	E Valley Highway E/Elm Street E	New signal when warranted	\$1,500,000
SP4	Valley Avenue/Elm Street E	New signal when warranted	\$1,500,000
SP5	Traffic Avenue/Main Street	Add EB right-turn overlap. Convert W Main Street to one-way facility westbound.	\$150,000
SP6	Parker Road E/Main Street E	New signal when warranted	\$1,650,000
SP7	160th Avenue E/Main Street (60th Street E)	New signal or RAB when warranted	\$3,000,000
SP8	Valley Avenue/74th Street E	Add EB/WB left-turn restrictions. Shift WB left-turns to U-turning movement at Valley Avenue/SR 410 EB Ramp RAB	\$75,000
SP9	Sumner Tapps Highway/60th Street E	Signalization of the intersection. Construct EB right-turn lane	\$3,400,000
		<i>Sport/Intersection Subtotal</i>	<i>\$16,875,000</i>
RW1	166th Avenue E Widening; SR 410 WB ramps to 64th St E (WSDOT SUM-24)	Widen to 4-5 lanes, includes new roundabouts at WB ramp and 64th Street E	\$19,000,000
RW2	160th Avenue E; Main Street to 64th Street E	Improve and widen streets to minor arterial standards with bike paths and sidewalks	\$500,000
RW3	Valley Avenue; South City Limits to Main Street	Overlay existing roadway surface, ADA upgrades	\$1,850,750
RW4	Stewart Rd Corridor ITS improvements; SR 167 to Lakeland Hills (WSDOT SUM-27)	Connect traffic signals and railroad crossings to coordinate signal timing	\$3,500,000
RW5	160th Avenue E; Elm St to Main Street	Improve to collector standards with curb, gutter, sidewalks on both sides, and bike facilities	\$2,900,000
RW6	Elm Street; E Valley Hwy to 160th Avenue E	Improve to collector standards with curb, gutter, sidewalks on both sides, and bike facilities	\$2,600,000
RW7	Parker Road E; 62nd Street to 63rd Street	Construct curb, gutter, and sidewalk on east side of street	\$250,000
RW8	Parker Road E; Main Street to Elm Street	Improve to collector standards with curb, gutter, and sidewalks on both sides	\$1,300,000
RW9	Zehnder Street; Pease Avenue to Wood Avenue	Railroad Crossing Improvements	\$1,000,000

Map ID ¹	Title and Location	Description	Project Cost ²
RW10	162nd Avenue E Segment Extension; 64th Street to 60th Street	Construct 2-lane facility	\$3,000,000
RW11	164th Avenue Court E Segment Extension; 160th Avenue E to existing 164th Avenue Court E	Construct 2-lane facility	\$2,000,000
RW12	Systemic Horizontal Curve and Roadway Departure Safety Improvements (WSDOT SUM-28)	East Valley Highway, West Valley Highway, Sumner-Tapps Highway/166th Avenue E, 142nd Avenue E/24th Street E. Install static and/or dynamic curve warning signs, speed feedback signs, centerline and edge line profiled striping, rumble strips, reflective markers on-pavement as appropriate to delineate roadside objects, channelization, guardrail/roadway shouldering, and street lighting	\$903,000
-	Stewart Road SW: Butte Avenue SE to 140th Avenue Court E ⁴	Widen to 5 lanes including a center two-way left-turn lane	-
<i>Roadway Subtotal</i>			<i>\$38,803,750</i>
NM1	West Valley Highway Sidewalks	Complete missing sidewalk facilities on the east side between 16th Street E and SR 167 SB Ramps	\$1,000,000
NM2	16th Street E Ped/Bike	Construct ped/bike facilities between Valentine Avenue and 138th Avenue E	\$2,000,000
NM3	White River Restoration Tail	#9 Ditch to area north of 16th Street	\$3,000,000
NM4	Tacoma Avenue Trail	New trail facilities between the White River and 45th Street E	\$150,000
NM5	Salmon Creek Trail	New trail between current end at 149th Avenue E and Sumner-Tapps Highway E	\$3,000,000
NM6	Edgewood Drive Sidewalks	Complete missing sidewalk facilities between SR 167 and Sumner Heights Drive E	\$550,000
NM7	Fryar Avenue Trail (WSDOT SUM-17)	West Main Street to Puyallup Street	\$7,200,000
NM8	Zehnder Street/Elm Street Sidewalks	"Construct pedestrian and bike facilities. Bike lanes from Valley Avenue to Main Street Complete missing sidewalk facilities between Pease Avenue and Wright Avenue"	\$1,600,000
NM9	Academy Street Bike Facilities	Construct bike facilities between Wood Avenue and Valley Avenue E	\$800,000
NM10	Wood Avenue/Meade McCumber Road	Construct bike facilities between Main Street E and Valley Avenue	\$1,800,000

Map ID ¹	Title and Location	Description	Project Cost ²
NM11	62nd Street Court E Trail	Construct trail east of 62nd Street Court E between Parker Road and 160th Avenue E	\$1,000,000
NM12	Main Street E Sidewalks	Construct missing sidewalk facilities between 162nd Avenue E and Sumner-Tapps Highway E	\$575,000
NM13	Puyallup River Crossing	Over White River. Two-part project: 1. Study best location for trail crossing 2. Construct ped/bike trail crossing	\$4,000,000
NM14	Construct sidewalks on one side of 72nd Street E	Between River Street and 143rd Avenue E	\$250,000
NM15	Rivergrove Pedestrian Bridge (WSDOT SUM-29)	Trail overpass connecting the vicinity of Alder Ave. to 143rd Ave. E over SR 410	\$11,200,000
NM16	Puyallup River Trail Bridge	Bridge and trail connections to the Foothills Trail. Trail overpass connecting 144th Ave E to 143rd Ave E	\$6,000,000
NM17	Mead McCumber Road/64th Street E Non-motor	Construct pedestrian and bike facilities between Valley Avenue E and Sumner-Tapps Highway	\$900,000
NM18	Sumner-Tapps Highway Sidewalks	Construct missing sidewalk facilities between Main Street E and the southern City Limits	\$1,000,000
NM19	Rainier Street Sidewalks	Construct missing sidewalk facilities between Sumner Avenue and Guptil Avenue	\$150,000
NM20	Traffic Avenue Pedestrian Signal (WSDOT SUM-25)	Replace existing pedestrian rectangular rapid flashing beacon with pedestrian signal	\$616,753
NM21	Alder Avenue Sidewalks	Construct pedestrian and bike facilities between SR 410 and Academy Street	\$950,000
NM22	Houston Road E Sidewalks	Construct pedestrian facilities between Valley Avenue E and the west City limits	\$850,000
<i>Non-Motorized Subtotal</i>			\$48,591,753
Total			\$104,270,503

Notes:

BOLD indicates a **new** project that has been identified based on the transportation analysis of land use alternatives.

1. Map identification references to Exhibit 5-6, 20-Year Transportation Improvement Projects.

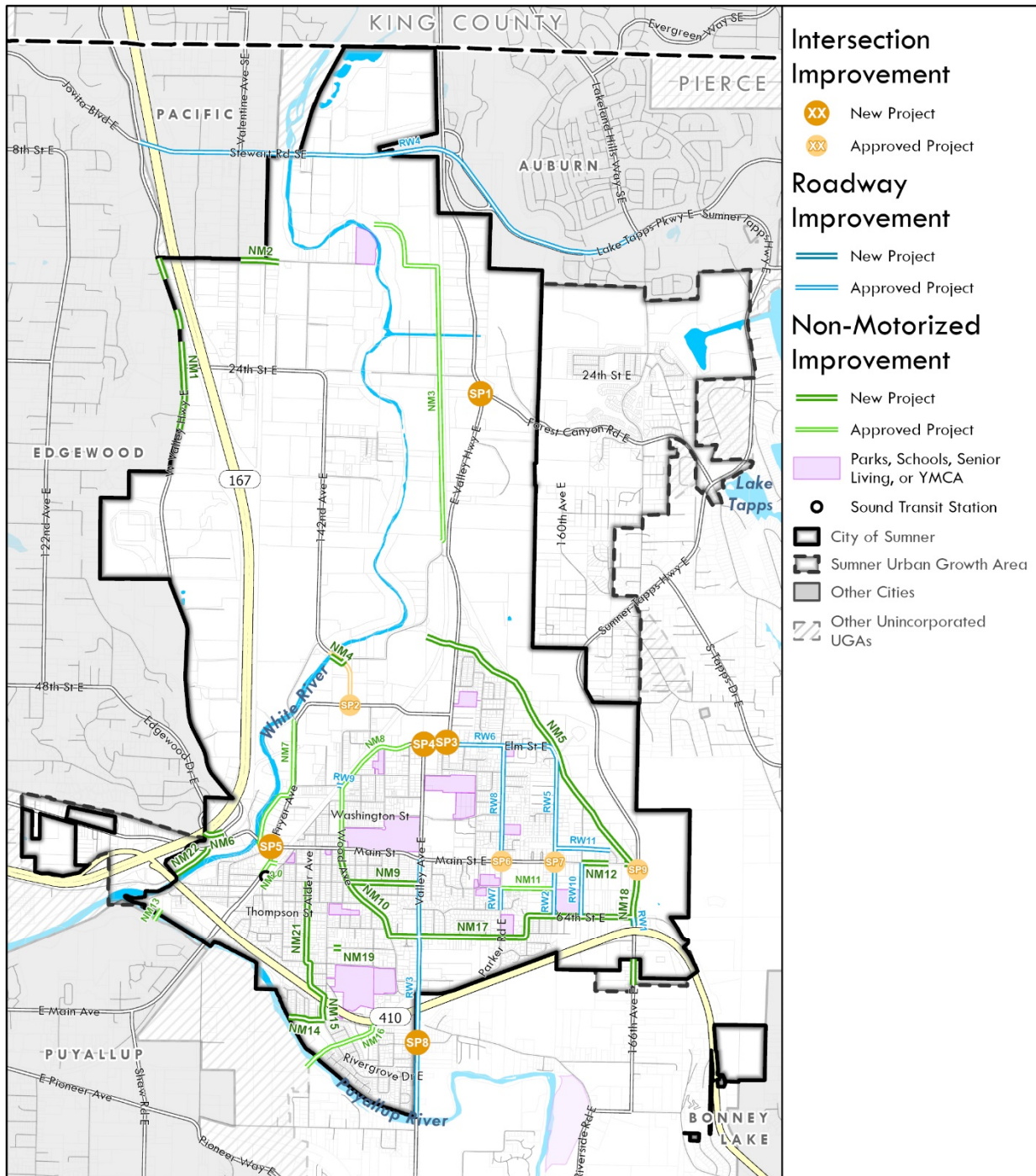
2. Project cost represents 2023 dollars. Source: Transpo Group 2023

3. Identifies current WSDOT or grant funding.

4. This project is fully funded and will be completed before 2044; however, to remain eligible for transportation impact fees already set aside for the project, it is included on the 20-year project list.

The following chapter discusses how to finance the implement the modal plans.

Exhibit 5-6. 20-Year Transportation Improvement Projects



CITY OF SUMNER 20-Year Improvement Projects



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

6. Finance and Implementation Program

The transportation improvement projects must be funded and implemented to meet existing and future travel demands in and around the City of Sumner. A summary of project costs and a strategy for funding the projects over the life of the Transportation Plan are presented. In addition, implementation strategies are discussed, including continuing coordination with WSDOT and other agencies to prioritize and fund regional improvements. Other strategies call for monitoring and refining the City's transportation impact fee programs to ensure development addresses multimodal needs and does not out pace transportation system investments. The implementation plan provides the framework for the City to prioritize and fund the improvements identified in the transportation improvement program. It also addresses the City's development review program covering LOS standards and concurrency.

Financing Program

The GMA requires the Transportation Plan to include a multi-year financing plan based on the identified needs in the transportation improvement program. The financing plan for the Transportation Plan provides a basis for the City's annual Six-Year Transportation Improvement Program (TIP). As required by the GMA, the financing program also includes a discussion of how additional funds will be raised and/or level of service standards will be reassessed to assure that the Transportation Plan can adequately support the Land Use Element. Alternatively, the city may reassess its Land Use Element.

The transportation financing program becomes a subset of the City's Capital Facilities Plan (CFP) Element. The GMA requires the CFP Element to include at least a six-year plan for financing capital facilities and identifies the sources of public money for the projects.

Project Cost Summary

Planning level project cost estimates have been prepared to determine the magnitude of the transportation investments needed over the life of the Plan. Exhibit 5-5, in the previous chapter, summarizes the list of capital transportation improvement projects based on the analyses of existing and future 2044 conditions. Exhibit 6-1 summarizes the planning level capital costs into three primary improvement categories: Spot/Intersections, Roadway Improvements, and Non-Motorized Improvements. In addition, Exhibit 6-1 includes a summary of transportation programs and administration costs allocated to the City of Sumner to implement the Plan through 2044.

Exhibit 6-1. Transportation Projects and Programs Cost Summary

Cost (2023 Dollars)¹	
Transportation Capital Projects	
Spot/Intersection Improvements	\$16,875,000
Roadway Improvements	\$38,803,750
Non-Motorized Improvements	\$48,591,753
Total	\$104,270,503
Citywide Transportation Programs	
Arterial Maintenance/Street Overlay	\$3,000,000
Roadway Paint Line Application	\$800,000
Pavement Repairs	\$1,323,000
Roadway Plastic Marking Application	\$1,122,000
Chip Seal Application	\$2,730,000
Crack Seal Application	\$1,575,000
Neighborhood Traffic Control Program	\$560,000
Signal Replacement Program (NEW)	\$2,000,000
ADA Transition Plan	\$800,000
Sidewalk Maintenance Program	\$2,500,000
Total	\$16,410,000
Total Cost (Capital and Programs)	\$120,680,503
Cost/Year	\$6,034,025

Notes:

1. Planning level costs in 2023 dollars.

Source: Transpo Group and City of Sumner 2023

Approximately \$104 million (2023 dollars) will be needed to fully fund the capital improvements over the 20-year horizon of the Plan. Of these costs, over \$16.8 million are related to intersection improvements, \$38.8 million are related to roadway improvements, and over \$48.5 million are related to non-motorized improvements. In addition, \$16.4 million is anticipated to implement the citywide transportation programs over the life of the Plan. Combined, the total costs for the Sumner Transportation Plan is estimated at approximately \$120.6 million. This equates to an average of approximately \$6 million each year for the life of the Plan through 2044. Funding the transportation projects and programs will require Sumner to seek outside sources, which is consistent with current practices. Ultimately, the portion of funding that is solely the responsibility of Sumner will vary by project and program and will depend on the availability of grants, partnerships, and other sources. The following section describes the Sumner funding strategy for implementing this Transportation Plan.

Funding Strategy

The City of Sumner utilizes fees and tax revenues to construct and maintain their transportation facilities. Funding sources include local tax revenues, fees, grants, partnerships with other agencies, and developer impact fees. The City also uses fuel taxes and can direct revenues from its General Fund to transportation capital projects, as needed, to balance its Six-Year Transportation Improvement Program (TIP).

Developer mitigation includes transportation impact fees and/or construction of frontage improvements at the time of development. Other agencies such as WSDOT are expected to share in the cost of state highway improvements to meet regional transportation needs.

The City identifies the most appropriate potential funding sources for each of the improvement projects. For example, grants or other agency funding are assumed to be a greater share of the revenues for funding improvements on SR 167 or SR 410 than on the local arterial improvements. While it is unlikely that implementation of the Transportation Plan projects will match the city's funding assumptions at a project-by-project level, this process does provide for a reasonable estimate of anticipated revenues needed for the overall capital improvement program. It also establishes a level of funding needed through transportation impact fees.

Exhibit 6-2 summarizes the anticipated sources of revenues used by the city to fund transportation improvements and programs. Key strategies related to funding transportation include:

- **Grants.** The city has been successful in applying for State and Federal grants. Partial grant funding was allocated to projects based on the type and location of the improvement. Projects that would serve Sumner as well as regional traffic and provided multimodal solutions are excellent candidates for grants. Projects that also support economic development are also good candidates.
- **Local Improvement District (LIDs) and Developer Funding.** LIDs or developer improvements would cover the cost of curb, gutter, sidewalks, planter strips, and a portion of the street lighting that are not included in the impact fee program. Other improvements would also be covered by developers based on SEPA mitigation or frontage improvement requirements. While the City has rarely used LIDs, the City could use this approach to set up LIDs that fund improvements and benefit the adjacent property owners. The City could pursue low interest loans from the Public Works Trust Fund (PWTF) and then pay off the loans with annual proceeds from the LIDs.
- **Transportation Impact Fee (TIF) Update.** The city will update the TIF based on the 20-Year project list and the allowance of multimodal fees. Additional details on the TIF are provided in the second following Exhibit 6-2.

Exhibit 6-2. Existing and Projected Revenues

	Annual Revenue (2023 Dollars)	2023-2044 20-Year Revenues (2023 Dollars)
General Revenue Source		
Motor Vehicle Fuel – City	\$210,000	\$4,200,000
Local Parking Tax	\$58,000	\$1,160,000
Street & Curb Permits	\$27,500	\$550,000
Plan Check Fees	\$430,000	\$8,600,000
Subtotal	\$725,500	\$14,510,000
Grants or Other Funding		
Federal State, or Other Grants/Funding Partnership	\$5,810,000	\$116,200,000
Local Improvement District/Developer Funded	\$100,000	\$2,000,000
Transportation Impact Fees ¹	\$500,000	\$10,000,000
Subtotal	\$6,410,000	\$128,200,000
Total Existing Revenue and Other Funding	\$7,135,500	\$142,710,000

Source: City of Sumner 2023

Notes:

1. Based review of historic Transportation Impact Fee (TIF) revenue data.

Transportation Impact Fees Update

The GMA allows agencies to develop and implement a transportation impact fee (TIF) program to help fund some of the costs of transportation facilities needed to accommodate growth. State law (Chapter 82.02 RCW) requires that TIFs are:

- Related to improvements to serve new developments and not existing deficiencies.
- Assessed proportional to the impacts of new developments.
- Allocated for improvements that reasonably benefit new development.
- Spent on facilities identified in the CFP.

TIFs can only be used to help fund improvements that are needed to serve new growth. The projects can include recently completed projects to the extent that they serve future growth and do not solely resolve existing deficiencies. The cost of projects needed to resolve existing deficiencies cannot be included.

State Bill 5452 effective July 23, 2023, amends 82.02.090(7) RCW to include bike and pedestrian facilities designed with the intent of multimodal commuting as part of the definition of public facilities where impact fees are allowed. With this amendment, the City intends to adopt a multimodal transportation impact fee to help fund improvements.

The City implemented and adopted a transportation impact fee program in 2003. The program is defined in Chapter 12.36 of the Sumner Municipal Code (SMC). As part of the Transportation Plan, the City would amend SMC Chapter 12.36 to include pedestrian and bike facilities in the TIF program consistent with the State law.

The funding strategy assumes the TIF program is updated based on the 20-year list of improvement projects, as identified in Exhibit 5-5. An evaluation and update of the TIF rates has been conducted as part of the Transportation Plan to reflect changes in land use plans, funding, level of service standards, and the new State legislation allowing funding to be directed towards non-motorized transportation projects. The TIF eligible projects are a subset of the long-term transportation projects identified in Chapter 5 Exhibit 5-5. Appendix C provides a more detailed summary of the traffic impact fee eligibility and the amount of the project cost that was applied in the development of the TIF.

The current TIF program divides Sumner into districts. The district approach was used due to the large amount of growth in jobs that was anticipated in the MIC area with implementation of the 2015 Comprehensive Plan and to help incentivize development in the Town Center. The growth allocation for the current plan does not anticipate significant growth in jobs and residential growth is spread more evenly throughout the City, within the Town Center and other residential areas. The current TIF approach recommends eliminating the three districts and having one fee schedule for the entire City. This approach simplifies the fee structure and provides ease in understanding fees. Exhibit 6-3 summarizes the potential transportation impact fee based on the Preferred Alternative land use plan and cost for the TIF applied to the projects. The application of the TIF was reduced from the eligible amount based on anticipated grant funding or developer contributions to improvement projects. Appendix C provides a breakdown of the TIF eligible and the applied TIF percentages for each of the improvement projects.

Alternative 1 and the Preferred Alternative have a higher TIF per PM peak hour trip since there is less growth, but the system needs are similar to that of Alternative 2. Alternative 3 has approximately the same amount of growth in trips as Alternative 2 so the TIF per PM peak hour trip would be about the same as Alternative 2. The Preferred Alternative is used as the basis of the TIF calculations presented below.

Exhibit 6-3. Potential Transportation Impact Fee Rates

Applied TIF Share ¹	Total New PM Peak Hour Trips (Passenger car equivalents)	Cost Per New PM Peak Hour Trip (Passenger car equivalents)
\$26,515,384	2,479	\$7,452

Notes:

1. Total cost share in 2023 dollars, based on relative impact of the 2023 - 2044 traffic growth on each capacity-added project on a passenger car equivalent basis.

The transportation impact fees are estimated to account for almost 26.5 million (2023 dollars) in revenues. This represents approximately 22 percent of the total funding program, including the contributions related to expected debt service.

The current fee per weekday PM peak hour trip for the City ranges between \$1,900 to \$3,400 depending on the location of the development. The proposed fee estimate, including non-motorized transportation improvements, will be a significant increase over current fees. Staff will review the TIF with City Council who will determine the fee that is ultimately selected.

The following section describes the reassessment strategy that can be used in the case the TIF proportion or other funding source are less than estimated in this initial funding strategy.

Reassessment Strategy

The funding strategy is partially based on grants and other outside funding that the City does not control. The City may be able to shift revenues from other funding programs to address specific needs as yearly budgets are prepared or consider other revenue options such as increasing the vehicle license tab fee. In addition, the City is committed to reassessing their transportation needs and funding sources each year as part of their annual Six-Year Transportation Improvement Program (TIP). This allows the City to match the financing program with the shorter-term improvement projects and funding. The Transportation Plan also includes goals and policies to periodically review land use growth, adopted level of service standards, and funding sources to ensure they support one another and meet concurrency requirements.

To maintain the vitality of Sumner's transportation system, the City should adhere to the following principles in its funding program:

- As part of the development of the annual Six-Year Transportation Improvement Program, the City will balance improvement costs with available revenues.
- Review project design during the development review process to determine whether costs could be reduced through reasonable changes in scope or deviations from design standards.
- Coordinate and partner with WSDOT and other agencies to vigorously pursue grants from state, federal, and regional agencies to help fund and implement improvements along SR 167 and SR 410.
- Work with regional and local agencies to develop multi-agency grant applications for projects that serve regional travel.
- Review transportation impact fee revenues each year to determine whether the impact fees should be adjusted to account for project cost increases and/or decreases in grants or WSDOT cost sharing.
- If the actions above are not sufficient, consider changes in the level of service standards and/or limit the rate of growth.

Implementation Program

Implementation of the Transportation Plan involves several strategies. These include coordination with developers and partnering with other agencies to construct the transportation improvement projects. Partnering with other agencies and use of grants will be especially critical in the implementation of safety, capacity, and operational improvements along SR 167 and SR 410. This may include re-prioritizing roadway projects as new funding sources become available or by focusing on areas most impacted by new development. The City will also continue to review strategies for phasing improvements allowing

funding to be spread over a longer period. In addition, the City will need to review, maintain, and update its concurrency management, Transportation Impact Fee, and other development review processes to account for the revised multimodal LOS standards and assure that the impacts of growth are mitigated, and transportation improvements are completed concurrent with new development.

Partnering with Other Agencies

The Transportation Plan supports the City's role in the regional transportation strategy (in PSRCs Vision 2050) through its policies to support and expand use of transit, transportation demand management, and active travel to reduce the number of vehicle trips generated by development in the city. Sumner will need to coordinate with Sound Transit, other transit providers, and other nearby cities to implement facilities and services to meet those objectives. Coordination will also help assure consistency in plans and implementation programs between agencies to meet the goals of the regional plan.

The City will continue to partner with WSDOT to implement improvements along both SR 167 and SR 410 consistent with the Transportation Plan project list. Projects along both state highways serve regional travel patterns as well as provide local access within the City of Sumner. Without WSDOT as a partner, the City is unable to put a high priority on major capacity improvements along both state highways since the improvements serve significant levels of regional traffic and the projects will cost more than the City can reasonably fund on their own. These projects should be considered for joint submittal of grants, with the local match being combined from benefiting agencies. Partnering with WSDOT will be critical in the implementation of the Transportation Element project list.

Project Priorities and Timing

The City of Sumner will use the annual update of the Six-Year TIP to re-evaluate priorities and timing of projects. Throughout the planning period, projects will be completed, and priorities will be revised. The development of the TIP will also be used to identify potential phasing options to fit within available revenues during that six-year time horizon. The city will monitor traffic volumes and the location and intensity of land use growth in the city. The city will also need to monitor traffic growth from other adjacent communities. Based on this information, the city will then be able to direct funding to areas that are most impacted by growth or may fall below the City's level of service standard. The development of the TIP will be an ongoing process over the life of the plan and will be reviewed and amended annually.

Concurrency Management and Development Review

Concurrency refers to the ongoing process of coordinating infrastructure needs with community development. This concept was formalized in the GMA to ensure that adequate public facilities are provided in concert with population and employment growth. For transportation facilities, the GMA requirement is fulfilled if its level of service standards will continue to be met including the additional travel demand generated by each development.

As part of the review of developments applications, the city will apply its level of service standards, street classifications and conceptual street designs, and other regulations related to transportation. The City has options for implementing its concurrency requirements. Development permit applications are evaluated for vehicle trips generated, and Transportation Impact Fees (TIF) are assessed. Alternatively, depending on the scale of a proposed project, the City may also review concurrency through the SEPA

review process. The SEPA process also ties the concurrency to specific development applications, instead of applying it citywide or to subareas of the city. This process is consistent with the 2015 Transportation Plan.

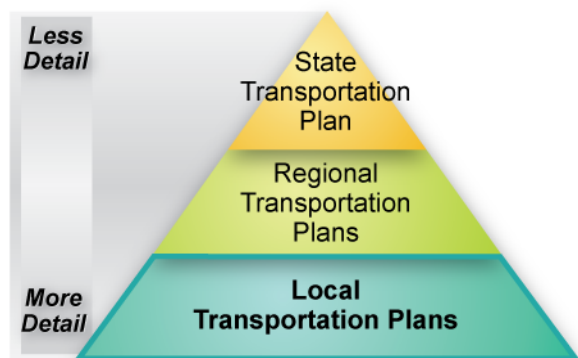
The following summarizes the City's framework for the SEPA-based concurrency review:

- Baseline traffic forecasts to be developed and based on existing traffic, historical growth rates, and pipeline development traffic.
- Project traffic based on trip generation, distribution, and assignment.
- Future conditions evaluated based on city or other agency improvements that are funded for construction within six years.
- Assess project impacts at locations that fall below the city's adopted LOS standard.
- Require mitigation to resolve LOS deficiencies, unless exempt from concurrency based on policies.
- If deficient location is exempt from concurrency, require appropriate mitigation (such as payment of impact fees or proportionate share mitigation, construct partial improvements to offset project impacts, or reduce development impacts through phasing or TDM programs)
- If adequate mitigation is not defined to resolve the LOS deficiency, then the city will deny the development.
- Identified LOS deficiencies will be used to seek grants or other funding and as an input to the annual Six-Year TIP process.

7. Consistency With Other Agencies

Sumner's transportation system is part of, and connected to, a broader regional highway and arterial system. The GMA works to increase coordination and compatibility between the various agencies that are responsible for the overall transportation system. Since transportation improvements need to be coordinated across jurisdictional boundaries, the Transportation Plan needs to be consistent with and supportive of the objectives identified in the Washington State Transportation Plan, PSRC's Vision 2050, and the transportation plans or capital improvement plans of the surrounding agencies. Developing the Transportation Plan is primarily a bottoms-up approach to planning, with the city exploring its needs based on the land use plan. Eventually, local projects are incorporated into regional and state plans. A schematic of this approach is shown below in Exhibit 7-1. The following sections provide a review of this Plan's consistent with neighboring jurisdictions.

Exhibit 7-1. Transportation Plan Approach



Washington State Department of Transportation

As required by the 1998 amendments to the GMA, the Sumner Transportation Plan addresses the state highway system. Specifically, the Transportation Plan addresses the following elements related to the state highway system:

- Inventory of existing facilities – see Chapter 3
- Level of service standards – see Chapter 3 and 4
- Concurrency on state facilities – see Chapters 4 and 5
- Analysis of traffic impacts on state facilities – see Chapter 4
- Consistency with the State Highway Systems Plan – see Chapter 5 and Exhibit 7-2

Exhibit 7-2 summarizes the improvements on state facilities listed in the Statewide Transportation Improvement Program (STIP) 2023 – 2026, which are consistent with the Plan identified in chapter 5.

Exhibit 7-2. State Highway Improvement Plan

State Route (limits) ¹	State Project ID (Sumner Project ID)	State Highway System Plan Project Description
166th Avenue E SR 410 WB Ramp Intersection to 64th Street E	SUM-24 (RW1)	Widen 166th Avenue E to a 4-lane facility with roundabouts at the SR 410 WB Ramp and 64th Street E
Fryar Avenue W Main Street to Puyallup Street	SUM-17 (NM7)	Shared Use Trail W Main Street to Puyallup Street
Main Street/Traffic Avenue	SUM-25 (NM21)	Replace existing pedestrian rectangular rapid flashing beacon with pedestrian signal
Rivergrove Community Pedestrian Bridge Alder Avenue and Maybelle Street to 143rd Avenue E	SUM-29 (NM16)	Construct a non-motorized pedestrian bridge over SR 410 with approach ramp, shared use path and sidewalk connections to Alder Avenue, 143rd Avenue E, and 72nd Street E
Stewart Road Corridor Completion Butte Avenue E to 140th Avenue Curt E	SUM-16	Replace and widen existing bridge to accommodate 4 travel lanes and separate shared use path
Stewart Road ITS W Valley Highway E - SR 167/Stewart Road Interchange to Future signal at Golf Course Entrance west of East Valley Highway	SUM-27 (RW4)	Add/replace/upgrade interconnected conduit/cabling and signal hardware to coordinate traffic signals and devices along Stewart Road
Systemic Horizontal Curve and Roadway Departure Safety Improvements East Valley Highway, West Valley Highway, Sumner-Tapps Highway/166th Avenue E, 142nd Avenue E/24th Street E	SUM-28 (RW12)	Install static and/or dynamic curve warning signs, speed feedback signs, centerline and edge line profiled striping, rumble strips, reflective markers on-pavement as appropriate to delineate roadside objects, channelization, guardrail/roadway shouldering, and street lighting
Tacoma Avenue Overlay Puyallup Street to the White River Bridge	SUM-30 (SP2)	Plane, repair, and overlay, complete intersection channelization improvements, add an eastbound left-turn pocket on Puyallup Street at Tacoma Avenue. Add a signal at the Puyallup Street/Tacoma Avenue intersection
Valley Ave Overlay Sumner City Limits to Meade McCumber Rd E	SUM-26 (RW3 in part)	Grinde and overlay Valey Avenue

Notes:

1. Based on the WSDOT Statewide Transportation Improvement Program (STIP) 2023-2026.

Pierce County

The recommendations and functional classifications of arterials and collectors are consistent between the City's and County's Plans.

The most significant improvement project in the Transportation Plan involving Pierce County is the widening of Stewart Road SE Bridge over the White (Stuck) River (SUM-16). This project is fully funded and is being led by the City of Sumner with participation by Pierce County and the Cities of Auburn and Pacific. It provides the principal east-west route in the north part of the City of Sumner connecting with Stewart Road from the SR 167 interchange to Lake Tapps Parkway.

Sound Transit

The future transit recommendations in the Sumner Transportation Plan are consistent with Sound Transit's short and long-term plans for the area.

City of Auburn

Auburn is planning on widening East Valley Highway between Lakeland Hills Way and E Valley Access Road to four to five lanes including storm water, illumination, and intelligent transportation system (ITS) improvements. A separate non-motorized trail would also be constructed on the east side of East Valley Highway. This project provides a continuation of the Auburn Way principal arterial to connect to the Stewart Road/Lake Tapps Parkway corridor.

City of Pacific

The Cities of Sumner and Pacific transportation systems connect in the northwest part of Sumner. The City of Pacific is also participating in Pierce County's expansion of the Stewart Road SE Bridge. The Sumner Regional Trail system along the White (Stuck) River also will connect with segments in Pacific. The trail project is being coordinated between the two cities and Pierce County.

City of Edgewood

The City of Edgewood is located west of Sumner. The primary transportation system interface is in the Pacific Avenue/West Valley Highway corridor. Traffic using Sumner Heights Drive or Edgewood Drive E in southeast Edgewood access either Valley Avenue or Pacific Avenue. Traffic using Pacific Avenue can access SR 410 via Bridge Street and Traffic Avenue. Traffic to/from Edgewood is also able to use the North Sumner interchange with SR 167 at 24th Street E.

City of Puyallup

The City of Puyallup is located southwest of Sumner. The primary transportation system interface is in the E Main Avenue (Traffic Avenue) corridor and SR 162 via Pioneer Way E. City of Puyallup has acknowledged the need for working with Sumner.

Appendix A LOS Definition

Highway Capacity Manual 2010/6th Edition

Signalized intersection level of service (LOS) is defined in terms of a weighted average control delay for the entire intersection. Control delay quantifies the increase in travel time that a vehicle experiences due to the traffic signal control as well as provides a surrogate measure for driver discomfort and fuel consumption. Signalized intersection LOS is stated in terms of average control delay per vehicle (in seconds) during a specified time period (e.g., weekday PM peak hour). Control delay is a complex measure based on many variables, including signal phasing and coordination (i.e., progression of movements through the intersection and along the corridor), signal cycle length, and traffic volumes with respect to intersection capacity and resulting queues. Table 1 summarizes the LOS criteria for signalized intersections, as described in the *Highway Capacity Manual 2010* and 6th Edition (Transportation Research Board, 2010 and 2016, respectively).

Table 1. Level of Service Criteria for Signalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)	General Description
A	≤10	Free Flow
B	>10 – 20	Stable Flow (slight delays)
C	>20 – 35	Stable flow (acceptable delays)
D	>35 – 55	Approaching unstable flow (tolerable delay, occasionally wait through more than one signal cycle before proceeding)
E	>55 – 80	Unstable flow (intolerable delay)
F ¹	>80	Forced flow (congested and queues fail to clear)

Source: *Highway Capacity Manual 2010 and 6th Edition*, Transportation Research Board, 2010 and 2016, respectively.

1. If the volume-to-capacity (v/c) ratio for a lane group exceeds 1.0 LOS F is assigned to the individual lane group. LOS for overall approach or intersection is determined solely by the control delay.

Unsignalized intersection LOS criteria can be further reduced into two intersection types: all-way stop and two-way stop control. All-way stop control intersection LOS is expressed in terms of the weighted average control delay of the overall intersection or by approach. Two-way stop-controlled intersection LOS is defined in terms of the average control delay for each minor-street movement (or shared movement) as well as major-street left-turns. This approach is because major-street through vehicles are assumed to experience zero delay, a weighted average of all movements results in very low overall average delay, and this calculated low delay could mask deficiencies of minor movements. Table 2 shows LOS criteria for unsignalized intersections.

Table 2. Level of Service Criteria for Unsignalized Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	0 – 10
B	>10 – 15
C	>15 – 25
D	>25 – 35
E	>35 – 50
F ¹	>50

Source: *Highway Capacity Manual 2010 and 6th Edition*, Transportation Research Board, 2010 and 2016, respectively.

1. If the volume-to-capacity (v/c) ratio exceeds 1.0, LOS F is assigned an individual lane group for all unsignalized intersections, or minor street approach at two-way stop-controlled intersections. Overall intersection LOS is determined solely by control delay.

Appendix A LOS Definition

Highway Capacity Manual, 2000

Signalized intersection level of service (LOS) is defined in terms of the average total vehicle delay of all movements through an intersection. Vehicle delay is a method of quantifying several intangible factors, including driver discomfort, frustration, and lost travel time. Specifically, LOS criteria are stated in terms of average delay per vehicle during a specified time period (for example, the PM peak hour). Vehicle delay is a complex measure based on many variables, including signal phasing (i.e., progression of movements through the intersection), signal cycle length, and traffic volumes with respect to intersection capacity. Table 1 shows LOS criteria for signalized intersections, as described in the *Highway Capacity Manual* (Transportation Research Board, Special Report 209, 2000).

Table 1. Level of Service Criteria for Signalized Intersections

Level of Service	Average Control Delay (sec/veh)	General Description (Signalized Intersections)
A	≤10	Free Flow
B	>10 - 20	Stable Flow (slight delays)
C	>20 - 35	Stable flow (acceptable delays)
D	>35 - 55	Approaching unstable flow (tolerable delay, occasionally wait through more than one signal cycle before proceeding)
E	>55 - 80	Unstable flow (intolerable delay)
F	>80	Forced flow (jammed)

Source: *Highway Capacity Manual*, Transportation Research Board, Special Report 209, 2000.

Unsignalized intersection LOS criteria can be further reduced into two intersection types: all-way stop-controlled and two-way stop-controlled. All-way, stop-controlled intersection LOS is expressed in terms of the average vehicle delay of all of the movements, much like that of a signalized intersection. Two-way, stop-controlled intersection LOS is defined in terms of the average vehicle delay of an individual movement(s). This is because the performance of a two-way, stop-controlled intersection is more closely reflected in terms of its individual movements, rather than its performance overall. For this reason, LOS for a two-way, stop-controlled intersection is defined in terms of its individual movements. With this in mind, total average vehicle delay (i.e., average delay of all movements) for a two-way, stop-controlled intersection should be viewed with discretion. Table 2 shows LOS criteria for unsignalized intersections (both all-way and two-way, stop-controlled).

Table 2. Level of Service Criteria for Unsignalized Intersections

Level of Service	Average Control Delay (sec/veh)
A	0 - 10
B	>10 - 15
C	>15 - 25
D	>25 - 35
E	>35 - 50
F	>50

Source: *Highway Capacity Manual*, Transportation Research Board, Special Report 209, 2000.

Appendix B LOS Summary and Worksheets

Sumner Comp Plan Update - 2024
PM Peak Hour

Intersection	Traffic Control	2023 Existing			2044 Alt 1			2044 Alt 2		
		LOS	Delay	WM	LOS	Delay	WM or v/c	LOS	Delay	WM or v/c
1. Stewart Rd SE/Butte Ave SE	TWSC	F	186.4	SB	C	32.5	-	D	35.6	-
2. 140th Ave Ct E/Stewart Rd SE	Signal	B	10	-	A	7.3	-	A	7.4	-
3. W Valley Hwy E/24th St E	Signal	C	21.6	-	C	26.6	-	C	25.8	-
4. SR 167 NB Ramps/24th St E	Signal	D	35.8	-	C	33.6	-	C	33.6	-
5. 136th Ave E/24th St E	Signal	C	25.1	-	C	27.9	-	C	28.1	-
6. 142nd Ave E/24th St E	TWSC	B	13.9	WB	C	15.3	WB	C	16.4	WB
7. E Valley Hwy E/Forest Canyon Rd E	TWSC	F	327.1	WB	F	1268.8	WB	F	2472.2	WB
8. W Valley Hwy E/SR 167 SB Ramps	Signal	B	18.5	-	C	20.9	-	C	21	-
9. 142nd Ave E/Costco Access	Signal	A	6.8	-	A	6.7	-	A	6.6	-
10. W Valley Hwy E/42nd St E	TWSC	B	11.3	WB	B	14.2	WB	B	14.4	WB
11. 142nd Avenue E/Tacoma Avenue	TWSC	B	13.1	EBL	C	16.3	EBL	C	16.9	EBL
12. Puyallup St/Tacoma Ave	AWSC	C	18.9	-	F	84.3	-	F	105.8	-
13. E Valley Hwy E/Puyallup St	Signal	B	14.4	-	B	16.1	-	B	17.5	-
14. E Valley Hwy E/Elm St E	TWSC	D	29.6	NBL	F	57.4	NBL	F	64.1	NBL
15. Valley Ave/Elm St E	TWSC	D	30.7	NBL	E	43.1	NBL	E	45.2	NBL
16. Fryar Ave/Zehnder St	TWSC	C	20.7	WB	C	24.6	WB	D	25.9	WB
17. Parker Rd E/Washington St	TWSC	B	10.3	EB	B	11	EB	B	11.2	EB
18. Sumner Heights Dr E/W Valley Hwy E	Signal	C	28.6	-	D	41.1	-	D	42.5	-
19. Sumner Heights Dr E/Valley Ave E/Cannery Way	Signal	C	20.5	-	C	30.7	-	C	31.8	-
20. Traffic Ave/Main St	Signal	D	43.1	-	E	58.1	-	E	59.5	-
21. Alder Ave/Main St	AWSC	B	11.1	-	B	13.6	-	B	14.6	-
22. Ryan St/Main St	TWSC	B	11.8	NB	B	12.4	NB	B	12.6	NB
23. Wood Ave/Main St	Signal	B	10.7	-	B	13	-	B	13.3	-
24. Valley Ave/Main St	Signal	C	22.7	-	C	32.4	-	D	36.7	-
25. Parker Rd E/Main St E	TWSC	C	24.4	SB	F	55.9	SB	F	66.2	SB
26. 160th Ave E/Main St (60th St E)	AWSC	C	15.8	-	E	46.5	-	F	56.3	-
27. Sumner Tapps Hwy E/60th St E	TWSC	C	18.9	EBR	C	27.7	-	C	30.8	-
28. Traffic Ave/Maple St	TWSC	C	22.3	EB	D	25.4	EB	D	26	EB
29. Traffic Ave/Thompson St	Signal	C	23.8	-	D	35.9	-	D	36.7	-
30. Station Ln/Thompson St	Signal	A	7.5	-	A	7.5	-	A	7.5	-
31. Alder Avenue/Thompson Street	TWSC	B	11.7	NB	B	11.8	NB	B	12.1	NB
32. E Main Ave/SR 410 EB Ramps	Signal	B	19	-	C	23.1	-	C	21.7	-
33. Valley Ave/Meade-McCumber Rd E	Signal	B	18.1	-	C	29.7	-	C	34.9	-
34. Parker Rd E/Meade-McCumber Rd E	TWSC	B	11	NB	B	11.3	SB	B	11.8	SB
35. 160th Ave E/64th St E	AWSC	B	11.8	-	C	17.8	-	C	19.7	-
36. Sumner-Tapps Hwy E/64th St E	Signal	C	22.3	-	A	6.7	0.398	A	6.9	0.414
37. Sumner-Tapps Hwy E/SR 410 WB Ramps	TWSC	F	61	WB	A	7.4	0.539	A	7.6	0.55
38. Sumner-Tapps Hwy E/SR 410 EB Ramps	Signal	C	21.2	-	B	18.4	-	B	18.4	-
39. Valley Ave/Gary St E	TWSC	B	12	EB	C	18.4	EB	C	20	EB
40. Valley Ave/SR 410 WB Ramps	Signal	C	27.7	-	A	8	0.597	A	8.5	0.628
41. Valley Ave/SR 410 EB Ramps	Signal	F	80.4	-	B	12.2	0.867	B	12.5	0.875
42. Valley Ave/74th St E	TWSC	F	110	EB	F	611.8	EB	F	685.5	WB
43. Valley Ave/Rivergrove Dr E	Signal	B	16.5	-	B	15.4	-	B	15.4	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

1: Stewart Road SE (8th St E) & Butte Ave SE

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	20.1											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	40	885	5	5	525	20	15	0	10	75	0	95
Future Vol, veh/h	40	885	5	5	525	20	15	0	10	75	0	95
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	96	96	96	96	96	96	96	96	96	96	96	96
Heavy Vehicles, %	6	6	6	5	5	5	0	0	0	2	2	2
Mvmt Flow	42	922	5	5	547	21	16	0	10	78	0	99
Major/Minor	Major1		Major2		Minor1		Minor2					
Conflicting Flow All	568	0	0	927	0	0	1626	1587	925	1582	1579	558
Stage 1	-	-	-	-	-	-	1009	1009	-	568	568	-
Stage 2	-	-	-	-	-	-	617	578	-	1014	1011	-
Critical Hdwy	4.16	-	-	4.15	-	-	7.1	6.5	6.2	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Follow-up Hdwy	2.254	-	-	2.245	-	-	3.5	4	3.3	3.518	4.018	3.318
Pot Cap-1 Maneuver	985	-	-	725	-	-	83	109	329	88	109	529
Stage 1	-	-	-	-	-	-	292	320	-	508	506	-
Stage 2	-	-	-	-	-	-	481	504	-	288	317	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	985	-	-	725	-	-	62	98	329	79	98	529
Mov Cap-2 Maneuver	-	-	-	-	-	-	62	98	-	79	98	-
Stage 1	-	-	-	-	-	-	266	292	-	463	501	-
Stage 2	-	-	-	-	-	-	387	499	-	254	289	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	0.4		0.1		58.9		186.4					
HCM LOS					F		F					
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	92	985	-	-	725	-	-	151				
HCM Lane V/C Ratio	0.283	0.042	-	-	0.007	-	-	1.173				
HCM Control Delay (s)	58.9	8.8	0	-	10	0	-	186.4				
HCM Lane LOS	F	A	A	-	B	A	-	F				
HCM 95th %tile Q(veh)	1.1	0.1	-	-	0	-	-	9.9				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
2: 140th Ct E & Stewart Road SE (8th St E)

Summer Comp Plan Update
Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	5	970	10	5	490	0	45	0	20	5	0	10
Future Volume (veh/h)	5	970	10	5	490	0	45	0	20	5	0	10
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1811	1811	1811	1826	1826	1826	1811	1811	1811
Adj Flow Rate, veh/h	5	1000	10	5	505	0	46	0	21	5	0	10
Peak Hour Factor	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	4	4	6	6	6	5	5	5	6	6	6
Cap, veh/h	586	1169	12	254	1164	986	337	0	216	134	32	143
Arrive On Green	0.64	0.64	0.64	0.64	0.64	0.00	0.14	0.00	0.14	0.14	0.00	0.14
Sat Flow, veh/h	879	1819	18	540	1811	1535	1367	0	1543	278	231	1018
Grp Volume(v), veh/h	5	0	1010	5	505	0	46	0	21	15	0	0
Grp Sat Flow(s),veh/h/ln	879	0	1837	540	1811	1535	1367	0	1543	1528	0	0
Q Serve(g_s), s	0.1	0.0	22.1	0.4	7.0	0.0	1.0	0.0	0.6	0.0	0.0	0.0
Cycle Q Clear(g_c), s	7.1	0.0	22.1	22.5	7.0	0.0	1.4	0.0	0.6	0.4	0.0	0.0
Prop In Lane	1.00		0.01	1.00		1.00	1.00		1.00	0.33		0.67
Lane Grp Cap(c), veh/h	586	0	1181	254	1164	986	337	0	216	309	0	0
V/C Ratio(X)	0.01	0.00	0.86	0.02	0.43	0.00	0.14	0.00	0.10	0.05	0.00	0.00
Avail Cap(c_a), veh/h	707	0	1433	328	1412	1197	806	0	747	811	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	6.3	0.0	7.2	16.1	4.5	0.0	19.3	0.0	19.0	18.9	0.0	0.0
Incr Delay (d2), s/veh	0.0	0.0	4.7	0.0	0.3	0.0	0.1	0.0	0.1	0.0	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.0	6.4	0.0	1.6	0.0	0.5	0.0	0.2	0.1	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	6.3	0.0	11.9	16.1	4.8	0.0	19.4	0.0	19.1	18.9	0.0	0.0
LnGrp LOS	A	A	B	B	A	A	B	A	B	B	A	A
Approach Vol, veh/h	1015			510			67			15		
Approach Delay, s/veh	11.9			4.9			19.3			18.9		
Approach LOS	B			A			B			B		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	38.1			12.6			38.1			12.6		
Change Period (Y+Rc), s	5.5			5.5			5.5			5.5		
Max Green Setting (Gmax), s	39.5			24.5			39.5			24.5		
Max Q Clear Time (g_c+I1), s	24.1			2.4			24.5			3.4		
Green Ext Time (p_c), s	8.4			0.0			3.4			0.1		
Intersection Summary												
HCM 6th Ctrl Delay	10.0											
HCM 6th LOS	B											

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Summer Comp Plan Update

3: W Valley Highway E & 24th Street E

Existing PM Peak Hour

						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	 		 			
Traffic Volume (veh/h)	365	30	60	190	190	515
Future Volume (veh/h)	365	30	60	190	190	515
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No			No
Adj Sat Flow, veh/h/ln	1707	1707	1544	1544	1781	1781
Adj Flow Rate, veh/h	380	31	62	198	198	536
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	13	13	24	24	8	8
Cap, veh/h	476	219	818	715	234	1330
Arrive On Green	0.15	0.15	0.56	0.56	0.14	0.75
Sat Flow, veh/h	3155	1447	1544	1282	1697	1781
Grp Volume(v), veh/h	380	31	62	198	198	536
Grp Sat Flow(s),veh/h/ln	1577	1447	1467	1282	1697	1781
Q Serve(g_s), s	10.5	1.7	1.8	7.3	10.3	9.8
Cycle Q Clear(g_c), s	10.5	1.7	1.8	7.3	10.3	9.8
Prop In Lane	1.00	1.00		1.00	1.00	
Lane Grp Cap(c), veh/h	476	219	818	715	234	1330
V/C Ratio(X)	0.80	0.14	0.08	0.28	0.85	0.40
Avail Cap(c_a), veh/h	890	408	818	715	385	1330
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.76	0.76	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	36.9	33.1	9.2	10.4	37.9	4.1
Incr Delay (d2), s/veh	2.2	0.2	0.2	1.0	7.1	0.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.1	0.6	0.6	2.1	4.6	3.0
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	39.0	33.3	9.4	11.4	45.0	5.0
LnGrp LOS	D	C	A	B	D	A
Approach Vol, veh/h	411		260			734
Approach Delay, s/veh	38.6		10.9			15.8
Approach LOS	D		B			B
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	17.0	54.8			71.8	18.2
Change Period (Y+Rc), s	4.6	4.6			4.6	4.6
Max Green Setting (Gmax), s	20.4	30.4			55.4	25.4
Max Q Clear Time (g_c+I1), s	12.3	9.3			11.8	12.5
Green Ext Time (p_c), s	0.3	1.5			3.7	1.1
Intersection Summary						
HCM 6th Ctrl Delay			21.6			
HCM 6th LOS			C			
Notes						
User approved pedestrian interval to be less than phase max green.						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

4: SR-167 NB Ramps & 24th Street E

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	85	290	0	0	375	265	20	5	250	0	0	0
Future Volume (veh/h)	85	290	0	0	375	265	20	5	250	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach	No			No			No					
Adj Sat Flow, veh/h/ln	1574	1574	0	0	1693	1693	1678	1678	1678			
Adj Flow Rate, veh/h	90	309	0	0	399	282	13	16	0			
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94			
Percent Heavy Veh, %	22	22	0	0	14	14	15	15	15			
Cap, veh/h	110	1090	0	0	772	345	852	895				
Arrive On Green	0.07	0.36	0.00	0.00	0.08	0.08	0.53	0.53	0.00			
Sat Flow, veh/h	1499	3069	0	0	3300	1434	1598	1678	1422			
Grp Volume(v), veh/h	90	309	0	0	399	282	13	16	0			
Grp Sat Flow(s),veh/h/ln	1499	1495	0	0	1608	1434	1598	1678	1422			
Q Serve(g_s), s	5.3	6.6	0.0	0.0	10.7	17.4	0.3	0.4	0.0			
Cycle Q Clear(g_c), s	5.3	6.6	0.0	0.0	10.7	17.4	0.3	0.4	0.0			
Prop In Lane	1.00		0.00	0.00		1.00	1.00		1.00			
Lane Grp Cap(c), veh/h	110	1090	0	0	772	345	852	895				
V/C Ratio(X)	0.82	0.28	0.00	0.00	0.52	0.82	0.02	0.02				
Avail Cap(c_a), veh/h	157	1376	0	0	979	437	852	895				
HCM Platoon Ratio	1.00	1.00	1.00	1.00	0.33	0.33	1.00	1.00	1.00			
Upstream Filter(I)	0.66	0.66	0.00	0.00	0.95	0.95	1.00	1.00	0.00			
Uniform Delay (d), s/veh	41.1	20.3	0.0	0.0	36.4	39.5	9.9	9.9	0.0			
Incr Delay (d2), s/veh	12.4	0.1	0.0	0.0	0.5	8.7	0.0	0.0	0.0			
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	2.3	2.3	0.0	0.0	4.6	7.5	0.1	0.2	0.0			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	53.5	20.4	0.0	0.0	36.9	48.2	9.9	9.9	0.0			
LnGrp LOS	D	C	A	A	D	D	A	A				
Approach Vol, veh/h	399			681			29					
Approach Delay, s/veh	27.8			41.6			9.9					
Approach LOS	C			D			A					
Timer - Assigned Phs	2			4			7			8		
Phs Duration (G+Y+Rc), s	52.6			37.4			11.2			26.2		
Change Period (Y+Rc), s	4.6			4.6			4.6			4.6		
Max Green Setting (Gmax), s	39.4			41.4			9.4			27.4		
Max Q Clear Time (g_c+l1), s	2.4			8.6			7.3			19.4		
Green Ext Time (p_c), s	0.1			2.0			0.0			2.2		

Intersection Summary

HCM 6th Ctrl Delay 35.8

HCM 6th LOS D

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR] is excluded from calculations of the approach delay and intersection delay.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Summer Comp Plan Update

5: 136th Avenue E & 24th Street E

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	115	345	75	35	355	60	70	20	60	210	20	220
Future Volume (veh/h)	115	345	75	35	355	60	70	20	60	210	20	220
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1604	1604	1604	1648	1648	1648	1841	1841	1841	1693	1693	1693
Adj Flow Rate, veh/h	126	379	82	38	390	66	77	22	66	231	22	242
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	20	20	20	17	17	17	4	4	4	14	14	14
Cap, veh/h	477	1220	261	434	1250	210	221	76	227	380	26	283
Arrive On Green	0.02	0.16	0.16	0.04	0.47	0.47	0.06	0.19	0.19	0.08	0.21	0.21
Sat Flow, veh/h	1527	2496	534	1570	2682	450	1753	404	1213	1612	121	1328
Grp Volume(v), veh/h	126	230	231	38	226	230	77	0	88	231	0	264
Grp Sat Flow(s),veh/h/ln	1527	1523	1507	1570	1566	1566	1753	0	1618	1612	0	1449
Q Serve(g_s), s	3.8	12.0	12.2	1.1	8.1	8.3	3.1	0.0	4.2	7.5	0.0	15.8
Cycle Q Clear(g_c), s	3.8	12.0	12.2	1.1	8.1	8.3	3.1	0.0	4.2	7.5	0.0	15.8
Prop In Lane	1.00		0.35	1.00		0.29	1.00		0.75	1.00		0.92
Lane Grp Cap(c), veh/h	477	745	737	434	730	730	221	0	302	380	0	309
V/C Ratio(X)	0.26	0.31	0.31	0.09	0.31	0.31	0.35	0.00	0.29	0.61	0.00	0.85
Avail Cap(c_a), veh/h	558	745	737	501	730	730	268	0	530	380	0	475
HCM Platoon Ratio	0.33	0.33	0.33	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.96	0.96	0.96	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	11.8	24.3	24.4	11.8	15.0	15.0	28.0	0.0	31.5	29.5	0.0	34.1
Incr Delay (d2), s/veh	0.1	1.0	1.1	0.0	1.1	1.1	0.3	0.0	0.2	2.0	0.0	5.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.3	5.1	5.1	0.4	3.0	3.0	1.3	0.0	1.6	1.4	0.0	5.9
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	11.9	25.3	25.5	11.8	16.1	16.2	28.3	0.0	31.7	31.5	0.0	39.8
LnGrp LOS	B	C	C	B	B	B	C	A	C	C	A	D
Approach Vol, veh/h	587			494			165			495		
Approach Delay, s/veh	22.5			15.8			30.1			35.9		
Approach LOS	C			B			C			D		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	10.2	46.4	12.0	21.3	8.2	48.5	9.6	23.7				
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5				
Max Green Setting (Gmax), s	10.5	24.5	7.5	29.5	7.5	27.5	7.5	29.5				
Max Q Clear Time (g_c+I1), s	5.8	10.3	9.5	6.2	3.1	14.2	5.1	17.8				
Green Ext Time (p_c), s	0.1	3.2	0.0	0.3	0.0	3.2	0.0	0.9				
Intersection Summary												
HCM 6th Ctrl Delay	25.1											
HCM 6th LOS	C											
Notes												

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
6: 142nd Ave E & 24th St E

Sumner Comp Plan Update
Existing PM Peak Hour

Intersection						
Int Delay, s/veh	0.7					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	↔↔		↔		↔	↔↔
Traffic Vol, veh/h	15	25	390	15	35	750
Future Vol, veh/h	15	25	390	15	35	750
Conflicting Peds, #/hr	1	0	0	1	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	70	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	34	34	23	23	18	18
Mvmt Flow	16	27	424	16	38	815
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	918	433	0	0	441	0
Stage 1	433	-	-	-	-	-
Stage 2	485	-	-	-	-	-
Critical Hdwy	7.11	6.71	-	-	4.37	-
Critical Hdwy Stg 1	5.91	-	-	-	-	-
Critical Hdwy Stg 2	6.31	-	-	-	-	-
Follow-up Hdwy	3.823	3.623	-	-	2.371	-
Pot Cap-1 Maneuver	241	547	-	-	1024	-
Stage 1	577	-	-	-	-	-
Stage 2	515	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	232	547	-	-	1023	-
Mov Cap-2 Maneuver	348	-	-	-	-	-
Stage 1	576	-	-	-	-	-
Stage 2	495	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	13.9	0	0.4			
HCM LOS	B					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	450	1023	-	
HCM Lane V/C Ratio	-	-	0.097	0.037	-	
HCM Control Delay (s)	-	-	13.9	8.7	-	
HCM Lane LOS	-	-	B	A	-	
HCM 95th %tile Q(veh)	-	-	0.3	0.1	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

7: E Valley Highway E & Forest Canyon Road E

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	23											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	5	40	0	55	5	230	135	395	660	0
Future Vol, veh/h	0	0	5	40	0	55	5	230	135	395	660	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	55	-	-	65	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	91	91	91	91	91	91	91	91	91	91	91	91
Heavy Vehicles, %	0	0	0	6	6	6	2	2	2	3	3	3
Mvmt Flow	0	0	5	44	0	60	5	253	148	434	725	0
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	1960	2004	725	1933	1930	327	725	0	0	401	0	0
Stage 1	1593	1593	-	337	337	-	-	-	-	-	-	-
Stage 2	367	411	-	1596	1593	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.16	6.56	6.26	4.12	-	-	4.13	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.554	4.054	3.354	2.218	-	-	2.227	-	-
Pot Cap-1 Maneuver	48	60	428	49	65	705	878	-	-	1152	-	-
Stage 1	136	168	-	669	634	-	-	-	-	-	-	-
Stage 2	657	598	-	131	163	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	31	37	428	~ 34	40	705	878	-	-	1152	-	-
Mov Cap-2 Maneuver	31	37	-	~ 34	40	-	-	-	-	-	-	-
Stage 1	135	105	-	665	630	-	-	-	-	-	-	-
Stage 2	597	594	-	81	102	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	13.5		\$ 327.1		0.1		3.7					
HCM LOS	B		F									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1WBLn1	SBL	SBT	SBR					
Capacity (veh/h)	878	-	-	428	76	1152	-	-				
HCM Lane V/C Ratio	0.006	-	-	0.013	1.374	0.377	-	-				
HCM Control Delay (s)	9.1	-	-	13.5	\$ 327.1	10	-	-				
HCM Lane LOS	A	-	-	B	F	B	-	-				
HCM 95th %tile Q(veh)	0	-	-	0	8.3	1.8	-	-				
Notes												
~: Volume exceeds capacity		\$: Delay exceeds 300s		+: Computation Not Defined				*: All major volume in platoon				

Synchro 11 Report

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary 8: W Valley Highway E & SR-167 SB Ramps

Sumner Comp Plan Update
Existing PM Peak Hour

						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Volume (veh/h)	35	60	190	55	530	365
Future Volume (veh/h)	35	60	190	55	530	365
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No			No
Adj Sat Flow, veh/h/ln	1411	1411	1648	1648	1767	1767
Adj Flow Rate, veh/h	37	64	202	59	564	388
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	33	33	17	17	9	9
Cap, veh/h	128	200	533	151	639	0
Arrive On Green	0.09	0.09	0.22	0.22	0.38	0.00
Sat Flow, veh/h	1344	2104	2476	678	1682	564
Grp Volume(v), veh/h	37	64	130	131	564	19.5
Grp Sat Flow(s),veh/h/ln	1344	1052	1566	1506	1682	B
Q Serve(g_s), s	1.2	1.3	3.2	3.4	14.3	
Cycle Q Clear(g_c), s	1.2	1.3	3.2	3.4	14.3	
Prop In Lane	1.00	1.00		0.45	1.00	
Lane Grp Cap(c), veh/h	128	200	349	336	639	
V/C Ratio(X)	0.29	0.32	0.37	0.39	0.88	
Avail Cap(c_a), veh/h	454	710	1215	1169	937	
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	
Uniform Delay (d), s/veh	19.2	19.3	15.0	15.1	13.2	
Incr Delay (d2), s/veh	1.1	0.8	0.6	0.7	6.3	
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	
%ile BackOfQ(50%),veh/ln	0.4	0.3	1.0	1.1	5.3	
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	20.3	20.1	15.6	15.8	19.5	
LnGrp LOS	C	C	B	B	B	
Approach Vol, veh/h	101		261			
Approach Delay, s/veh	20.2		15.7			
Approach LOS	C		B			
Timer - Assigned Phs	1	2			8	
Phs Duration (G+Y+Rc), s	21.9	14.8			8.9	
Change Period (Y+Rc), s	4.6	4.6			4.6	
Max Green Setting (Gmax), s	25.4	35.4			15.4	
Max Q Clear Time (g_c+I1), s	16.3	5.4			3.3	
Green Ext Time (p_c), s	1.1	1.5			0.2	
Intersection Summary						
HCM 6th Ctrl Delay			18.5			
HCM 6th LOS			B			

Notes

Unsignalized Delay for [SBT] is excluded from calculations of the approach delay and intersection delay.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

9: 142nd Ave E & Costco Access

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	5	0	15	5	0	5	5	280	5	0	610	5
Future Volume (veh/h)	5	0	15	5	0	5	5	280	5	0	610	5
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		1.00	1.00		0.99	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	477	477	477	1900	1900	1900	1722	1722	1722	1781	1781	1781
Adj Flow Rate, veh/h	5	0	16	5	0	5	5	295	5	0	642	5
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	96	96	96	0	0	0	12	12	12	8	8	8
Cap, veh/h	355	0	14	343	0	57	530	1919	32	749	1332	10
Arrive On Green	0.04	0.00	0.04	0.04	0.00	0.04	0.01	0.58	0.58	0.00	0.39	0.39
Sat Flow, veh/h	357	0	404	1419	0	1586	1640	3292	56	1697	3442	27
Grp Volume(v), veh/h	5	0	16	5	0	5	5	146	154	0	316	331
Grp Sat Flow(s),veh/h/ln	357	0	404	1419	0	1586	1640	1636	1712	1697	1692	1776
Q Serve(g_s), s	0.3	0.0	0.8	0.0	0.0	0.1	0.0	0.9	0.9	0.0	2.9	3.0
Cycle Q Clear(g_c), s	0.4	0.0	0.8	0.8	0.0	0.1	0.0	0.9	0.9	0.0	2.9	3.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.03	1.00		0.02
Lane Grp Cap(c), veh/h	355	0	14	343	0	57	530	954	998	749	655	687
V/C Ratio(X)	0.01	0.00	1.11	0.01	0.00	0.09	0.01	0.15	0.15	0.00	0.48	0.48
Avail Cap(c_a), veh/h	614	0	308	1374	0	1210	833	1247	1305	1064	1290	1354
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00
Uniform Delay (d), s/veh	10.0	0.0	10.1	10.5	0.0	9.8	3.4	2.0	2.0	0.0	4.8	4.8
Incr Delay (d2), s/veh	0.0	0.0	141.7	0.0	0.0	0.7	0.0	0.1	0.1	0.0	0.6	0.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	10.0	0.0	151.8	10.5	0.0	10.4	3.4	2.1	2.1	0.0	5.4	5.4
LnGrp LOS	A	A	F	B	A	B	A	A	A	A	A	A
Approach Vol, veh/h	21			10			305			647		
Approach Delay, s/veh	118.0			10.5			2.1			5.4		
Approach LOS	F			B			A			A		
Timer - Assigned Phs	2		3	4		6		7	8			
Phs Duration (G+Y+Rc), s	4.8		0.0	16.2		4.8		4.1	12.1			
Change Period (Y+Rc), s	4.0		4.0	4.0		4.0		4.0	4.0			
Max Green Setting (Gmax), s	16.0		4.0	16.0		16.0		4.0	16.0			
Max Q Clear Time (g_c+I1), s	2.8		0.0	2.9		2.8		2.0	5.0			
Green Ext Time (p_c), s	0.0		0.0	1.4		0.1		0.0	3.0			
Intersection Summary												
HCM 6th Ctrl Delay	6.8											
HCM 6th LOS	A											

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

10: W Valley Highway E & 42nd Street E

Existing PM Peak Hour

Intersection						
Int Delay, s/veh	1.4					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	Y		↑	↑	↑	↑
Traffic Vol, veh/h	25	40	125	10	15	385
Future Vol, veh/h	25	40	125	10	15	385
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	100	200	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	95	95	95	95	95	95
Heavy Vehicles, %	20	20	29	29	11	11
Mvmt Flow	26	42	132	11	16	405
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	569	132	0	0	143	0
Stage 1	132	-	-	-	-	-
Stage 2	437	-	-	-	-	-
Critical Hdwy	6.6	6.4	-	-	4.21	-
Critical Hdwy Stg 1	5.6	-	-	-	-	-
Critical Hdwy Stg 2	5.6	-	-	-	-	-
Follow-up Hdwy	3.68	3.48	-	-	2.299	-
Pot Cap-1 Maneuver	455	871	-	-	1386	-
Stage 1	852	-	-	-	-	-
Stage 2	615	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	450	871	-	-	1386	-
Mov Cap-2 Maneuver	450	-	-	-	-	-
Stage 1	852	-	-	-	-	-
Stage 2	608	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	11.3	0	0.3			
HCM LOS	B					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	641	1386	-	
HCM Lane V/C Ratio	-	-	0.107	0.011	-	
HCM Control Delay (s)	-	-	11.3	7.6	-	
HCM Lane LOS	-	-	B	A	-	
HCM 95th %tile Q(veh)	-	-	0.4	0	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
11: Tacoma Ave & 142nd Ave E

Sumner Comp Plan Update
Existing PM Peak Hour

Intersection						
Int Delay, s/veh	0.4					
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	10	5	20	275	345	405
Future Vol, veh/h	10	5	20	275	345	405
Conflicting Peds, #/hr	1	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	0	170	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	46	46	22	22	12	12
Mvmt Flow	11	5	22	299	375	440
Major/Minor	Minor2	Major1		Major2		
Conflicting Flow All	570	375	815	0	-	0
Stage 1	375	-	-	-	-	-
Stage 2	195	-	-	-	-	-
Critical Hdwy	7.29	6.89	4.43	-	-	-
Critical Hdwy Stg 1	6.09	-	-	-	-	-
Critical Hdwy Stg 2	6.49	-	-	-	-	-
Follow-up Hdwy	3.937	3.737	2.409	-	-	-
Pot Cap-1 Maneuver	387	567	711	-	-	-
Stage 1	591	-	-	-	-	-
Stage 2	714	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	375	567	711	-	-	-
Mov Cap-2 Maneuver	456	-	-	-	-	-
Stage 1	573	-	-	-	-	-
Stage 2	714	-	-	-	-	-
Approach	EB	NB		SB		
HCM Control Delay, s	12.5	0.7		0		
HCM LOS	B					
Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	711	-	456	567	-	-
HCM Lane V/C Ratio	0.031	-	0.024	0.01	-	-
HCM Control Delay (s)	10.2	-	13.1	11.4	-	-
HCM Lane LOS	B	-	B	B	-	-
HCM 95th %tile Q(veh)	0.1	-	0.1	0	-	-

Appendix B LOS Summary and Worksheets

HCM 6th AWSC
12: Puyallup St & Tacoma Ave

Sumner Comp Plan Update
Existing PM Peak Hour

Intersection	
Intersection Delay, s/veh	18.9
Intersection LOS	C

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Vol, veh/h	130	50	95	115	335	135
Future Vol, veh/h	130	50	95	115	335	135
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	25	25	22	22	12	12
Mvmt Flow	143	55	104	126	368	148
Number of Lanes	0	1	1	0	1	0

Approach	EB	WB	SB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left	SB		WB
Conflicting Lanes Left	1	0	1
Conflicting Approach Right		SB	EB
Conflicting Lanes Right	0	1	1
HCM Control Delay	12.9	12.3	24.1
HCM LOS	B	B	C

Lane	EBLn1	WBLn1	SBLn1
Vol Left, %	72%	0%	71%
Vol Thru, %	28%	45%	0%
Vol Right, %	0%	55%	29%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	180	210	470
LT Vol	130	0	335
Through Vol	50	95	0
RT Vol	0	115	135
Lane Flow Rate	198	231	516
Geometry Grp	1	1	1
Degree of Util (X)	0.351	0.373	0.77
Departure Headway (Hd)	6.381	5.823	5.365
Convergence, Y/N	Yes	Yes	Yes
Cap	562	616	677
Service Time	4.432	3.873	3.401
HCM Lane V/C Ratio	0.352	0.375	0.762
HCM Control Delay	12.9	12.3	24.1
HCM Lane LOS	B	B	C
HCM 95th-tile Q	1.6	1.7	7.3

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

13: E Valley Highway E & Puyallup Street

Existing PM Peak Hour



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	80	285	100	300	665	70
Future Volume (vph)	80	285	100	300	665	70
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00
Frpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	0.85	1.00	1.00	1.00	0.85
Flt Protected	0.95	1.00	0.95	1.00	1.00	1.00
Satd. Flow (prot)	1787	1599	1769	1863	1845	1534
Flt Permitted	0.95	1.00	0.24	1.00	1.00	1.00
Satd. Flow (perm)	1787	1599	445	1863	1845	1534
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	82	294	103	309	686	72
RTOR Reduction (vph)	0	262	0	0	0	7
Lane Group Flow (vph)	82	32	103	309	686	65
Confl. Peds. (#/hr)	2		1			1
Heavy Vehicles (%)	1%	1%	2%	2%	3%	3%
Turn Type	Prot	Perm	pm+pt	NA	NA	Perm
Protected Phases	6		7	4	8	
Permitted Phases		6	4			8
Actuated Green, G (s)	8.5	8.5	58.5	58.5	44.3	44.3
Effective Green, g (s)	8.5	8.5	58.5	58.5	44.3	44.3
Actuated g/C Ratio	0.11	0.11	0.76	0.76	0.58	0.58
Clearance Time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.5	2.5	2.5	2.5	2.5	2.5
Lane Grp Cap (vph)	197	176	496	1415	1061	882
v/s Ratio Prot	c0.05		0.02	c0.17	c0.37	
v/s Ratio Perm		0.02	0.13			0.04
v/c Ratio	0.42	0.18	0.21	0.22	0.65	0.07
Uniform Delay, d1	31.9	31.1	5.4	2.7	11.1	7.2
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	1.0	0.4	0.2	0.1	1.2	0.0
Delay (s)	33.0	31.5	5.6	2.7	12.3	7.3
Level of Service	C	C	A	A	B	A
Approach Delay (s)	31.8			3.4	11.8	
Approach LOS	C			A	B	

Intersection Summary

HCM 2000 Control Delay	14.4	HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio	0.58		
Actuated Cycle Length (s)	77.0	Sum of lost time (s)	17.0
Intersection Capacity Utilization	61.0%	ICU Level of Service	B
Analysis Period (min)	15		

c Critical Lane Group

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

14: Elm Street E & E Valley Highway E

Existing PM Peak Hour

Intersection						
Int Delay, s/veh	2.9					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	320	80	270	650	25	80
Future Vol, veh/h	320	80	270	650	25	80
Conflicting Peds, #/hr	0	0	0	0	1	7
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	100	-	45	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	2	2	2	2	0	0
Mvmt Flow	333	83	281	677	26	83
Major/Minor	Major1	Major2		Minor1		
Conflicting Flow All	0	0	416	0	1615	382
Stage 1	-	-	-	-	375	-
Stage 2	-	-	-	-	1240	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1143	-	115	670
Stage 1	-	-	-	-	699	-
Stage 2	-	-	-	-	276	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1143	-	87	666
Mov Cap-2 Maneuver	-	-	-	-	172	-
Stage 1	-	-	-	-	699	-
Stage 2	-	-	-	-	208	-
Approach	EB	WB		NB		
HCM Control Delay, s	0	2.7		15.6		
HCM LOS	C					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	172	666	-	-	1143	-
HCM Lane V/C Ratio	0.151	0.125	-	-	0.246	-
HCM Control Delay (s)	29.6	11.2	-	-	9.2	-
HCM Lane LOS	D	B	-	-	A	-
HCM 95th %tile Q(veh)	0.5	0.4	-	-	1	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
15: Valley Avenue & Elm Street E

Sumner Comp Plan Update
Existing PM Peak Hour

Intersection						
Int Delay, s/veh	6.4					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	190	25	465	210	20	210
Future Vol, veh/h	190	25	465	210	20	210
Conflicting Peds, #/hr	0	1	1	0	2	1
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	275	-	100	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	1	1	1	1	1	1
Mvmt Flow	198	26	484	219	21	219
Major/Minor	Major1	Major2		Minor1		
Conflicting Flow All	0	0	225	0	1401	213
Stage 1	-	-	-	-	212	-
Stage 2	-	-	-	-	1189	-
Critical Hdwy	-	-	4.11	-	6.41	6.21
Critical Hdwy Stg 1	-	-	-	-	5.41	-
Critical Hdwy Stg 2	-	-	-	-	5.41	-
Follow-up Hdwy	-	-	2.209	-	3.509	3.309
Pot Cap-1 Maneuver	-	-	1350	-	155	830
Stage 1	-	-	-	-	826	-
Stage 2	-	-	-	-	290	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1349	-	99	829
Mov Cap-2 Maneuver	-	-	-	-	161	-
Stage 1	-	-	-	-	825	-
Stage 2	-	-	-	-	186	-
Approach	EB	WB		NB		
HCM Control Delay, s	0	6.3		12.6		
HCM LOS	B					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	161	829	-	-	1349	-
HCM Lane V/C Ratio	0.129	0.264	-	-	0.359	-
HCM Control Delay (s)	30.7	10.9	-	-	9.2	-
HCM Lane LOS	D	B	-	-	A	-
HCM 95th %tile Q(veh)	0.4	1.1	-	-	1.7	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
16: Fryar Avenue & Zehnder Avenue

Sumner Comp Plan Update
Existing PM Peak Hour

Intersection						
Int Delay, s/veh	2.9					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	120	5	215	185	70	500
Future Vol, veh/h	120	5	215	185	70	500
Conflicting Peds, #/hr	0	1	0	2	2	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	100	-
Veh in Median Storage, #	1	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	3	3	10	10	7	7
Mvmt Flow	130	5	234	201	76	543
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	1032	338	0	0	437	0
Stage 1	337	-	-	-	-	-
Stage 2	695	-	-	-	-	-
Critical Hdwy	6.43	6.23	-	-	4.17	-
Critical Hdwy Stg 1	5.43	-	-	-	-	-
Critical Hdwy Stg 2	5.43	-	-	-	-	-
Follow-up Hdwy	3.527	3.327	-	-	2.263	-
Pot Cap-1 Maneuver	257	702	-	-	1097	-
Stage 1	721	-	-	-	-	-
Stage 2	493	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	239	700	-	-	1095	-
Mov Cap-2 Maneuver	356	-	-	-	-	-
Stage 1	720	-	-	-	-	-
Stage 2	459	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	20.7	0	1			
HCM LOS	C					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	363	1095	-	
HCM Lane V/C Ratio	-	-	0.374	0.069	-	
HCM Control Delay (s)	-	-	20.7	8.5	-	
HCM Lane LOS	-	-	C	A	-	
HCM 95th %tile Q(veh)	-	-	1.7	0.2	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

17: Parker Road E & Washington Street

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	2.7											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↔			↔			↔			↔	
Traffic Vol, veh/h	15	15	10	5	5	5	5	45	5	10	115	10
Future Vol, veh/h	15	15	10	5	5	5	5	45	5	10	115	10
Conflicting Peds, #/hr	4	0	4	4	0	4	3	0	1	1	0	3
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	89	89	89	89	89	89	89	89	89	89	89	89
Heavy Vehicles, %	0	0	0	0	0	0	4	4	4	2	2	2
Mvmt Flow	17	17	11	6	6	6	6	51	6	11	129	11

Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	236	230	142	242	232	59	143	0	0	58	0	0
Stage 1	160	160	-	67	67	-	-	-	-	-	-	-
Stage 2	76	70	-	175	165	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.1	6.5	6.2	4.14	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.5	4	3.3	2.236	-	-	2.218	-	-
Pot Cap-1 Maneuver	723	673	911	716	672	1012	1427	-	-	1546	-	-
Stage 1	847	769	-	948	843	-	-	-	-	-	-	-
Stage 2	938	841	-	832	766	-	-	-	-	-	-	-
Platoon blocked, %								-	-	-	-	-
Mov Cap-1 Maneuver	703	663	906	684	662	1008	1423	-	-	1545	-	-
Mov Cap-2 Maneuver	703	663	-	684	662	-	-	-	-	-	-	-
Stage 1	842	761	-	943	839	-	-	-	-	-	-	-
Stage 2	920	837	-	794	758	-	-	-	-	-	-	-

Approach	EB		WB		NB		SB	
HCM Control Delay, s	10.3		9.9		0.7		0.5	
HCM LOS	B		A					

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1423	-	-	727	757	1545	-
HCM Lane V/C Ratio	0.004	-	-	0.062	0.022	0.007	-
HCM Control Delay (s)	7.5	0	-	10.3	9.9	7.3	0
HCM Lane LOS	A	A	-	B	A	A	A
HCM 95th %tile Q(veh)	0	-	-	0.2	0.1	0	-

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis
18: W Valley Highway E & Sumner-Heights Drive E

Sumner Comp Plan Update
Existing PM Peak Hour

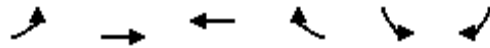
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	W	W	T	T	L	L
Traffic Volume (vph)	125	90	10	135	445	15
Future Volume (vph)	125	90	10	135	445	15
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0		5.0		3.5	5.0
Lane Util. Factor	1.00		1.00		1.00	1.00
Frpb, ped/bikes	0.99		0.98		1.00	1.00
Flpb, ped/bikes	1.00		1.00		1.00	1.00
Frt	0.94		0.87		1.00	1.00
Flt Protected	0.97		1.00		0.95	1.00
Satd. Flow (prot)	1487		1612		1626	1712
Flt Permitted	0.97		1.00		0.66	1.00
Satd. Flow (perm)	1487		1612		1121	1712
Peak-hour factor, PHF	0.90	0.90	0.90	0.90	0.90	0.90
Adj. Flow (vph)	139	100	11	150	494	17
RTOR Reduction (vph)	0	0	100	0	0	0
Lane Group Flow (vph)	239	0	61	0	494	17
Confl. Bikes (#/hr)		2		1		
Heavy Vehicles (%)	16%	16%	1%	1%	11%	11%
Turn Type	Perm		NA		pm+pt	NA
Protected Phases			4		1	8
Permitted Phases	2				8	
Actuated Green, G (s)	19.9		26.4		34.3	15.2
Effective Green, g (s)	19.9		26.4		34.3	15.2
Actuated g/C Ratio	0.25		0.33		0.43	0.19
Clearance Time (s)	5.0		5.0		3.5	5.0
Vehicle Extension (s)	3.0		3.0		3.0	3.0
Lane Grp Cap (vph)	375		539		609	329
v/s Ratio Prot			c0.04		c0.20	0.01
v/s Ratio Perm	c0.16				c0.16	
v/c Ratio	0.64		0.11		0.81	0.05
Uniform Delay, d1	26.3		18.2		18.8	26.0
Progression Factor	1.36		1.00		1.00	1.00
Incremental Delay, d2	3.5		0.1		8.1	0.1
Delay (s)	39.3		18.3		26.8	26.0
Level of Service	D		B		C	C
Approach Delay (s)	39.3		18.3			26.8
Approach LOS	D		B			C
Intersection Summary						
HCM 2000 Control Delay			28.6		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.67			
Actuated Cycle Length (s)			78.9		Sum of lost time (s)	17.0
Intersection Capacity Utilization			57.6%		ICU Level of Service	B
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis 19: Valley Avenue E & Sumner-Heights Drive E

Sumner Comp Plan Update

Existing PM Peak Hour



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (vph)	65	230	175	145	325	240
Future Volume (vph)	65	230	175	145	325	240
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	3.5	5.0	5.0	5.0	5.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	
Frpb, ped/bikes	1.00	1.00	1.00	0.98	0.99	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	1.00	0.85	0.94	
Flt Protected	0.95	1.00	1.00	1.00	0.97	
Satd. Flow (prot)	1654	1743	1881	1561	1598	
Flt Permitted	0.44	1.00	1.00	1.00	0.97	
Satd. Flow (perm)	767	1743	1881	1561	1598	
Peak-hour factor, PHF	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	69	245	186	154	346	255
RTOR Reduction (vph)	0	0	0	124	0	0
Lane Group Flow (vph)	69	245	186	30	601	0
Confl. Peds. (#/hr)	2			2		1
Heavy Vehicles (%)	9%	9%	1%	1%	8%	8%
Turn Type	pm+pt	NA	NA	Perm	Perm	
Protected Phases	7	4	8			
Permitted Phases	4			8	6	
Actuated Green, G (s)	26.4	26.4	15.2	15.2	42.5	
Effective Green, g (s)	26.4	26.4	15.2	15.2	42.5	
Actuated g/C Ratio	0.33	0.33	0.19	0.19	0.54	
Clearance Time (s)	3.5	5.0	5.0	5.0	5.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	343	583	362	300	860	
v/s Ratio Prot	0.02	c0.14	c0.10			
v/s Ratio Perm	0.05			0.02	c0.38	
v/c Ratio	0.20	0.42	0.51	0.10	0.70	
Uniform Delay, d1	18.5	20.3	28.5	26.2	13.5	
Progression Factor	1.00	1.00	1.00	1.00	1.03	
Incremental Delay, d2	0.3	0.5	1.2	0.1	2.3	
Delay (s)	18.7	20.8	29.8	26.4	16.3	
Level of Service	B	C	C	C	B	
Approach Delay (s)		20.4	28.2		16.3	
Approach LOS		C	C		B	
Intersection Summary						
HCM 2000 Control Delay			20.5		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.66			
Actuated Cycle Length (s)			78.9		Sum of lost time (s)	17.0
Intersection Capacity Utilization			62.5%		ICU Level of Service	B
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Summer Comp Plan Update

20: Traffic Avenue/Fryar Avenue & Cannery Way/Main Street

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	105	205	290	140	125	25	115	245	115	40	580	95
Future Volume (veh/h)	105	205	290	140	125	25	115	245	115	40	580	95
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		0.98	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1885	1885	1885	1811	1811	1811	1826	1826	1826
Adj Flow Rate, veh/h	115	225	319	154	137	27	126	269	126	44	637	104
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	1	1	1	1	1	1	6	6	6	5	5	5
Cap, veh/h	556	450	378	475	368	73	283	322	267	408	739	120
Arrive On Green	0.16	0.24	0.24	0.17	0.24	0.24	0.16	0.18	0.18	0.23	0.25	0.25
Sat Flow, veh/h	1795	1885	1584	1795	1525	301	1725	1811	1505	1739	2979	486
Grp Volume(v), veh/h	115	225	319	154	0	164	126	269	126	44	370	371
Grp Sat Flow(s),veh/h/ln	1795	1885	1584	1795	0	1826	1725	1811	1505	1739	1735	1730
Q Serve(g_s), s	4.9	12.4	23.0	6.7	0.0	9.0	7.9	17.2	6.2	2.4	24.5	24.6
Cycle Q Clear(g_c), s	4.9	12.4	23.0	6.7	0.0	9.0	7.9	17.2	6.2	2.4	24.5	24.6
Prop In Lane	1.00		1.00	1.00		0.16	1.00		1.00	1.00		0.28
Lane Grp Cap(c), veh/h	556	450	378	475	0	440	283	322	267	408	430	429
V/C Ratio(X)	0.21	0.50	0.84	0.32	0.00	0.37	0.44	0.84	0.47	0.11	0.86	0.86
Avail Cap(c_a), veh/h	779	699	587	694	0	677	496	823	683	500	788	786
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	23.3	39.5	43.6	24.1	0.0	37.9	45.2	47.6	20.9	36.0	43.1	43.2
Incr Delay (d2), s/veh	0.2	0.9	6.7	0.4	0.0	0.5	1.1	5.7	1.3	0.1	5.2	5.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	5.9	9.6	2.9	0.0	4.1	3.4	8.2	3.3	1.0	11.0	11.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	23.5	40.4	50.2	24.5	0.0	38.5	46.3	53.4	22.2	36.2	48.3	48.4
LnGrp LOS	C	D	D	C	A	D	D	D	C	D	D	D
Approach Vol, veh/h	659			318			521			785		
Approach Delay, s/veh	42.2			31.7			44.1			47.7		
Approach LOS	D			C			D			D		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	25.1	34.4	33.7	26.8	25.4	34.1	25.2	35.3				
Change Period (Y+Rc), s	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5				
Max Green Setting (Gmax), s	34.5	44.5	34.5	54.5	34.5	44.5	34.5	54.5				
Max Q Clear Time (g_c+I1), s	6.9	11.0	4.4	19.2	8.7	25.0	9.9	26.6				
Green Ext Time (p_c), s	0.4	0.7	0.1	1.6	0.6	2.4	0.3	3.2				
Intersection Summary												
HCM 6th Ctrl Delay	43.1											
HCM 6th LOS	D											

Synchro 11 Report

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

Summer Comp Plan Update

21: Alder Avenue & Main Street

Existing PM Peak Hour

Intersection

Intersection Delay, s/veh 11.1

Intersection LOS B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	330	45	75	250	25	25
Future Vol, veh/h	330	45	75	250	25	25
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93
Heavy Vehicles, %	0	0	2	2	0	0
Mvmt Flow	355	48	81	269	27	27
Number of Lanes	1	0	0	1	1	0

Approach	EB	WB	NB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left		NB	EB
Conflicting Lanes Left	0	1	1
Conflicting Approach Right	NB		WB
Conflicting Lanes Right	1	0	1
HCM Control Delay	11.4	11.1	8.8
HCM LOS	B	B	A

Lane	NBLn1	EBLn1	WBLn1
Vol Left, %	50%	0%	23%
Vol Thru, %	0%	88%	77%
Vol Right, %	50%	12%	0%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	50	375	325
LT Vol	25	0	75
Through Vol	0	330	250
RT Vol	25	45	0
Lane Flow Rate	54	403	349
Geometry Grp	1	1	1
Degree of Util (X)	0.079	0.486	0.44
Departure Headway (Hd)	5.307	4.341	4.532
Convergence, Y/N	Yes	Yes	Yes
Cap	673	831	797
Service Time	3.359	2.364	2.557
HCM Lane V/C Ratio	0.08	0.485	0.438
HCM Control Delay	8.8	11.4	11.1
HCM Lane LOS	A	B	B
HCM 95th-tile Q	0.3	2.7	2.3

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

22: Ryan Ave & Main Street

Existing PM Peak Hour

Intersection						
Int Delay, s/veh	0.5					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	340	10	10	295	5	15
Future Vol, veh/h	340	10	10	295	5	15
Conflicting Peds, #/hr	0	20	20	0	0	2
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	93	93	93	93	93	93
Heavy Vehicles, %	1	1	2	2	0	0
Mvmt Flow	366	11	11	317	5	16
Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	397	0	731	394
Stage 1	-	-	-	-	392	-
Stage 2	-	-	-	-	339	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1162	-	392	659
Stage 1	-	-	-	-	687	-
Stage 2	-	-	-	-	726	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1143	-	381	647
Mov Cap-2 Maneuver	-	-	-	-	381	-
Stage 1	-	-	-	-	675	-
Stage 2	-	-	-	-	717	-
Approach	EB		WB		NB	
HCM Control Delay, s	0		0.3		11.8	
HCM LOS	B					
Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT	
Capacity (veh/h)	551	-	-	1143	-	
HCM Lane V/C Ratio	0.039	-	-	0.009	-	
HCM Control Delay (s)	11.8	-	-	8.2	0	
HCM Lane LOS	B	-	-	A	A	
HCM 95th %tile Q(veh)	0.1	-	-	0	-	

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

23: Wood Avenue & Main Street

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	45	285	35	10	185	35	10	35	15	60	160	105
Future Volume (veh/h)	45	285	35	10	185	35	10	35	15	60	160	105
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.98	0.99		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1885	1885	1885	1885	1885	1885	1870	1945	1870	1900	1900	1900
Adj Flow Rate, veh/h	51	320	39	11	208	39	11	39	17	67	180	118
Peak Hour Factor	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Percent Heavy Veh, %	1	1	1	1	1	1	2	2	2	0	0	0
Cap, veh/h	174	502	57	132	513	93	169	369	137	201	288	167
Arrive On Green	0.34	0.34	0.34	0.34	0.34	0.34	0.30	0.30	0.30	0.30	0.30	0.30
Sat Flow, veh/h	126	1474	168	28	1506	273	108	1225	453	207	956	556
Grp Volume(v), veh/h	410	0	0	258	0	0	67	0	0	365	0	0
Grp Sat Flow(s),veh/h/ln	1768	0	0	1807	0	0	1786	0	0	1718	0	0
Q Serve(g_s), s	1.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.6	0.0	0.0
Cycle Q Clear(g_c), s	5.9	0.0	0.0	3.3	0.0	0.0	0.8	0.0	0.0	5.7	0.0	0.0
Prop In Lane	0.12		0.10	0.04		0.15	0.16		0.25	0.18		0.32
Lane Grp Cap(c), veh/h	734	0	0	738	0	0	675	0	0	657	0	0
V/C Ratio(X)	0.56	0.00	0.00	0.35	0.00	0.00	0.10	0.00	0.00	0.56	0.00	0.00
Avail Cap(c_a), veh/h	1014	0	0	1027	0	0	904	0	0	888	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	0.00	1.00	0.00	0.00	1.00	0.00	0.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	8.6	0.0	0.0	7.8	0.0	0.0	7.8	0.0	0.0	9.4	0.0	0.0
Incr Delay (d2), s/veh	2.4	0.0	0.0	1.0	0.0	0.0	0.2	0.0	0.0	2.7	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.0	0.0	1.1	0.0	0.0	0.3	0.0	0.0	2.0	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	11.0	0.0	0.0	8.8	0.0	0.0	8.0	0.0	0.0	12.1	0.0	0.0
LnGrp LOS	B	A	A	A	A	A	A	A	A	B	A	A
Approach Vol, veh/h		410			258			67			365	
Approach Delay, s/veh		11.0			8.8			8.0			12.1	
Approach LOS		B			A			A			B	
Timer - Assigned Phs		2		4		6		8				
Phs Duration (G+Y+Rc), s		14.8		16.0		14.8		16.0				
Change Period (Y+Rc), s		5.5		5.5		5.5		5.5				
Max Green Setting (Gmax), s		13.5		15.5		13.5		15.5				
Max Q Clear Time (g_c+I1), s		2.8		7.9		7.7		5.3				
Green Ext Time (p_c), s		0.3		2.5		1.8		1.8				
Intersection Summary												
HCM 6th Ctrl Delay				10.7								
HCM 6th LOS				B								

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Summer Comp Plan Update

24: Valley Avenue & Main Street

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	160	255	65	185	200	45	45	265	80	60	400	50
Future Volume (veh/h)	160	255	65	185	200	45	45	265	80	60	400	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.98	0.99		0.98	0.99		0.98	0.99		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1900	1976	1900	1900	1900	1900	1961	1885	1885	1900	1976	1900
Adj Flow Rate, veh/h	168	268	68	195	211	47	47	279	84	63	421	53
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	1	1	1	0	0	0
Cap, veh/h	435	373	95	392	388	87	273	406	122	332	519	65
Arrive On Green	0.10	0.25	0.25	0.11	0.26	0.26	0.05	0.29	0.29	0.06	0.30	0.30
Sat Flow, veh/h	1810	1512	384	1810	1497	333	1867	1385	417	1810	1717	216
Grp Volume(v), veh/h	168	0	336	195	0	258	47	0	363	63	0	474
Grp Sat Flow(s),veh/h/ln	1810	0	1896	1810	0	1831	1867	0	1802	1810	0	1933
Q Serve(g_s), s	4.6	0.0	11.2	5.4	0.0	8.4	1.2	0.0	12.3	1.6	0.0	15.7
Cycle Q Clear(g_c), s	4.6	0.0	11.2	5.4	0.0	8.4	1.2	0.0	12.3	1.6	0.0	15.7
Prop In Lane	1.00		0.20	1.00		0.18	1.00		0.23	1.00		0.11
Lane Grp Cap(c), veh/h	435	0	468	392	0	475	273	0	528	332	0	584
V/C Ratio(X)	0.39	0.00	0.72	0.50	0.00	0.54	0.17	0.00	0.69	0.19	0.00	0.81
Avail Cap(c_a), veh/h	652	0	1097	586	0	1060	582	0	1043	615	0	1119
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	16.9	0.0	23.8	17.1	0.0	22.1	16.9	0.0	21.6	16.1	0.0	22.3
Incr Delay (d2), s/veh	0.6	0.0	2.1	1.0	0.0	1.0	0.3	0.0	1.6	0.3	0.0	2.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.0	5.1	2.2	0.0	3.6	0.5	0.0	5.2	0.7	0.0	7.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	17.4	0.0	25.9	18.1	0.0	23.0	17.2	0.0	23.2	16.4	0.0	25.1
LnGrp LOS	B	A	C	B	A	C	B	A	C	B	A	C
Approach Vol, veh/h	504			453			410			537		
Approach Delay, s/veh	23.1			20.9			22.6			24.0		
Approach LOS	C			C			C			C		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	12.6	22.0	9.2	25.2	11.7	22.9	8.6	25.9				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	15.0	40.0	15.0	40.0	15.0	40.0	15.0	40.0				
Max Q Clear Time (g_c+I1), s	7.4	13.2	3.6	14.3	6.6	10.4	3.2	17.7				
Green Ext Time (p_c), s	0.4	1.5	0.1	1.6	0.4	1.1	0.1	2.1				
Intersection Summary												
HCM 6th Ctrl Delay	22.7											
HCM 6th LOS	C											

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

25: Parker Road E & Main Street

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	4.9											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	30	405	40	15	255	30	30	15	5	65	40	30
Future Vol, veh/h	30	405	40	15	255	30	30	15	5	65	40	30
Conflicting Peds, #/hr	5	0	10	10	0	5	0	0	4	4	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	250	-	-	235	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	1	1	1
Mvmt Flow	31	413	41	15	260	31	31	15	5	66	41	31

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	296	0	0	464	0	0	848	832	448	821	837	281
Stage 1	-	-	-	-	-	-	506	506	-	311	311	-
Stage 2	-	-	-	-	-	-	342	326	-	510	526	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1277	-	-	1108	-	-	284	307	615	295	304	760
Stage 1	-	-	-	-	-	-	552	543	-	702	660	-
Stage 2	-	-	-	-	-	-	677	652	-	548	530	-
Platoon blocked, %	-	-	-	-	-	-	-	-	-	-	-	-
Mov Cap-1 Maneuver	1272	-	-	1099	-	-	234	292	608	271	289	757
Mov Cap-2 Maneuver	-	-	-	-	-	-	234	292	-	271	289	-
Stage 1	-	-	-	-	-	-	534	526	-	682	648	-
Stage 2	-	-	-	-	-	-	600	640	-	513	513	-

Approach	EB	WB	NB	SB
HCM Control Delay, s	0.5	0.4	21.7	24.2
HCM LOS			C	C

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	266	1272	-	-	1099	-	-	323
HCM Lane V/C Ratio	0.192	0.024	-	-	0.014	-	-	0.426
HCM Control Delay (s)	21.7	7.9	-	-	8.3	-	-	24.2
HCM Lane LOS	C	A	-	-	A	-	-	C
HCM 95th %tile Q(veh)	0.7	0.1	-	-	0	-	-	2

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

Summer Comp Plan Update

26: 160th Avenue E & Main Street E

Existing PM Peak Hour

Intersection	
Intersection Delay, s/veh	15.8
Intersection LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	15	145	320	30	225	50	75	10	5	90	100	20
Future Vol, veh/h	15	145	320	30	225	50	75	10	5	90	100	20
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	1	1	1	0	0	0	0	0	0	1	1	1
Mvmt Flow	16	159	352	33	247	55	82	11	5	99	110	22
Number of Lanes	1	1	1	1	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	2	3	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	3	2
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	2	3
HCM Control Delay	14.3	18.7	12.8	16.3
HCM LOS	B	C	B	C

Lane	NBLn1	EBLn1	EBLn2	EBLn3	WBLn1	WBLn2	SBLn1
Vol Left, %	83%	100%	0%	0%	100%	0%	43%
Vol Thru, %	11%	0%	100%	0%	0%	82%	48%
Vol Right, %	6%	0%	0%	100%	0%	18%	10%
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Stop
Traffic Vol by Lane	90	15	145	320	30	275	210
LT Vol	75	15	0	0	30	0	90
Through Vol	10	0	145	0	0	225	100
RT Vol	5	0	0	320	0	50	20
Lane Flow Rate	99	16	159	352	33	302	231
Geometry Grp	7	7	7	7	8	8	7
Degree of Util (X)	0.217	0.032	0.287	0.564	0.07	0.59	0.467
Departure Headway (Hd)	7.889	6.994	6.483	5.769	7.672	7.029	7.287
Convergence, Y/N	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Cap	455	515	558	629	467	514	494
Service Time	5.642	4.694	4.183	3.469	5.422	4.778	5.031
HCM Lane V/C Ratio	0.218	0.031	0.285	0.56	0.071	0.588	0.468
HCM Control Delay	12.8	9.9	11.8	15.7	11	19.5	16.3
HCM Lane LOS	B	A	B	C	B	C	C
HCM 95th-tile Q	0.8	0.1	1.2	3.5	0.2	3.8	2.4

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

27: Sumner-Tapps Highway E & 60th Street E

Existing PM Peak Hour

Intersection						
Int Delay, s/veh	4.5					
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations		↗	↘	↑	↗	
Traffic Vol, veh/h	0	275	180	535	455	105
Future Vol, veh/h	0	275	180	535	455	105
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	-	0	0	-	-	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	94	94	94	94	94	94
Heavy Vehicles, %	0	0	1	1	2	2
Mvmt Flow	0	293	191	569	484	112
Major/Minor	Minor2	Major1		Major2		
Conflicting Flow All	-	540	596	0	-	0
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Critical Hdwy	-	6.2	4.11	-	-	-
Critical Hdwy Stg 1	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	-	-	-
Follow-up Hdwy	-	3.3	2.209	-	-	-
Pot Cap-1 Maneuver	0	546	985	-	-	-
Stage 1	0	-	-	-	-	-
Stage 2	0	-	-	-	-	-
Platoon blocked, %	-	-	-	-	-	-
Mov Cap-1 Maneuver	-	546	985	-	-	-
Mov Cap-2 Maneuver	-	-	-	-	-	-
Stage 1	-	-	-	-	-	-
Stage 2	-	-	-	-	-	-
Approach	EB	NB		SB		
HCM Control Delay, s	18.9	2.4		0		
HCM LOS	C					
Minor Lane/Major Mvmt	NBL	NBT	EBLn1	SBT	SBR	
Capacity (veh/h)	985	-	546	-	-	
HCM Lane V/C Ratio	0.194	-	0.536	-	-	
HCM Control Delay (s)	9.5	-	18.9	-	-	
HCM Lane LOS	A	-	C	-	-	
HCM 95th %tile Q(veh)	0.7	-	3.1	-	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

28: Traffic Avenue & Maple Street

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	0.5											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕↕				↗	↗	↕↕	↗	↗	↕↕	
Traffic Vol, veh/h	5	0	10	0	0	15	0	455	15	30	975	5
Future Vol, veh/h	5	0	10	0	0	15	0	455	15	30	975	5
Conflicting Peds, #/hr	2	0	0	0	0	2	0	0	5	5	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	Yield	-	-	None	-	-	None
Storage Length	-	-	-	-	-	0	45	-	115	55	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	0	0	0	7	7	7	5	5	5	4	4	4
Mvmt Flow	5	0	11	0	0	16	0	484	16	32	1037	5
Major/Minor	Minor2		Minor1			Major1			Major2			
Conflicting Flow All	1348	1609	521	-	-	249	1042	0	0	505	0	0
Stage 1	1104	1104	-	-	-	-	-	-	-	-	-	-
Stage 2	244	505	-	-	-	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.5	6.9	-	-	7.04	4.2	-	-	4.18	-	-
Critical Hdwy Stg 1	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	-	-	3.37	2.25	-	-	2.24	-	-
Pot Cap-1 Maneuver	111	106	505	0	0	736	646	-	-	1042	-	-
Stage 1	229	289	-	0	0	-	-	-	-	-	-	-
Stage 2	744	544	-	0	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	106	102	505	-	-	732	646	-	-	1038	-	-
Mov Cap-2 Maneuver	106	102	-	-	-	-	-	-	-	-	-	-
Stage 1	229	280	-	-	-	-	-	-	-	-	-	-
Stage 2	727	542	-	-	-	-	-	-	-	-	-	-
Approach	EB		WB			NB			SB			
HCM Control Delay, s	22.3		10			0			0.3			
HCM LOS	C		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	646	-	-	224	732	1038	-	-				
HCM Lane V/C Ratio	-	-	-	0.071	0.022	0.031	-	-				
HCM Control Delay (s)	0	-	-	22.3	10	8.6	-	-				
HCM Lane LOS	A	-	-	C	B	A	-	-				
HCM 95th %tile Q(veh)	0	-	-	0.2	0.1	0.1	-	-				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

29: E Main Ave/Traffic Avenue & SR-410 WB Ramps/Thompson Street

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	70	15	205	235	100	10	265	400	185	20	655	330
Future Volume (veh/h)	70	15	205	235	100	10	265	400	185	20	655	330
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1841	1841	1914	1841	1914	1914	1841	1841	1841
Adj Flow Rate, veh/h	76	16	0	188	203	0	288	435	0	22	712	359
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	4	4	4	4	4	4	4	4	4	4	4	4
Cap, veh/h	104	109		245	257		400	2040		646	1175	592
Arrive On Green	0.06	0.06	0.00	0.14	0.14	0.00	0.10	0.56	0.00	0.06	0.52	0.52
Sat Flow, veh/h	1753	1841	1560	1753	1841	0	1753	3733	0	1753	2246	1132
Grp Volume(v), veh/h	76	16	0	188	203	0	288	435	0	22	554	517
Grp Sat Flow(s),veh/h/ln	1753	1841	1560	1753	1841	0	1753	1819	0	1753	1749	1629
Q Serve(g_s), s	4.3	0.8	0.0	10.3	10.7	0.0	7.5	6.0	0.0	0.5	22.1	22.2
Cycle Q Clear(g_c), s	4.3	0.8	0.0	10.3	10.7	0.0	7.5	6.0	0.0	0.5	22.1	22.2
Prop In Lane	1.00		1.00	1.00		0.00	1.00		0.00	1.00		0.69
Lane Grp Cap(c), veh/h	104	109		245	257		400	2040		646	915	852
V/C Ratio(X)	0.73	0.15		0.77	0.79		0.72	0.21		0.03	0.61	0.61
Avail Cap(c_a), veh/h	289	304		447	469		447	2040		725	915	852
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	0.98	0.98	0.00	0.87	0.87	0.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	46.2	44.6	0.0	41.4	41.6	0.0	14.1	11.0	0.0	7.5	16.7	16.7
Incr Delay (d2), s/veh	9.4	0.6	0.0	4.9	5.3	0.0	4.3	0.2	0.0	0.0	3.0	3.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.4	0.0	4.8	5.2	0.0	3.0	2.3	0.0	0.2	9.4	8.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	55.6	45.2	0.0	46.3	46.8	0.0	18.5	11.2	0.0	7.5	19.6	19.9
LnGrp LOS	E	D		D	D		B	B		A	B	B
Approach Vol, veh/h	92				391				723			
Approach Delay, s/veh	53.8				46.6				14.1			
Approach LOS	D				D				B			
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	14.3	56.8		18.5	10.5	60.6		10.4				
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		4.5				
Max Green Setting (Gmax), s	12.5	27.5		25.5	10.5	29.5		16.5				
Max Q Clear Time (g_c+I1), s	9.5	24.2		12.7	2.5	8.0		6.3				
Green Ext Time (p_c), s	0.3	1.7		1.3	0.0	1.9		0.2				

Intersection Summary

HCM 6th Ctrl Delay 23.8

HCM 6th LOS C

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

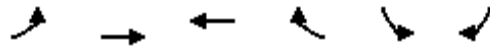
Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

30: Thompson Street & Station Lane

Existing PM Peak Hour



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	10	205	270	5	5	70
Future Volume (veh/h)	10	205	270	5	5	70
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			0.97	1.00	0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1885	1885	1737	1737
Adj Flow Rate, veh/h	11	228	300	6	6	78
Peak Hour Factor	0.90	0.90	0.90	0.90	0.90	0.90
Percent Heavy Veh, %	2	2	1	1	11	11
Cap, veh/h	448	904	507	10	10	126
Arrive On Green	0.01	0.48	0.28	0.28	0.09	0.09
Sat Flow, veh/h	1781	1870	1840	37	104	1357
Grp Volume(v), veh/h	11	228	0	306	85	0
Grp Sat Flow(s),veh/h/ln	1781	1870	0	1877	1479	0
Q Serve(g_s), s	0.1	1.9	0.0	3.7	1.4	0.0
Cycle Q Clear(g_c), s	0.1	1.9	0.0	3.7	1.4	0.0
Prop In Lane	1.00			0.02	0.07	0.92
Lane Grp Cap(c), veh/h	448	904	0	517	137	0
V/C Ratio(X)	0.02	0.25	0.00	0.59	0.62	0.00
Avail Cap(c_a), veh/h	1109	1767	0	1773	1397	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	5.8	3.9	0.0	8.1	11.3	0.0
Incr Delay (d2), s/veh	0.0	0.1	0.0	0.4	1.7	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.3	0.0	1.0	0.4	0.0
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	5.9	4.0	0.0	8.5	13.0	0.0
LnGrp LOS	A	A	A	A	B	A
Approach Vol, veh/h		239	306		85	
Approach Delay, s/veh		4.1	8.5		13.0	
Approach LOS		A	A		B	
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	5.4	12.6			18.0	7.9
Change Period (Y+Rc), s	5.0	5.5			5.5	5.5
Max Green Setting (Gmax), s	10.0	24.5			24.5	24.5
Max Q Clear Time (g_c+l1), s	2.1	5.7			3.9	3.4
Green Ext Time (p_c), s	0.0	1.2			0.8	0.1
Intersection Summary						
HCM 6th Ctrl Delay			7.5			
HCM 6th LOS			A			

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

31: Alder Ave & Thompson Street

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	5.5											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	30	105	5	5	125	5	5	10	5	5	15	200
Future Vol, veh/h	30	105	5	5	125	5	5	10	5	5	15	200
Conflicting Peds, #/hr	0	0	3	3	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	6	6	6	0	0	0	0	0	0	1	1	1
Mvmt Flow	32	112	5	5	133	5	5	11	5	5	16	213
Major/Minor	Major1		Major2		Minor1		Minor2					
Conflicting Flow All	138	0	0	120	0	0	442	330	118	333	330	136
Stage 1	-	-	-	-	-	-	182	182	-	146	146	-
Stage 2	-	-	-	-	-	-	260	148	-	187	184	-
Critical Hdwy	4.16	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.254	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1421	-	-	1480	-	-	529	592	939	622	591	915
Stage 1	-	-	-	-	-	-	824	753	-	859	778	-
Stage 2	-	-	-	-	-	-	749	779	-	817	749	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1421	-	-	1476	-	-	388	574	937	596	573	915
Mov Cap-2 Maneuver	-	-	-	-	-	-	388	574	-	596	573	-
Stage 1	-	-	-	-	-	-	803	733	-	838	775	-
Stage 2	-	-	-	-	-	-	561	776	-	781	730	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	1.6		0.3		11.7		10.7					
HCM LOS					B		B					
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	561	1421	-	-	1476	-	-	869				
HCM Lane V/C Ratio	0.038	0.022	-	-	0.004	-	-	0.269				
HCM Control Delay (s)	11.7	7.6	0	-	7.4	0	-	10.7				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.1	-	-	0	-	-	1.1				

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

32: E Main Ave & SR-410 EB Ramps

Existing PM Peak Hour

						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	215	545	210	600	935	190
Future Volume (vph)	215	545	210	600	935	190
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.5	4.5	4.5	4.5	4.5	
Lane Util. Factor	0.97	0.91	1.00	0.95	0.95	
Frpb, ped/bikes	0.98	0.97	1.00	1.00	1.00	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	0.92	0.85	1.00	1.00	0.97	
Flt Protected	0.98	1.00	0.95	1.00	1.00	
Satd. Flow (prot)	3012	1337	1770	3539	3416	
Flt Permitted	0.98	1.00	0.13	1.00	1.00	
Satd. Flow (perm)	3012	1337	247	3539	3416	
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	226	574	221	632	984	200
RTOR Reduction (vph)	241	246	0	0	12	0
Lane Group Flow (vph)	272	41	221	632	1172	0
Confl. Peds. (#/hr)		7				
Heavy Vehicles (%)	7%	7%	2%	2%	3%	3%
Turn Type	Prot	Perm	D.P+P	NA	NA	
Protected Phases	8		1	6	2	
Permitted Phases		8	2			
Actuated Green, G (s)	14.4	14.4	62.4	66.9	49.8	
Effective Green, g (s)	14.4	14.4	62.4	66.9	49.8	
Actuated g/C Ratio	0.14	0.14	0.62	0.67	0.50	
Clearance Time (s)	4.5	4.5	4.5	4.5	4.5	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	433	192	346	2367	1701	
v/s Ratio Prot	c0.09		c0.08	0.18	c0.34	
v/s Ratio Perm		0.03	0.32			
v/c Ratio	0.63	0.22	0.64	0.27	0.69	
Uniform Delay, d1	40.3	37.8	12.9	6.7	19.2	
Progression Factor	1.00	1.00	1.00	1.00	0.48	
Incremental Delay, d2	2.8	0.6	3.8	0.3	1.6	
Delay (s)	43.1	38.4	16.8	6.9	10.8	
Level of Service	D	D	B	A	B	
Approach Delay (s)	41.4			9.5	10.8	
Approach LOS	D			A	B	
Intersection Summary						
HCM 2000 Control Delay			19.0		HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio			0.63			
Actuated Cycle Length (s)			100.0		Sum of lost time (s)	18.0
Intersection Capacity Utilization			67.0%		ICU Level of Service	C
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

33: Valley Avenue & Meade-McCumber Road E

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	20	75	105	70	50	10	30	350	95	5	595	35
Future Volume (veh/h)	20	75	105	70	50	10	30	350	95	5	595	35
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		1.00	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1870	1945	1870	1885	1885	1885	1900	1900	1900
Adj Flow Rate, veh/h	22	81	113	75	54	11	32	376	102	5	640	38
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	1	1	1	2	2	2	1	1	1	0	0	0
Cap, veh/h	387	109	152	309	307	62	268	644	175	377	740	44
Arrive On Green	0.03	0.15	0.15	0.07	0.20	0.20	0.04	0.45	0.45	0.01	0.42	0.42
Sat Flow, veh/h	1795	710	990	1781	1567	319	1795	1428	387	1810	1773	105
Grp Volume(v), veh/h	22	0	194	75	0	65	32	0	478	5	0	678
Grp Sat Flow(s),veh/h/ln	1795	0	1699	1781	0	1886	1795	0	1815	1810	0	1878
Q Serve(g_s), s	0.6	0.0	6.2	1.9	0.0	1.6	0.6	0.0	11.2	0.1	0.0	18.8
Cycle Q Clear(g_c), s	0.6	0.0	6.2	1.9	0.0	1.6	0.6	0.0	11.2	0.1	0.0	18.8
Prop In Lane	1.00		0.58	1.00		0.17	1.00		0.21	1.00		0.06
Lane Grp Cap(c), veh/h	387	0	261	309	0	369	268	0	819	377	0	783
V/C Ratio(X)	0.06	0.00	0.74	0.24	0.00	0.18	0.12	0.00	0.58	0.01	0.00	0.87
Avail Cap(c_a), veh/h	523	0	686	368	0	761	385	0	1164	556	0	1204
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	19.3	0.0	23.1	18.2	0.0	19.2	11.8	0.0	11.7	10.2	0.0	15.2
Incr Delay (d2), s/veh	0.1	0.0	4.2	0.4	0.0	0.2	0.2	0.0	0.7	0.0	0.0	4.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.2	0.0	2.7	0.8	0.0	0.7	0.2	0.0	4.1	0.0	0.0	8.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	19.3	0.0	27.3	18.6	0.0	19.4	12.0	0.0	12.4	10.3	0.0	19.6
LnGrp LOS	B	A	C	B	A	B	B	A	B	B	A	B
Approach Vol, veh/h	216			140			510			683		
Approach Delay, s/veh	26.5			19.0			12.4			19.5		
Approach LOS	C			B			B			B		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	5.0	30.3	8.7	13.3	6.9	28.4	6.3	15.7				
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5				
Max Green Setting (Gmax), s	6.1	36.7	6.1	23.1	6.1	36.7	6.1	23.1				
Max Q Clear Time (g_c+I1), s	2.1	13.2	3.9	8.2	2.6	20.8	2.6	3.6				
Green Ext Time (p_c), s	0.0	2.2	0.0	0.7	0.0	3.0	0.0	0.2				
Intersection Summary												
HCM 6th Ctrl Delay	18.1											
HCM 6th LOS	B											

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

34: Parker Road E & Mead McCumber Road E

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	4.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	40	115	10	5	50	10	10	5	5	25	15	65
Future Vol, veh/h	40	115	10	5	50	10	10	5	5	25	15	65
Conflicting Peds, #/hr	10	0	2	2	0	10	0	0	5	5	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	93	93	93	93	93	93	93	93	93	93	93	93
Heavy Vehicles, %	1	1	1	2	2	2	0	0	0	2	2	2
Mvmt Flow	43	124	11	5	54	11	11	5	5	27	16	70
Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	75	0	0	137	0	0	331	303	137	306	303	70
Stage 1	-	-	-	-	-	-	218	218	-	80	80	-
Stage 2	-	-	-	-	-	-	113	85	-	226	223	-
Critical Hdwy	4.11	-	-	4.12	-	-	7.1	6.5	6.2	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Follow-up Hdwy	2.209	-	-	2.218	-	-	3.5	4	3.3	3.518	4.018	3.318
Pot Cap-1 Maneuver	1531	-	-	1447	-	-	626	613	917	646	610	993
Stage 1	-	-	-	-	-	-	789	726	-	929	828	-
Stage 2	-	-	-	-	-	-	897	828	-	777	719	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1518	-	-	1445	-	-	553	585	912	613	583	985
Mov Cap-2 Maneuver	-	-	-	-	-	-	553	585	-	613	583	-
Stage 1	-	-	-	-	-	-	763	702	-	893	818	-
Stage 2	-	-	-	-	-	-	814	818	-	740	695	-
Approach	EB			WB			NB			SB		
HCM Control Delay, s	1.8			0.6			11			10.3		
HCM LOS							B			B		
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	623	1518	-	-	1445	-	-	792				
HCM Lane V/C Ratio	0.035	0.028	-	-	0.004	-	-	0.143				
HCM Control Delay (s)	11	7.4	0	-	7.5	0	-	10.3				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.1	-	-	0	-	-	0.5				

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

Summer Comp Plan Update

35: 160th Avenue E & 64th Street E

Existing PM Peak Hour

Intersection												
Intersection Delay, s/veh	11.8											
Intersection LOS	B											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	10	110	5	5	50	60	5	0	0	370	5	15
Future Vol, veh/h	10	110	5	5	50	60	5	0	0	370	5	15
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles, %	0	0	0	1	1	1	0	0	0	0	0	0
Mvmt Flow	11	120	5	5	54	65	5	0	0	402	5	16
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0
Approach	EB			WB			NB			SB		
Opposing Approach	WB			EB			SB			NB		
Opposing Lanes	1			1			1			1		
Conflicting Approach Left	SB			NB			EB			WB		
Conflicting Lanes Left	1			1			1			1		
Conflicting Approach Right	NB			SB			WB			EB		
Conflicting Lanes Right	1			1			1			1		
HCM Control Delay	9.4			8.9			8.4			13.5		
HCM LOS	A			A			A			B		
Lane	NBLn1	EBLn1	WBLn1	SBLn1								
Vol Left, %	100%	8%	4%	95%								
Vol Thru, %	0%	88%	43%	1%								
Vol Right, %	0%	4%	52%	4%								
Sign Control	Stop	Stop	Stop	Stop								
Traffic Vol by Lane	5	125	115	390								
LT Vol	5	10	5	370								
Through Vol	0	110	50	5								
RT Vol	0	5	60	15								
Lane Flow Rate	5	136	125	424								
Geometry Grp	1	1	1	1								
Degree of Util (X)	0.008	0.193	0.169	0.555								
Departure Headway (Hd)	5.275	5.113	4.855	4.712								
Convergence, Y/N	Yes	Yes	Yes	Yes								
Cap	672	698	734	763								
Service Time	3.357	3.175	2.919	2.763								
HCM Lane V/C Ratio	0.007	0.195	0.17	0.556								
HCM Control Delay	8.4	9.4	8.9	13.5								
HCM Lane LOS	A	A	A	B								
HCM 95th-tile Q	0	0.7	0.6	3.5								

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
36: Sumner-Tapps Highway E & 64th Street E

Sumner Comp Plan Update
Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	120	5	410	20	10	5	160	590	15	0	675	50
Future Volume (veh/h)	120	5	410	20	10	5	160	590	15	0	675	50
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1722	1722	1722	1885	1885	1885	1870	1870	1870
Adj Flow Rate, veh/h	126	5	432	21	11	5	168	621	16	0	711	53
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	1	1	1	12	12	12	1	1	1	2	2	2
Cap, veh/h	419	6	482	90	39	10	228	1161	33	0	1024	76
Arrive On Green	0.30	0.30	0.30	0.30	0.30	0.30	0.79	0.79	0.79	0.00	0.60	0.60
Sat Flow, veh/h	1408	18	1582	88	127	34	279	1950	55	0	1719	128
Grp Volume(v), veh/h	126	0	437	37	0	0	312	0	493	0	0	764
Grp Sat Flow(s),veh/h/ln	1408	0	1600	249	0	0	579	0	1706	0	0	1847
Q Serve(g_s), s	0.0	0.0	23.5	0.8	0.0	0.0	22.9	0.0	8.8	0.0	0.0	25.7
Cycle Q Clear(g_c), s	8.3	0.0	23.5	24.3	0.0	0.0	48.5	0.0	8.8	0.0	0.0	25.7
Prop In Lane	1.00		0.99	0.57		0.14	0.54		0.03	0.00		0.07
Lane Grp Cap(c), veh/h	419	0	487	139	0	0	406	0	1016	0	0	1100
V/C Ratio(X)	0.30	0.00	0.90	0.27	0.00	0.00	0.77	0.00	0.49	0.00	0.00	0.69
Avail Cap(c_a), veh/h	498	0	578	201	0	0	406	0	1016	0	0	1100
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.33	1.33	1.33	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	0.00	1.00	0.00	1.00	0.00	0.00	1.00
Uniform Delay (d), s/veh	24.7	0.0	29.9	25.0	0.0	0.0	16.5	0.0	4.7	0.0	0.0	12.6
Incr Delay (d2), s/veh	0.4	0.0	14.8	0.9	0.0	0.0	13.1	0.0	1.7	0.0	0.0	3.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.1	0.0	10.9	0.6	0.0	0.0	6.5	0.0	2.6	0.0	0.0	10.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	25.0	0.0	44.7	26.0	0.0	0.0	29.6	0.0	6.4	0.0	0.0	16.2
LnGrp LOS	C	A	D	C	A	A	C	A	A	A	A	B
Approach Vol, veh/h	563			37			805			764		
Approach Delay, s/veh	40.3			26.0			15.4			16.2		
Approach LOS	D			C			B			B		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	58.1			31.9			58.1			31.9		
Change Period (Y+Rc), s	4.5			4.5			4.5			4.5		
Max Green Setting (Gmax), s	48.5			32.5			48.5			32.5		
Max Q Clear Time (g_c+I1), s	27.7			26.3			50.5			25.5		
Green Ext Time (p_c), s	5.0			0.1			0.0			1.9		
Intersection Summary												
HCM 6th Ctrl Delay	22.3											
HCM 6th LOS	C											

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Sumner Comp Plan Update

37: Sumner-Tapps Highway E & SR-410 WB Ramps

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	10.2											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations					↕		↗	↖			↗	
Traffic Vol, veh/h	0	0	0	35	0	280	105	485	0	0	770	340
Future Vol, veh/h	0	0	0	35	0	280	105	485	0	0	770	340
Conflicting Peds, #/hr	0	0	0	0	0	0	1	0	0	0	0	1
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	0	-	-	-	-	-
Veh in Median Storage, #	-	1	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	2	2	2	1	1	1	2	2	2
Mvmt Flow	0	0	0	36	0	286	107	495	0	0	786	347
Major/Minor				Minor1		Major1		Major2				
Conflicting Flow All				1669	1843	495	1134	0	-	-	-	0
Stage 1				709	709	-	-	-	-	-	-	-
Stage 2				960	1134	-	-	-	-	-	-	-
Critical Hdwy				6.42	6.52	6.22	4.11	-	-	-	-	-
Critical Hdwy Stg 1				5.42	5.52	-	-	-	-	-	-	-
Critical Hdwy Stg 2				5.42	5.52	-	-	-	-	-	-	-
Follow-up Hdwy				3.518	4.018	3.318	2.209	-	-	-	-	-
Pot Cap-1 Maneuver				106	75	575	620	-	0	0	-	-
Stage 1				488	437	-	-	-	0	0	-	-
Stage 2				372	278	-	-	-	0	0	-	-
Platoon blocked, %								-			-	-
Mov Cap-1 Maneuver				88	0	575	620	-	-	-	-	-
Mov Cap-2 Maneuver				88	0	-	-	-	-	-	-	-
Stage 1				404	0	-	-	-	-	-	-	-
Stage 2				372	0	-	-	-	-	-	-	-
Approach				WB		NB		SB				
HCM Control Delay, s				61		2.1		0				
HCM LOS				F								
Minor Lane/Major Mvmt		NBL	NBTWBLn1	SBT	SBR							
Capacity (veh/h)		620	-	356	-	-						
HCM Lane V/C Ratio		0.173	-	0.903	-	-						
HCM Control Delay (s)		12	-	61	-	-						
HCM Lane LOS		B	-	F	-	-						
HCM 95th %tile Q(veh)		0.6	-	9	-	-						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

38: Sumner-Tapps Highway E & SR-410 EB Ramps

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	330	0	195	0	0	0	0	265	80	355	450	0
Future Volume (veh/h)	330	0	195	0	0	0	0	265	80	355	450	0
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No						No			No		
Adj Sat Flow, veh/h/ln	1870	1870	1870				0	1885	1885	1885	1885	0
Adj Flow Rate, veh/h	344	0	203				0	276	83	370	469	0
Peak Hour Factor	0.96	0.96	0.96				0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	2	2	2				0	1	1	1	1	0
Cap, veh/h	416	0	370				0	939	796	717	1256	0
Arrive On Green	0.23	0.00	0.23				0.00	0.50	0.50	0.04	0.22	0.00
Sat Flow, veh/h	1781	0	1585				0	1885	1598	1795	1885	0
Grp Volume(v), veh/h	344	0	203				0	276	83	370	469	0
Grp Sat Flow(s),veh/h/ln	1781	0	1585				0	1885	1598	1795	1885	0
Q Serve(g_s), s	16.5	0.0	10.1				0.0	7.7	2.5	7.8	19.0	0.0
Cycle Q Clear(g_c), s	16.5	0.0	10.1				0.0	7.7	2.5	7.8	19.0	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	416	0	370				0	939	796	717	1256	0
V/C Ratio(X)	0.83	0.00	0.55				0.00	0.29	0.10	0.52	0.37	0.00
Avail Cap(c_a), veh/h	663	0	590				0	939	796	914	1256	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	0.33	0.33	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	32.8	0.0	30.3				0.0	13.3	12.0	8.9	19.1	0.0
Incr Delay (d2), s/veh	4.8	0.0	1.3				0.0	0.8	0.3	0.5	0.9	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	7.5	0.0	3.9				0.0	3.4	0.9	3.4	9.8	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	37.5	0.0	31.6				0.0	14.1	12.2	9.4	20.0	0.0
LnGrp LOS	D	A	C				A	B	B	A	B	A
Approach Vol, veh/h	547						359			839		
Approach Delay, s/veh	35.3						13.6			15.3		
Approach LOS	D						B			B		
Timer - Assigned Phs	1	2		4			6					
Phs Duration (G+Y+Rc), s	15.1	49.3		25.5			64.5					
Change Period (Y+Rc), s	4.5	4.5		4.5			4.5					
Max Green Setting (Gmax), s	20.5	22.5		33.5			47.5					
Max Q Clear Time (g_c+I1), s	9.8	9.7		18.5			21.0					
Green Ext Time (p_c), s	0.8	1.6		2.5			3.3					
Intersection Summary												
HCM 6th Ctrl Delay	21.2											
HCM 6th LOS	C											

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

39: Valley Avenue & Gary Street /Gary Street E

Existing PM Peak Hour

Intersection												
Int Delay, s/veh		1.6										
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	60	5	0	5	140	475	5	5	750	10
Future Vol, veh/h	0	0	60	5	0	5	140	475	5	5	750	10
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	0	-	-	0	175	-	-	175	-	175
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	90	90	90	90	90	90	90	90	90	90	90	90
Heavy Vehicles, %	2	2	2	0	0	0	1	1	1	0	0	0
Mvmt Flow	0	0	67	6	0	6	156	528	6	6	833	11
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	-	-	422	1272	-	531	844	0	0	534	0	0
Stage 1	-	-	-	843	-	-	-	-	-	-	-	-
Stage 2	-	-	-	429	-	-	-	-	-	-	-	-
Critical Hdwy	-	-	6.93	7.3	-	6.2	4.115	-	-	4.1	-	-
Critical Hdwy Stg 1	-	-	-	6.1	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	6.5	-	-	-	-	-	-	-	-
Follow-up Hdwy	-	-	3.319	3.5	-	3.3	2.2095	-	-	2.2	-	-
Pot Cap-1 Maneuver	0	0	581	136	0	552	796	-	-	1044	-	-
Stage 1	0	0	-	361	0	-	-	-	-	-	-	-
Stage 2	0	0	-	580	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	-	-	581	102	-	552	796	-	-	1044	-	-
Mov Cap-2 Maneuver	-	-	-	102	-	-	-	-	-	-	-	-
Stage 1	-	-	-	290	-	-	-	-	-	-	-	-
Stage 2	-	-	-	510	-	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	12		11.6		2.4		0.1					
HCM LOS	B		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	796	-	-	581	552	1044	-	-				
HCM Lane V/C Ratio	0.195	-	-	0.115	0.01	0.005	-	-				
HCM Control Delay (s)	10.6	-	-	12	11.6	8.5	-	-				
HCM Lane LOS	B	-	-	B	B	A	-	-				
HCM 95th %tile Q(veh)	0.7	-	-	0.4	0	0	-	-				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

40: Valley Avenue & SR-410 WB Ramps

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	0	0	0	115	0	200	215	425	0	0	655	160
Future Volume (veh/h)	0	0	0	115	0	200	215	425	0	0	655	160
Initial Q (Qb), veh				0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)				1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj				1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach				No			No				No	
Adj Sat Flow, veh/h/ln				1885	1885	1885	1885	1885	0	0	1900	1900
Adj Flow Rate, veh/h				125	0	217	234	462	0	0	712	174
Peak Hour Factor				0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %				1	1	1	1	1	0	0	0	0
Cap, veh/h				291	0	258	509	1387	0	0	763	646
Arrive On Green				0.16	0.00	0.16	0.57	1.00	0.00	0.00	0.40	0.40
Sat Flow, veh/h				1795	0	1593	1795	1885	0	0	1900	1610
Grp Volume(v), veh/h				125	0	217	234	462	0	0	712	174
Grp Sat Flow(s),veh/h/ln				1795	0	1593	1795	1885	0	0	1900	1610
Q Serve(g_s), s				5.6	0.0	11.9	6.9	0.0	0.0	0.0	32.3	6.5
Cycle Q Clear(g_c), s				5.6	0.0	11.9	6.9	0.0	0.0	0.0	32.3	6.5
Prop In Lane				1.00		1.00	1.00		0.00	0.00		1.00
Lane Grp Cap(c), veh/h				291	0	258	509	1387	0	0	763	646
V/C Ratio(X)				0.43	0.00	0.84	0.46	0.33	0.00	0.00	0.93	0.27
Avail Cap(c_a), veh/h				447	0	396	509	1387	0	0	790	669
HCM Platoon Ratio				1.00	1.00	1.00	2.00	2.00	1.00	1.00	1.00	1.00
Upstream Filter(I)				1.00	0.00	1.00	0.50	0.50	0.00	0.00	1.00	1.00
Uniform Delay (d), s/veh				34.0	0.0	36.6	15.5	0.0	0.0	0.0	25.8	18.1
Incr Delay (d2), s/veh				0.4	0.0	5.7	0.4	0.3	0.0	0.0	19.9	1.0
Initial Q Delay(d3),s/veh				0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln				2.5	0.0	5.0	2.4	0.1	0.0	0.0	18.2	2.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh				34.3	0.0	42.3	15.9	0.3	0.0	0.0	45.7	19.1
LnGrp LOS				C	A	D	B	A	A	A	D	B
Approach Vol, veh/h					342			696			886	
Approach Delay, s/veh					39.4			5.5			40.5	
Approach LOS					D			A			D	
Timer - Assigned Phs	2			5			6			8		
Phs Duration (G+Y+Rc), s	70.8			30.1			40.7			19.2		
Change Period (Y+Rc), s	4.6			4.6			* 4.6			4.6		
Max Green Setting (Gmax), s	58.4			16.5			* 37			22.4		
Max Q Clear Time (g_c+I1), s	2.0			8.9			34.3			13.9		
Green Ext Time (p_c), s	4.4			0.5			1.8			0.6		
Intersection Summary												
HCM 6th Ctrl Delay			27.7									
HCM 6th LOS			C									
Notes												

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

41: Valley Avenue & SR-410 EB Ramps

Existing PM Peak Hour

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	170	0	600	0	0	0	0	480	115	95	690	0
Future Volume (veh/h)	170	0	600	0	0	0	0	480	115	95	690	0
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No						No			No		
Adj Sat Flow, veh/h/ln	1856	1856	1856				0	1870	1870	1885	1885	0
Adj Flow Rate, veh/h	181	0	638				0	511	122	101	734	0
Peak Hour Factor	0.94	0.94	0.94				0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	3	3	3				0	2	2	1	1	0
Cap, veh/h	558	0	496				0	460	110	387	1098	0
Arrive On Green	0.32	0.00	0.32				0.00	0.32	0.32	0.43	1.00	0.00
Sat Flow, veh/h	1767	0	1572				0	1458	348	1795	1885	0
Grp Volume(v), veh/h	181	0	638				0	0	633	101	734	0
Grp Sat Flow(s),veh/h/ln	1767	0	1572				0	0	1806	1795	1885	0
Q Serve(g_s), s	7.0	0.0	28.4				0.0	0.0	28.4	3.2	0.0	0.0
Cycle Q Clear(g_c), s	7.0	0.0	28.4				0.0	0.0	28.4	3.2	0.0	0.0
Prop In Lane	1.00		1.00				0.00		0.19	1.00		0.00
Lane Grp Cap(c), veh/h	558	0	496				0	0	570	387	1098	0
V/C Ratio(X)	0.32	0.00	1.29				0.00	0.00	1.11	0.26	0.67	0.00
Avail Cap(c_a), veh/h	558	0	496				0	0	570	389	1098	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	2.00	2.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	0.00	1.00	0.66	0.66	0.00
Uniform Delay (d), s/veh	23.5	0.0	30.8				0.0	0.0	30.8	21.0	0.0	0.0
Incr Delay (d2), s/veh	0.3	0.0	143.2				0.0	0.0	71.7	0.2	2.2	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.9	0.0	30.1				0.0	0.0	23.0	1.3	0.7	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	23.8	0.0	174.0				0.0	0.0	102.5	21.2	2.2	0.0
LnGrp LOS	C	A	F				A	A	F	C	A	A
Approach Vol, veh/h	819						633			835		
Approach Delay, s/veh	140.8						102.5			4.5		
Approach LOS	F						F			A		
Timer - Assigned Phs	1	2		4		6						
Phs Duration (G+Y+Rc), s	24.0	33.0		33.0		57.0						
Change Period (Y+Rc), s	4.6	* 4.6		4.6		4.6						
Max Green Setting (Gmax), s	19.5	* 28		28.4		52.4						
Max Q Clear Time (g_c+I1), s	5.2	30.4		30.4		2.0						
Green Ext Time (p_c), s	0.2	0.0		0.0		6.0						
Intersection Summary												
HCM 6th Ctrl Delay			80.4									
HCM 6th LOS			F									
Notes												

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

Summer Comp Plan Update

42: Valley Avenue & 74th Street E

Existing PM Peak Hour

Intersection												
Int Delay, s/veh	3											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↗	↖		↗	↖	
Traffic Vol, veh/h	5	0	5	5	0	70	0	505	20	280	965	60
Future Vol, veh/h	5	0	5	5	0	70	0	505	20	280	965	60
Conflicting Peds, #/hr	0	0	0	0	0	0	1	0	0	0	0	1
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	25	-	-	50	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	1	1	1	2	2	2	2	2	2
Mvmt Flow	5	0	5	5	0	71	0	515	20	286	985	61
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	2150	2124	1017	2115	2144	525	1047	0	0	535	0	0
Stage 1	1589	1589	-	525	525	-	-	-	-	-	-	-
Stage 2	561	535	-	1590	1619	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.11	6.51	6.21	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.509	4.009	3.309	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	35	51	291	37	49	554	665	-	-	1033	-	-
Stage 1	137	169	-	538	531	-	-	-	-	-	-	-
Stage 2	516	527	-	136	163	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	24	37	291	29	35	554	664	-	-	1033	-	-
Mov Cap-2 Maneuver	24	37	-	29	35	-	-	-	-	-	-	-
Stage 1	137	122	-	538	531	-	-	-	-	-	-	-
Stage 2	449	527	-	97	118	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	110		25.5		0		2.1					
HCM LOS	F		D									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	664	-	-	44	251	1033	-	-				
HCM Lane V/C Ratio	-	-	-	0.232	0.305	0.277	-	-				
HCM Control Delay (s)	0	-	-	110	25.5	9.8	-	-				
HCM Lane LOS	A	-	-	F	D	A	-	-				
HCM 95th %tile Q(veh)	0	-	-	0.8	1.2	1.1	-	-				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

43: Valley Avenue & Rivergrove Drive E

Existing PM Peak Hour

						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	75	20	25	450	865	90
Future Volume (veh/h)	75	20	25	450	865	90
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1900	1900	1870	1870	1870	1870
Adj Flow Rate, veh/h	76	20	25	455	874	91
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	2	2	2	2
Cap, veh/h	170	151	43	1307	955	99
Arrive On Green	0.09	0.09	0.02	0.70	0.57	0.57
Sat Flow, veh/h	1810	1610	1781	1870	1666	173
Grp Volume(v), veh/h	76	20	25	455	0	965
Grp Sat Flow(s),veh/h/ln	1810	1610	1781	1870	0	1839
Q Serve(g_s), s	1.8	0.5	0.6	4.3	0.0	20.9
Cycle Q Clear(g_c), s	1.8	0.5	0.6	4.3	0.0	20.9
Prop In Lane	1.00	1.00	1.00			0.09
Lane Grp Cap(c), veh/h	170	151	43	1307	0	1054
V/C Ratio(X)	0.45	0.13	0.59	0.35	0.00	0.92
Avail Cap(c_a), veh/h	1037	923	221	2338	0	1054
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	19.0	18.4	21.4	2.7	0.0	8.5
Incr Delay (d2), s/veh	1.8	0.4	12.2	0.2	0.0	13.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	0.0	0.4	0.4	0.0	8.4
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	20.8	18.8	33.6	2.8	0.0	22.1
LnGrp LOS	C	B	C	A	A	C
Approach Vol, veh/h	96			480	965	
Approach Delay, s/veh	20.4			4.4	22.1	
Approach LOS	C			A	C	
Timer - Assigned Phs	2		4		5	6
Phs Duration (G+Y+Rc), s	35.6		8.8		5.6	30.0
Change Period (Y+Rc), s	4.6		4.6		4.5	4.6
Max Green Setting (Gmax), s	55.4		25.4		5.5	25.4
Max Q Clear Time (g_c+I1), s	6.3		3.8		2.6	22.9
Green Ext Time (p_c), s	3.1		0.2		0.0	1.6
Intersection Summary						
HCM 6th Ctrl Delay			16.5			
HCM 6th LOS			B			

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

1: Stewart Road SE (8th St E) & Butte Ave SE

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		 			 							
Traffic Volume (veh/h)	45	1320	5	5	710	20	15	0	10	80	0	105
Future Volume (veh/h)	45	1320	5	5	710	20	15	0	10	80	0	105
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1811	1811	1811	1826	1826	1826	1900	1900	1900	1870	1870	1870
Adj Flow Rate, veh/h	47	1375	5	5	740	21	16	0	10	83	0	109
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	6	6	6	5	5	5	0	0	0	2	2	2
Cap, veh/h	269	1453	5	110	1424	40	386	0	339	380	0	338
Arrive On Green	0.41	0.41	0.41	0.41	0.41	0.41	0.21	0.00	0.21	0.21	0.00	0.21
Sat Flow, veh/h	683	3517	13	383	3445	98	1810	0	1589	1781	0	1585
Grp Volume(v), veh/h	47	673	707	5	372	389	16	0	10	83	0	109
Grp Sat Flow(s),veh/h/ln	683	1721	1809	383	1735	1808	1810	0	1589	1781	0	1585
Q Serve(g_s), s	4.1	28.2	28.3	1.0	12.0	12.0	0.5	0.0	0.4	2.9	0.0	4.4
Cycle Q Clear(g_c), s	16.2	28.2	28.3	29.2	12.0	12.0	0.5	0.0	0.4	2.9	0.0	4.4
Prop In Lane	1.00		0.01	1.00		0.05	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	269	711	748	110	717	747	386	0	339	380	0	338
V/C Ratio(X)	0.18	0.95	0.95	0.05	0.52	0.52	0.04	0.00	0.03	0.22	0.00	0.32
Avail Cap(c_a), veh/h	269	711	748	110	717	747	386	0	339	380	0	338
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.87	0.87	0.87	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	22.5	21.2	21.2	35.3	16.4	16.4	23.4	0.0	23.4	24.3	0.0	24.9
Incr Delay (d2), s/veh	0.3	21.5	20.8	0.1	0.6	0.6	0.2	0.0	0.2	1.3	0.0	2.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	14.5	15.1	0.1	4.4	4.6	0.2	0.0	0.2	1.3	0.0	1.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	22.8	42.7	42.0	35.4	17.0	17.0	23.6	0.0	23.5	25.7	0.0	27.4
LnGrp LOS	C	D	D	D	B	B	C	A	C	C	A	C
Approach Vol, veh/h	1427			766			26			192		
Approach Delay, s/veh	41.7			17.1			23.6			26.7		
Approach LOS	D			B			C			C		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	20.0			35.0			20.0			35.0		
Change Period (Y+Rc), s	4.0			4.0			4.0			4.0		
Max Green Setting (Gmax), s	16.0			31.0			16.0			31.0		
Max Q Clear Time (g_c+I1), s	2.5			30.3			6.4			31.2		
Green Ext Time (p_c), s	0.0			0.6			0.5			0.0		
Intersection Summary												
HCM 6th Ctrl Delay	32.5											
HCM 6th LOS	C											

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
2: 140th Ct E & Stewart Road SE (8th St E)

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	10	1405	15	5	665	0	50	0	25	5	0	15
Future Volume (veh/h)	10	1405	15	5	665	0	50	0	25	5	0	15
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1811	1811	1811	1826	1826	1826	1811	1811	1811
Adj Flow Rate, veh/h	10	1448	15	5	686	0	52	0	26	5	0	15
Peak Hour Factor	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	4	4	6	6	6	5	5	5	6	6	6
Cap, veh/h	429	2164	22	272	1106	937	371	0	244	122	33	182
Arrive On Green	0.61	0.61	0.61	0.61	0.61	0.00	0.16	0.00	0.16	0.16	0.00	0.16
Sat Flow, veh/h	744	3545	37	351	1811	1535	1363	0	1545	174	211	1155
Grp Volume(v), veh/h	10	714	749	5	686	0	52	0	26	20	0	0
Grp Sat Flow(s), veh/h/ln	744	1749	1833	351	1811	1535	1363	0	1545	1540	0	0
Q Serve(g_s), s	0.4	12.7	12.8	0.5	11.3	0.0	0.9	0.0	0.7	0.0	0.0	0.0
Cycle Q Clear(g_c), s	11.7	12.7	12.8	13.2	11.3	0.0	1.4	0.0	0.7	0.5	0.0	0.0
Prop In Lane	1.00		0.02	1.00		1.00	1.00		1.00	0.25		0.75
Lane Grp Cap(c), veh/h	429	1068	1119	272	1106	937	371	0	244	338	0	0
V/C Ratio(X)	0.02	0.67	0.67	0.02	0.62	0.00	0.14	0.00	0.11	0.06	0.00	0.00
Avail Cap(c_a), veh/h	594	1456	1526	350	1508	1278	859	0	798	868	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	9.5	6.1	6.1	10.4	5.8	0.0	17.4	0.0	17.1	17.0	0.0	0.0
Incr Delay (d2), s/veh	0.0	0.9	0.8	0.0	0.7	0.0	0.1	0.0	0.1	0.0	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	3.0	3.1	0.0	2.7	0.0	0.5	0.0	0.2	0.2	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	9.5	7.0	6.9	10.5	6.5	0.0	17.5	0.0	17.2	17.1	0.0	0.0
LnGrp LOS	A	A	A	B	A	A	B	A	B	B	A	A
Approach Vol, veh/h	1473			691			78			20		
Approach Delay, s/veh	7.0			6.5			17.4			17.1		
Approach LOS	A			A			B			B		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	34.5			13.0			34.5			13.0		
Change Period (Y+Rc), s	5.5			5.5			5.5			5.5		
Max Green Setting (Gmax), s	39.5			24.5			39.5			24.5		
Max Q Clear Time (g_c+I1), s	14.8			2.5			15.2			3.4		
Green Ext Time (p_c), s	14.2			0.0			6.3			0.1		

Intersection Summary

HCM 6th Ctrl Delay	7.3
HCM 6th LOS	A

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

3: W Valley Highway E & 24th Street E

Future (2044) PM Peak Hour - Alternative 1



Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	←←	→	↑↑		←	→
Traffic Volume (veh/h)	445	75	90	255	295	545
Future Volume (veh/h)	445	75	90	255	295	545
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No		No	
Adj Sat Flow, veh/h/ln	1707	1707	1544	1544	1781	1781
Adj Flow Rate, veh/h	464	78	94	266	307	568
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	13	13	24	24	8	8
Cap, veh/h	566	260	684	598	341	1279
Arrive On Green	0.18	0.18	0.47	0.47	0.20	0.72
Sat Flow, veh/h	3155	1447	1544	1282	1697	1781
Grp Volume(v), veh/h	464	78	94	266	307	568
Grp Sat Flow(s), veh/h/ln	1577	1447	1467	1282	1697	1781
Q Serve(g_s), s	12.7	4.2	3.3	12.6	15.9	11.9
Cycle Q Clear(g_c), s	12.7	4.2	3.3	12.6	15.9	11.9
Prop In Lane	1.00	1.00		1.00	1.00	
Lane Grp Cap(c), veh/h	566	260	684	598	341	1279
V/C Ratio(X)	0.82	0.30	0.14	0.45	0.90	0.44
Avail Cap(c_a), veh/h	890	408	684	598	385	1279
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.74	0.74	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	35.5	32.0	13.7	16.2	35.1	5.2
Incr Delay (d2), s/veh	2.4	0.4	0.4	2.4	21.5	1.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.0	1.5	1.1	3.9	8.4	3.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	37.9	32.4	14.1	18.6	56.5	6.4
LnGrp LOS	D	C	B	B	E	A
Approach Vol, veh/h	542		360			875
Approach Delay, s/veh	37.1		17.4			24.0
Approach LOS	D		B			C
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	32.7	46.6			69.2	20.8
Change Period (Y+Rc), s	4.6	4.6			4.6	4.6
Max Green Setting (Gmax), s	30.4				55.4	25.4
Max Q Clear Time (g_c+I1), s	14.6				13.9	14.7
Green Ext Time (p_c), s	0.2	2.0			4.0	1.4

Intersection Summary

HCM 6th Ctrl Delay	26.6
HCM 6th LOS	C

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

4: SR-167 NB Ramps & 24th Street E

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	75	475	0	0	450	170	70	5	260	0	0	0
Future Volume (veh/h)	75	475	0	0	450	170	70	5	260	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach	No			No			No					
Adj Sat Flow, veh/h/ln	1574	1574	0	0	1693	1693	1678	1678	1678			
Adj Flow Rate, veh/h	80	505	0	0	479	181	78	0	0			
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94			
Percent Heavy Veh, %	22	22	0	0	14	14	15	15	15			
Cap, veh/h	98	948	0	0	646	288	1856	0				
Arrive On Green	0.07	0.32	0.00	0.00	0.07	0.07	0.58	0.00	0.00			
Sat Flow, veh/h	1499	3069	0	0	3300	1434	3196	0	1422			
Grp Volume(v), veh/h	80	505	0	0	479	181	78	0	0			
Grp Sat Flow(s), veh/h/ln	1499	1495	0	0	1608	1434	1598	0	1422			
Q Serve(g_s), s	4.7	12.5	0.0	0.0	13.2	11.1	0.9	0.0	0.0			
Cycle Q Clear(g_c), s	4.7	12.5	0.0	0.0	13.2	11.1	0.9	0.0	0.0			
Prop In Lane	1.00		0.00	0.00		1.00	1.00		1.00			
Lane Grp Cap(c), veh/h	98	948	0	0	646	288	1856	0				
V/C Ratio(X)	0.82	0.53	0.00	0.00	0.74	0.63	0.04	0.00				
Avail Cap(c_a), veh/h	157	1376	0	0	979	437	1856	0				
HCM Platoon Ratio	1.00	1.00	1.00	1.00	0.33	0.33	1.00	1.00	1.00			
Upstream Filter(I)	0.48	0.48	0.00	0.00	0.96	0.96	1.00	0.00	0.00			
Uniform Delay (d), s/veh	41.6	25.3	0.0	0.0	39.7	38.7	8.1	0.0	0.0			
Incr Delay (d2), s/veh	6.7	0.2	0.0	0.0	1.5	2.0	0.0	0.0	0.0			
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	1.9	4.3	0.0	0.0	5.8	4.4	0.3	0.0	0.0			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	48.2	25.5	0.0	0.0	41.2	40.7	8.1	0.0	0.0			
LnGrp LOS	D	C	A	A	D	D	A	A				
Approach Vol, veh/h	585			660			78					
Approach Delay, s/veh	28.6			41.1			8.1					
Approach LOS	C			D			A					
Timer - Assigned Phs	2			4			7		8			
Phs Duration (G+Y+Rc), s	56.9			33.1			10.5		22.7			
Change Period (Y+Rc), s	4.6			4.6			4.6		4.6			
Max Green Setting (Gmax), s	39.4			41.4			9.4		27.4			
Max Q Clear Time (g_c+I1), s	2.9			14.5			6.7		15.2			
Green Ext Time (p_c), s	0.2			3.4			0.0		2.9			

Intersection Summary

HCM 6th Ctrl Delay 33.6

HCM 6th LOS C

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR] is excluded from calculations of the approach delay and intersection delay.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

5: 136th Avenue E & 24th Street E

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	155	500	80	35	305	105	55	30	75	220	25	260
Future Volume (veh/h)	155	500	80	35	305	105	55	30	75	220	25	260
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No				No				No			
Adj Sat Flow, veh/h/ln	1604	1604	1604	1648	1648	1648	1841	1841	1841	1693	1693	1693
Adj Flow Rate, veh/h	170	549	88	38	335	115	60	33	82	242	27	286
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	20	20	20	17	17	17	4	4	4	14	14	14
Cap, veh/h	463	1217	194	334	970	328	209	100	247	391	31	324
Arrive On Green	0.03	0.15	0.15	0.04	0.42	0.42	0.05	0.21	0.21	0.08	0.24	0.24
Sat Flow, veh/h	1527	2631	420	1570	2298	775	1753	467	1161	1612	125	1325
Grp Volume(v), veh/h	170	317	320	38	226	224	60	0	115	242	0	313
Grp Sat Flow(s),veh/h/ln	1527	1523	1527	1570	1566	1507	1753	0	1628	1612	0	1450
Q Serve(g_s), s	5.3	17.0	17.2	1.2	8.8	9.1	2.3	0.0	5.4	7.5	0.0	18.7
Cycle Q Clear(g_c), s	5.3	17.0	17.2	1.2	8.8	9.1	2.3	0.0	5.4	7.5	0.0	18.7
Prop In Lane	1.00		0.28	1.00		0.51	1.00		0.71	1.00		0.91
Lane Grp Cap(c), veh/h	463	705	707	334	661	637	209	0	347	391	0	355
V/C Ratio(X)	0.37	0.45	0.45	0.11	0.34	0.35	0.29	0.00	0.33	0.62	0.00	0.88
Avail Cap(c_a), veh/h	518	705	707	400	661	637	265	0	534	391	0	475
HCM Platoon Ratio	0.33	0.33	0.33	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.91	0.91	0.91	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	13.3	27.7	27.8	14.4	17.6	17.6	26.7	0.0	30.0	28.0	0.0	32.7
Incr Delay (d2), s/veh	0.2	1.9	1.9	0.1	1.4	1.5	0.3	0.0	0.2	2.2	0.0	11.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	7.3	7.3	0.4	3.3	3.3	1.0	0.0	2.1	1.6	0.0	7.5
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	13.5	29.6	29.7	14.4	19.0	19.1	26.9	0.0	30.2	30.2	0.0	44.3
LnGrp LOS	B	C	C	B	B	B	C	A	C	C	A	D
Approach Vol, veh/h	807				488				175			
Approach Delay, s/veh	26.2				18.7				29.1			
Approach LOS	C				B				C			
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	1.8	42.5	12.0	23.7	8.2	46.1	9.2	26.5				
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5				
Max Green Setting (Gmax), s	10.5	24.5	7.5	29.5	7.5	27.5	7.5	29.5				
Max Q Clear Time (g_c+11), s	11.1	11.1	9.5	7.4	3.2	19.2	4.3	20.7				
Green Ext Time (p_c), s	0.1	3.1	0.0	0.4	0.0	3.3	0.0	0.9				

Intersection Summary

HCM 6th Ctrl Delay 27.9

HCM 6th LOS C

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
6: 142nd Ave E & 24th St E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	0.7					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	Y		P		Y	Y
Traffic Vol, veh/h	20	25	390	15	35	1030
Future Vol, veh/h	20	25	390	15	35	1030
Conflicting Peds, #/hr	1	0	0	1	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	70	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	34	34	23	23	18	18
Mvmt Flow	22	27	424	16	38	1120
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	1070	433	0	0	441	0
Stage 1	433	-	-	-	-	-
Stage 2	637	-	-	-	-	-
Critical Hdwy	7.11	6.71	-	-	4.37	-
Critical Hdwy Stg 1	5.91	-	-	-	-	-
Critical Hdwy Stg 2	6.31	-	-	-	-	-
Follow-up Hdwy	3.823	3.623	-	-	2.371	-
Pot Cap-1 Maneuver	190	547	-	-	1024	-
Stage 1	577	-	-	-	-	-
Stage 2	424	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	183	547	-	-	1023	-
Mov Cap-2 Maneuver	298	-	-	-	-	-
Stage 1	576	-	-	-	-	-
Stage 2	408	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	15.3	0	0.3			
HCM LOS	C					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	399	1023	-	
HCM Lane V/C Ratio	-	-	0.123	0.037	-	
HCM Control Delay (s)	-	-	15.3	8.7	-	
HCM Lane LOS	-	-	C	A	-	
HCM 95th %tile Q(veh)	-	-	0.4	0.1	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

7: E Valley Highway E & Forest Canyon Road E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	111.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	0	0	5	60	0	100	5	295	180	400	815	0
Future Vol, veh/h	0	0	5	60	0	100	5	295	180	400	815	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	55	-	-	65	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	91	91	91	91	91	91	91	91	91	91	91	91
Heavy Vehicles, %	0	0	0	6	6	6	2	2	2	3	3	3
Mvmt Flow	0	0	5	66	0	110	5	324	198	440	896	0
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	2264	2308	896	2212	2209	423	896	0	0	522	0	0
Stage 1	1776	1776	-	433	433	-	-	-	-	-	-	-
Stage 2	488	532	-	1779	1776	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.16	6.56	6.26	4.12	-	-	4.13	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.554	4.054	3.354	2.218	-	-	2.227	-	-
Pot Cap-1 Maneuver	29	39	342	~ 31	43	622	757	-	-	1039	-	-
Stage 1	107	137	-	593	575	-	-	-	-	-	-	-
Stage 2	565	529	-	102	132	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	16	22	342	~ 20	25	622	757	-	-	1039	-	-
Mov Cap-2 Maneuver	16	22	-	~ 20	25	-	-	-	-	-	-	-
Stage 1	106	79	-	589	571	-	-	-	-	-	-	-
Stage 2	462	525	-	~ 58	76	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	15.7		\$ 1268.8		0.1		3.6					
HCM LOS	C		F									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1WBLn1	SBL	SBT	SBR					
Capacity (veh/h)	757	-	-	342	51	1039	-	-				
HCM Lane V/C Ratio	0.007	-	-	0.016	3.448	0.423	-	-				
HCM Control Delay (s)	9.8	-	-	15.7	\$ 1268.8	11	-	-				
HCM Lane LOS	A	-	-	C	F	B	-	-				
HCM 95th %tile Q(veh)	0	-	-	0	19.1	2.1	-	-				
Notes												
~: Volume exceeds capacity		\$: Delay exceeds 300s		+: Computation Not Defined				*: All major volume in platoon				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary 8: W Valley Highway E & SR-167 SB Ramps

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Volume (veh/h)	95	85	260	60	545	445
Future Volume (veh/h)	95	85	260	60	545	445
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No			No
Adj Sat Flow, veh/h/ln	1411	1411	1648	1648	1767	1767
Adj Flow Rate, veh/h	101	90	277	64	580	473
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	33	33	17	17	9	9
Cap, veh/h	155	242	534	121	650	0
Arrive On Green	0.12	0.12	0.21	0.21	0.39	0.00
Sat Flow, veh/h	1344	2104	2605	572	1682	580
Grp Volume(v), veh/h	101	90	170	171	580	22.0
Grp Sat Flow(s),veh/h/ln	1344	1052	1566	1529	1682	C
Q Serve(g_s), s	3.5	1.9	4.6	4.8	15.5	
Cycle Q Clear(g_c), s	3.5	1.9	4.6	4.8	15.5	
Prop In Lane	1.00	1.00		0.37	1.00	
Lane Grp Cap(c), veh/h	155	242	331	324	650	
V/C Ratio(X)	0.65	0.37	0.51	0.53	0.89	
Avail Cap(c_a), veh/h	431	674	1153	1126	889	
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	
Uniform Delay (d), s/veh	20.3	19.7	16.7	16.8	13.8	
Incr Delay (d2), s/veh	4.2	0.9	1.1	1.2	8.2	
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	
%ile BackOfQ(50%),veh/ln	1.2	0.5	1.6	1.6	6.2	
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	24.5	20.5	17.9	18.0	22.0	
LnGrp LOS	C	C	B	B	C	
Approach Vol, veh/h	191		341			
Approach Delay, s/veh	22.6		17.9			
Approach LOS	C		B			
Timer - Assigned Phs	1	2			8	
Phs Duration (G+Y+Rc), s	23.1	14.8			10.1	
Change Period (Y+Rc), s	4.6	4.6			4.6	
Max Green Setting (Gmax), s	25.4	35.4			15.4	
Max Q Clear Time (g_c+I1), s	17.5	6.8			5.5	
Green Ext Time (p_c), s	1.0	2.0			0.4	
Intersection Summary						
HCM 6th Ctrl Delay			20.9			
HCM 6th LOS			C			

Notes

Unsignalized Delay for [SBT] is excluded from calculations of the approach delay and intersection delay.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

9: 142nd Ave E & Costco Access

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	5	0	15	5	0	5	5	260	5	0	915	5
Future Volume (veh/h)	5	0	15	5	0	5	5	260	5	0	915	5
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		1.00	1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	477	477	477	1900	1900	1900	1722	1722	1722	1781	1781	1781
Adj Flow Rate, veh/h	5	0	16	5	0	5	5	274	5	0	963	5
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	96	96	96	0	0	0	12	12	12	8	8	8
Cap, veh/h	309	0	14	297	0	56	443	2086	38	790	1601	8
Arrive On Green	0.04	0.00	0.04	0.04	0.00	0.04	0.01	0.63	0.63	0.00	0.46	0.46
Sat Flow, veh/h	357	0	404	1419	0	1586	1640	3287	60	1697	3453	18
Grp Volume(v), veh/h	5	0	16	5	0	5	5	136	143	0	472	496
Grp Sat Flow(s),veh/h/ln	357	0	404	1419	0	1586	1640	1636	1711	1697	1692	1778
Q Serve(g_s), s	0.3	0.0	0.9	0.0	0.0	0.1	0.0	0.8	0.8	0.0	5.0	5.0
Cycle Q Clear(g_c), s	0.4	0.0	0.9	0.9	0.0	0.1	0.0	0.8	0.8	0.0	5.0	5.0
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.03	1.00		0.01
Lane Grp Cap(c), veh/h	309	0	14	297	0	56	443	1038	1086	790	785	825
V/C Ratio(X)	0.02	0.00	1.12	0.02	0.00	0.09	0.01	0.13	0.13	0.00	0.60	0.60
Avail Cap(c_a), veh/h	532	0	267	1184	0	1047	705	1080	1130	1063	1118	1174
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00
Uniform Delay (d), s/veh	11.5	0.0	11.7	12.1	0.0	11.3	3.5	1.8	1.8	0.0	4.8	4.8
Incr Delay (d2), s/veh	0.0	0.0	147.1	0.0	0.0	0.7	0.0	0.1	0.1	0.0	0.7	0.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6	0.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	11.5	0.0	158.8	12.1	0.0	12.0	3.5	1.8	1.8	0.0	5.6	5.5
LnGrp LOS	B	A	F	B	A	B	A	A	A	A	A	A
Approach Vol, veh/h	21		10				284			968		
Approach Delay, s/veh	123.7		12.1				1.9			5.6		
Approach LOS	F		B				A			A		
Timer - Assigned Phs	2		3		4		6		7		8	
Phs Duration (G+Y+Rc), s	4.9		0.0		19.4		4.9		4.1		15.2	
Change Period (Y+Rc), s	4.0		4.0		4.0		4.0		4.0		4.0	
Max Green Setting (Gmax), s	16.0		4.0		16.0		16.0		4.0		16.0	
Max Q Clear Time (g_c+I1), s	2.9		0.0		2.8		2.9		2.0		7.0	
Green Ext Time (p_c), s	0.0		0.0		1.3		0.1		0.0		4.1	
Intersection Summary												
HCM 6th Ctrl Delay			6.7									
HCM 6th LOS			A									

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

10: W Valley Highway E & 42nd Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	1.8					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	↘↘		↑	↗	↘	↑
Traffic Vol, veh/h	40	50	185	10	25	520
Future Vol, veh/h	40	50	185	10	25	520
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	100	200	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	95	95	95	95	95	95
Heavy Vehicles, %	20	20	29	29	11	11
Mvmt Flow	42	53	195	11	26	547
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	794	195	0	0	206	0
Stage 1	195	-	-	-	-	-
Stage 2	599	-	-	-	-	-
Critical Hdwy	6.6	6.4	-	-	4.21	-
Critical Hdwy Stg 1	5.6	-	-	-	-	-
Critical Hdwy Stg 2	5.6	-	-	-	-	-
Follow-up Hdwy	3.68	3.48	-	-	2.299	-
Pot Cap-1 Maneuver	333	803	-	-	1313	-
Stage 1	797	-	-	-	-	-
Stage 2	515	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	326	803	-	-	1313	-
Mov Cap-2 Maneuver	326	-	-	-	-	-
Stage 1	797	-	-	-	-	-
Stage 2	505	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	14.2	0	0.4			
HCM LOS	B					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	487	1313	-	
HCM Lane V/C Ratio	-	-	0.195	0.02	-	
HCM Control Delay (s)	-	-	14.2	7.8	-	
HCM Lane LOS	-	-	B	A	-	
HCM 95th %tile Q(veh)	-	-	0.7	0.1	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
11: Tacoma Ave & 142nd Ave E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	0.4					
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	10	5	20	255	610	450
Future Vol, veh/h	10	5	20	255	610	450
Conflicting Peds, #/hr	1	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	0	170	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	46	46	22	22	12	12
Mvmt Flow	11	5	22	277	663	489
Major/Minor	Minor2	Major1	Major2			
Conflicting Flow All	847	663	1152	0	-	0
Stage 1	663	-	-	-	-	-
Stage 2	184	-	-	-	-	-
Critical Hdwy	7.29	6.89	4.43	-	-	-
Critical Hdwy Stg 1	6.09	-	-	-	-	-
Critical Hdwy Stg 2	6.49	-	-	-	-	-
Follow-up Hdwy	3.937	3.737	2.409	-	-	-
Pot Cap-1 Maneuver	252	375	519	-	-	-
Stage 1	419	-	-	-	-	-
Stage 2	725	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	241	375	519	-	-	-
Mov Cap-2 Maneuver	330	-	-	-	-	-
Stage 1	401	-	-	-	-	-
Stage 2	725	-	-	-	-	-
Approach	EB	NB	SB			
HCM Control Delay, s	15.8	0.9	0			
HCM LOS	C					
Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	519	-	330	375	-	-
HCM Lane V/C Ratio	0.042	-	0.033	0.014	-	-
HCM Control Delay (s)	12.2	-	16.3	14.7	-	-
HCM Lane LOS	B	-	C	B	-	-
HCM 95th %tile Q(veh)	0.1	-	0.1	0	-	-

Appendix B LOS Summary and Worksheets

HCM 6th AWSC
12: Puyallup St & Tacoma Ave

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection	
Intersection Delay, s/veh	84.3
Intersection LOS	F

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Vol, veh/h	150	55	90	65	465	265
Future Vol, veh/h	150	55	90	65	465	265
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	25	25	22	22	12	12
Mvmt Flow	165	60	99	71	511	291
Number of Lanes	0	1	1	0	1	0

Approach	EB	WB	SB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left	SB		WB
Conflicting Lanes Left	1	0	1
Conflicting Approach Right		SB	EB
Conflicting Lanes Right	0	1	1
HCM Control Delay	15.3	12.9	118.8
HCM LOS	C	B	F

Lane	EBLn1	WBLn1	SBLn1
Vol Left, %	73%	0%	64%
Vol Thru, %	27%	58%	0%
Vol Right, %	0%	42%	36%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	205	155	730
LT Vol	150	0	465
Through Vol	55	90	0
RT Vol	0	65	265
Lane Flow Rate	225	170	802
Geometry Grp	1	1	1
Degree of Util (X)	0.418	0.301	1.188
Departure Headway (Hd)	7.233	6.929	5.333
Convergence, Y/N	Yes	Yes	Yes
Cap	500	523	690
Service Time	5.233	4.929	3.333
HCM Lane V/C Ratio	0.45	0.325	1.162
HCM Control Delay	15.3	12.9	118.8
HCM Lane LOS	C	B	F
HCM 95th-tile Q	2	1.3	27

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

13: E Valley Highway E & Puyallup Street

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	100	345	65	380	850	60
Future Volume (vph)	100	345	65	380	850	60
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00
Frpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	0.85	1.00	1.00	1.00	0.85
Flt Protected	0.95	1.00	0.95	1.00	1.00	1.00
Satd. Flow (prot)	1787	1599	1770	1863	1845	1534
Flt Permitted	0.95	1.00	0.15	1.00	1.00	1.00
Satd. Flow (perm)	1787	1599	272	1863	1845	1534
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	103	356	67	392	876	62
RTOR Reduction (vph)	0	313	0	0	0	5
Lane Group Flow (vph)	103	43	67	392	876	57
Confl. Peds. (#/hr)	2		1			1
Heavy Vehicles (%)	1%	1%	2%	2%	3%	3%
Turn Type	Prot	Perm	pm+pt	NA	NA	Perm
Protected Phases	6		7	4	8	
Permitted Phases		6	4			8
Actuated Green, G (s)	9.1	9.1	56.7	56.7	45.5	45.5
Effective Green, g (s)	9.1	9.1	56.7	56.7	45.5	45.5
Actuated g/C Ratio	0.12	0.12	0.75	0.75	0.60	0.60
Clearance Time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.5	2.5	2.5	2.5	2.5	2.5
Lane Grp Cap (vph)	214	191	325	1393	1107	920
v/s Ratio Prot	c0.06		0.02	c0.21	c0.47	
v/s Ratio Perm		0.03	0.14			0.04
v/c Ratio	0.48	0.22	0.21	0.28	0.79	0.06
Uniform Delay, d1	31.1	30.2	8.6	3.0	11.5	6.3
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	1.2	0.4	0.2	0.1	3.8	0.0
Delay (s)	32.4	30.6	8.8	3.1	15.4	6.3
Level of Service	C	C	A	A	B	A
Approach Delay (s)	31.0			4.0	14.8	
Approach LOS	C			A	B	
Intersection Summary						
HCM 2000 Control Delay			16.1		HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio			0.73			
Actuated Cycle Length (s)			75.8		Sum of lost time (s)	17.0
Intersection Capacity Utilization			74.4%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

14: Elm Street E & E Valley Highway E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	3.8					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↰		↰	↰	↰	↰
Traffic Vol, veh/h	380	65	400	760	25	80
Future Vol, veh/h	380	65	400	760	25	80
Conflicting Peds, #/hr	0	0	0	0	1	7
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	100	-	45	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	2	2	2	2	0	0
Mvmt Flow	396	68	417	792	26	83
Major/Minor	Major1	Major2		Minor1		
Conflicting Flow All	0	0	464	0	2057	437
Stage 1	-	-	-	-	430	-
Stage 2	-	-	-	-	1627	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1097	-	61	624
Stage 1	-	-	-	-	660	-
Stage 2	-	-	-	-	178	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1097	-	38	620
Mov Cap-2 Maneuver	-	-	-	-	94	-
Stage 1	-	-	-	-	660	-
Stage 2	-	-	-	-	110	-
Approach	EB	WB		NB		
HCM Control Delay, s	0	3.5		22.6		
HCM LOS	C					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	94	620	-	-	1097	-
HCM Lane V/C Ratio	0.277	0.134	-	-	0.38	-
HCM Control Delay (s)	57.4	11.7	-	-	10.3	-
HCM Lane LOS	F	B	-	-	B	-
HCM 95th %tile Q(veh)	1	0.5	-	-	1.8	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
15: Valley Avenue & Elm Street E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	6.9					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↰		↰	↰	↰	↰
Traffic Vol, veh/h	210	30	545	240	20	235
Future Vol, veh/h	210	30	545	240	20	235
Conflicting Peds, #/hr	0	1	1	0	2	1
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	275	-	100	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	1	1	1	1	1	1
Mvmt Flow	219	31	568	250	21	245
Major/Minor	Major1	Major2		Minor1		
Conflicting Flow All	0	0	251	0	1624	237
Stage 1	-	-	-	-	236	-
Stage 2	-	-	-	-	1388	-
Critical Hdwy	-	-	4.11	-	6.41	6.21
Critical Hdwy Stg 1	-	-	-	-	5.41	-
Critical Hdwy Stg 2	-	-	-	-	5.41	-
Follow-up Hdwy	-	-	2.209	-	3.509	3.309
Pot Cap-1 Maneuver	-	-	1320	-	113	804
Stage 1	-	-	-	-	806	-
Stage 2	-	-	-	-	232	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1319	-	64	803
Mov Cap-2 Maneuver	-	-	-	-	115	-
Stage 1	-	-	-	-	805	-
Stage 2	-	-	-	-	132	-
Approach	EB	WB		NB		
HCM Control Delay, s	0	6.8		13.9		
HCM LOS	B					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	115	803	-	-	1319	-
HCM Lane V/C Ratio	0.181	0.305	-	-	0.43	-
HCM Control Delay (s)	43.1	11.4	-	-	9.8	-
HCM Lane LOS	E	B	-	-	A	-
HCM 95th %tile Q(veh)	0.6	1.3	-	-	2.2	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
16: Fryar Avenue & Zehnder Avenue

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	2.6					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	95	5	240	165	90	655
Future Vol, veh/h	95	5	240	165	90	655
Conflicting Peds, #/hr	0	1	0	2	2	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	100	-
Veh in Median Storage, #	1	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	3	3	10	10	7	7
Mvmt Flow	103	5	261	179	98	712
Major/Minor	Minor1	Major1		Major2		
Conflicting Flow All	1261	354	0	0	442	0
Stage 1	353	-	-	-	-	-
Stage 2	908	-	-	-	-	-
Critical Hdwy	6.43	6.23	-	-	4.17	-
Critical Hdwy Stg 1	5.43	-	-	-	-	-
Critical Hdwy Stg 2	5.43	-	-	-	-	-
Follow-up Hdwy	3.527	3.327	-	-	2.263	-
Pot Cap-1 Maneuver	187	688	-	-	1092	-
Stage 1	709	-	-	-	-	-
Stage 2	392	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	170	686	-	-	1090	-
Mov Cap-2 Maneuver	282	-	-	-	-	-
Stage 1	708	-	-	-	-	-
Stage 2	357	-	-	-	-	-
Approach	WB	NB		SB		
HCM Control Delay, s	24.6	0		1		
HCM LOS	C					
Minor Lane/Major Mvmt	NBT	NBRWBLn1		SBL	SBT	
Capacity (veh/h)	-	-	291	1090	-	
HCM Lane V/C Ratio	-	-	0.374	0.09	-	
HCM Control Delay (s)	-	-	24.6	8.6	-	
HCM Lane LOS	-	-	C	A	-	
HCM 95th %tile Q(veh)	-	-	1.7	0.3	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

17: Parker Road E & Washington Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	3.4											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↔			↔			↔			↔	
Traffic Vol, veh/h	20	20	10	5	5	5	5	40	5	30	130	10
Future Vol, veh/h	20	20	10	5	5	5	5	40	5	30	130	10
Conflicting Peds, #/hr	4	0	4	4	0	4	3	0	1	1	0	3
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	89	89	89	89	89	89	89	89	89	89	89	89
Heavy Vehicles, %	0	0	0	0	0	0	4	4	4	2	2	2
Mvmt Flow	22	22	11	6	6	6	6	45	6	34	146	11

Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	293	287	159	301	289	53	160	0	0	52	0	0
Stage 1	223	223	-	61	61	-	-	-	-	-	-	-
Stage 2	70	64	-	240	228	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.1	6.5	6.2	4.14	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.5	4	3.3	2.236	-	-	2.218	-	-
Pot Cap-1 Maneuver	663	626	892	655	624	1020	1407	-	-	1554	-	-
Stage 1	784	723	-	955	848	-	-	-	-	-	-	-
Stage 2	945	846	-	768	719	-	-	-	-	-	-	-
Platoon blocked, %								-	-	-	-	-
Mov Cap-1 Maneuver	637	607	887	612	605	1016	1403	-	-	1553	-	-
Mov Cap-2 Maneuver	637	607	-	612	605	-	-	-	-	-	-	-
Stage 1	779	704	-	950	844	-	-	-	-	-	-	-
Stage 2	927	842	-	714	700	-	-	-	-	-	-	-

Approach	EB		WB		NB		SB	
HCM Control Delay, s	11		10.3		0.8		1.3	
HCM LOS	B		B					

Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1WBLn1	SBL	SBT	SBR
Capacity (veh/h)	1403	-	-	661	702	1553	-
HCM Lane V/C Ratio	0.004	-	-	0.085	0.024	0.022	-
HCM Control Delay (s)	7.6	0	-	11	10.3	7.4	0
HCM Lane LOS	A	A	-	B	B	A	A
HCM 95th %tile Q(veh)	0	-	-	0.3	0.1	0.1	-

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis 18: W Valley Highway E & Sumner-Heights Drive E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

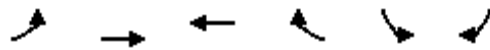
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	W	W	T	T	L	T
Traffic Volume (vph)	140	135	20	180	580	30
Future Volume (vph)	140	135	20	180	580	30
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0		5.0		3.5	5.0
Lane Util. Factor	1.00		1.00		1.00	1.00
Frpb, ped/bikes	0.99		0.98		1.00	1.00
Flpb, ped/bikes	1.00		1.00		1.00	1.00
Frt	0.93		0.88		1.00	1.00
Flt Protected	0.98		1.00		0.95	1.00
Satd. Flow (prot)	1475		1621		1626	1712
Flt Permitted	0.98		1.00		0.62	1.00
Satd. Flow (perm)	1475		1621		1061	1712
Peak-hour factor, PHF	0.90	0.90	0.90	0.90	0.90	0.90
Adj. Flow (vph)	156	150	22	200	644	33
RTOR Reduction (vph)	0	0	143	0	0	0
Lane Group Flow (vph)	306	0	79	0	644	33
Confl. Bikes (#/hr)		2		1		
Heavy Vehicles (%)	16%	16%	1%	1%	11%	11%
Turn Type	Perm		NA		pm+pt	NA
Protected Phases			4		1	8
Permitted Phases	2				8	
Actuated Green, G (s)	28.8		30.8		54.7	19.7
Effective Green, g (s)	28.8		30.8		54.7	19.7
Actuated g/C Ratio	0.27		0.28		0.51	0.18
Clearance Time (s)	5.0		5.0		3.5	5.0
Vehicle Extension (s)	3.0		3.0		3.0	3.0
Lane Grp Cap (vph)	392		461		719	311
v/s Ratio Prot			c0.05		c0.29	0.02
v/s Ratio Perm	c0.21				c0.16	
v/c Ratio	0.78		0.17		0.90	0.11
Uniform Delay, d1	36.7		29.1		23.2	36.9
Progression Factor	1.36		1.00		1.00	1.00
Incremental Delay, d2	9.2		0.2		13.7	0.2
Delay (s)	59.2		29.2		36.9	37.0
Level of Service	E		C		D	D
Approach Delay (s)	59.2		29.2			36.9
Approach LOS	E		C			D
Intersection Summary						
HCM 2000 Control Delay			41.1		HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio			0.80			
Actuated Cycle Length (s)			108.1		Sum of lost time (s)	17.0
Intersection Capacity Utilization			72.0%		ICU Level of Service	C
Analysis Period (min)			15			

c Critical Lane Group

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis 19: Valley Avenue E & Sumner-Heights Drive E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (vph)	80	295	220	195	480	280
Future Volume (vph)	80	295	220	195	480	280
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	3.5	5.0	5.0	5.0	5.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	
Frpb, ped/bikes	1.00	1.00	1.00	0.97	0.99	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	1.00	0.85	0.95	
Flt Protected	0.95	1.00	1.00	1.00	0.97	
Satd. Flow (prot)	1655	1743	1881	1559	1608	
Flt Permitted	0.30	1.00	1.00	1.00	0.97	
Satd. Flow (perm)	529	1743	1881	1559	1608	
Peak-hour factor, PHF	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	85	314	234	207	511	298
RTOR Reduction (vph)	0	0	0	169	0	0
Lane Group Flow (vph)	85	314	234	38	809	0
Confl. Peds. (#/hr)	2			2		1
Heavy Vehicles (%)	9%	9%	1%	1%	8%	8%
Turn Type	pm+pt	NA	NA	Perm	Perm	
Protected Phases	7	4	8			
Permitted Phases	4			8	6	
Actuated Green, G (s)	30.8	30.8	19.7	19.7	67.3	
Effective Green, g (s)	30.8	30.8	19.7	19.7	67.3	
Actuated g/C Ratio	0.28	0.28	0.18	0.18	0.62	
Clearance Time (s)	3.5	5.0	5.0	5.0	5.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	229	496	342	284	1001	
v/s Ratio Prot	0.03	c0.18	0.12			
v/s Ratio Perm	0.08			0.02	c0.50	
v/c Ratio	0.37	0.63	0.68	0.13	0.81	
Uniform Delay, d1	29.8	33.7	41.3	37.0	15.5	
Progression Factor	1.00	1.00	1.00	1.00	1.19	
Incremental Delay, d2	1.0	2.6	5.6	0.2	3.7	
Delay (s)	30.8	36.4	46.9	37.3	22.2	
Level of Service	C	D	D	D	C	
Approach Delay (s)		35.2	42.4		22.2	
Approach LOS		D	D		C	
Intersection Summary						
HCM 2000 Control Delay			30.7		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.81			
Actuated Cycle Length (s)			108.1		Sum of lost time (s)	17.0
Intersection Capacity Utilization			75.7%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

20: Traffic Avenue/Fryar Avenue & Cannery Way/Main Street

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	135	295	415	145	125	25	215	250	75	110	615	115
Future Volume (veh/h)	135	295	415	145	125	25	215	250	75	110	615	115
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		0.98	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1885	1885	1885	1811	1811	1811	1826	1826	1826
Adj Flow Rate, veh/h	148	324	456	159	137	27	236	275	82	121	676	126
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	1	1	1	1	1	1	6	6	6	5	5	5
Cap, veh/h	578	566	476	403	458	90	262	311	258	418	758	141
Arrive On Green	0.14	0.30	0.30	0.14	0.30	0.30	0.15	0.17	0.17	0.24	0.26	0.26
Sat Flow, veh/h	1795	1885	1586	1795	1526	301	1725	1811	1504	1739	2912	542
Grp Volume(v), veh/h	148	324	456	159	0	164	236	275	82	121	402	400
Grp Sat Flow(s),veh/h/ln	1795	1885	1586	1795	0	1827	1725	1811	1504	1739	1735	1720
Q Serve(g_s), s	7.4	21.2	41.2	8.0	0.0	10.1	19.6	21.6	5.2	8.3	32.6	32.7
Cycle Q Clear(g_c), s	7.4	21.2	41.2	8.0	0.0	10.1	19.6	21.6	5.2	8.3	32.6	32.7
Prop In Lane	1.00		1.00	1.00		0.16	1.00		1.00	1.00		0.32
Lane Grp Cap(c), veh/h	578	566	476	403	0	548	262	311	258	418	452	448
V/C Ratio(X)	0.26	0.57	0.96	0.39	0.00	0.30	0.90	0.88	0.32	0.29	0.89	0.89
Avail Cap(c_a), veh/h	757	575	484	582	0	558	408	677	562	418	648	643
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	25.6	43.1	50.1	27.4	0.0	39.2	60.8	59.0	29.2	45.2	51.9	52.0
Incr Delay (d2), s/veh	0.2	1.3	30.2	0.6	0.0	0.3	15.7	8.2	0.7	0.4	10.8	11.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.3	10.3	20.1	3.6	0.0	4.7	9.7	10.6	2.6	3.6	15.4	15.4
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	25.8	44.5	80.4	28.0	0.0	39.5	76.5	67.2	29.9	45.6	62.7	63.0
LnGrp LOS	C	D	F	C	A	D	E	E	C	D	E	E
Approach Vol, veh/h	928			323			593			923		
Approach Delay, s/veh	59.1			33.8			65.7			60.6		
Approach LOS	E			C			E			E		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	25.5	49.3	40.5	30.6	25.5	49.2	27.6	43.5				
Change Period (Y+Rc), s	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5				
Max Green Setting (Gmax), s	34.5	44.5	34.5	54.5	34.5	44.5	34.5	54.5				
Max Q Clear Time (g_c+19.4)	12.1	12.1	10.3	23.6	10.0	43.2	21.6	34.7				
Green Ext Time (p_c), s	0.5	0.7	0.3	1.4	0.6	0.6	0.5	3.3				

Intersection Summary

HCM 6th Ctrl Delay 58.1

HCM 6th LOS E

Appendix B LOS Summary and Worksheets

HCM 6th AWSC
21: Alder Avenue & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection

Intersection Delay, s/veh 13.6

Intersection LOS B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	365	140	85	250	25	45
Future Vol, veh/h	365	140	85	250	25	45
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93
Heavy Vehicles, %	0	0	2	2	0	0
Mvmt Flow	392	151	91	269	27	48
Number of Lanes	1	0	0	1	1	0

Approach	EB	WB	NB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left		NB	EB
Conflicting Lanes Left	0	1	1
Conflicting Approach Right	NB		WB
Conflicting Lanes Right	1	0	1
HCM Control Delay	15.3	12	9.3
HCM LOS	C	B	A

Lane	NBLn1	EBLn1	WBLn1
Vol Left, %	36%	0%	25%
Vol Thru, %	0%	72%	75%
Vol Right, %	64%	28%	0%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	70	505	335
LT Vol	25	0	85
Through Vol	0	365	250
RT Vol	45	140	0
Lane Flow Rate	75	543	360
Geometry Grp	1	1	1
Degree of Util (X)	0.115	0.654	0.474
Departure Headway (Hd)	5.494	4.338	4.741
Convergence, Y/N	Yes	Yes	Yes
Cap	647	831	756
Service Time	3.571	2.377	2.789
HCM Lane V/C Ratio	0.116	0.653	0.476
HCM Control Delay	9.3	15.3	12
HCM Lane LOS	A	C	B
HCM 95th-tile Q	0.4	5	2.6

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
22: Ryan Ave & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection						
Int Delay, s/veh	0.5					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	395	10	10	310	5	15
Future Vol, veh/h	395	10	10	310	5	15
Conflicting Peds, #/hr	0	20	20	0	0	2
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	93	93	93	93	93	93
Heavy Vehicles, %	1	1	2	2	0	0
Mvmt Flow	425	11	11	333	5	16
Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	456	0	806	453
Stage 1	-	-	-	-	451	-
Stage 2	-	-	-	-	355	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1105	-	354	611
Stage 1	-	-	-	-	646	-
Stage 2	-	-	-	-	714	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1087	-	344	600
Mov Cap-2 Maneuver	-	-	-	-	344	-
Stage 1	-	-	-	-	635	-
Stage 2	-	-	-	-	705	-
Approach	EB		WB		NB	
HCM Control Delay, s	0		0.3		12.4	
HCM LOS	B					
Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT	
Capacity (veh/h)	506	-	-	1087	-	
HCM Lane V/C Ratio	0.043	-	-	0.01	-	
HCM Control Delay (s)	12.4	-	-	8.3	0	
HCM Lane LOS	B	-	-	A	A	
HCM 95th %tile Q(veh)	0.1	-	-	0	-	

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

23: Wood Avenue & Main Street

Future (2044) PM Peak Hour - Alternative 1

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	55	345	20	10	185	60	10	70	30	105	170	130
Future Volume (vph)	55	345	20	10	185	60	10	70	30	105	170	130
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	11	12	12	12	10	12	12	16	12	12	10	11
Total Lost time (s)	5.5	5.5			5.5			5.5			5.5	4.0
Lane Util. Factor	1.00	1.00			1.00			1.00			1.00	1.00
Frpb, ped/bikes	1.00	1.00			0.99			1.00			1.00	1.00
Flpb, ped/bikes	0.99	1.00			1.00			1.00			1.00	1.00
Frt	1.00	0.99			0.97			0.96			1.00	0.85
Flt Protected	0.95	1.00			1.00			1.00			0.98	1.00
Satd. Flow (prot)	1715	1863			1684			2024			1740	1561
Flt Permitted	0.65	1.00			0.98			0.95			0.82	1.00
Satd. Flow (perm)	1177	1863			1651			1939			1457	1561
Peak-hour factor, PHF	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Adj. Flow (vph)	62	388	22	11	208	67	11	79	34	118	191	146
RTOR Reduction (vph)	0	5	0	0	26	0	0	23	0	0	0	146
Lane Group Flow (vph)	62	405	0	0	260	0	0	101	0	0	309	0
Confl. Peds. (#/hr)	9		11	11		9	1					1
Heavy Vehicles (%)	1%	1%	1%	1%	1%	1%	2%	2%	2%	0%	0%	0%
Turn Type	Perm	NA		Perm	NA		Perm	NA		Perm	NA	NA
Protected Phases		4			8			2			6	
Permitted Phases	4			8			2			6		
Actuated Green, G (s)	17.0	17.0			17.0			13.2			13.2	0.0
Effective Green, g (s)	17.0	17.0			17.0			13.2			13.2	0.0
Actuated g/C Ratio	0.41	0.41			0.41			0.32			0.32	0.00
Clearance Time (s)	5.5	5.5			5.5			5.5			5.5	
Vehicle Extension (s)	6.0	6.0			6.0			6.0			6.0	
Lane Grp Cap (vph)	485	768			681			621			466	0
v/s Ratio Prot		c0.22										
v/s Ratio Perm	0.05				0.16			0.05			c0.21	
v/c Ratio	0.13	0.53			0.38			0.16			0.66	0.00
Uniform Delay, d1	7.5	9.1			8.4			10.0			12.1	20.6
Progression Factor	1.00	1.00			1.00			1.00			1.00	1.00
Incremental Delay, d2	0.3	1.6			1.0			0.3			5.5	0.0
Delay (s)	7.8	10.7			9.4			10.4			17.6	20.6
Level of Service	A	B			A			B			B	C
Approach Delay (s)		10.3			9.4			10.4			18.6	
Approach LOS		B			A			B			B	
Intersection Summary												
HCM 2000 Control Delay			13.0									
HCM 2000 Volume to Capacity ratio			0.59									
Actuated Cycle Length (s)			41.2									
Intersection Capacity Utilization			59.4%									
Analysis Period (min)			15									
c Critical Lane Group												

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

24: Valley Avenue & Main Street

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	155	380	65	185	255	65	15	305	105	65	585	55
Future Volume (veh/h)	155	380	65	185	255	65	15	305	105	65	585	55
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.98	0.99		0.98	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1900	1976	1900	1900	1900	1900	1961	1885	1885	1900	1976	1900
Adj Flow Rate, veh/h	163	400	68	195	268	68	16	321	111	68	616	58
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	1	1	1	0	0	0
Cap, veh/h	377	458	78	305	426	108	158	459	159	310	670	63
Arrive On Green	0.09	0.28	0.28	0.10	0.29	0.29	0.02	0.34	0.34	0.05	0.38	0.38
Sat Flow, veh/h	1810	1640	279	1810	1455	369	1867	1333	461	1810	1776	167
Grp Volume(v), veh/h	163	0	468	195	0	336	16	0	432	68	0	674
Grp Sat Flow(s),veh/h/ln	1810	0	1919	1810	0	1824	1867	0	1794	1810	0	1943
Q Serve(g_s), s	5.7	0.0	21.0	6.8	0.0	14.4	0.5	0.0	18.8	2.1	0.0	29.9
Cycle Q Clear(g_c), s	5.7	0.0	21.0	6.8	0.0	14.4	0.5	0.0	18.8	2.1	0.0	29.9
Prop In Lane	1.00		0.15	1.00		0.20	1.00		0.26	1.00		0.09
Lane Grp Cap(c), veh/h	377	0	536	305	0	534	158	0	618	310	0	733
V/C Ratio(X)	0.43	0.00	0.87	0.64	0.00	0.63	0.10	0.00	0.70	0.22	0.00	0.92
Avail Cap(c_a), veh/h	520	0	850	424	0	808	427	0	795	513	0	861
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	21.1	0.0	31.0	22.5	0.0	27.7	22.4	0.0	25.5	19.0	0.0	26.8
Incr Delay (d2), s/veh	0.8	0.0	6.2	2.2	0.0	1.2	0.3	0.0	1.9	0.4	0.0	13.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.4	0.0	10.5	3.0	0.0	6.4	0.2	0.0	8.2	0.9	0.0	16.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	21.9	0.0	37.2	24.8	0.0	28.9	22.7	0.0	27.4	19.4	0.0	40.4
LnGrp LOS	C	A	D	C	A	C	C	A	C	B	A	D
Approach Vol, veh/h	631		531			448			742			
Approach Delay, s/veh	33.2		27.4			27.3			38.5			
Approach LOS	C		C			C			D			
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	4.1	30.2	9.9	36.1	12.9	31.4	7.0	39.0				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	5.0	40.0	15.0	40.0	15.0	40.0	15.0	40.0				
Max Q Clear Time (g_c+1/3), s	23.0	4.1	20.8	7.7	16.4	2.5	31.9					
Green Ext Time (p_c), s	0.4	1.9	0.1	1.9	0.3	1.4	0.0	2.2				

Intersection Summary

HCM 6th Ctrl Delay	32.4
HCM 6th LOS	C

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
25: Parker Road E & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	8.4											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	20	625	40	15	340	30	30	15	5	55	65	30
Future Vol, veh/h	20	625	40	15	340	30	30	15	5	55	65	30
Conflicting Peds, #/hr	5	0	10	10	0	5	0	0	4	4	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	250	-	-	235	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	1	1	1
Mvmt Flow	20	638	41	15	347	31	31	15	5	56	66	31

Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	383	0	0	689	0	0	1150	1122	673	1111	1127	368
Stage 1	-	-	-	-	-	-	709	709	-	398	398	-
Stage 2	-	-	-	-	-	-	441	413	-	713	729	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1187	-	-	915	-	-	177	208	459	187	205	680
Stage 1	-	-	-	-	-	-	428	440	-	630	605	-
Stage 2	-	-	-	-	-	-	599	597	-	424	430	-
Platoon blocked, %	-	-	-	-	-	-	-	-	-	-	-	-
Mov Cap-1 Maneuver	1182	-	-	907	-	-	121	199	454	168	196	677
Mov Cap-2 Maneuver	-	-	-	-	-	-	121	199	-	168	196	-
Stage 1	-	-	-	-	-	-	417	429	-	617	592	-
Stage 2	-	-	-	-	-	-	499	584	-	396	419	-

Approach	EB			WB			NB			SB		
HCM Control Delay, s	0.2			0.4			40.9			55.9		
HCM LOS							E			F		

Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1
Capacity (veh/h)	150	1182	-	-	907	-	-	213
HCM Lane V/C Ratio	0.34	0.017	-	-	0.017	-	-	0.719
HCM Control Delay (s)	40.9	8.1	-	-	9	-	-	55.9
HCM Lane LOS	E	A	-	-	A	-	-	F
HCM 95th %tile Q(veh)	1.4	0.1	-	-	0.1	-	-	4.7

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

26: 160th Avenue E & Main Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Intersection Delay, s/veh	46.5											
Intersection LOS	E											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	20	280	410	30	290	35	105	45	15	180	110	20
Future Vol, veh/h	20	280	410	30	290	35	105	45	15	180	110	20
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	1	1	1	0	0	0	0	0	0	1	1	1
Mvmt Flow	22	308	451	33	319	38	115	49	16	198	121	22
Number of Lanes	1	1	1	1	1	0	0	1	0	0	1	0
Approach	EB			WB			NB			SB		
Opposing Approach	WB			EB			SB			NB		
Opposing Lanes	2			3			1			1		
Conflicting Approach Left	SB			NB			EB			WB		
Conflicting Lanes Left	1			1			3			2		
Conflicting Approach Right	NB			SB			WB			EB		
Conflicting Lanes Right	1			1			2			3		
HCM Control Delay	45.9			58.6			21.6			47.1		
HCM LOS	E			F			C			E		
Lane	NBLn1	EBLn1	EBLn2	EBLn3	WBLn1	WBLn2	SBLn1					
Vol Left, %	64%	100%	0%	0%	100%	0%	58%					
Vol Thru, %	27%	0%	100%	0%	0%	89%	35%					
Vol Right, %	9%	0%	0%	100%	0%	11%	6%					
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Stop					
Traffic Vol by Lane	165	20	280	410	30	325	310					
LT Vol	105	20	0	0	30	0	180					
Through Vol	45	0	280	0	0	290	110					
RT Vol	15	0	0	410	0	35	20					
Lane Flow Rate	181	22	308	451	33	357	341					
Geometry Grp	7	7	7	7	8	8	7					
Degree of Util (X)	0.491	0.054	0.714	0.955	0.092	0.936	0.857					
Departure Headway (Hd)	9.75	8.877	8.357	7.628	10.038	9.433	9.054					
Convergence, Y/N	Yes	Yes	Yes	Yes	Yes	Yes	Yes					
Cap	370	402	431	473	356	382	399					
Service Time	7.526	6.653	6.132	5.403	7.823	7.217	6.815					
HCM Lane V/C Ratio	0.489	0.055	0.715	0.953	0.093	0.935	0.855					
HCM Control Delay	21.6	12.2	29.5	58.7	13.8	62.7	47.1					
HCM Lane LOS	C	B	D	F	B	F	E					
HCM 95th-tile Q	2.6	0.2	5.5	11.7	0.3	10.1	8.3					

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary 27: Sumner-Tapps Highway E & 60th Street E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	260	275	160	505	605	175
Future Volume (veh/h)	260	275	160	505	605	175
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1900	1900	1885	1885	1870	1870
Adj Flow Rate, veh/h	277	293	170	537	644	186
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	1	1	2	2
Cap, veh/h	387	344	191	1253	694	200
Arrive On Green	0.21	0.21	0.11	0.66	0.50	0.50
Sat Flow, veh/h	1810	1610	1795	1885	1395	403
Grp Volume(v), veh/h	277	293	170	537	0	830
Grp Sat Flow(s), veh/h/ln	1810	1610	1795	1885	0	1798
Q Serve(g_s), s	9.3	11.5	6.2	8.8	0.0	28.4
Cycle Q Clear(g_c), s	9.3	11.5	6.2	8.8	0.0	28.4
Prop In Lane	1.00	1.00	1.00			0.22
Lane Grp Cap(c), veh/h	387	344	191	1253	0	894
V/C Ratio(X)	0.72	0.85	0.89	0.43	0.00	0.93
Avail Cap(c_a), veh/h	440	391	191	1318	0	956
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	24.0	24.9	29.0	5.2	0.0	15.4
Incr Delay (d2), s/veh	4.7	14.8	36.4	0.2	0.0	14.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.3	1.4	4.4	2.3	0.0	12.9
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	28.7	39.6	65.4	5.4	0.0	29.8
LnGrp LOS	C	D	E	A	A	C
Approach Vol, veh/h	570			707	830	
Approach Delay, s/veh	34.3			19.8	29.8	
Approach LOS	C			B	C	
Timer - Assigned Phs	2			4	5	6
Phs Duration (G+Y+Rc), s	47.7			18.1	11.0	36.7
Change Period (Y+Rc), s	4.0			4.0	4.0	4.0
Max Green Setting (Gmax), s	46.0			16.0	7.0	35.0
Max Q Clear Time (g_c+l1), s	10.8			13.5	8.2	30.4
Green Ext Time (p_c), s	3.7			0.6	0.0	2.4
Intersection Summary						
HCM 6th Ctrl Delay			27.7			
HCM 6th LOS			C			

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

28: Traffic Avenue & Maple Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	0.5											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕↕				↗	↗	↕↕	↗	↗	↕↕	
Traffic Vol, veh/h	5	0	10	0	0	20	0	495	80	40	1035	5
Future Vol, veh/h	5	0	10	0	0	20	0	495	80	40	1035	5
Conflicting Peds, #/hr	2	0	0	0	0	2	0	0	5	5	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	Yield	-	-	None	-	-	None
Storage Length	-	-	-	-	-	0	45	-	115	55	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	0	0	0	7	7	7	5	5	5	4	4	4
Mvmt Flow	5	0	11	0	0	21	0	527	85	43	1101	5
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	1456	1807	553	-	-	271	1106	0	0	617	0	0
Stage 1	1190	1190	-	-	-	-	-	-	-	-	-	-
Stage 2	266	617	-	-	-	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.5	6.9	-	-	7.04	4.2	-	-	4.18	-	-
Critical Hdwy Stg 1	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	-	-	3.37	2.25	-	-	2.24	-	-
Pot Cap-1 Maneuver	93	80	482	0	0	712	610	-	-	945	-	-
Stage 1	202	263	-	0	0	-	-	-	-	-	-	-
Stage 2	722	484	-	0	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	87	76	482	-	-	708	610	-	-	941	-	-
Mov Cap-2 Maneuver	87	76	-	-	-	-	-	-	-	-	-	-
Stage 1	202	251	-	-	-	-	-	-	-	-	-	-
Stage 2	699	482	-	-	-	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	25.4		10.2		0		0.3					
HCM LOS	D		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	610	-	-	192	708	941	-	-				
HCM Lane V/C Ratio	-	-	-	0.083	0.03	0.045	-	-				
HCM Control Delay (s)	0	-	-	25.4	10.2	9	-	-				
HCM Lane LOS	A	-	-	D	B	A	-	-				
HCM 95th %tile Q(veh)	0	-	-	0.3	0.1	0.1	-	-				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

29: E Main Ave/Traffic Avenue & SR-410 WB Ramps/Thompson Street (2044) PM Peak Hour - Alternative 1

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	140	20	310	260	65	10	325	480	255	25	795	305
Future Volume (veh/h)	140	20	310	260	65	10	325	480	255	25	795	305
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1841	1841	1914	1841	1914	1914	1841	1841	1841
Adj Flow Rate, veh/h	152	22	0	182	212	0	353	522	0	27	864	332
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	4	4	4	4	4	4	4	4	4	4	4	4
Cap, veh/h	187	197		253	266		357	1850		546	1095	419
Arrive On Green	0.11	0.11	0.00	0.14	0.14	0.00	0.13	0.51	0.00	0.06	0.44	0.44
Sat Flow, veh/h	1753	1841	1560	1753	1841	0	1753	3733	0	1753	2467	945
Grp Volume(v), veh/h	152	22	0	182	212	0	353	522	0	27	611	585
Grp Sat Flow(s),veh/h/ln	1753	1841	1560	1753	1841	0	1753	1819	0	1753	1749	1663
Q Serve(g_s), s	8.5	1.1	0.0	9.9	11.1	0.0	12.2	8.2	0.0	0.7	29.9	30.1
Cycle Q Clear(g_c), s	8.5	1.1	0.0	9.9	11.1	0.0	12.2	8.2	0.0	0.7	29.9	30.1
Prop In Lane	1.00		1.00	1.00		0.00	1.00		0.00	1.00		0.57
Lane Grp Cap(c), veh/h	187	197		253	266		357	1850		546	776	738
V/C Ratio(X)	0.81	0.11		0.72	0.80		0.99	0.28		0.05	0.79	0.79
Avail Cap(c_a), veh/h	289	304		447	469		357	1850		625	776	738
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	0.98	0.98	0.00	0.83	0.83	0.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	43.7	40.4	0.0	40.8	41.4	0.0	23.1	14.1	0.0	9.8	23.8	23.9
Incr Delay (d2), s/veh	9.5	0.2	0.0	3.7	5.3	0.0	40.7	0.3	0.0	0.0	8.0	8.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.2	0.5	0.0	4.6	5.4	0.0	8.6	3.3	0.0	0.3	13.7	13.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	53.2	40.6	0.0	44.6	46.7	0.0	63.8	14.4	0.0	9.8	31.8	32.4
LnGrp LOS	D	D		D	D		E	B		A	C	C
Approach Vol, veh/h	174				394				875			
Approach Delay, s/veh	51.6				45.7				34.3			
Approach LOS	D				D				C			
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	17.0	48.9		18.9	10.5	55.4		15.2				
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		4.5				
Max Green Setting (Gmax), s	12.5	27.5		25.5	10.5	29.5		16.5				
Max Q Clear Time (g_c+I1), s	14.2	32.1		13.1	2.7	10.2		10.5				
Green Ext Time (p_c), s	0.0	0.0		1.3	0.0	2.3		0.3				

Intersection Summary

HCM 6th Ctrl Delay 35.9

HCM 6th LOS D

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

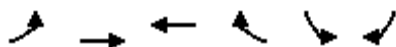
Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

30: Thompson Street & Station Lane

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	25	270	255	5	20	70
Future Volume (veh/h)	25	270	255	5	20	70
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			0.97	1.00	0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1885	1885	1737	1737
Adj Flow Rate, veh/h	28	300	283	6	22	78
Peak Hour Factor	0.90	0.90	0.90	0.90	0.90	0.90
Percent Heavy Veh, %	2	2	1	1	11	11
Cap, veh/h	472	907	483	10	34	120
Arrive On Green	0.04	0.48	0.26	0.26	0.10	0.10
Sat Flow, veh/h	1781	1870	1838	39	328	1162
Grp Volume(v), veh/h	28	300	0	289	101	0
Grp Sat Flow(s),veh/h/ln	1781	1870	0	1877	1504	0
Q Serve(g_s), s	0.3	2.6	0.0	3.6	1.7	0.0
Cycle Q Clear(g_c), s	0.3	2.6	0.0	3.6	1.7	0.0
Prop In Lane	1.00			0.02	0.22	0.77
Lane Grp Cap(c), veh/h	472	907	0	493	155	0
V/C Ratio(X)	0.06	0.33	0.00	0.59	0.65	0.00
Avail Cap(c_a), veh/h	1076	1716	0	1722	1380	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	5.9	4.2	0.0	8.6	11.5	0.0
Incr Delay (d2), s/veh	0.0	0.1	0.0	0.4	1.7	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	0.4	0.0	1.0	0.5	0.0
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	6.0	4.3	0.0	9.0	13.2	0.0
LnGrp LOS	A	A	A	A	B	A
Approach Vol, veh/h		328	289		101	
Approach Delay, s/veh		4.4	9.0		13.2	
Approach LOS		A	A		B	
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	5.9	12.5			18.4	8.3
Change Period (Y+Rc), s	5.0	5.5			5.5	5.5
Max Green Setting (Gmax), s	10.0	24.5			24.5	24.5
Max Q Clear Time (g_c+12, s)	12.3	5.6			4.6	3.7
Green Ext Time (p_c), s	0.0	1.1			1.2	0.1

Intersection Summary

HCM 6th Ctrl Delay	7.5
HCM 6th LOS	A

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

31: Alder Ave & Thompson Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	5.2											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	70	160	5	5	125	5	0	10	5	5	15	200
Future Vol, veh/h	70	160	5	5	125	5	0	10	5	5	15	200
Conflicting Peds, #/hr	0	0	3	3	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	6	6	6	0	0	0	0	0	0	1	1	1
Mvmt Flow	74	170	5	5	133	5	0	11	5	5	16	213
Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	138	0	0	178	0	0	584	472	176	475	472	136
Stage 1	-	-	-	-	-	-	324	324	-	146	146	-
Stage 2	-	-	-	-	-	-	260	148	-	329	326	-
Critical Hdwy	4.16	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.254	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1421	-	-	1410	-	-	426	493	872	502	492	915
Stage 1	-	-	-	-	-	-	692	653	-	859	778	-
Stage 2	-	-	-	-	-	-	749	779	-	686	650	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1421	-	-	1406	-	-	302	461	870	467	461	915
Mov Cap-2 Maneuver	-	-	-	-	-	-	302	461	-	467	461	-
Stage 1	-	-	-	-	-	-	650	614	-	809	775	-
Stage 2	-	-	-	-	-	-	561	776	-	631	611	-
Approach	EB			WB			NB			SB		
HCM Control Delay, s	2.3			0.3			11.8			10.9		
HCM LOS							B			B		
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	547	1421	-	-	1406	-	-	840				
HCM Lane V/C Ratio	0.029	0.052	-	-	0.004	-	-	0.279				
HCM Control Delay (s)	11.8	7.7	0	-	7.6	0	-	10.9				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.2	-	-	0	-	-	1.1				

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

32: E Main Ave & SR-410 EB Ramps

Future (2044) PM Peak Hour - Alternative 1

						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	225	660	255	835	1075	290
Future Volume (vph)	225	660	255	835	1075	290
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.5	4.5	4.5	4.5	4.5	
Lane Util. Factor	0.97	0.91	1.00	0.95	0.95	
Frpb, ped/bikes	0.98	0.97	1.00	1.00	1.00	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	0.91	0.85	1.00	1.00	0.97	
Flt Protected	0.98	1.00	0.95	1.00	1.00	
Satd. Flow (prot)	2998	1339	1770	3539	3393	
Flt Permitted	0.98	1.00	0.09	1.00	1.00	
Satd. Flow (perm)	2998	1339	170	3539	3393	
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	237	695	268	879	1132	305
RTOR Reduction (vph)	276	293	0	0	19	0
Lane Group Flow (vph)	309	54	268	879	1418	0
Confl. Peds. (#/hr)		7				
Heavy Vehicles (%)	7%	7%	2%	2%	3%	3%
Turn Type	Prot	Perm	D.P+P	NA	NA	
Protected Phases	8		1	6	2	
Permitted Phases		8	2			
Actuated Green, G (s)	15.6	15.6	61.2	65.7	43.9	
Effective Green, g (s)	15.6	15.6	61.2	65.7	43.9	
Actuated g/C Ratio	0.16	0.16	0.61	0.66	0.44	
Clearance Time (s)	4.5	4.5	4.5	4.5	4.5	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	467	208	380	2325	1489	
v/s Ratio Prot	c0.10		c0.12	0.25	c0.42	
v/s Ratio Perm		0.04	0.31			
v/c Ratio	0.66	0.26	0.71	0.38	0.95	
Uniform Delay, d1	39.7	37.1	25.0	7.8	27.0	
Progression Factor	1.00	1.00	1.00	1.00	0.52	
Incremental Delay, d2	3.5	0.7	5.9	0.5	4.9	
Delay (s)	43.2	37.8	30.9	8.3	18.9	
Level of Service	D	D	C	A	B	
Approach Delay (s)	41.2			13.6	18.9	
Approach LOS	D			B	B	
Intersection Summary						
HCM 2000 Control Delay			23.1		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.78			
Actuated Cycle Length (s)			100.0		Sum of lost time (s)	18.0
Intersection Capacity Utilization			78.1%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
33: Valley Avenue & Meade-McCumber Road E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	20	95	120	60	65	10	30	370	90	5	795	35
Future Volume (veh/h)	20	95	120	60	65	10	30	370	90	5	795	35
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		1.00	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1870	1945	1870	1885	1885	1885	1900	1900	1900
Adj Flow Rate, veh/h	22	102	129	65	70	11	32	398	97	5	855	38
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	1	1	1	2	2	2	1	1	1	0	0	0
Cap, veh/h	363	126	159	246	323	51	188	765	186	427	886	39
Arrive On Green	0.03	0.17	0.17	0.06	0.20	0.20	0.04	0.52	0.52	0.01	0.49	0.49
Sat Flow, veh/h	1795	754	953	1781	1640	258	1795	1464	357	1810	1803	80
Grp Volume(v), veh/h	22	0	231	65	0	81	32	0	495	5	0	893
Grp Sat Flow(s),veh/h/ln	1795	0	1707	1781	0	1897	1795	0	1821	1810	0	1884
Q Serve(g_s), s	0.7	0.0	9.7	2.2	0.0	2.7	0.6	0.0	13.2	0.1	0.0	34.0
Cycle Q Clear(g_c), s	0.7	0.0	9.7	2.2	0.0	2.7	0.6	0.0	13.2	0.1	0.0	34.0
Prop In Lane	1.00		0.56	1.00		0.14	1.00		0.20	1.00		0.04
Lane Grp Cap(c), veh/h	363	0	285	246	0	374	188	0	951	427	0	925
V/C Ratio(X)	0.06	0.00	0.81	0.26	0.00	0.22	0.17	0.00	0.52	0.01	0.00	0.97
Avail Cap(c_a), veh/h	458	0	533	286	0	592	266	0	951	562	0	934
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	24.2	0.0	29.7	23.6	0.0	24.9	16.5	0.0	11.6	10.1	0.0	18.2
Incr Delay (d2), s/veh	0.1	0.0	5.5	0.6	0.0	0.3	0.4	0.0	0.5	0.0	0.0	21.3
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.3	0.0	4.3	0.9	0.0	1.2	0.3	0.0	5.0	0.0	0.0	18.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	24.3	0.0	35.2	24.2	0.0	25.2	17.0	0.0	12.1	10.1	0.0	39.6
LnGrp LOS	C	A	D	C	A	C	B	A	B	B	A	D
Approach Vol, veh/h	253			146			527			898		
Approach Delay, s/veh	34.3			24.8			12.4			39.4		
Approach LOS	C			C			B			D		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	43.2	8.9	16.9	7.4	40.9	6.7	19.1					
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5					
Max Green Setting (Gmax), s	36.7	6.1	23.1	6.1	36.7	6.1	23.1					
Max Q Clear Time (g_c+11.2), s	15.2	4.2	11.7	2.6	36.0	2.7	4.7					
Green Ext Time (p_c), s	0.0	2.2	0.0	0.7	0.0	0.4	0.0	0.2				

Intersection Summary

HCM 6th Ctrl Delay	29.7
HCM 6th LOS	C

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

34: Parker Road E & Mead McCumber Road E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	5.2											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	40	135	5	5	55	10	5	5	5	55	20	70
Future Vol, veh/h	40	135	5	5	55	10	5	5	5	55	20	70
Conflicting Peds, #/hr	10	0	2	2	0	10	0	0	5	5	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	93	93	93	93	93	93	93	93	93	93	93	93
Heavy Vehicles, %	1	1	1	2	2	2	0	0	0	2	2	2
Mvmt Flow	43	145	5	5	59	11	5	5	5	59	22	75
Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	80	0	0	152	0	0	359	326	155	329	323	75
Stage 1	-	-	-	-	-	-	236	236	-	85	85	-
Stage 2	-	-	-	-	-	-	123	90	-	244	238	-
Critical Hdwy	4.11	-	-	4.12	-	-	7.1	6.5	6.2	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Follow-up Hdwy	2.209	-	-	2.218	-	-	3.5	4	3.3	3.518	4.018	3.318
Pot Cap-1 Maneuver	1524	-	-	1429	-	-	600	596	896	624	595	986
Stage 1	-	-	-	-	-	-	772	713	-	923	824	-
Stage 2	-	-	-	-	-	-	886	824	-	760	708	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1511	-	-	1427	-	-	523	569	891	592	568	978
Mov Cap-2 Maneuver	-	-	-	-	-	-	523	569	-	592	568	-
Stage 1	-	-	-	-	-	-	747	689	-	887	814	-
Stage 2	-	-	-	-	-	-	793	814	-	723	685	-
Approach	EB			WB			NB			SB		
HCM Control Delay, s	1.7			0.5			10.9			11.3		
HCM LOS							B			B		
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	626	1511	-	-	1427	-	-	726				
HCM Lane V/C Ratio	0.026	0.028	-	-	0.004	-	-	0.215				
HCM Control Delay (s)	10.9	7.5	0	-	7.5	0	-	11.3				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.1	-	-	0	-	-	0.8				

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

35: 160th Avenue E & 64th Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection	
Intersection Delay, s/veh	17.8
Intersection LOS	C

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↔			↔			↔			↔	
Traffic Vol, veh/h	20	155	5	5	45	135	5	0	0	460	5	25
Future Vol, veh/h	20	155	5	5	45	135	5	0	0	460	5	25
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles, %	0	0	0	1	1	1	0	0	0	0	0	0
Mvmt Flow	22	168	5	5	49	147	5	0	0	500	5	27
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	1	1	1	1
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	1	1	1
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	1	1	1	1
HCM Control Delay	11.4	10.6	9.2	23
HCM LOS	B	B	A	C

Lane	NBLn1	EBLn1	WBLn1	SBLn1
Vol Left, %	100%	11%	3%	94%
Vol Thru, %	0%	86%	24%	1%
Vol Right, %	0%	3%	73%	5%
Sign Control	Stop	Stop	Stop	Stop
Traffic Vol by Lane	5	180	185	490
LT Vol	5	20	5	460
Through Vol	0	155	45	5
RT Vol	0	5	135	25
Lane Flow Rate	5	196	201	533
Geometry Grp	1	1	1	1
Degree of Util (X)	0.009	0.311	0.297	0.765
Departure Headway (Hd)	6.083	5.723	5.311	5.169
Convergence, Y/N	Yes	Yes	Yes	Yes
Cap	586	628	676	703
Service Time	4.14	3.768	3.356	3.197
HCM Lane V/C Ratio	0.009	0.312	0.297	0.758
HCM Control Delay	9.2	11.4	10.6	23
HCM Lane LOS	A	B	B	C
HCM 95th-tile Q	0	1.3	1.2	7.2

Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Sumner-Tapps Hwy E/64th St E (Site Folder: General)]

 Network: N101 [Network1 (Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: 166th Ave E														
3	L2	253	1.0	253	1.0	0.326	5.5	LOS A	0.8	19.4	0.19	0.08	0.19	33.6
8	T1	653	1.0	653	1.0	0.326	5.4	LOS A	0.8	19.7	0.19	0.07	0.19	34.6
18	R2	16	1.0	16	1.0	0.326	5.3	LOS A	0.8	19.7	0.19	0.07	0.19	34.0
Approach		921	1.0	921	1.0	0.326	5.4	LOS A	0.8	19.7	0.19	0.07	0.19	34.3
East: 64th St E														
1	L2	21	12.0	21	12.0	0.047	5.1	LOS A	0.1	1.7	0.49	0.44	0.49	28.4
6	T1	11	12.0	11	12.0	0.047	5.1	LOS A	0.1	1.7	0.49	0.44	0.49	33.4
16	R2	5	12.0	5	12.0	0.047	5.1	LOS A	0.1	1.7	0.49	0.44	0.49	32.4
Approach		37	12.0	37	12.0	0.047	5.1	LOS A	0.1	1.7	0.49	0.44	0.49	31.0
North: Sumner Tapps Hwy E														
7	L2	1	2.0	1	2.0	0.382	7.0	LOS A	0.8	20.7	0.45	0.33	0.45	34.4
4	T1	868	2.0	868	2.0	0.382	6.7	LOS A	0.8	21.1	0.44	0.32	0.44	29.4
14	R2	58	2.0	58	2.0	0.382	6.5	LOS A	0.8	21.1	0.44	0.31	0.44	33.4
Approach		927	2.0	927	2.0	0.382	6.7	LOS A	0.8	21.1	0.44	0.32	0.44	29.8
West: 64th St E														
5	L2	42	1.0	42	1.0	0.398	9.2	LOS A	0.8	21.0	0.65	0.70	0.78	32.8
2	T1	5	1.0	5	1.0	0.398	9.2	LOS A	0.8	21.0	0.65	0.70	0.78	32.7
12	R2	695	1.0	695	1.0	0.398	8.4	LOS A	0.9	21.5	0.64	0.68	0.75	27.6
Approach		742	1.0	742	1.0	0.398	8.4	LOS A	0.9	21.5	0.64	0.68	0.75	28.2
All Vehicles		2627	1.5	2627	1.5	0.398	6.7	LOS A	0.9	21.5	0.41	0.34	0.44	31.5

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 102 [166th Ave/SR 410 WB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %	v/c	sec		[Veh. veh	Dist] ft				mph
South: 166th Ave E														
3	L2	107	1.0	107	1.0	0.445	6.7	LOS A	0.0	0.0	0.00	0.00	0.00	37.9
8	T1	541	1.0	541	1.0	0.445	6.7	LOS A	0.0	0.0	0.00	0.00	0.00	34.6
Approach		648	1.0	648	1.0	0.445	6.7	LOS A	0.0	0.0	0.00	0.00	0.00	35.4
East: SR 410 WB Off Ramp														
1	L2	41	2.0	41	2.0	0.050	4.8	LOS A	0.1	2.7	0.61	0.46	0.61	32.7
6	T1	1	2.0	1	2.0	0.050	4.8	LOS A	0.1	2.7	0.61	0.46	0.61	32.7
16	R2	352	2.0	352	2.0	0.296	5.8	LOS A	0.8	20.0	0.67	0.55	0.67	29.8
Approach		394	2.0	394	2.0	0.296	5.7	LOS A	0.8	20.0	0.66	0.54	0.66	30.3
North: 166th Ave E														
4	T1	1020	2.0	1020	2.0	0.539	8.3	LOS A	1.8	45.8	0.47	0.28	0.47	33.4
14	R2	515	2.0	515	2.0	0.539	7.7	LOS A	1.8	45.8	0.45	0.26	0.45	32.6
Approach		1536	2.0	1536	2.0	0.539	8.1	LOS A	1.8	45.8	0.47	0.28	0.47	33.1
All Vehicles		2578	1.7	2578	1.7	0.539	7.4	LOS A	1.8	45.8	0.38	0.25	0.38	33.2

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

38: Sumner-Tapps Highway E & SR-410 EB Ramps

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	345	0	195	0	0	0	0	290	115	455	585	0
Future Volume (veh/h)	345	0	195	0	0	0	0	290	115	455	585	0
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No						No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870				0	1885	1885	1885	1885	0
Adj Flow Rate, veh/h	359	0	203				0	302	120	474	609	0
Peak Hour Factor	0.96	0.96	0.96				0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	2	2	2				0	1	1	1	1	0
Cap, veh/h	431	0	384				0	836	709	703	1240	0
Arrive On Green	0.24	0.00	0.24				0.00	0.44	0.44	0.16	0.66	0.00
Sat Flow, veh/h	1781	0	1585				0	1885	1598	1795	1885	0
Grp Volume(v), veh/h	359	0	203				0	302	120	474	609	0
Grp Sat Flow(s),veh/h/ln	1781	0	1585				0	1885	1598	1795	1885	0
Q Serve(g_s), s	17.2	0.0	10.0				0.0	9.6	4.1	11.9	14.7	0.0
Cycle Q Clear(g_c), s	17.2	0.0	10.0				0.0	9.6	4.1	11.9	14.7	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	431	0	384				0	836	709	703	1240	0
V/C Ratio(X)	0.83	0.00	0.53				0.00	0.36	0.17	0.67	0.49	0.00
Avail Cap(c_a), veh/h	663	0	590				0	836	709	817	1240	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	32.4	0.0	29.6				0.0	16.6	15.1	9.8	7.8	0.0
Incr Delay (d2), s/veh	5.4	0.0	1.1				0.0	1.2	0.5	1.7	1.4	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	7.9	0.0	3.9				0.0	4.3	1.6	4.5	5.8	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	37.8	0.0	30.8				0.0	17.8	15.6	11.5	9.2	0.0
LnGrp LOS	D	A	C				A	B	B	B	A	A
Approach Vol, veh/h	562							422		1083		
Approach Delay, s/veh	35.3							17.2		10.2		
Approach LOS	D							B		B		
Timer - Assigned Phs	1	2	4		6							
Phs Duration (G+Y+Rc), s	49.3	44.4	26.3		63.7							
Change Period (Y+Rc), s	4.5	4.5	4.5		4.5							
Max Green Setting (Gmax), s	20.5	22.5	33.5		47.5							
Max Q Clear Time (g_c+I13, s)	11.6	11.6	19.2		16.7							
Green Ext Time (p_c), s	0.9	1.7	2.6		4.9							

Intersection Summary

HCM 6th Ctrl Delay	18.4
HCM 6th LOS	B

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

39: Valley Avenue & Gary Street /Gary Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	3.3											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations			↗			↗	↗	↑		↗	↕	
Traffic Vol, veh/h	0	0	200	15	0	25	155	470	5	5	965	5
Future Vol, veh/h	0	0	200	15	0	25	155	470	5	5	965	5
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	0	-	-	0	175	-	-	175	-	175
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	90	90	90	90	90	90	90	90	90	90	90	90
Heavy Vehicles, %	2	2	2	0	0	0	1	1	1	0	0	0
Mvmt Flow	0	0	222	17	0	28	172	522	6	6	1072	6
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	-	-	539	1417	-	525	1078	0	0	528	0	0
Stage 1	-	-	-	869	-	-	-	-	-	-	-	-
Stage 2	-	-	-	548	-	-	-	-	-	-	-	-
Critical Hdwy	-	-	6.93	7.3	-	6.2	4.115	-	-	4.1	-	-
Critical Hdwy Stg 1	-	-	-	6.1	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	6.5	-	-	-	-	-	-	-	-
Follow-up Hdwy	-	-	3.319	3.5	-	3.3	2.2095	-	-	2.2	-	-
Pot Cap-1 Maneuver	0	0	488	107	0	556	650	-	-	1049	-	-
Stage 1	0	0	-	349	0	-	-	-	-	-	-	-
Stage 2	0	0	-	493	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	-	-	488	46	-	556	650	-	-	1049	-	-
Mov Cap-2 Maneuver	-	-	-	46	-	-	-	-	-	-	-	-
Stage 1	-	-	-	257	-	-	-	-	-	-	-	-
Stage 2	-	-	-	267	-	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	18.4		11.8		3.1		0					
HCM LOS	C		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	650	-	-	488	556	1049	-	-				
HCM Lane V/C Ratio	0.265	-	-	0.455	0.05	0.005	-	-				
HCM Control Delay (s)	12.5	-	-	18.4	11.8	8.4	-	-				
HCM Lane LOS	B	-	-	C	B	A	-	-				
HCM 95th %tile Q(veh)	1.1	-	-	2.3	0.2	0	-	-				

Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Valley Ave/SR 410 WB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: Valley Ave														
3	L2	397	1.0	397	1.0	0.264	4.5	LOS A	0.0	0.0	0.00	0.00	0.00	35.2
8	T1	478	1.0	478	1.0	0.264	4.1	LOS A	0.0	0.0	0.00	0.00	0.00	38.2
Approach		875	1.0	875	1.0	0.264	4.3	LOS A	0.0	0.0	0.00	0.00	0.00	36.8
East: SR 410 WB Off Ramp														
1	L2	207	1.0	207	1.0	0.197	5.2	LOS A	0.3	8.3	0.55	0.51	0.55	27.0
6	T1	1	1.0	1	1.0	0.197	5.2	LOS A	0.3	8.3	0.55	0.51	0.55	32.5
16	R2	207	1.0	207	1.0	0.239	6.7	LOS A	0.4	10.0	0.58	0.58	0.58	33.2
Approach		414	1.0	414	1.0	0.239	5.9	LOS A	0.4	10.0	0.57	0.54	0.57	30.7
North: Valley Ave														
4	T1	1136	0.0	1136	0.0	0.597	11.3	LOS B	2.8	70.3	0.85	0.87	1.12	26.4
14	R2	147	0.0	147	0.0	0.597	10.2	LOS B	2.8	70.3	0.84	0.81	1.06	31.7
Approach		1283	0.0	1283	0.0	0.597	11.2	LOS B	2.8	70.3	0.85	0.86	1.11	27.3
All Vehicles		2572	0.5	2572	0.5	0.597	8.0	LOS A	2.8	70.3	0.52	0.52	0.64	31.6

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Valley Ave/SR 410 EB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: Valley Ave														
8	T1	665	2.0	665	2.0	0.422	8.4	LOS A	1.1	28.6	0.66	0.57	0.66	28.2
18	R2	186	2.0	186	2.0	0.422	7.9	LOS A	1.1	28.6	0.66	0.55	0.66	32.7
Approach		851	2.0	851	2.0	0.422	8.3	LOS A	1.1	28.6	0.66	0.57	0.66	29.6
North: Valley Ave														
7	L2	293	1.0	293	1.0	0.397	5.9	LOS A	0.0	0.0	0.00	0.00	0.00	36.8
4	T1	1021	1.0	1021	1.0	0.397	5.5	LOS A	0.0	0.0	0.00	0.00	0.00	37.7
Approach		1314	1.0	1314	1.0	0.397	5.6	LOS A	0.0	0.0	0.00	0.00	0.00	37.5
West: SR 410 EB Off Ramp														
5	L2	191	3.0	191	3.0	0.330	10.8	LOS B	0.6	15.0	0.70	0.73	0.80	24.1
2	T1	1	3.0	1	3.0	0.330	10.8	LOS B	0.6	15.0	0.70	0.73	0.80	30.1
12	R2	798	3.0	798	3.0	0.867	27.5	LOS C	5.4	137.9	0.89	1.43	2.47	25.3
Approach		990	3.0	990	3.0	0.867	24.3	LOS C	5.4	137.9	0.86	1.29	2.14	25.2
All Vehicles		3155	1.9	3155	1.9	0.867	12.2	LOS B	5.4	137.9	0.45	0.56	0.85	31.0

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

HCM 6th TWSC

42: Valley Avenue & 74th Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 1

Intersection												
Int Delay, s/veh	32.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↵	↵		↵	↵	
Traffic Vol, veh/h	5	0	5	15	0	110	0	670	20	320	1340	60
Future Vol, veh/h	5	0	5	15	0	110	0	670	20	320	1340	60
Conflicting Peds, #/hr	0	0	0	0	0	0	1	0	0	0	0	1
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	25	-	-	50	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	1	1	1	2	2	2	2	2	2
Mvmt Flow	5	0	5	15	0	112	0	684	20	327	1367	61
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	2803	2757	1399	2748	2777	694	1429	0	0	704	0	0
Stage 1	2053	2053	-	694	694	-	-	-	-	-	-	-
Stage 2	750	704	-	2054	2083	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.11	6.51	6.21	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.509	4.009	3.309	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	12	20	174	~ 13	19	444	476	-	-	894	-	-
Stage 1	73	99	-	435	446	-	-	-	-	-	-	-
Stage 2	407	443	-	73	95	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	6	13	174	~ 9	12	444	476	-	-	894	-	-
Mov Cap-2 Maneuver	6	13	-	~ 9	12	-	-	-	-	-	-	-
Stage 1	73	63	-	435	446	-	-	-	-	-	-	-
Stage 2	304	443	-	45	60	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s\$	611.8		\$ 586.4		0		2.1					
HCM LOS	F		F									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	476	-	-	12	65	894	-	-				
HCM Lane V/C Ratio	-	-	-	0.85	1.962	0.365	-	-				
HCM Control Delay (s)	0	-	-	\$ 611.8	\$ 586.4	11.3	-	-				
HCM Lane LOS	A	-	-	F	F	B	-	-				
HCM 95th %tile Q(veh)	0	-	-	1.8	11.9	1.7	-	-				
Notes												
~: Volume exceeds capacity		\$: Delay exceeds 300s		+: Computation Not Defined				*: All major volume in platoon				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

43: Valley Avenue & Rivergrove Drive E

Future (2044) PM Peak Hour - Alternative 1



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	55	45	35	635	1260	80
Future Volume (veh/h)	55	45	35	635	1260	80
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1900	1900	1870	1870	1870	1870
Adj Flow Rate, veh/h	56	45	35	641	1273	81
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	2	2	2	2
Cap, veh/h	85	75	45	1644	1423	91
Arrive On Green	0.05	0.05	0.02	0.88	0.82	0.82
Sat Flow, veh/h	1810	1610	1781	1870	1740	111
Grp Volume(v), veh/h	56	45	35	641	0	1354
Grp Sat Flow(s),veh/h/ln	1810	1610	1781	1870	0	1850
Q Serve(g_s), s	3.8	3.4	2.4	7.8	0.0	61.7
Cycle Q Clear(g_c), s	3.8	3.4	2.4	7.8	0.0	61.7
Prop In Lane	1.00	1.00	1.00			0.06
Lane Grp Cap(c), veh/h	85	75	45	1644	0	1513
V/C Ratio(X)	0.66	0.60	0.79	0.39	0.00	0.89
Avail Cap(c_a), veh/h	294	262	65	1665	0	1513
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	58.2	58.1	60.2	1.4	0.0	7.7
Incr Delay (d2), s/veh	8.5	7.3	31.6	0.2	0.0	8.6
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.2	1.5	1.1	0.0	19.7
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	66.7	65.4	91.9	1.5	0.0	16.2
LnGrp LOS	E	E	F	A	A	B
Approach Vol, veh/h	101			676	1354	
Approach Delay, s/veh	66.1			6.2	16.2	
Approach LOS	E			A	B	
Timer - Assigned Phs	2			4	5	6
Phs Duration (G+Y+Rc), s	113.8			10.4	7.6	106.2
Change Period (Y+Rc), s	4.6			4.6	4.5	4.6
Max Green Setting (Gmax), s	110.6			20.2	4.5	101.6
Max Q Clear Time (g_c+I1), s	9.8			5.8	4.4	63.7
Green Ext Time (p_c), s	5.0			0.2	0.0	20.2
Intersection Summary						
HCM 6th Ctrl Delay			15.4			
HCM 6th LOS			B			

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

1: Stewart Road SE (8th St E) & Butte Ave SE

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		 			 						 	
Traffic Volume (veh/h)	45	1355	5	5	735	20	15	0	10	80	0	105
Future Volume (veh/h)	45	1355	5	5	735	20	15	0	10	80	0	105
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		0.99	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1811	1811	1811	1826	1826	1826	1900	1900	1900	1870	1870	1870
Adj Flow Rate, veh/h	47	1411	5	5	766	21	16	0	10	83	0	109
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	6	6	6	5	5	5	0	0	0	2	2	2
Cap, veh/h	260	1454	5	103	1426	39	386	0	339	380	0	338
Arrive On Green	0.41	0.41	0.41	0.41	0.41	0.41	0.21	0.00	0.21	0.21	0.00	0.21
Sat Flow, veh/h	666	3517	12	370	3449	95	1810	0	1589	1781	0	1585
Grp Volume(v), veh/h	47	690	726	5	385	402	16	0	10	83	0	109
Grp Sat Flow(s),veh/h/ln	666	1721	1809	370	1735	1809	1810	0	1589	1781	0	1585
Q Serve(g_s), s	4.3	29.5	29.5	1.0	12.6	12.6	0.5	0.0	0.4	2.9	0.0	4.4
Cycle Q Clear(g_c), s	16.9	29.5	29.5	30.5	12.6	12.6	0.5	0.0	0.4	2.9	0.0	4.4
Prop In Lane	1.00		0.01	1.00		0.05	1.00		1.00	1.00		1.00
Lane Grp Cap(c), veh/h	260	711	748	103	717	748	386	0	339	380	0	338
V/C Ratio(X)	0.18	0.97	0.97	0.05	0.54	0.54	0.04	0.00	0.03	0.22	0.00	0.32
Avail Cap(c_a), veh/h	260	711	748	103	717	748	386	0	339	380	0	338
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	0.86	0.86	0.86	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	22.9	21.6	21.6	36.5	16.6	16.6	23.4	0.0	23.4	24.3	0.0	24.9
Incr Delay (d2), s/veh	0.3	26.5	25.8	0.2	0.7	0.7	0.2	0.0	0.2	1.3	0.0	2.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.7	16.0	16.7	0.1	4.6	4.8	0.2	0.0	0.2	1.3	0.0	1.8
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	23.3	48.1	47.3	36.7	17.3	17.3	23.6	0.0	23.5	25.7	0.0	27.4
LnGrp LOS	C	D	D	D	B	B	C	A	C	C	A	C
Approach Vol, veh/h	1463			792			26			192		
Approach Delay, s/veh	46.9			17.4			23.6			26.7		
Approach LOS	D			B			C			C		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	20.0			35.0			20.0			35.0		
Change Period (Y+Rc), s	4.0			4.0			4.0			4.0		
Max Green Setting (Gmax), s	16.0			31.0			16.0			31.0		
Max Q Clear Time (g_c+I1), s	2.5			31.5			6.4			32.5		
Green Ext Time (p_c), s	0.0			0.0			0.5			0.0		
Intersection Summary												
HCM 6th Ctrl Delay	35.6											
HCM 6th LOS	D											

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
2: 140th Ct E & Stewart Road SE (8th St E)

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	10	1440	15	5	685	0	50	0	25	5	0	15
Future Volume (veh/h)	10	1440	15	5	685	0	50	0	25	5	0	15
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		0.98	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1811	1811	1811	1826	1826	1826	1811	1811	1811
Adj Flow Rate, veh/h	10	1485	15	5	706	0	52	0	26	5	0	15
Peak Hour Factor	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97	0.97
Percent Heavy Veh, %	4	4	4	6	6	6	5	5	5	6	6	6
Cap, veh/h	420	2185	22	264	1116	946	366	0	241	120	33	180
Arrive On Green	0.62	0.62	0.62	0.62	0.62	0.00	0.16	0.00	0.16	0.16	0.00	0.16
Sat Flow, veh/h	730	3546	36	339	1811	1535	1363	0	1545	175	210	1155
Grp Volume(v), veh/h	10	732	768	5	706	0	52	0	26	20	0	0
Grp Sat Flow(s), veh/h/ln	730	1749	1833	339	1811	1535	1363	0	1545	1539	0	0
Q Serve(g_s), s	0.4	13.4	13.4	0.5	11.9	0.0	1.0	0.0	0.7	0.0	0.0	0.0
Cycle Q Clear(g_c), s	12.3	13.4	13.4	13.9	11.9	0.0	1.5	0.0	0.7	0.5	0.0	0.0
Prop In Lane	1.00		0.02	1.00		1.00	1.00		1.00	0.25		0.75
Lane Grp Cap(c), veh/h	420	1077	1130	264	1116	946	366	0	241	334	0	0
V/C Ratio(X)	0.02	0.68	0.68	0.02	0.63	0.00	0.14	0.00	0.11	0.06	0.00	0.00
Avail Cap(c_a), veh/h	567	1429	1498	332	1480	1254	844	0	783	852	0	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	0.00	1.00	0.00	1.00	1.00	0.00	0.00
Uniform Delay (d), s/veh	9.7	6.1	6.1	10.7	5.8	0.0	17.8	0.0	17.5	17.4	0.0	0.0
Incr Delay (d2), s/veh	0.0	1.0	0.9	0.0	0.7	0.0	0.1	0.0	0.1	0.0	0.0	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.1	3.2	3.3	0.0	2.9	0.0	0.5	0.0	0.2	0.2	0.0	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	9.7	7.1	7.1	10.7	6.6	0.0	17.9	0.0	17.6	17.4	0.0	0.0
LnGrp LOS	A	A	A	B	A	A	B	A	B	B	A	A
Approach Vol, veh/h	1510			711			78			20		
Approach Delay, s/veh	7.1			6.6			17.8			17.4		
Approach LOS	A			A			B			B		
Timer - Assigned Phs	2			4			6			8		
Phs Duration (G+Y+Rc), s	35.3			13.1			35.3			13.1		
Change Period (Y+Rc), s	5.5			5.5			5.5			5.5		
Max Green Setting (Gmax), s	39.5			24.5			39.5			24.5		
Max Q Clear Time (g_c+I1), s	15.4			2.5			15.9			3.5		
Green Ext Time (p_c), s	14.4			0.0			6.5			0.1		

Intersection Summary

HCM 6th Ctrl Delay	7.4
HCM 6th LOS	A

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

3: W Valley Highway E & 24th Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2



Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	LT	RT	LT	RT	LT	RT
Traffic Volume (veh/h)	455	80	90	260	275	560
Future Volume (veh/h)	455	80	90	260	275	560
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No		No	
Adj Sat Flow, veh/h/ln	1707	1707	1544	1544	1781	1781
Adj Flow Rate, veh/h	474	83	94	271	286	583
Peak Hour Factor	0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	13	13	24	24	8	8
Cap, veh/h	577	265	696	608	321	1274
Arrive On Green	0.18	0.18	0.47	0.47	0.19	0.71
Sat Flow, veh/h	3155	1447	1544	1282	1697	1781
Grp Volume(v), veh/h	474	83	94	271	286	583
Grp Sat Flow(s), veh/h/ln	1577	1447	1467	1282	1697	1781
Q Serve(g_s), s	13.0	4.5	3.2	12.7	14.8	12.5
Cycle Q Clear(g_c), s	13.0	4.5	3.2	12.7	14.8	12.5
Prop In Lane	1.00	1.00		1.00	1.00	
Lane Grp Cap(c), veh/h	577	265	696	608	321	1274
V/C Ratio(X)	0.82	0.31	0.13	0.45	0.89	0.46
Avail Cap(c_a), veh/h	890	408	696	608	385	1274
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.73	0.73	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	35.4	31.9	13.3	15.7	35.6	5.4
Incr Delay (d2), s/veh	2.5	0.4	0.4	2.4	18.9	1.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	5.1	1.6	1.1	3.9	7.7	4.1
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	37.9	32.3	13.7	18.1	54.5	6.6
LnGrp LOS	D	C	B	B	D	A
Approach Vol, veh/h	557		365			869
Approach Delay, s/veh	37.1		17.0			22.4
Approach LOS	D		B			C
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	31.6	47.3			68.9	21.1
Change Period (Y+Rc), s	4.6	4.6			4.6	4.6
Max Green Setting (Gmax), s	30.4				55.4	25.4
Max Q Clear Time (g_c+I1), s	14.7				14.5	15.0
Green Ext Time (p_c), s	0.2	2.0			4.1	1.5

Intersection Summary

HCM 6th Ctrl Delay 25.8

HCM 6th LOS C

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

4: SR-167 NB Ramps & 24th Street E

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	75	460	0	0	465	175	70	5	260	0	0	0
Future Volume (veh/h)	75	460	0	0	465	175	70	5	260	0	0	0
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0			
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00			
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00			
Work Zone On Approach	No			No			No					
Adj Sat Flow, veh/h/ln	1574	1574	0	0	1693	1693	1678	1678	1678			
Adj Flow Rate, veh/h	80	489	0	0	495	186	78	0	0			
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94	0.94			
Percent Heavy Veh, %	22	22	0	0	14	14	15	15	15			
Cap, veh/h	98	964	0	0	663	296	1839	0				
Arrive On Green	0.07	0.32	0.00	0.00	0.07	0.07	0.58	0.00	0.00			
Sat Flow, veh/h	1499	3069	0	0	3300	1434	3196	0	1422			
Grp Volume(v), veh/h	80	489	0	0	495	186	78	0	0			
Grp Sat Flow(s),veh/h/ln	1499	1495	0	0	1608	1434	1598	0	1422			
Q Serve(g_s), s	4.7	11.9	0.0	0.0	13.6	11.4	1.0	0.0	0.0			
Cycle Q Clear(g_c), s	4.7	11.9	0.0	0.0	13.6	11.4	1.0	0.0	0.0			
Prop In Lane	1.00		0.00	0.00		1.00	1.00		1.00			
Lane Grp Cap(c), veh/h	98	964	0	0	663	296	1839	0				
V/C Ratio(X)	0.82	0.51	0.00	0.00	0.75	0.63	0.04	0.00				
Avail Cap(c_a), veh/h	157	1376	0	0	979	437	1839	0				
HCM Platoon Ratio	1.00	1.00	1.00	1.00	0.33	0.33	1.00	1.00	1.00			
Upstream Filter(I)	0.50	0.50	0.00	0.00	0.94	0.94	1.00	0.00	0.00			
Uniform Delay (d), s/veh	41.6	24.7	0.0	0.0	39.6	38.6	8.3	0.0	0.0			
Incr Delay (d2), s/veh	6.9	0.2	0.0	0.0	1.5	1.9	0.0	0.0	0.0			
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0			
%ile BackOfQ(50%),veh/ln	1.9	4.1	0.0	0.0	6.0	4.5	0.3	0.0	0.0			
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	48.5	24.9	0.0	0.0	41.1	40.5	8.4	0.0	0.0			
LnGrp LOS	D	C	A	A	D	D	A	A				
Approach Vol, veh/h	569			681			78					
Approach Delay, s/veh	28.2			41.0			8.4					
Approach LOS	C			D			A					
Timer - Assigned Phs	2		4		7		8					
Phs Duration (G+Y+Rc), s	56.4		33.6		10.5		23.2					
Change Period (Y+Rc), s	4.6		4.6		4.6		4.6					
Max Green Setting (Gmax), s	39.4		41.4		9.4		27.4					
Max Q Clear Time (g_c+I1), s	3.0		13.9		6.7		15.6					
Green Ext Time (p_c), s	0.2		3.3		0.0		3.0					

Intersection Summary

HCM 6th Ctrl Delay 33.6

HCM 6th LOS C

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR] is excluded from calculations of the approach delay and intersection delay.

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

5: 136th Avenue E & 24th Street E

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	155	485	80	40	320	105	55	35	80	220	25	265
Future Volume (veh/h)	155	485	80	40	320	105	55	35	80	220	25	265
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No				No				No			
Adj Sat Flow, veh/h/ln	1604	1604	1604	1648	1648	1648	1841	1841	1841	1693	1693	1693
Adj Flow Rate, veh/h	170	533	88	44	352	115	60	38	88	242	27	291
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	20	20	20	17	17	17	4	4	4	14	14	14
Cap, veh/h	453	1193	196	341	974	314	209	106	247	387	31	329
Arrive On Green	0.03	0.15	0.15	0.04	0.42	0.42	0.05	0.22	0.22	0.08	0.25	0.25
Sat Flow, veh/h	1527	2618	431	1570	2328	749	1753	492	1140	1612	123	1327
Grp Volume(v), veh/h	170	309	312	44	235	232	60	0	126	242	0	318
Grp Sat Flow(s),veh/h/ln	1527	1523	1526	1570	1566	1512	1753	0	1632	1612	0	1450
Q Serve(g_s), s	5.4	16.6	16.8	1.4	9.2	9.5	2.3	0.0	5.9	7.5	0.0	19.0
Cycle Q Clear(g_c), s	5.4	16.6	16.8	1.4	9.2	9.5	2.3	0.0	5.9	7.5	0.0	19.0
Prop In Lane	1.00		0.28	1.00		0.50	1.00		0.70	1.00		0.92
Lane Grp Cap(c), veh/h	453	694	695	341	655	633	209	0	353	387	0	359
V/C Ratio(X)	0.37	0.45	0.45	0.13	0.36	0.37	0.29	0.00	0.36	0.63	0.00	0.88
Avail Cap(c_a), veh/h	507	694	695	402	655	633	264	0	535	387	0	475
HCM Platoon Ratio	0.33	0.33	0.33	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	0.91	0.91	0.91	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	13.7	27.9	27.9	14.4	17.9	18.0	26.5	0.0	29.9	28.0	0.0	32.6
Incr Delay (d2), s/veh	0.2	1.9	1.9	0.1	1.5	1.6	0.3	0.0	0.2	2.4	0.0	12.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	7.1	7.2	0.5	3.5	3.5	1.0	0.0	2.3	1.6	0.0	7.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	13.8	29.8	29.8	14.5	19.4	19.6	26.8	0.0	30.2	30.3	0.0	44.8
LnGrp LOS	B	C	C	B	B	B	C	A	C	C	A	D
Approach Vol, veh/h	791				511		186				560	
Approach Delay, s/veh	26.4				19.1		29.1				38.5	
Approach LOS	C				B		C				D	
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	1.9	42.2	12.0	24.0	8.5	45.5	9.2	26.8				
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5				
Max Green Setting (Gmax), s	1.5	24.5	7.5	29.5	7.5	27.5	7.5	29.5				
Max Q Clear Time (g_c+11), s	11.5	11.5	9.5	7.9	3.4	18.8	4.3	21.0				
Green Ext Time (p_c), s	0.1	3.2	0.0	0.4	0.0	3.3	0.0	0.9				

Intersection Summary

HCM 6th Ctrl Delay 28.1

HCM 6th LOS C

Notes

User approved pedestrian interval to be less than phase max green.

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
6: 142nd Ave E & 24th St E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	0.7					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	25	25	420	20	35	1055
Future Vol, veh/h	25	25	420	20	35	1055
Conflicting Peds, #/hr	1	0	0	1	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	70	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	34	34	23	23	18	18
Mvmt Flow	27	27	457	22	38	1147
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	1120	469	0	0	480	0
Stage 1	469	-	-	-	-	-
Stage 2	651	-	-	-	-	-
Critical Hdwy	7.11	6.71	-	-	4.37	-
Critical Hdwy Stg 1	5.91	-	-	-	-	-
Critical Hdwy Stg 2	6.31	-	-	-	-	-
Follow-up Hdwy	3.823	3.623	-	-	2.371	-
Pot Cap-1 Maneuver	176	520	-	-	989	-
Stage 1	554	-	-	-	-	-
Stage 2	417	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	169	520	-	-	988	-
Mov Cap-2 Maneuver	286	-	-	-	-	-
Stage 1	553	-	-	-	-	-
Stage 2	401	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	16.4	0	0.3			
HCM LOS	C					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	369	988	-	
HCM Lane V/C Ratio	-	-	0.147	0.039	-	
HCM Control Delay (s)	-	-	16.4	8.8	-	
HCM Lane LOS	-	-	C	A	-	
HCM 95th %tile Q(veh)	-	-	0.5	0.1	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

7: E Valley Highway E & Forest Canyon Road E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	234.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↵	↵		↵	↵	
Traffic Vol, veh/h	0	0	5	85	0	100	5	330	200	405	840	0
Future Vol, veh/h	0	0	5	85	0	100	5	330	200	405	840	0
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	55	-	-	65	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	91	91	91	91	91	91	91	91	91	91	91	91
Heavy Vehicles, %	0	0	0	6	6	6	2	2	2	3	3	3
Mvmt Flow	0	0	5	93	0	110	5	363	220	445	923	0
Major/Minor	Minor2		Minor1		Major1			Major2				
Conflicting Flow All	2351	2406	923	2299	2296	473	923	0	0	583	0	0
Stage 1	1813	1813	-	483	483	-	-	-	-	-	-	-
Stage 2	538	593	-	1816	1813	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.16	6.56	6.26	4.12	-	-	4.13	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.16	5.56	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.554	4.054	3.354	2.218	-	-	2.227	-	-
Pot Cap-1 Maneuver	25	34	330	~ 26	38	583	740	-	-	986	-	-
Stage 1	101	131	-	557	546	-	-	-	-	-	-	-
Stage 2	531	497	-	97	127	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	13	19	330	~ 16	21	583	740	-	-	986	-	-
Mov Cap-2 Maneuver	13	19	-	~ 16	21	-	-	-	-	-	-	-
Stage 1	100	72	-	553	542	-	-	-	-	-	-	-
Stage 2	428	494	-	~ 52	70	-	-	-	-	-	-	-
Approach	EB		WB		NB			SB				
HCM Control Delay, s	16.1		\$ 2472.2		0.1			3.8				
HCM LOS	C		F									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	740	-	-	330	34	986	-	-				
HCM Lane V/C Ratio	0.007	-	-	0.017	5.979	0.451	-	-				
HCM Control Delay (s)	9.9	-	-	16.5	\$ 2472.2	11.6	-	-				
HCM Lane LOS	A	-	-	C	F	B	-	-				
HCM 95th %tile Q(veh)	0	-	-	0.1	24.3	2.4	-	-				
Notes												
~: Volume exceeds capacity		\$: Delay exceeds 300s		+: Computation Not Defined				*: All major volume in platoon				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary 8: W Valley Highway E & SR-167 SB Ramps

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

						
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Volume (veh/h)	75	85	265	65	555	480
Future Volume (veh/h)	75	85	265	65	555	480
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00		0.98	1.00	
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No		No			No
Adj Sat Flow, veh/h/ln	1411	1411	1648	1648	1767	1767
Adj Flow Rate, veh/h	80	90	282	69	590	511
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	33	33	17	17	9	9
Cap, veh/h	150	235	525	126	659	0
Arrive On Green	0.11	0.11	0.21	0.21	0.39	0.00
Sat Flow, veh/h	1344	2104	2573	598	1682	590
Grp Volume(v), veh/h	80	90	175	176	590	22.5
Grp Sat Flow(s),veh/h/ln	1344	1052	1566	1523	1682	C
Q Serve(g_s), s	2.7	1.9	4.8	5.0	15.9	
Cycle Q Clear(g_c), s	2.7	1.9	4.8	5.0	15.9	
Prop In Lane	1.00	1.00		0.39	1.00	
Lane Grp Cap(c), veh/h	150	235	330	321	659	
V/C Ratio(X)	0.53	0.38	0.53	0.55	0.90	
Avail Cap(c_a), veh/h	429	672	1149	1118	886	
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	
Uniform Delay (d), s/veh	20.2	19.9	16.9	17.0	13.8	
Incr Delay (d2), s/veh	2.7	0.9	1.2	1.3	8.7	
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	
%ile BackOfQ(50%),veh/ln	0.9	0.5	1.6	1.6	6.4	
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	22.9	20.8	18.1	18.3	22.5	
LnGrp LOS	C	C	B	B	C	
Approach Vol, veh/h	170		351			
Approach Delay, s/veh	21.8		18.2			
Approach LOS	C		B			
Timer - Assigned Phs	1	2			8	
Phs Duration (G+Y+Rc), s	23.5	14.8			10.0	
Change Period (Y+Rc), s	4.6	4.6			4.6	
Max Green Setting (Gmax), s	25.4	35.4			15.4	
Max Q Clear Time (g_c+I1), s	17.9	7.0			4.7	
Green Ext Time (p_c), s	1.0	2.1			0.4	
Intersection Summary						
HCM 6th Ctrl Delay			21.0			
HCM 6th LOS			C			
Notes						
Unsignalized Delay for [SBT] is excluded from calculations of the approach delay and intersection delay.						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

9: 142nd Ave E & Costco Access

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	5	0	15	5	0	5	5	285	5	0	960	5
Future Volume (veh/h)	5	0	15	5	0	5	5	285	5	0	960	5
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		1.00	1.00		0.98	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	477	477	477	1900	1900	1900	1722	1722	1722	1781	1781	1781
Adj Flow Rate, veh/h	5	0	16	5	0	5	5	300	5	0	1011	5
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	96	96	96	0	0	0	12	12	12	8	8	8
Cap, veh/h	303	0	14	292	0	56	431	2110	35	783	1634	8
Arrive On Green	0.04	0.00	0.04	0.04	0.00	0.04	0.01	0.64	0.64	0.00	0.47	0.47
Sat Flow, veh/h	357	0	404	1419	0	1586	1640	3293	55	1697	3454	17
Grp Volume(v), veh/h	5	0	16	5	0	5	5	149	156	0	495	521
Grp Sat Flow(s),veh/h/ln	357	0	404	1419	0	1586	1640	1636	1712	1697	1692	1778
Q Serve(g_s), s	0.3	0.0	0.9	0.0	0.0	0.1	0.0	0.9	0.9	0.0	5.4	5.4
Cycle Q Clear(g_c), s	0.4	0.0	0.9	0.9	0.0	0.1	0.0	0.9	0.9	0.0	5.4	5.4
Prop In Lane	1.00		1.00	1.00		1.00	1.00		0.03	1.00		0.01
Lane Grp Cap(c), veh/h	303	0	14	292	0	56	431	1048	1097	783	801	841
V/C Ratio(X)	0.02	0.00	1.12	0.02	0.00	0.09	0.01	0.14	0.14	0.00	0.62	0.62
Avail Cap(c_a), veh/h	522	0	262	1162	0	1028	688	1061	1110	1051	1097	1153
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00
Uniform Delay (d), s/veh	11.7	0.0	11.9	12.3	0.0	11.5	3.5	1.8	1.8	0.0	4.8	4.8
Incr Delay (d2), s/veh	0.0	0.0	147.8	0.0	0.0	0.7	0.0	0.1	0.1	0.0	0.8	0.7
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.7	0.7
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	11.7	0.0	159.7	12.4	0.0	12.2	3.5	1.8	1.8	0.0	5.6	5.6
LnGrp LOS	B	A	F	B	A	B	A	A	A	A	A	A
Approach Vol, veh/h	21					10		310		1016		
Approach Delay, s/veh	124.5					12.3		1.8		5.6		
Approach LOS	F					B		A		A		
Timer - Assigned Phs	2		3		4		6		7		8	
Phs Duration (G+Y+Rc), s	4.9		0.0		19.8		4.9		4.1		15.7	
Change Period (Y+Rc), s	4.0		4.0		4.0		4.0		4.0		4.0	
Max Green Setting (Gmax), s	16.0		4.0		16.0		16.0		4.0		16.0	
Max Q Clear Time (g_c+I1), s	2.9		0.0		2.9		2.9		2.0		7.4	
Green Ext Time (p_c), s	0.0		0.0		1.4		0.1		0.0		4.2	
Intersection Summary												
HCM 6th Ctrl Delay			6.6									
HCM 6th LOS			A									

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

10: W Valley Highway E & 42nd Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	1.8					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	↘↘		↑	↗	↘	↑
Traffic Vol, veh/h	40	50	190	10	25	530
Future Vol, veh/h	40	50	190	10	25	530
Conflicting Peds, #/hr	0	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	100	200	-
Veh in Median Storage, #	0	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	95	95	95	95	95	95
Heavy Vehicles, %	20	20	29	29	11	11
Mvmt Flow	42	53	200	11	26	558
Major/Minor	Minor1	Major1		Major2		
Conflicting Flow All	810	200	0	0	211	0
Stage 1	200	-	-	-	-	-
Stage 2	610	-	-	-	-	-
Critical Hdwy	6.6	6.4	-	-	4.21	-
Critical Hdwy Stg 1	5.6	-	-	-	-	-
Critical Hdwy Stg 2	5.6	-	-	-	-	-
Follow-up Hdwy	3.68	3.48	-	-	2.299	-
Pot Cap-1 Maneuver	326	797	-	-	1308	-
Stage 1	792	-	-	-	-	-
Stage 2	509	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	319	797	-	-	1308	-
Mov Cap-2 Maneuver	319	-	-	-	-	-
Stage 1	792	-	-	-	-	-
Stage 2	499	-	-	-	-	-
Approach	WB	NB		SB		
HCM Control Delay, s	14.4	0		0.4		
HCM LOS	B					
Minor Lane/Major Mvmt	NBT	NBRWBLn1		SBL	SBT	
Capacity (veh/h)	-	- 478		1308	-	
HCM Lane V/C Ratio	-	- 0.198		0.02	-	
HCM Control Delay (s)	-	- 14.4		7.8	-	
HCM Lane LOS	-	- B		A	-	
HCM 95th %tile Q(veh)	-	- 0.7		0.1	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
11: Tacoma Ave & 142nd Ave E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	0.3					
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Vol, veh/h	10	5	20	280	645	465
Future Vol, veh/h	10	5	20	280	645	465
Conflicting Peds, #/hr	1	0	0	0	0	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	0	170	-	-	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	46	46	22	22	12	12
Mvmt Flow	11	5	22	304	701	505
Major/Minor	Minor2	Major1		Major2		
Conflicting Flow All	898	701	1206	0	-	0
Stage 1	701	-	-	-	-	-
Stage 2	197	-	-	-	-	-
Critical Hdwy	7.29	6.89	4.43	-	-	-
Critical Hdwy Stg 1	6.09	-	-	-	-	-
Critical Hdwy Stg 2	6.49	-	-	-	-	-
Follow-up Hdwy	3.937	3.737	2.409	-	-	-
Pot Cap-1 Maneuver	233	354	494	-	-	-
Stage 1	400	-	-	-	-	-
Stage 2	713	-	-	-	-	-
Platoon blocked, %				-	-	-
Mov Cap-1 Maneuver	223	354	494	-	-	-
Mov Cap-2 Maneuver	313	-	-	-	-	-
Stage 1	382	-	-	-	-	-
Stage 2	713	-	-	-	-	-
Approach	EB	NB		SB		
HCM Control Delay, s	16.4	0.8		0		
HCM LOS	C					
Minor Lane/Major Mvmt	NBL	NBT	EBLn1	EBLn2	SBT	SBR
Capacity (veh/h)	494	-	313	354	-	-
HCM Lane V/C Ratio	0.044	-	0.035	0.015	-	-
HCM Control Delay (s)	12.6	-	16.9	15.3	-	-
HCM Lane LOS	B	-	C	C	-	-
HCM 95th %tile Q(veh)	0.1	-	0.1	0	-	-

Appendix B LOS Summary and Worksheets

HCM 6th AWSC
12: Puyallup St & Tacoma Ave

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection	
Intersection Delay, s/veh	105.8
Intersection LOS	F

Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Vol, veh/h	155	60	90	85	490	275
Future Vol, veh/h	155	60	90	85	490	275
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	25	25	22	22	12	12
Mvmt Flow	170	66	99	93	538	302
Number of Lanes	0	1	1	0	1	0

Approach	EB	WB	SB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left	SB		WB
Conflicting Lanes Left	1	0	1
Conflicting Approach Right		SB	EB
Conflicting Lanes Right	0	1	1
HCM Control Delay	16.2	13.7	152.1
HCM LOS	C	B	F

Lane	EBLn1	WBLn1	SBLn1
Vol Left, %	72%	0%	64%
Vol Thru, %	28%	51%	0%
Vol Right, %	0%	49%	36%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	215	175	765
LT Vol	155	0	490
Through Vol	60	90	0
RT Vol	0	85	275
Lane Flow Rate	236	192	841
Geometry Grp	1	1	1
Degree of Util (X)	0.441	0.34	1.271
Departure Headway (Hd)	7.46	7.098	5.441
Convergence, Y/N	Yes	Yes	Yes
Cap	487	510	673
Service Time	5.46	5.098	3.441
HCM Lane V/C Ratio	0.485	0.376	1.25
HCM Control Delay	16.2	13.7	152.1
HCM Lane LOS	C	B	F
HCM 95th-tile Q	2.2	1.5	32.2

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

13: E Valley Highway E & Puyallup Street

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	125	340	85	440	870	55
Future Volume (vph)	125	340	85	440	870	55
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	1.00
Frpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	0.98
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	1.00
Frt	1.00	0.85	1.00	1.00	1.00	0.85
Flt Protected	0.95	1.00	0.95	1.00	1.00	1.00
Satd. Flow (prot)	1787	1599	1770	1863	1845	1534
Flt Permitted	0.95	1.00	0.12	1.00	1.00	1.00
Satd. Flow (perm)	1787	1599	227	1863	1845	1534
Peak-hour factor, PHF	0.97	0.97	0.97	0.97	0.97	0.97
Adj. Flow (vph)	129	351	88	454	897	57
RTOR Reduction (vph)	0	304	0	0	0	5
Lane Group Flow (vph)	129	47	88	454	897	52
Confl. Peds. (#/hr)	2		1			1
Heavy Vehicles (%)	1%	1%	2%	2%	3%	3%
Turn Type	Prot	Perm	pm+pt	NA	NA	Perm
Protected Phases	6		7	4	8	
Permitted Phases		6	4			8
Actuated Green, G (s)	10.3	10.3	57.4	57.4	45.5	45.5
Effective Green, g (s)	10.3	10.3	57.4	57.4	45.5	45.5
Actuated g/C Ratio	0.13	0.13	0.74	0.74	0.59	0.59
Clearance Time (s)	5.0	5.0	5.0	5.0	5.0	5.0
Vehicle Extension (s)	2.5	2.5	2.5	2.5	2.5	2.5
Lane Grp Cap (vph)	236	211	304	1376	1080	898
v/s Ratio Prot	c0.07		0.03	c0.24	c0.49	
v/s Ratio Perm		0.03	0.19			0.03
v/c Ratio	0.55	0.22	0.29	0.33	0.83	0.06
Uniform Delay, d1	31.5	30.1	10.5	3.5	13.0	6.9
Progression Factor	1.00	1.00	1.00	1.00	1.00	1.00
Incremental Delay, d2	2.0	0.4	0.4	0.1	5.4	0.0
Delay (s)	33.6	30.5	10.9	3.6	18.4	6.9
Level of Service	C	C	B	A	B	A
Approach Delay (s)	31.3			4.8	17.7	
Approach LOS	C			A	B	
Intersection Summary						
HCM 2000 Control Delay			17.5		HCM 2000 Level of Service	B
HCM 2000 Volume to Capacity ratio			0.77			
Actuated Cycle Length (s)			77.7		Sum of lost time (s)	17.0
Intersection Capacity Utilization			75.2%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

14: Elm Street E & E Valley Highway E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	4.1					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↰		↰	↰	↰	↰
Traffic Vol, veh/h	420	65	415	765	25	105
Future Vol, veh/h	420	65	415	765	25	105
Conflicting Peds, #/hr	0	0	0	0	1	7
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	100	-	45	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	2	2	2	2	0	0
Mvmt Flow	438	68	432	797	26	109
Major/Minor	Major1	Major2		Minor1		
Conflicting Flow All	0	0	506	0	2134	479
Stage 1	-	-	-	-	472	-
Stage 2	-	-	-	-	1662	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1059	-	55	591
Stage 1	-	-	-	-	632	-
Stage 2	-	-	-	-	171	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1059	-	33	588
Mov Cap-2 Maneuver	-	-	-	-	86	-
Stage 1	-	-	-	-	632	-
Stage 2	-	-	-	-	101	-
Approach	EB	WB		NB		
HCM Control Delay, s	0	3.8		22.4		
HCM LOS	C					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	86	588	-	-	1059	-
HCM Lane V/C Ratio	0.303	0.186	-	-	0.408	-
HCM Control Delay (s)	64.1	12.5	-	-	10.7	-
HCM Lane LOS	F	B	-	-	B	-
HCM 95th %tile Q(veh)	1.1	0.7	-	-	2	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
15: Valley Avenue & Elm Street E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	7.2					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↰		↰	↰	↰	↰
Traffic Vol, veh/h	235	35	555	235	20	250
Future Vol, veh/h	235	35	555	235	20	250
Conflicting Peds, #/hr	0	1	1	0	2	1
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	275	-	100	0
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	96	96	96	96	96	96
Heavy Vehicles, %	1	1	1	1	1	1
Mvmt Flow	245	36	578	245	21	260
Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	282	0	1667	265
Stage 1	-	-	-	-	264	-
Stage 2	-	-	-	-	1403	-
Critical Hdwy	-	-	4.11	-	6.41	6.21
Critical Hdwy Stg 1	-	-	-	-	5.41	-
Critical Hdwy Stg 2	-	-	-	-	5.41	-
Follow-up Hdwy	-	-	2.209	-	3.509	3.309
Pot Cap-1 Maneuver	-	-	1286	-	107	776
Stage 1	-	-	-	-	783	-
Stage 2	-	-	-	-	229	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1285	-	59	775
Mov Cap-2 Maneuver	-	-	-	-	110	-
Stage 1	-	-	-	-	782	-
Stage 2	-	-	-	-	126	-
Approach	EB		WB		NB	
HCM Control Delay, s	0		7.1		14.5	
HCM LOS	B					
Minor Lane/Major Mvmt	NBLn1	NBLn2	EBT	EBR	WBL	WBT
Capacity (veh/h)	110	775	-	-	1285	-
HCM Lane V/C Ratio	0.189	0.336	-	-	0.45	-
HCM Control Delay (s)	45.2	12	-	-	10.1	-
HCM Lane LOS	E	B	-	-	B	-
HCM 95th %tile Q(veh)	0.7	1.5	-	-	2.4	-

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
16: Fryar Avenue & Zehnder Avenue

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	2.7					
Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations						
Traffic Vol, veh/h	95	10	245	190	95	680
Future Vol, veh/h	95	10	245	190	95	680
Conflicting Peds, #/hr	0	1	0	2	2	0
Sign Control	Stop	Stop	Free	Free	Free	Free
RT Channelized	-	None	-	None	-	None
Storage Length	0	-	-	-	100	-
Veh in Median Storage, #	1	-	0	-	-	0
Grade, %	0	-	0	-	-	0
Peak Hour Factor	92	92	92	92	92	92
Heavy Vehicles, %	3	3	10	10	7	7
Mvmt Flow	103	11	266	207	103	739
Major/Minor	Minor1	Major1	Major2			
Conflicting Flow All	1317	373	0	0	475	0
Stage 1	372	-	-	-	-	-
Stage 2	945	-	-	-	-	-
Critical Hdwy	6.43	6.23	-	-	4.17	-
Critical Hdwy Stg 1	5.43	-	-	-	-	-
Critical Hdwy Stg 2	5.43	-	-	-	-	-
Follow-up Hdwy	3.527	3.327	-	-	2.263	-
Pot Cap-1 Maneuver	173	671	-	-	1061	-
Stage 1	695	-	-	-	-	-
Stage 2	376	-	-	-	-	-
Platoon blocked, %			-	-		-
Mov Cap-1 Maneuver	156	669	-	-	1059	-
Mov Cap-2 Maneuver	268	-	-	-	-	-
Stage 1	694	-	-	-	-	-
Stage 2	340	-	-	-	-	-
Approach	WB	NB	SB			
HCM Control Delay, s	25.9	0	1.1			
HCM LOS	D					
Minor Lane/Major Mvmt	NBT	NBRWBLn1	SBL	SBT		
Capacity (veh/h)	-	-	284	1059	-	
HCM Lane V/C Ratio	-	-	0.402	0.098	-	
HCM Control Delay (s)	-	-	25.9	8.8	-	
HCM Lane LOS	-	-	D	A	-	
HCM 95th %tile Q(veh)	-	-	1.9	0.3	-	

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

17: Parker Road E & Washington Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	3.5											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	15	30	10	5	5	5	5	40	5	30	135	10
Future Vol, veh/h	15	30	10	5	5	5	5	40	5	30	135	10
Conflicting Peds, #/hr	4	0	4	4	0	4	3	0	1	1	0	3
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	89	89	89	89	89	89	89	89	89	89	89	89
Heavy Vehicles, %	0	0	0	0	0	0	4	4	4	2	2	2
Mvmt Flow	17	34	11	6	6	6	6	45	6	34	152	11
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	299	293	165	313	295	53	166	0	0	52	0	0
Stage 1	229	229	-	61	61	-	-	-	-	-	-	-
Stage 2	70	64	-	252	234	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.1	6.5	6.2	4.14	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.1	5.5	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.5	4	3.3	2.236	-	-	2.218	-	-
Pot Cap-1 Maneuver	657	621	885	643	620	1020	1400	-	-	1554	-	-
Stage 1	778	718	-	955	848	-	-	-	-	-	-	-
Stage 2	945	846	-	757	715	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	631	602	880	592	601	1016	1397	-	-	1553	-	-
Mov Cap-2 Maneuver	631	602	-	592	601	-	-	-	-	-	-	-
Stage 1	773	699	-	950	844	-	-	-	-	-	-	-
Stage 2	927	842	-	692	696	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	11.2		10.3		0.8		1.3					
HCM LOS	B		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	1397	-	-	647	692	1553	-	-				
HCM Lane V/C Ratio	0.004	-	-	0.096	0.024	0.022	-	-				
HCM Control Delay (s)	7.6	0	-	11.2	10.3	7.4	0	-				
HCM Lane LOS	A	A	-	B	B	A	A	-				
HCM 95th %tile Q(veh)	0	-	-	0.3	0.1	0.1	-	-				

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis 18: W Valley Highway E & Sumner-Heights Drive E

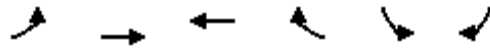
Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Movement	WBL	WBR	NBT	NBR	SBL	SBT
Lane Configurations	WT		WT		WT	WT
Traffic Volume (vph)	145	135	20	180	595	35
Future Volume (vph)	145	135	20	180	595	35
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	5.0		5.0		3.5	5.0
Lane Util. Factor	1.00		1.00		1.00	1.00
Frpb, ped/bikes	0.99		0.98		1.00	1.00
Flpb, ped/bikes	1.00		1.00		1.00	1.00
Frt	0.93		0.88		1.00	1.00
Flt Protected	0.97		1.00		0.95	1.00
Satd. Flow (prot)	1476		1621		1626	1712
Flt Permitted	0.97		1.00		0.62	1.00
Satd. Flow (perm)	1476		1621		1061	1712
Peak-hour factor, PHF	0.90	0.90	0.90	0.90	0.90	0.90
Adj. Flow (vph)	161	150	22	200	661	39
RTOR Reduction (vph)	0	0	144	0	0	0
Lane Group Flow (vph)	311	0	78	0	661	39
Confl. Bikes (#/hr)		2		1		
Heavy Vehicles (%)	16%	16%	1%	1%	11%	11%
Turn Type	Perm		NA		pm+pt	NA
Protected Phases			4		1	8
Permitted Phases	2				8	
Actuated Green, G (s)	29.4		31.2		57.2	20.1
Effective Green, g (s)	29.4		31.2		57.2	20.1
Actuated g/C Ratio	0.26		0.28		0.51	0.18
Clearance Time (s)	5.0		5.0		3.5	5.0
Vehicle Extension (s)	3.0		3.0		3.0	3.0
Lane Grp Cap (vph)	390		454		734	309
v/s Ratio Prot			c0.05		c0.30	0.02
v/s Ratio Perm	c0.21				c0.16	
v/c Ratio	0.80		0.17		0.90	0.13
Uniform Delay, d1	38.1		30.2		23.5	38.2
Progression Factor	1.35		1.00		1.00	1.00
Incremental Delay, d2	10.2		0.2		14.2	0.2
Delay (s)	61.8		30.4		37.6	38.4
Level of Service	E		C		D	D
Approach Delay (s)	61.8		30.4			37.7
Approach LOS	E		C			D
Intersection Summary						
HCM 2000 Control Delay			42.5		HCM 2000 Level of Service	D
HCM 2000 Volume to Capacity ratio			0.81			
Actuated Cycle Length (s)			111.2		Sum of lost time (s)	17.0
Intersection Capacity Utilization			73.1%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis 19: Valley Avenue E & Sumner-Heights Drive E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (vph)	80	300	225	200	490	285
Future Volume (vph)	80	300	225	200	490	285
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	3.5	5.0	5.0	5.0	5.0	
Lane Util. Factor	1.00	1.00	1.00	1.00	1.00	
Frpb, ped/bikes	1.00	1.00	1.00	0.97	0.99	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	1.00	1.00	1.00	0.85	0.95	
Flt Protected	0.95	1.00	1.00	1.00	0.97	
Satd. Flow (prot)	1655	1743	1881	1559	1608	
Flt Permitted	0.29	1.00	1.00	1.00	0.97	
Satd. Flow (perm)	502	1743	1881	1559	1608	
Peak-hour factor, PHF	0.94	0.94	0.94	0.94	0.94	0.94
Adj. Flow (vph)	85	319	239	213	521	303
RTOR Reduction (vph)	0	0	0	174	0	0
Lane Group Flow (vph)	85	319	239	39	824	0
Confl. Peds. (#/hr)	2			2		1
Heavy Vehicles (%)	9%	9%	1%	1%	8%	8%
Turn Type	pm+pt	NA	NA	Perm	Perm	
Protected Phases	7	4	8			
Permitted Phases	4			8	6	
Actuated Green, G (s)	31.2	31.2	20.1	20.1	70.0	
Effective Green, g (s)	31.2	31.2	20.1	20.1	70.0	
Actuated g/C Ratio	0.28	0.28	0.18	0.18	0.63	
Clearance Time (s)	3.5	5.0	5.0	5.0	5.0	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	219	489	340	281	1012	
v/s Ratio Prot	0.03	c0.18	0.13			
v/s Ratio Perm	0.08			0.02	c0.51	
v/c Ratio	0.39	0.65	0.70	0.14	0.81	
Uniform Delay, d1	31.1	35.2	42.7	38.3	15.7	
Progression Factor	1.00	1.00	1.00	1.00	1.19	
Incremental Delay, d2	1.1	3.1	6.5	0.2	3.8	
Delay (s)	32.2	38.3	49.2	38.5	22.4	
Level of Service	C	D	D	D	C	
Approach Delay (s)		37.1	44.2		22.4	
Approach LOS		D	D		C	
Intersection Summary						
HCM 2000 Control Delay			31.8		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.82			
Actuated Cycle Length (s)			111.2		Sum of lost time (s)	17.0
Intersection Capacity Utilization			76.8%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

20: Traffic Avenue/Fryar Avenue & Cannery Way/Main Street

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	150	305	420	145	145	25	215	260	75	125	625	120
Future Volume (veh/h)	150	305	420	145	145	25	215	260	75	125	625	120
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		0.98	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1885	1885	1885	1811	1811	1811	1826	1826	1826
Adj Flow Rate, veh/h	165	335	462	159	159	27	236	286	82	137	687	132
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Percent Heavy Veh, %	1	1	1	1	1	1	6	6	6	5	5	5
Cap, veh/h	556	566	476	393	471	80	261	322	267	415	767	147
Arrive On Green	0.13	0.30	0.30	0.13	0.30	0.30	0.15	0.18	0.18	0.24	0.26	0.26
Sat Flow, veh/h	1795	1885	1586	1795	1567	266	1725	1811	1505	1739	2896	556
Grp Volume(v), veh/h	165	335	462	159	0	186	236	286	82	137	411	408
Grp Sat Flow(s),veh/h/ln	1795	1885	1586	1795	0	1834	1725	1811	1505	1739	1735	1717
Q Serve(g_s), s	8.5	22.4	42.6	8.1	0.0	11.7	19.9	22.9	5.2	9.6	33.9	33.9
Cycle Q Clear(g_c), s	8.5	22.4	42.6	8.1	0.0	11.7	19.9	22.9	5.2	9.6	33.9	33.9
Prop In Lane	1.00		1.00	1.00		0.15	1.00		1.00	1.00		0.32
Lane Grp Cap(c), veh/h	556	566	476	393	0	550	261	322	267	415	460	455
V/C Ratio(X)	0.30	0.59	0.97	0.40	0.00	0.34	0.90	0.89	0.31	0.33	0.89	0.90
Avail Cap(c_a), veh/h	732	566	476	569	0	551	402	666	553	415	638	631
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	26.6	44.1	51.2	28.2	0.0	40.4	61.8	59.5	29.5	46.6	52.5	52.5
Incr Delay (d2), s/veh	0.3	1.6	33.4	0.7	0.0	0.4	16.5	8.3	0.6	0.5	11.8	12.1
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.8	10.9	21.2	3.7	0.0	5.5	9.9	11.2	2.7	4.3	16.1	16.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	26.9	45.8	84.6	28.8	0.0	40.7	78.3	67.8	30.1	47.1	64.3	64.6
LnGrp LOS	C	D	F	C	A	D	E	E	C	D	E	E
Approach Vol, veh/h	962			345			604			956		
Approach Delay, s/veh	61.2			35.3			66.8			61.9		
Approach LOS	E			D			E			E		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	25.5	50.0	40.9	31.8	25.5	50.0	28.0	44.8				
Change Period (Y+Rc), s	5.5	5.5	5.5	5.5	5.5	5.5	5.5	5.5				
Max Green Setting (Gmax), s	34.5	44.5	34.5	54.5	34.5	44.5	34.5	54.5				
Max Q Clear Time (g_c+I10), s	10.5	13.7	11.6	24.9	10.1	44.6	21.9	35.9				
Green Ext Time (p_c), s	0.6	0.7	0.3	1.5	0.6	0.0	0.5	3.3				

Intersection Summary

HCM 6th Ctrl Delay	59.5
HCM 6th LOS	E

Appendix B LOS Summary and Worksheets

HCM 6th AWSC
21: Alder Avenue & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection

Intersection Delay, s/veh 14.6

Intersection LOS B

Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	370	160	85	265	30	45
Future Vol, veh/h	370	160	85	265	30	45
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93
Heavy Vehicles, %	0	0	2	2	0	0
Mvmt Flow	398	172	91	285	32	48
Number of Lanes	1	0	0	1	1	0

Approach	EB	WB	NB
Opposing Approach	WB	EB	
Opposing Lanes	1	1	0
Conflicting Approach Left		NB	EB
Conflicting Lanes Left	0	1	1
Conflicting Approach Right	NB		WB
Conflicting Lanes Right	1	0	1
HCM Control Delay	16.7	12.6	9.5
HCM LOS	C	B	A

Lane	NBLn1	EBLn1	WBLn1
Vol Left, %	40%	0%	24%
Vol Thru, %	0%	70%	76%
Vol Right, %	60%	30%	0%
Sign Control	Stop	Stop	Stop
Traffic Vol by Lane	75	530	350
LT Vol	30	0	85
Through Vol	0	370	265
RT Vol	45	160	0
Lane Flow Rate	81	570	376
Geometry Grp	1	1	1
Degree of Util (X)	0.126	0.691	0.501
Departure Headway (Hd)	5.616	4.365	4.789
Convergence, Y/N	Yes	Yes	Yes
Cap	632	826	749
Service Time	3.706	2.41	2.844
HCM Lane V/C Ratio	0.128	0.69	0.502
HCM Control Delay	9.5	16.7	12.6
HCM Lane LOS	A	C	B
HCM 95th-tile Q	0.4	5.7	2.8

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
22: Ryan Ave & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection						
Int Delay, s/veh	0.5					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations						
Traffic Vol, veh/h	405	10	10	320	5	15
Future Vol, veh/h	405	10	10	320	5	15
Conflicting Peds, #/hr	0	20	20	0	0	2
Sign Control	Free	Free	Free	Free	Stop	Stop
RT Channelized	-	None	-	None	-	None
Storage Length	-	-	-	-	0	-
Veh in Median Storage, #	0	-	-	0	0	-
Grade, %	0	-	-	0	0	-
Peak Hour Factor	93	93	93	93	93	93
Heavy Vehicles, %	1	1	2	2	0	0
Mvmt Flow	435	11	11	344	5	16
Major/Minor	Major1		Major2		Minor1	
Conflicting Flow All	0	0	466	0	827	463
Stage 1	-	-	-	-	461	-
Stage 2	-	-	-	-	366	-
Critical Hdwy	-	-	4.12	-	6.4	6.2
Critical Hdwy Stg 1	-	-	-	-	5.4	-
Critical Hdwy Stg 2	-	-	-	-	5.4	-
Follow-up Hdwy	-	-	2.218	-	3.5	3.3
Pot Cap-1 Maneuver	-	-	1095	-	344	603
Stage 1	-	-	-	-	639	-
Stage 2	-	-	-	-	706	-
Platoon blocked, %	-	-		-		
Mov Cap-1 Maneuver	-	-	1077	-	334	592
Mov Cap-2 Maneuver	-	-	-	-	334	-
Stage 1	-	-	-	-	628	-
Stage 2	-	-	-	-	697	-
Approach	EB		WB		NB	
HCM Control Delay, s	0		0.3		12.6	
HCM LOS					B	
Minor Lane/Major Mvmt	NBLn1	EBT	EBR	WBL	WBT	
Capacity (veh/h)	496	-	-	1077	-	
HCM Lane V/C Ratio	0.043	-	-	0.01	-	
HCM Control Delay (s)	12.6	-	-	8.4	0	
HCM Lane LOS	B	-	-	A	A	
HCM 95th %tile Q(veh)	0.1	-	-	0	-	

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

23: Wood Avenue & Main Street

Future (2044) PM Peak Hour - Alternative 2

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (vph)	50	355	25	10	195	55	10	75	35	115	165	130
Future Volume (vph)	50	355	25	10	195	55	10	75	35	115	165	130
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900	1900
Lane Width	11	12	12	12	10	12	12	16	12	12	10	11
Total Lost time (s)	5.5	5.5			5.5			5.5			5.5	4.0
Lane Util. Factor	1.00	1.00			1.00			1.00			1.00	1.00
Frpb, ped/bikes	1.00	1.00			0.99			1.00			1.00	1.00
Flpb, ped/bikes	0.99	1.00			1.00			1.00			1.00	1.00
Frt	1.00	0.99			0.97			0.96			1.00	0.85
Flt Protected	0.95	1.00			1.00			1.00			0.98	1.00
Satd. Flow (prot)	1716	1859			1691			2020			1738	1561
Flt Permitted	0.64	1.00			0.98			0.96			0.81	1.00
Satd. Flow (perm)	1163	1859			1657			1940			1429	1561
Peak-hour factor, PHF	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89	0.89
Adj. Flow (vph)	56	399	28	11	219	62	11	84	39	129	185	146
RTOR Reduction (vph)	0	6	0	0	23	0	0	27	0	0	0	146
Lane Group Flow (vph)	56	421	0	0	269	0	0	107	0	0	314	0
Confl. Peds. (#/hr)	9		11	11		9	1					1
Heavy Vehicles (%)	1%	1%	1%	1%	1%	1%	2%	2%	2%	0%	0%	0%
Turn Type	Perm	NA		Perm	NA		Perm	NA		Perm	NA	NA
Protected Phases		4			8			2			6	
Permitted Phases	4			8			2			6		
Actuated Green, G (s)	17.3	17.3			17.3			13.3			13.3	0.0
Effective Green, g (s)	17.3	17.3			17.3			13.3			13.3	0.0
Actuated g/C Ratio	0.42	0.42			0.42			0.32			0.32	0.00
Clearance Time (s)	5.5	5.5			5.5			5.5			5.5	
Vehicle Extension (s)	6.0	6.0			6.0			6.0			6.0	
Lane Grp Cap (vph)	483	773			689			620			456	0
v/s Ratio Prot		c0.23										
v/s Ratio Perm	0.05				0.16			0.06			c0.22	
v/c Ratio	0.12	0.54			0.39			0.17			0.69	0.00
Uniform Delay, d1	7.5	9.2			8.5			10.2			12.3	20.8
Progression Factor	1.00	1.00			1.00			1.00			1.00	1.00
Incremental Delay, d2	0.3	1.8			1.0			0.4			6.5	0.0
Delay (s)	7.8	11.0			9.5			10.6			18.8	20.8
Level of Service	A	B			A			B			B	C
Approach Delay (s)		10.6			9.5			10.6			19.4	
Approach LOS		B			A			B			B	
Intersection Summary												
HCM 2000 Control Delay			13.3									
HCM 2000 Volume to Capacity ratio			0.61									
Actuated Cycle Length (s)			41.6									
Intersection Capacity Utilization			57.2%									
Analysis Period (min)			15									
c Critical Lane Group												

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

24: Valley Avenue & Main Street

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	160	390	80	185	250	70	15	345	100	75	605	65
Future Volume (veh/h)	160	390	80	185	250	70	15	345	100	75	605	65
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.98	1.00		0.98	1.00		0.99	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1900	1976	1900	1900	1900	1900	1961	1885	1885	1900	1976	1900
Adj Flow Rate, veh/h	168	411	84	195	263	74	16	363	105	79	637	68
Peak Hour Factor	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95	0.95
Percent Heavy Veh, %	0	0	0	0	0	0	1	1	1	0	0	0
Cap, veh/h	379	459	94	288	426	120	141	494	143	291	676	72
Arrive On Green	0.09	0.29	0.29	0.10	0.30	0.30	0.02	0.35	0.35	0.05	0.39	0.39
Sat Flow, veh/h	1810	1586	324	1810	1419	399	1867	1400	405	1810	1752	187
Grp Volume(v), veh/h	168	0	495	195	0	337	16	0	468	79	0	705
Grp Sat Flow(s),veh/h/ln	1810	0	1910	1810	0	1819	1867	0	1805	1810	0	1939
Q Serve(g_s), s	6.2	0.0	24.2	7.2	0.0	15.5	0.5	0.0	22.0	2.6	0.0	34.1
Cycle Q Clear(g_c), s	6.2	0.0	24.2	7.2	0.0	15.5	0.5	0.0	22.0	2.6	0.0	34.1
Prop In Lane	1.00		0.17	1.00		0.22	1.00		0.22	1.00		0.10
Lane Grp Cap(c), veh/h	379	0	552	288	0	546	141	0	637	291	0	748
V/C Ratio(X)	0.44	0.00	0.90	0.68	0.00	0.62	0.11	0.00	0.73	0.27	0.00	0.94
Avail Cap(c_a), veh/h	502	0	786	391	0	749	389	0	743	472	0	799
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	22.1	0.0	33.1	24.1	0.0	29.2	24.2	0.0	27.5	20.5	0.0	28.8
Incr Delay (d2), s/veh	0.8	0.0	9.8	2.8	0.0	1.1	0.4	0.0	3.2	0.5	0.0	18.8
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	2.7	0.0	12.5	3.3	0.0	6.9	0.2	0.0	9.9	1.1	0.0	19.3
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	22.9	0.0	42.9	26.9	0.0	30.3	24.5	0.0	30.7	21.0	0.0	47.6
LnGrp LOS	C	A	D	C	A	C	C	A	C	C	A	D
Approach Vol, veh/h	663			532			484			784		
Approach Delay, s/veh	37.8			29.1			30.5			44.9		
Approach LOS	D			C			C			D		
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	4.5	33.1	10.3	39.3	13.4	34.2	7.1	42.5				
Change Period (Y+Rc), s	5.0	5.0	5.0	5.0	5.0	5.0	5.0	5.0				
Max Green Setting (Gmax), s	45.0	40.0	15.0	40.0	15.0	40.0	15.0	40.0				
Max Q Clear Time (g_c+19.2), s	19.2	26.2	4.6	24.0	8.2	17.5	2.5	36.1				
Green Ext Time (p_c), s	0.3	1.9	0.1	1.9	0.3	1.4	0.0	1.4				

Intersection Summary

HCM 6th Ctrl Delay	36.7
HCM 6th LOS	D

Appendix B LOS Summary and Worksheets

HCM 6th TWSC
25: Parker Road E & Main Street

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	9.9											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	20	650	40	15	345	30	30	15	10	55	70	30
Future Vol, veh/h	20	650	40	15	345	30	30	15	10	55	70	30
Conflicting Peds, #/hr	5	0	10	10	0	5	0	0	4	4	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	250	-	-	235	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	0	0	0	0	0	0	1	1	1
Mvmt Flow	20	663	41	15	352	31	31	15	10	56	71	31
Major/Minor	Major1		Major2			Minor1			Minor2			
Conflicting Flow All	388	0	0	714	0	0	1183	1152	698	1143	1157	373
Stage 1	-	-	-	-	-	-	734	734	-	403	403	-
Stage 2	-	-	-	-	-	-	449	418	-	740	754	-
Critical Hdwy	4.1	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.2	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1182	-	-	895	-	-	168	199	444	178	197	675
Stage 1	-	-	-	-	-	-	415	429	-	626	601	-
Stage 2	-	-	-	-	-	-	593	594	-	410	419	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1177	-	-	888	-	-	109	190	439	158	188	672
Mov Cap-2 Maneuver	-	-	-	-	-	-	109	190	-	158	188	-
Stage 1	-	-	-	-	-	-	405	418	-	613	588	-
Stage 2	-	-	-	-	-	-	489	582	-	378	409	-
Approach	EB		WB			NB			SB			
HCM Control Delay, s	0.2		0.4			44.3			66.2			
HCM LOS						E			F			
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	146	1177	-	-	888	-	-	203				
HCM Lane V/C Ratio	0.384	0.017	-	-	0.017	-	-	0.779				
HCM Control Delay (s)	44.3	8.1	-	-	9.1	-	-	66.2				
HCM Lane LOS	E	A	-	-	A	-	-	F				
HCM 95th %tile Q(veh)	1.6	0.1	-	-	0.1	-	-	5.4				

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

26: 160th Avenue E & Main Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Intersection Delay, s/veh	56.3											
Intersection LOS	F											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	35	285	415	30	290	45	110	55	15	185	120	20
Future Vol, veh/h	35	285	415	30	290	45	110	55	15	185	120	20
Peak Hour Factor	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91	0.91
Heavy Vehicles, %	1	1	1	0	0	0	0	0	0	1	1	1
Mvmt Flow	38	313	456	33	319	49	121	60	16	203	132	22
Number of Lanes	1	1	1	1	1	0	0	1	0	0	1	0
Approach	EB			WB			NB			SB		
Opposing Approach	WB			EB			SB			NB		
Opposing Lanes	2			3			1			1		
Conflicting Approach Left	SB			NB			EB			WB		
Conflicting Lanes Left	1			1			3			2		
Conflicting Approach Right	NB			SB			WB			EB		
Conflicting Lanes Right	1			1			2			3		
HCM Control Delay	56.1			72			24.1			57		
HCM LOS	F			F			C			F		
Lane	NBLn1	EBLn1	EBLn2	EBLn3	WBLn1	WBLn2	SBLn1					
Vol Left, %	61%	100%	0%	0%	100%	0%	57%					
Vol Thru, %	31%	0%	100%	0%	0%	87%	37%					
Vol Right, %	8%	0%	0%	100%	0%	13%	6%					
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Stop					
Traffic Vol by Lane	180	35	285	415	30	335	325					
LT Vol	110	35	0	0	30	0	185					
Through Vol	55	0	285	0	0	290	120					
RT Vol	15	0	0	415	0	45	20					
Lane Flow Rate	198	38	313	456	33	368	357					
Geometry Grp	7	7	7	7	8	8	7					
Degree of Util (X)	0.541	0.099	0.761	1.015	0.094	0.992	0.91					
Departure Headway (Hd)	10.084	9.276	8.742	8.011	10.499	9.871	9.365					
Convergence, Y/N	Yes	Yes	Yes	Yes	Yes	Yes	Yes					
Cap	360	389	417	456	344	372	389					
Service Time	7.784	6.976	6.454	5.723	8.199	7.571	7.065					
HCM Lane V/C Ratio	0.55	0.098	0.751	1	0.096	0.989	0.918					
HCM Control Delay	24.1	13	34.4	74.7	14.3	77.2	57					
HCM Lane LOS	C	B	D	F	B	F	F					
HCM 95th-tile Q	3.1	0.3	6.3	13.5	0.3	11.5	9.5					

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary 27: Sumner-Tapps Highway E & 60th Street E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	275	280	165	510	615	185
Future Volume (veh/h)	275	280	165	510	615	185
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1900	1900	1885	1885	1870	1870
Adj Flow Rate, veh/h	293	298	176	543	654	197
Peak Hour Factor	0.94	0.94	0.94	0.94	0.94	0.94
Percent Heavy Veh, %	0	0	1	1	2	2
Cap, veh/h	390	347	187	1255	693	209
Arrive On Green	0.22	0.22	0.10	0.67	0.50	0.50
Sat Flow, veh/h	1810	1610	1795	1885	1380	416
Grp Volume(v), veh/h	293	298	176	543	0	851
Grp Sat Flow(s), veh/h/ln	1810	1610	1795	1885	0	1796
Q Serve(g_s), s	10.2	12.0	6.5	9.1	0.0	30.2
Cycle Q Clear(g_c), s	10.2	12.0	6.5	9.1	0.0	30.2
Prop In Lane	1.00	1.00	1.00			0.23
Lane Grp Cap(c), veh/h	390	347	187	1255	0	901
V/C Ratio(X)	0.75	0.86	0.94	0.43	0.00	0.94
Avail Cap(c_a), veh/h	431	383	187	1290	0	935
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	24.7	25.4	29.9	5.3	0.0	15.8
Incr Delay (d2), s/veh	6.6	16.4	49.1	0.2	0.0	17.2
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.9	1.6	5.2	2.5	0.0	14.3
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	31.3	41.8	79.0	5.5	0.0	33.1
LnGrp LOS	C	D	E	A	A	C
Approach Vol, veh/h	591			719	851	
Approach Delay, s/veh	36.6			23.5	33.1	
Approach LOS	D			C	C	
Timer - Assigned Phs	2			4	5	6
Phs Duration (G+Y+Rc), s	48.7			18.5	11.0	37.7
Change Period (Y+Rc), s	4.0			4.0	4.0	4.0
Max Green Setting (Gmax), s	46.0			16.0	7.0	35.0
Max Q Clear Time (g_c+l1), s	11.1			14.0	8.5	32.2
Green Ext Time (p_c), s	3.8			0.5	0.0	1.6
Intersection Summary						
HCM 6th Ctrl Delay			30.8			
HCM 6th LOS			C			

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

28: Traffic Avenue & Maple Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	0.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕↕				↗	↗	↕↕	↗	↗	↕↕	
Traffic Vol, veh/h	5	0	10	0	0	20	0	500	80	45	1040	5
Future Vol, veh/h	5	0	10	0	0	20	0	500	80	45	1040	5
Conflicting Peds, #/hr	2	0	0	0	0	2	0	0	5	5	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	Yield	-	-	None	-	-	None
Storage Length	-	-	-	-	-	0	45	-	115	55	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	0	0	0	7	7	7	5	5	5	4	4	4
Mvmt Flow	5	0	11	0	0	21	0	532	85	48	1106	5
Major/Minor	Minor2		Minor1			Major1			Major2			
Conflicting Flow All	1473	1827	556	-	-	273	1111	0	0	622	0	0
Stage 1	1205	1205	-	-	-	-	-	-	-	-	-	-
Stage 2	268	622	-	-	-	-	-	-	-	-	-	-
Critical Hdwy	7.5	6.5	6.9	-	-	7.04	4.2	-	-	4.18	-	-
Critical Hdwy Stg 1	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.5	5.5	-	-	-	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	-	-	3.37	2.25	-	-	2.24	-	-
Pot Cap-1 Maneuver	90	78	480	0	0	710	607	-	-	941	-	-
Stage 1	198	259	-	0	0	-	-	-	-	-	-	-
Stage 2	720	482	-	0	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	84	74	480	-	-	706	607	-	-	937	-	-
Mov Cap-2 Maneuver	84	74	-	-	-	-	-	-	-	-	-	-
Stage 1	198	246	-	-	-	-	-	-	-	-	-	-
Stage 2	697	480	-	-	-	-	-	-	-	-	-	-
Approach	EB		WB			NB			SB			
HCM Control Delay, s	26		10.3			0			0.4			
HCM LOS	D		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	607	-	-	187	706	937	-	-				
HCM Lane V/C Ratio	-	-	-	0.085	0.03	0.051	-	-				
HCM Control Delay (s)	0	-	-	26	10.3	9	-	-				
HCM Lane LOS	A	-	-	D	B	A	-	-				
HCM 95th %tile Q(veh)	0	-	-	0.3	0.1	0.2	-	-				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

29: E Main Ave/Traffic Avenue & SR-410 WB Ramps/Thompson Street (2044) PM Peak Hour - Alternative 2

												
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	140	20	315	265	65	15	325	475	260	25	815	300
Future Volume (veh/h)	140	20	315	265	65	15	325	475	260	25	815	300
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1841	1841	1841	1841	1841	1914	1841	1914	1914	1841	1841	1841
Adj Flow Rate, veh/h	152	22	0	188	212	0	353	516	0	27	886	326
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	4	4	4	4	4	4	4	4	4	4	4	4
Cap, veh/h	187	197		253	266		353	1849		549	1109	406
Arrive On Green	0.11	0.11	0.00	0.14	0.14	0.00	0.13	0.51	0.00	0.06	0.44	0.44
Sat Flow, veh/h	1753	1841	1560	1753	1841	0	1753	3733	0	1753	2501	916
Grp Volume(v), veh/h	152	22	0	188	212	0	353	516	0	27	619	593
Grp Sat Flow(s),veh/h/ln	1753	1841	1560	1753	1841	0	1753	1819	0	1753	1749	1668
Q Serve(g_s), s	8.5	1.1	0.0	10.3	11.1	0.0	12.5	8.1	0.0	0.7	30.5	30.7
Cycle Q Clear(g_c), s	8.5	1.1	0.0	10.3	11.1	0.0	12.5	8.1	0.0	0.7	30.5	30.7
Prop In Lane	1.00		1.00	1.00		0.00	1.00		0.00	1.00		0.55
Lane Grp Cap(c), veh/h	187	197		253	266		353	1849		549	776	740
V/C Ratio(X)	0.81	0.11		0.74	0.80		1.00	0.28		0.05	0.80	0.80
Avail Cap(c_a), veh/h	289	304		447	469		353	1849		627	776	740
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	0.97	0.97	0.00	0.84	0.84	0.00	1.00	1.00	1.00
Uniform Delay (d), s/veh	43.7	40.4	0.0	41.0	41.3	0.0	23.8	14.1	0.0	9.8	24.0	24.0
Incr Delay (d2), s/veh	9.5	0.2	0.0	4.1	5.2	0.0	44.0	0.3	0.0	0.0	8.4	9.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	4.2	0.5	0.0	4.7	5.4	0.0	9.0	3.2	0.0	0.3	14.1	13.6
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	53.2	40.6	0.0	45.1	46.6	0.0	67.8	14.4	0.0	9.8	32.3	33.0
LnGrp LOS	D	D		D	D		F	B		A	C	C
Approach Vol, veh/h	174			400			869			1239		
Approach Delay, s/veh	51.6			45.9			36.1			32.2		
Approach LOS	D			D			D			C		
Timer - Assigned Phs	1	2		4	5	6		8				
Phs Duration (G+Y+Rc), s	17.0	48.8		19.0	10.5	55.3		15.2				
Change Period (Y+Rc), s	4.5	4.5		4.5	4.5	4.5		4.5				
Max Green Setting (Gmax), s	12.5	27.5		25.5	10.5	29.5		16.5				
Max Q Clear Time (g_c+I1), s	14.5	32.7		13.1	2.7	10.1		10.5				
Green Ext Time (p_c), s	0.0	0.0		1.3	0.0	2.2		0.3				

Intersection Summary

HCM 6th Ctrl Delay 36.7

HCM 6th LOS D

Notes

User approved volume balancing among the lanes for turning movement.

Unsignalized Delay for [NBR, EBR, WBR] is excluded from calculations of the approach delay and intersection delay.

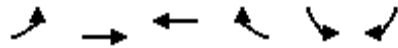
Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

30: Thompson Street & Station Lane

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	WBT	WBR	SBL	SBR
Lane Configurations						
Traffic Volume (veh/h)	20	280	265	5	20	70
Future Volume (veh/h)	20	280	265	5	20	70
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00			0.97	1.00	0.99
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No	No		No	
Adj Sat Flow, veh/h/ln	1870	1870	1885	1885	1737	1737
Adj Flow Rate, veh/h	22	311	294	6	22	78
Peak Hour Factor	0.90	0.90	0.90	0.90	0.90	0.90
Percent Heavy Veh, %	2	2	1	1	11	11
Cap, veh/h	460	906	495	10	34	120
Arrive On Green	0.03	0.48	0.27	0.27	0.10	0.10
Sat Flow, veh/h	1781	1870	1840	38	328	1162
Grp Volume(v), veh/h	22	311	0	300	101	0
Grp Sat Flow(s),veh/h/ln	1781	1870	0	1877	1504	0
Q Serve(g_s), s	0.2	2.7	0.0	3.7	1.7	0.0
Cycle Q Clear(g_c), s	0.2	2.7	0.0	3.7	1.7	0.0
Prop In Lane	1.00			0.02	0.22	0.77
Lane Grp Cap(c), veh/h	460	906	0	505	155	0
V/C Ratio(X)	0.05	0.34	0.00	0.59	0.65	0.00
Avail Cap(c_a), veh/h	1077	1717	0	1724	1381	0
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	0.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	5.9	4.2	0.0	8.5	11.5	0.0
Incr Delay (d2), s/veh	0.0	0.1	0.0	0.4	1.7	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.0	0.5	0.0	1.1	0.5	0.0
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	6.0	4.3	0.0	8.9	13.2	0.0
LnGrp LOS	A	A	A	A	B	A
Approach Vol, veh/h		333	300		101	
Approach Delay, s/veh		4.4	8.9		13.2	
Approach LOS		A	A		B	
Timer - Assigned Phs	1	2			6	8
Phs Duration (G+Y+Rc), s	5.8	12.7			18.4	8.3
Change Period (Y+Rc), s	5.0	5.5			5.5	5.5
Max Green Setting (Gmax), s	10.0	24.5			24.5	24.5
Max Q Clear Time (g_c+12.2), s	12.2	5.7			4.7	3.7
Green Ext Time (p_c), s	0.0	1.1			1.2	0.1

Intersection Summary

HCM 6th Ctrl Delay	7.5
HCM 6th LOS	A

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

31: Alder Ave & Thompson Street

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	5.1											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	75	175	5	5	135	5	0	10	5	5	15	200
Future Vol, veh/h	75	175	5	5	135	5	0	10	5	5	15	200
Conflicting Peds, #/hr	0	0	3	3	0	0	0	0	0	0	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	94	94	94	94	94	94	94	94	94	94	94	94
Heavy Vehicles, %	6	6	6	0	0	0	0	0	0	1	1	1
Mvmt Flow	80	186	5	5	144	5	0	11	5	5	16	213
Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	149	0	0	194	0	0	623	511	192	514	511	147
Stage 1	-	-	-	-	-	-	352	352	-	157	157	-
Stage 2	-	-	-	-	-	-	271	159	-	357	354	-
Critical Hdwy	4.16	-	-	4.1	-	-	7.1	6.5	6.2	7.11	6.51	6.21
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.11	5.51	-
Follow-up Hdwy	2.254	-	-	2.2	-	-	3.5	4	3.3	3.509	4.009	3.309
Pot Cap-1 Maneuver	1408	-	-	1391	-	-	401	469	855	473	467	903
Stage 1	-	-	-	-	-	-	669	635	-	848	770	-
Stage 2	-	-	-	-	-	-	739	770	-	663	632	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1408	-	-	1388	-	-	282	436	853	438	434	903
Mov Cap-2 Maneuver	-	-	-	-	-	-	282	436	-	438	434	-
Stage 1	-	-	-	-	-	-	625	593	-	794	767	-
Stage 2	-	-	-	-	-	-	551	767	-	606	590	-
Approach	EB			WB			NB			SB		
HCM Control Delay, s	2.3			0.3			12.1			11.1		
HCM LOS							B			B		
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	521	1408	-	-	1388	-	-	823				
HCM Lane V/C Ratio	0.031	0.057	-	-	0.004	-	-	0.284				
HCM Control Delay (s)	12.1	7.7	0	-	7.6	0	-	11.1				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.2	-	-	0	-	-	1.2				

Appendix B LOS Summary and Worksheets

HCM Signalized Intersection Capacity Analysis

Sumner Comp Plan Update

32: E Main Ave & SR-410 EB Ramps

Future (2044) PM Peak Hour - Alternative 2

						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (vph)	220	660	250	840	1100	295
Future Volume (vph)	220	660	250	840	1100	295
Ideal Flow (vphpl)	1900	1900	1900	1900	1900	1900
Total Lost time (s)	4.5	4.5	4.5	4.5	4.5	
Lane Util. Factor	0.97	0.91	1.00	0.95	0.95	
Frpb, ped/bikes	0.97	0.97	1.00	1.00	1.00	
Flpb, ped/bikes	1.00	1.00	1.00	1.00	1.00	
Frt	0.91	0.85	1.00	1.00	0.97	
Flt Protected	0.98	1.00	0.95	1.00	1.00	
Satd. Flow (prot)	2995	1339	1770	3539	3394	
Flt Permitted	0.98	1.00	0.09	1.00	1.00	
Satd. Flow (perm)	2995	1339	166	3539	3394	
Peak-hour factor, PHF	0.95	0.95	0.95	0.95	0.95	0.95
Adj. Flow (vph)	232	695	263	884	1158	311
RTOR Reduction (vph)	283	294	0	0	18	0
Lane Group Flow (vph)	297	53	263	884	1451	0
Confl. Peds. (#/hr)		7				
Heavy Vehicles (%)	7%	7%	2%	2%	3%	3%
Turn Type	Prot	Perm	D.P+P	NA	NA	
Protected Phases	8		1	6	2	
Permitted Phases		8	2			
Actuated Green, G (s)	15.3	15.3	61.5	66.0	44.8	
Effective Green, g (s)	15.3	15.3	61.5	66.0	44.8	
Actuated g/C Ratio	0.15	0.15	0.62	0.66	0.45	
Clearance Time (s)	4.5	4.5	4.5	4.5	4.5	
Vehicle Extension (s)	3.0	3.0	3.0	3.0	3.0	
Lane Grp Cap (vph)	458	204	369	2335	1520	
v/s Ratio Prot	c0.10		c0.12	0.25	c0.43	
v/s Ratio Perm		0.04	0.32			
v/c Ratio	0.65	0.26	0.71	0.38	0.95	
Uniform Delay, d1	39.8	37.4	25.3	7.7	26.6	
Progression Factor	1.00	1.00	1.00	1.00	0.52	
Incremental Delay, d2	3.2	0.7	6.4	0.5	2.0	
Delay (s)	43.0	38.0	31.7	8.2	15.8	
Level of Service	D	D	C	A	B	
Approach Delay (s)	41.1			13.6	15.8	
Approach LOS	D			B	B	
Intersection Summary						
HCM 2000 Control Delay			21.7		HCM 2000 Level of Service	C
HCM 2000 Volume to Capacity ratio			0.79			
Actuated Cycle Length (s)			100.0		Sum of lost time (s)	18.0
Intersection Capacity Utilization			78.5%		ICU Level of Service	D
Analysis Period (min)			15			
c Critical Lane Group						

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary
33: Valley Avenue & Meade-McCumber Road E

Sumner Comp Plan Update
Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	25	95	125	65	65	10	30	380	85	5	820	40
Future Volume (veh/h)	25	95	125	65	65	10	30	380	85	5	820	40
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	0.99		0.99	1.00		0.99	1.00		1.00	1.00		0.98
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No			No			No		
Adj Sat Flow, veh/h/ln	1885	1885	1885	1870	1945	1870	1885	1885	1885	1900	1900	1900
Adj Flow Rate, veh/h	27	102	134	70	70	11	32	409	91	5	882	43
Peak Hour Factor	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93	0.93
Percent Heavy Veh, %	1	1	1	2	2	2	1	1	1	0	0	0
Cap, veh/h	370	125	164	247	322	51	166	778	173	421	879	43
Arrive On Green	0.03	0.17	0.17	0.06	0.20	0.20	0.04	0.52	0.52	0.01	0.49	0.49
Sat Flow, veh/h	1795	737	968	1781	1640	258	1795	1493	332	1810	1795	87
Grp Volume(v), veh/h	27	0	236	70	0	81	32	0	500	5	0	925
Grp Sat Flow(s),veh/h/ln	1795	0	1704	1781	0	1897	1795	0	1825	1810	0	1882
Q Serve(g_s), s	0.9	0.0	10.0	2.4	0.0	2.7	0.6	0.0	13.5	0.1	0.0	36.7
Cycle Q Clear(g_c), s	0.9	0.0	10.0	2.4	0.0	2.7	0.6	0.0	13.5	0.1	0.0	36.7
Prop In Lane	1.00		0.57	1.00		0.14	1.00		0.18	1.00		0.05
Lane Grp Cap(c), veh/h	370	0	289	247	0	373	166	0	951	421	0	922
V/C Ratio(X)	0.07	0.00	0.82	0.28	0.00	0.22	0.19	0.00	0.53	0.01	0.00	1.00
Avail Cap(c_a), veh/h	455	0	525	282	0	585	242	0	951	554	0	922
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	24.1	0.0	30.0	23.8	0.0	25.3	17.5	0.0	11.8	10.3	0.0	19.1
Incr Delay (d2), s/veh	0.1	0.0	5.6	0.6	0.0	0.3	0.6	0.0	0.5	0.0	0.0	30.5
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	0.4	0.0	4.5	1.0	0.0	1.2	0.3	0.0	5.2	0.0	0.0	22.2
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	24.2	0.0	35.6	24.4	0.0	25.5	18.0	0.0	12.4	10.3	0.0	49.6
LnGrp LOS	C	A	D	C	A	C	B	A	B	B	A	F
Approach Vol, veh/h	263		151			532			930			
Approach Delay, s/veh	34.4		25.0			12.7			49.4			
Approach LOS	C		C			B			D			
Timer - Assigned Phs	1	2	3	4	5	6	7	8				
Phs Duration (G+Y+Rc), s	5.1	43.5	9.1	17.2	7.4	41.2	7.1	19.2				
Change Period (Y+Rc), s	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5				
Max Green Setting (Gmax), s	36.7	6.1	23.1	6.1	36.7	6.1	23.1					
Max Q Clear Time (g_c+12, s)	15.5	4.4	12.0	2.6	38.7	2.9	4.7					
Green Ext Time (p_c), s	0.0	2.3	0.0	0.7	0.0	0.0	0.0	0.2				
Intersection Summary												
HCM 6th Ctrl Delay			34.9									
HCM 6th LOS			C									

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

34: Parker Road E & Mead McCumber Road E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	5.5											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	40	145	5	5	65	10	10	5	5	65	20	75
Future Vol, veh/h	40	145	5	5	65	10	10	5	5	65	20	75
Conflicting Peds, #/hr	10	0	2	2	0	10	0	0	5	5	0	0
Sign Control	Free	Free	Free	Free	Free	Free	Stop	Stop	Stop	Stop	Stop	Stop
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	-	-	-	-	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	93	93	93	93	93	93	93	93	93	93	93	93
Heavy Vehicles, %	1	1	1	2	2	2	0	0	0	2	2	2
Mvmt Flow	43	156	5	5	70	11	11	5	5	70	22	81
Major/Minor	Major1			Major2			Minor1			Minor2		
Conflicting Flow All	91	0	0	163	0	0	384	348	166	351	345	86
Stage 1	-	-	-	-	-	-	247	247	-	96	96	-
Stage 2	-	-	-	-	-	-	137	101	-	255	249	-
Critical Hdwy	4.11	-	-	4.12	-	-	7.1	6.5	6.2	7.12	6.52	6.22
Critical Hdwy Stg 1	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Critical Hdwy Stg 2	-	-	-	-	-	-	6.1	5.5	-	6.12	5.52	-
Follow-up Hdwy	2.209	-	-	2.218	-	-	3.5	4	3.3	3.518	4.018	3.318
Pot Cap-1 Maneuver	1510	-	-	1416	-	-	578	579	884	604	578	973
Stage 1	-	-	-	-	-	-	761	706	-	911	815	-
Stage 2	-	-	-	-	-	-	871	815	-	749	701	-
Platoon blocked, %		-	-		-	-						
Mov Cap-1 Maneuver	1497	-	-	1414	-	-	499	553	879	573	552	965
Mov Cap-2 Maneuver	-	-	-	-	-	-	499	553	-	573	552	-
Stage 1	-	-	-	-	-	-	735	682	-	875	805	-
Stage 2	-	-	-	-	-	-	774	805	-	712	677	-
Approach	EB			WB			NB			SB		
HCM Control Delay, s	1.6			0.5			11.5			11.8		
HCM LOS							B			B		
Minor Lane/Major Mvmt	NBLn1	EBL	EBT	EBR	WBL	WBT	WBR	SBLn1				
Capacity (veh/h)	575	1497	-	-	1414	-	-	704				
HCM Lane V/C Ratio	0.037	0.029	-	-	0.004	-	-	0.244				
HCM Control Delay (s)	11.5	7.5	0	-	7.6	0	-	11.8				
HCM Lane LOS	B	A	A	-	A	A	-	B				
HCM 95th %tile Q(veh)	0.1	0.1	-	-	0	-	-	1				

Appendix B LOS Summary and Worksheets

HCM 6th AWSC

35: 160th Avenue E & 64th Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Intersection Delay, s/veh	19.7											
Intersection LOS	C											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕			↕			↕	
Traffic Vol, veh/h	25	170	5	5	55	145	5	0	0	470	5	25
Future Vol, veh/h	25	170	5	5	55	145	5	0	0	470	5	25
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles, %	0	0	0	1	1	1	0	0	0	0	0	0
Mvmt Flow	27	185	5	5	60	158	5	0	0	511	5	27
Number of Lanes	0	1	0	0	1	0	0	1	0	0	1	0
Approach	EB			WB			NB			SB		
Opposing Approach	WB			EB			SB			NB		
Opposing Lanes	1			1			1			1		
Conflicting Approach Left	SB			NB			EB			WB		
Conflicting Lanes Left	1			1			1			1		
Conflicting Approach Right	NB			SB			WB			EB		
Conflicting Lanes Right	1			1			1			1		
HCM Control Delay	12.1			11.3			9.4			26.3		
HCM LOS	B			B			A			D		
Lane	NBLn1	EBLn1	WBLn1	SBLn1								
Vol Left, %	100%	12%	2%	94%								
Vol Thru, %	0%	85%	27%	1%								
Vol Right, %	0%	3%	71%	5%								
Sign Control	Stop	Stop	Stop	Stop								
Traffic Vol by Lane	5	200	205	500								
LT Vol	5	25	5	470								
Through Vol	0	170	55	5								
RT Vol	0	5	145	25								
Lane Flow Rate	5	217	223	543								
Geometry Grp	1	1	1	1								
Degree of Util (X)	0.01	0.353	0.337	0.801								
Departure Headway (Hd)	6.303	5.841	5.44	5.307								
Convergence, Y/N	Yes	Yes	Yes	Yes								
Cap	565	613	657	679								
Service Time	4.374	3.897	3.496	3.343								
HCM Lane V/C Ratio	0.009	0.354	0.339	0.8								
HCM Control Delay	9.4	12.1	11.3	26.3								
HCM Lane LOS	A	B	B	D								
HCM 95th-tile Q	0	1.6	1.5	8.1								

Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Sumner-Tapps Hwy E/64th St E (Site Folder: General)]

 Network: N101 [Network1 (Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV] %	[Total veh/h	HV] %				[Veh. veh	Dist] ft				
South: 166th Ave E														
3	L2	258	1.0	258	1.0	0.331	5.6	LOS A	0.8	19.8	0.22	0.09	0.22	33.5
8	T1	653	1.0	653	1.0	0.331	5.4	LOS A	0.8	20.1	0.21	0.09	0.21	34.6
18	R2	16	1.0	16	1.0	0.331	5.4	LOS A	0.8	20.1	0.21	0.09	0.21	34.0
Approach		926	1.0	926	1.0	0.331	5.5	LOS A	0.8	20.1	0.22	0.09	0.22	34.3
East: 64th St E														
1	L2	26	12.0	26	12.0	0.055	5.3	LOS A	0.1	1.9	0.50	0.45	0.50	28.2
6	T1	11	12.0	11	12.0	0.055	5.3	LOS A	0.1	1.9	0.50	0.45	0.50	33.2
16	R2	5	12.0	5	12.0	0.055	5.3	LOS A	0.1	1.9	0.50	0.45	0.50	32.2
Approach		42	12.0	42	12.0	0.055	5.3	LOS A	0.1	1.9	0.50	0.45	0.50	30.5
North: Sumner Tapps Hwy E														
7	L2	1	2.0	1	2.0	0.387	7.1	LOS A	0.8	21.2	0.46	0.35	0.46	34.3
4	T1	868	2.0	868	2.0	0.387	6.8	LOS A	0.9	21.7	0.45	0.34	0.45	29.3
14	R2	63	2.0	63	2.0	0.387	6.6	LOS A	0.9	21.7	0.45	0.33	0.45	33.4
Approach		933	2.0	933	2.0	0.387	6.8	LOS A	0.9	21.7	0.45	0.34	0.45	29.7
West: 64th St E														
5	L2	53	1.0	53	1.0	0.414	9.5	LOS A	0.9	22.8	0.66	0.72	0.82	32.6
2	T1	5	1.0	5	1.0	0.414	9.5	LOS A	0.9	22.8	0.66	0.72	0.82	32.5
12	R2	711	1.0	711	1.0	0.414	8.6	LOS A	0.9	23.5	0.65	0.70	0.79	27.4
Approach		768	1.0	768	1.0	0.414	8.7	LOS A	0.9	23.5	0.65	0.70	0.79	28.0
All Vehicles		2669	1.5	2669	1.5	0.414	6.9	LOS A	0.9	23.5	0.43	0.36	0.47	31.4

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 102 [166th Ave/SR 410 WB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: 166th Ave E														
3	L2	117	1.0	117	1.0	0.455	6.8	LOS A	0.0	0.0	0.00	0.00	0.00	37.9
8	T1	546	1.0	546	1.0	0.455	6.8	LOS A	0.0	0.0	0.00	0.00	0.00	34.5
Approach		663	1.0	663	1.0	0.455	6.8	LOS A	0.0	0.0	0.00	0.00	0.00	35.4
East: SR 410 WB Off Ramp														
1	L2	41	2.0	41	2.0	0.051	4.9	LOS A	0.1	2.7	0.62	0.46	0.62	32.7
6	T1	1	2.0	1	2.0	0.051	4.9	LOS A	0.1	2.7	0.62	0.46	0.62	32.7
16	R2	352	2.0	352	2.0	0.298	5.8	LOS A	0.8	20.4	0.68	0.56	0.68	29.8
Approach		394	2.0	394	2.0	0.298	5.7	LOS A	0.8	20.4	0.67	0.55	0.67	30.3
North: 166th Ave E														
4	T1	1046	2.0	1046	2.0	0.550	8.5	LOS A	1.9	47.1	0.49	0.30	0.49	33.3
14	R2	510	2.0	510	2.0	0.550	8.0	LOS A	1.9	47.1	0.47	0.28	0.47	32.5
Approach		1556	2.0	1556	2.0	0.550	8.4	LOS A	1.9	47.1	0.49	0.29	0.49	33.0
All Vehicles		2613	1.7	2613	1.7	0.550	7.6	LOS A	1.9	47.1	0.39	0.26	0.39	33.1

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Project: M:\22\1.22330.00 - Sumner Comp Plan Update\Traffic Analysis\Traffic Operations\Sidra\SR 410 & 166th RABs - Alt 2.sip9

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

38: Sumner-Tapps Highway E & SR-410 EB Ramps

Future (2044) PM Peak Hour - Alternative 2



Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	340	0	195	0	0	0	0	310	115	455	610	0
Future Volume (veh/h)	340	0	195	0	0	0	0	310	115	455	610	0
Initial Q (Qb), veh	0	0	0				0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00		1.00				1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No						No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870				0	1885	1885	1885	1885	0
Adj Flow Rate, veh/h	354	0	203				0	323	120	474	635	0
Peak Hour Factor	0.96	0.96	0.96				0.96	0.96	0.96	0.96	0.96	0.96
Percent Heavy Veh, %	2	2	2				0	1	1	1	1	0
Cap, veh/h	426	0	379				0	843	715	691	1246	0
Arrive On Green	0.24	0.00	0.24				0.00	0.45	0.45	0.16	0.66	0.00
Sat Flow, veh/h	1781	0	1585				0	1885	1598	1795	1885	0
Grp Volume(v), veh/h	354	0	203				0	323	120	474	635	0
Grp Sat Flow(s),veh/h/ln	1781	0	1585				0	1885	1598	1795	1885	0
Q Serve(g_s), s	17.0	0.0	10.1				0.0	10.3	4.0	11.8	15.5	0.0
Cycle Q Clear(g_c), s	17.0	0.0	10.1				0.0	10.3	4.0	11.8	15.5	0.0
Prop In Lane	1.00		1.00				0.00		1.00	1.00		0.00
Lane Grp Cap(c), veh/h	426	0	379				0	843	715	691	1246	0
V/C Ratio(X)	0.83	0.00	0.54				0.00	0.38	0.17	0.69	0.51	0.00
Avail Cap(c_a), veh/h	663	0	590				0	843	715	807	1246	0
HCM Platoon Ratio	1.00	1.00	1.00				1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	0.00	1.00				0.00	1.00	1.00	1.00	1.00	0.00
Uniform Delay (d), s/veh	32.5	0.0	29.9				0.0	16.6	14.9	9.9	7.8	0.0
Incr Delay (d2), s/veh	5.2	0.0	1.2				0.0	1.3	0.5	1.9	1.5	0.0
Initial Q Delay(d3),s/veh	0.0	0.0	0.0				0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	7.7	0.0	3.9				0.0	4.7	1.5	4.5	6.1	0.0
Unsig. Movement Delay, s/veh												
LnGrp Delay(d),s/veh	37.7	0.0	31.0				0.0	17.9	15.4	11.8	9.3	0.0
LnGrp LOS	D	A	C				A	B	B	B	A	A
Approach Vol, veh/h	557						443			1109		
Approach Delay, s/veh	35.3						17.2			10.4		
Approach LOS	D						B			B		
Timer - Assigned Phs	1	2	4		6							
Phs Duration (G+Y+Rc), s	9.2	44.8	26.0		64.0							
Change Period (Y+Rc), s	4.5	4.5	4.5		4.5							
Max Green Setting (Gmax), s	20.5	22.5	33.5		47.5							
Max Q Clear Time (g_c+I13, s)	13.8	12.3	19.0		17.5							
Green Ext Time (p_c), s	0.9	1.8	2.6		5.1							

Intersection Summary

HCM 6th Ctrl Delay	18.4
HCM 6th LOS	B

Appendix B LOS Summary and Worksheets

HCM 6th TWSC

39: Valley Avenue & Gary Street /Gary Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	3.6											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations			↗			↗	↗	↗		↗	↗↘	
Traffic Vol, veh/h	0	0	220	15	0	25	160	490	5	5	980	5
Future Vol, veh/h	0	0	220	15	0	25	160	490	5	5	980	5
Conflicting Peds, #/hr	0	0	0	0	0	0	0	0	0	0	0	0
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	0	-	-	0	175	-	-	175	-	175
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	90	90	90	90	90	90	90	90	90	90	90	90
Heavy Vehicles, %	2	2	2	0	0	0	1	1	1	0	0	0
Mvmt Flow	0	0	244	17	0	28	178	544	6	6	1089	6
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	-	-	548	1460	-	547	1095	0	0	550	0	0
Stage 1	-	-	-	903	-	-	-	-	-	-	-	-
Stage 2	-	-	-	557	-	-	-	-	-	-	-	-
Critical Hdwy	-	-	6.93	7.3	-	6.2	4.115	-	-	4.1	-	-
Critical Hdwy Stg 1	-	-	-	6.1	-	-	-	-	-	-	-	-
Critical Hdwy Stg 2	-	-	-	6.5	-	-	-	-	-	-	-	-
Follow-up Hdwy	-	-	3.319	3.5	-	3.3	2.2095	-	-	2.2	-	-
Pot Cap-1 Maneuver	0	0	481	100	0	541	640	-	-	1030	-	-
Stage 1	0	0	-	335	0	-	-	-	-	-	-	-
Stage 2	0	0	-	487	0	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	-	-	481	38	-	541	640	-	-	1030	-	-
Mov Cap-2 Maneuver	-	-	-	38	-	-	-	-	-	-	-	-
Stage 1	-	-	-	242	-	-	-	-	-	-	-	-
Stage 2	-	-	-	238	-	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s	20		12		3.1		0					
HCM LOS	C		B									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	640	-	-	481	541	1030	-	-				
HCM Lane V/C Ratio	0.278	-	-	0.508	0.051	0.005	-	-				
HCM Control Delay (s)	12.8	-	-	20	12	8.5	-	-				
HCM Lane LOS	B	-	-	C	B	A	-	-				
HCM 95th %tile Q(veh)	1.1	-	-	2.8	0.2	0	-	-				

Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Valley Ave/SR 410 WB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: Valley Ave														
3	L2	408	1.0	408	1.0	0.273	4.6	LOS A	0.0	0.0	0.00	0.00	0.00	35.2
8	T1	495	1.0	495	1.0	0.273	4.2	LOS A	0.0	0.0	0.00	0.00	0.00	38.2
Approach		902	1.0	902	1.0	0.273	4.4	LOS A	0.0	0.0	0.00	0.00	0.00	36.8
East: SR 410 WB Off Ramp														
1	L2	217	1.0	217	1.0	0.209	5.4	LOS A	0.4	8.9	0.56	0.52	0.56	27.0
6	T1	1	1.0	1	1.0	0.209	5.4	LOS A	0.4	8.9	0.56	0.52	0.56	32.4
16	R2	217	1.0	217	1.0	0.254	6.9	LOS A	0.4	10.8	0.59	0.59	0.59	33.1
Approach		436	1.0	436	1.0	0.254	6.2	LOS A	0.4	10.8	0.58	0.56	0.58	30.6
North: Valley Ave														
4	T1	1163	0.0	1163	0.0	0.628	12.3	LOS B	3.2	80.9	0.88	0.93	1.22	25.8
14	R2	158	0.0	158	0.0	0.628	11.1	LOS B	3.2	80.9	0.87	0.88	1.16	31.3
Approach		1321	0.0	1321	0.0	0.628	12.2	LOS B	3.2	80.9	0.88	0.92	1.21	26.8
All Vehicles		2659	0.5	2659	0.5	0.628	8.5	LOS A	3.2	80.9	0.53	0.55	0.70	31.3

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

MOVEMENT SUMMARY

 Site: 101 [Valley Ave/SR 410 EB Ramps (Site Folder: General)]

 Network: N101 [Network1
(Network Folder: General)]

New Site
Site Category: (None)
Roundabout

Vehicle Movement Performance														
Mov ID	Turn	DEMAND FLOWS		ARRIVAL FLOWS		Deg. Satn	Aver. Delay	Level of Service	AVERAGE BACK OF QUEUE		Prop. Que	Effective Stop Rate	Aver. No. Cycles	Aver. Speed
		[Total veh/h	HV %	[Total veh/h	HV %				[Veh. veh	Dist] ft				
South: Valley Ave														
8	T1	676	2.0	676	2.0	0.436	8.7	LOS A	1.2	30.0	0.69	0.60	0.69	27.9
18	R2	186	2.0	186	2.0	0.436	8.2	LOS A	1.2	30.0	0.68	0.58	0.68	32.6
Approach		862	2.0	862	2.0	0.436	8.6	LOS A	1.2	30.0	0.68	0.59	0.69	29.4
North: Valley Ave														
7	L2	298	1.0	298	1.0	0.409	6.0	LOS A	0.0	0.0	0.00	0.00	0.00	36.8
4	T1	1053	1.0	1053	1.0	0.409	5.6	LOS A	0.0	0.0	0.00	0.00	0.00	37.7
Approach		1351	1.0	1351	1.0	0.409	5.7	LOS A	0.0	0.0	0.00	0.00	0.00	37.5
West: SR 410 EB Off Ramp														
5	L2	207	3.0	207	3.0	0.355	11.3	LOS B	0.7	16.9	0.71	0.75	0.85	23.9
2	T1	1	3.0	1	3.0	0.355	11.3	LOS B	0.7	16.9	0.71	0.75	0.85	30.0
12	R2	798	3.0	798	3.0	0.875	28.6	LOS C	5.6	142.2	0.90	1.46	2.55	25.0
Approach		1006	3.0	1006	3.0	0.875	25.0	LOS C	5.6	142.2	0.86	1.31	2.20	24.9
All Vehicles		3219	1.9	3219	1.9	0.875	12.5	LOS B	5.6	142.2	0.45	0.57	0.87	30.9

Site Level of Service (LOS) Method: Delay & v/c (HCM 6). Site LOS Method is specified in the Network Data dialog (Network tab).

Roundabout LOS Method: Same as Signalised Intersections.

Vehicle movement LOS values are based on average delay and v/c ratio (degree of saturation) per movement.

LOS F will result if v/c > 1 irrespective of movement delay value (does not apply for approaches and intersection).

Intersection and Approach LOS values are based on average delay for all movements (v/c not used as specified in HCM 6).

Roundabout Capacity Model: SIDRA Standard.

Delay Model: SIDRA Standard (Geometric Delay is included).

Gap-Acceptance Capacity: SIDRA Standard (Akçelik M3D).

HV (%) values are calculated for All Movement Classes of All Heavy Vehicle Model Designation.

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Appendix B LOS Summary and Worksheets

HCM 6th TWSC

42: Valley Avenue & 74th Street E

Sumner Comp Plan Update

Future (2044) PM Peak Hour - Alternative 2

Intersection												
Int Delay, s/veh	38.3											
Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations		↕			↕		↙	↘		↙	↘	
Traffic Vol, veh/h	5	0	5	15	0	115	0	680	20	335	1355	60
Future Vol, veh/h	5	0	5	15	0	115	0	680	20	335	1355	60
Conflicting Peds, #/hr	0	0	0	0	0	0	1	0	0	0	0	1
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Free	Free	Free	Free	Free	Free
RT Channelized	-	-	None	-	-	None	-	-	None	-	-	None
Storage Length	-	-	-	-	-	-	25	-	-	50	-	-
Veh in Median Storage, #	-	0	-	-	0	-	-	0	-	-	0	-
Grade, %	-	0	-	-	0	-	-	0	-	-	0	-
Peak Hour Factor	98	98	98	98	98	98	98	98	98	98	98	98
Heavy Vehicles, %	0	0	0	1	1	1	2	2	2	2	2	2
Mvmt Flow	5	0	5	15	0	117	0	694	20	342	1383	61
Major/Minor	Minor2		Minor1		Major1		Major2					
Conflicting Flow All	2862	2813	1415	2804	2833	704	1445	0	0	714	0	0
Stage 1	2099	2099	-	704	704	-	-	-	-	-	-	-
Stage 2	763	714	-	2100	2129	-	-	-	-	-	-	-
Critical Hdwy	7.1	6.5	6.2	7.11	6.51	6.21	4.12	-	-	4.12	-	-
Critical Hdwy Stg 1	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Critical Hdwy Stg 2	6.1	5.5	-	6.11	5.51	-	-	-	-	-	-	-
Follow-up Hdwy	3.5	4	3.3	3.509	4.009	3.309	2.218	-	-	2.218	-	-
Pot Cap-1 Maneuver	11	18	170	~ 12	18	439	469	-	-	886	-	-
Stage 1	69	94	-	429	441	-	-	-	-	-	-	-
Stage 2	400	438	-	68	90	-	-	-	-	-	-	-
Platoon blocked, %								-	-		-	-
Mov Cap-1 Maneuver	6	11	170	~ 8	11	439	469	-	-	886	-	-
Mov Cap-2 Maneuver	6	11	-	~ 8	11	-	-	-	-	-	-	-
Stage 1	69	58	-	429	441	-	-	-	-	-	-	-
Stage 2	293	438	-	40	55	-	-	-	-	-	-	-
Approach	EB		WB		NB		SB					
HCM Control Delay, s\$	611.8		\$ 685.5		0		2.2					
HCM LOS	F		F									
Minor Lane/Major Mvmt	NBL	NBT	NBR	EBLn1	WBLn1	SBL	SBT	SBR				
Capacity (veh/h)	469	-	-	12	61	886	-	-				
HCM Lane V/C Ratio	-	-	-	0.85	2.175	0.386	-	-				
HCM Control Delay (s)	0	-	-	\$ 611.8	\$ 685.5	11.6	-	-				
HCM Lane LOS	A	-	-	F	F	B	-	-				
HCM 95th %tile Q(veh)	0	-	-	1.8	12.8	1.8	-	-				
Notes												
~: Volume exceeds capacity		\$: Delay exceeds 300s		+: Computation Not Defined				*: All major volume in platoon				

Appendix B LOS Summary and Worksheets

HCM 6th Signalized Intersection Summary

Sumner Comp Plan Update

43: Valley Avenue & Rivergrove Drive E

Future (2044) PM Peak Hour - Alternative 2

						
Movement	EBL	EBR	NBL	NBT	SBT	SBR
Lane Configurations						
Traffic Volume (veh/h)	55	45	35	635	1280	70
Future Volume (veh/h)	55	45	35	635	1280	70
Initial Q (Qb), veh	0	0	0	0	0	0
Ped-Bike Adj(A_pbT)	1.00	1.00	1.00			1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach	No			No	No	
Adj Sat Flow, veh/h/ln	1900	1900	1870	1870	1870	1870
Adj Flow Rate, veh/h	56	45	35	641	1293	71
Peak Hour Factor	0.99	0.99	0.99	0.99	0.99	0.99
Percent Heavy Veh, %	0	0	2	2	2	2
Cap, veh/h	85	75	45	1644	1437	79
Arrive On Green	0.05	0.05	0.02	0.88	0.82	0.82
Sat Flow, veh/h	1810	1610	1781	1870	1757	96
Grp Volume(v), veh/h	56	45	35	641	0	1364
Grp Sat Flow(s),veh/h/ln	1810	1610	1781	1870	0	1853
Q Serve(g_s), s	3.8	3.4	2.4	7.8	0.0	63.1
Cycle Q Clear(g_c), s	3.8	3.4	2.4	7.8	0.0	63.1
Prop In Lane	1.00	1.00	1.00			0.05
Lane Grp Cap(c), veh/h	85	75	45	1644	0	1516
V/C Ratio(X)	0.66	0.60	0.79	0.39	0.00	0.90
Avail Cap(c_a), veh/h	294	262	65	1665	0	1516
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	58.2	58.1	60.2	1.4	0.0	7.8
Incr Delay (d2), s/veh	8.5	7.3	31.6	0.2	0.0	8.9
Initial Q Delay(d3),s/veh	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	1.9	0.2	1.5	1.1	0.0	20.2
Unsig. Movement Delay, s/veh						
LnGrp Delay(d),s/veh	66.7	65.4	91.9	1.5	0.0	16.7
LnGrp LOS	E	E	F	A	A	B
Approach Vol, veh/h	101			676	1364	
Approach Delay, s/veh	66.1			6.2	16.7	
Approach LOS	E			A	B	
Timer - Assigned Phs	2		4		5	6
Phs Duration (G+Y+Rc), s	113.8		10.4		7.6	106.2
Change Period (Y+Rc), s	4.6		4.6		4.5	4.6
Max Green Setting (Gmax), s	110.6		20.2		4.5	101.6
Max Q Clear Time (g_c+I1), s	9.8		5.8		4.4	65.1
Green Ext Time (p_c), s	5.0		0.2		0.0	20.1
Intersection Summary						
HCM 6th Ctrl Delay			15.7			
HCM 6th LOS			B			

Appendix C Transportation Impact Fee Detail

Sumner Transportation Plan January 2025

		Funding							
Map ID	Intersection	Project	Estimated Total Cost	Grants	WSDOT	Sumner Cost / Additional Funds Needed	TIF Eligible %	Applied TIF %	TIF Cost
	Spot Improvements								
SP1	E Valley Hwy E/Forest Canyon Rd E	New signal or RAB when warranted	\$3,000,000			\$3,000,000	15%	15%	\$450,000
SP2	Puyallup St/Tacoma Ave Puyallup Street to the White River Bridge (WSDOT SUM-30)	Plane, repair, and overlay ,complete intersection channelization improvements, add an eastbound left-turn pocket on Puyallup Street at Tacoma Avenue. Add a signal at the Puyallup Street/Tacoma Avenue intersection	\$2,600,000	\$328,700		\$2,271,300	40%	20%	\$520,000
SP3	E Valley Hwy E/Elm St E	New signal when warranted	\$1,500,000			\$1,500,000	50%	50%	\$750,000
SP4	Valley Ave/Elm St E	New signal when warranted	\$1,500,000			\$1,500,000	50%	50%	\$750,000
SP5	Traffic Ave/Main St	Add EB right-turn overlap. Convert W Main Street to one-way facility westbound.	\$150,000			\$150,000	10%	10%	\$15,000
SP6	Parker Rd E/Main St E	New signal when warranted	\$1,650,000			\$1,650,000	50%	50%	\$825,000
SP7	160th Ave E/Main St (60th St E)	New signal or RAB when warranted	\$3,000,000			\$3,000,000	50%	50%	\$1,500,000
SP8	Valley Ave/74th St E	Add EB/WB left-turn restrictions. Shift WB left-turns to U-turning movement at Valley Avenue/SR 410 EB Ramp RAB	\$75,000			\$75,000	10%	10%	\$7,500
SP9	Sumner Tapps Hwy/60th St E	Signalization of the intersection. Construct EB right-turn lane	\$3,400,000			\$3,400,000	50%	50%	\$1,700,000
SP10	Signal replacement program	Replace and modernize all signals in Sumner (15 City owned signals)					0%	0%	\$0
		Spot Improvements Subtotal	\$16,875,000	\$328,700	\$0	\$16,546,300			\$6,517,500
	Roadway								
RW1	166th Ave E Widening; SR 410 WB ramps to 64th St E (WSDOT SUM-24)	Widen to 4-5 lanes, includes new roundabouts at WB ramp and 64th Street E	\$19,000,000	\$2,249,000	\$500,000	\$16,251,000	40%	20%	\$3,800,000
RW2	160th Ave E; Main Street to 64th St E	Improve and widen streets to minor arterial standards with bike paths and sidewalks	\$500,000			\$500,000	40%	40%	\$200,000
RW3	Valley Ave; South City Limits to Main St	Overlay existing roadway surface, ADA upgrades	\$1,850,750			\$1,850,750	0%	0%	\$0
RW4	Stewart Rd Corridor ITS improvements; SR 167 to Lakeland Hills (WSDOT SUM-27)	Connect traffic signals and railroad crossings to coordinate signal timing	\$3,500,000	\$495,285		\$3,004,715	20%	20%	\$700,000
RW5	160th Ave E; Elm St to Main St	Improve to collector standards with curb, gutter and sidewalks on both sides, and bike facilities	\$2,900,000			\$2,900,000	20%	20%	\$580,000
RW6	Elm St; E Valley Hwy to 160th Ave E	Improve to collector standards with curb, gutter and sidewalks on both sides, and bike facilities	\$2,600,000			\$2,600,000	20%	20%	\$520,000
RW7	Parker Rd E; 62nd St to 63rd St	Construct curb, gutter, and sidewalk on east side of street	\$250,000			\$250,000	20%	20%	\$50,000
RW8	Parker Rd E; Main St to Elm St	Improve to collector standards with curb, gutter and sidewalks on both sides	\$1,300,000			\$1,300,000	20%	20%	\$260,000
RW9	Zehnder St; Pease Ave to Wood Ave	Railroad Crossing Improvements	\$1,000,000			\$1,000,000	20%	20%	\$200,000
RW10	162nd Ave E Segment Extension; 64th St to 60th St	Construct 2-lane facility	\$3,000,000			\$3,000,000	50%	0%	\$0
RW11	164th Ave Ct E Segment Extension; 160th Ave E to existing 164th Ave Ct E	Construct 2-lane facility	\$2,000,000			\$2,000,000	50%	0%	\$0
RW12	Systemic Horizontal Curve and Roadway Departure Safety Improvements (WSDOT SUM-28)	East Valley Highway, West Valley Highway, Sumner-Tapps Highway/166th Avenue E, 142nd Avenue E/24th Street E. Install static and/or dynamic curve warning signs, speed feedback signs, centerline and edge lie profiled striping, rumble strips, reflective markers on-pavement as appropriate to delineate roadside objects, channelization, guardrail/roadway shouldering, and street lighting	\$903,000	\$903,000		\$0	0%	0%	\$0
-	Stewart Road SW: Butte Avenue SE to 140th Avenue Court E ¹	Widen to 5 lanes including a center two-way left-turn lane	-	-	-	-	-	-	-
		Roadway Improvements Subtotal	\$38,803,750	\$3,647,285	\$500,000	\$34,656,465			\$6,310,000
	Non-Motorized								
NM1	West Valley Highway Sidewalks	Complete missing sidewalk facilities on the east side between 16th Street E and SR 167 SB Ramps	\$1,000,000			\$1,000,000	60%	15%	\$150,000
NM2	16th Street E Ped/Bike	Construct ped/bike facilities between Valentine Avenue and 138th Avenue E	\$2,000,000			\$2,000,000	60%	15%	\$300,000
NM3	White River Restoration Trail	#9 Ditch to area north of 16th Street	\$3,000,000			\$3,000,000	60%	0%	\$0
NM4	Tacoma Avenue Trail	New trail facilities between the White River and 45th Street E	\$150,000			\$150,000	60%	15%	\$22,500
NM5	Salmon Creek Trail	New trail between current end at 149th Avenue E and Sumner-Tapps Highway E	\$3,000,000			\$3,000,000	60%	0%	\$0
NM6	Edgewood Drive Sidewalks	Complete missing sidewalk facilities between SR 167 and Sumner Heights Drive E	\$550,000			\$550,000	60%	15%	\$82,500
NM7	Fyar Avenue Trail (WSDOT SUM-17)	West Main Street to Puyallup Street	\$7,200,000	\$655,143		\$6,544,857	60%	15%	\$1,080,000
NM8	Zehnder Street/Elm Street Non-Motor	Construct pedestrian and bike facilities. Bike lanes from Valley Avenue to Main Street							
NM8	Zehnder Street/Elm Street Non-Motor	Complete missing sidewalk facilities between Pease Avenue and Wright Avenue	\$1,600,000	\$346,000		\$1,254,000	60%	15%	\$240,000
NM9	Academy Street Bike Facilities	Construct bike facilities between Wood Avenue and Valley Avenue E	\$800,000			\$800,000	60%	15%	\$120,000
NM10	Wood Avenue/Meade McCumber Road	Construct bike facilities between Main Street E and Valley Avenue	\$1,800,000			\$1,800,000	-	15%	\$270,000
NM11	62nd Street Court E Trail	Construct trail east of 62nd Street Court E between Parker Road and 160th Avenue E	\$1,000,000			\$1,000,000	60%	0%	\$0
NM12	Main Street E Sidewalks	Construct missing sidewalk facilities between 162nd Avenue E and Sumner-Tapps Highway E	\$575,000			\$575,000	60%	0%	\$0
NM13	Puyallup River Crossing	Over White River. Two part project: 1. Study best location for trail crossing 2. Construct ped/bike trail crossing	\$4,000,000			\$4,000,000	60%	15%	\$600,000
NM14	Construct sidewalks on one side of 72nd Street E	Between River Street and 143rd Avenue E	\$250,000			\$250,000	60%	0%	\$0
NM15	Rivergrove Pedestrian Bridge (WSDOT SUM-29)	Trail overpass connecting the vicinity of Alder Ave. to 143rd Ave. E over SR 410	\$11,200,000	\$5,000,000		\$6,200,000	60%	15%	\$1,680,000
NM16	Puyallup River Trail Bridge	Bridge and trail connections to the Foothills Trail. Trail overpass connecting 144th Ave E to 143rd Ave E	\$6,000,000			\$6,000,000	60%	15%	\$900,000
NM17	Mead McCumber Road/64th Street E Non-motor	Construct pedestrian and bike facilities between Balley Avenue E and Sumner-Tapps Highway	\$900,000			\$900,000	60%	0%	\$0
NM18	Sumner-Tapps Highway Sidewalks	Construct missing sidewalk facilities between Main Street E and the southern City Limits	\$1,000,000			\$1,000,000	60%	0%	\$0
NM19	Rainier Street Sidewalks	Construct missing sidewalk facilities between Sumner Avenue and Guptil Avenue	\$150,000			\$150,000	60%	0%	\$0
NM20	Traffic Avenue Pedestrian Signal (WSDOT SUM-25)	Replace existing pedestrian rectangular rapid flashing beacon with pedestrian signal	\$616,753	\$531,753		\$85,000	10%	10%	\$61,675
NM21	Alder Avenue Sidewalks	Construct pedestrian and bike facilities between SR 410 and Academy Street	\$950,000			\$950,000	60%	15%	\$142,500
NM22	Houston Road E Sidewalks	Construct pedestrian facilities between Valley Avenue E and the west City limits	\$850,000			\$850,000	60%	0%	\$0
		Non-Motorized Improvements	\$48,591,753	\$6,532,896	\$0	\$42,058,857			\$5,649,175

1. This project is fully funded and will be completed before 2044; however, to remain eligible for transportation impact fees already set aside for the project, it is included on the 20-year project list.

City of Sumner

Capital Facilities Plan

January 6, 2025



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Executive Summary

What is the Capital Facilities Plan for the City of Sumner?

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 (LOS) for government facilities, water facilities, sanitary sewer, stormwater, 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.

General Government Facilities

There are known existing deficiencies and capacity issues with the City's general government facilities, such as sufficient police officer staffing and building space. As population growth occurs in Sumner, additional staffing and projects will be needed to meet LOS standards. The City has identified several projects related to government facilities over the next six years, including a new Public Works shop. The City will also be considering options for increasing general government capacity that include expansion of existing facilities, acquiring land and building new facilities, or locating offices within other city facilities such as the planned Operations Facility or new events building at Heritage Park, as well as increasing police staffing.

Water Facilities

The Sumner Water System Plan anticipates growth to 2068 and identifies associated strategies and investments. Growth assumptions for the 2068 high growth scenario in the Water System Plan are higher than planned growth through 2044, and it is possible that the 2044 growth could be accommodated. Growth timing can be addressed through regular monitoring and capital planning, as the Water System Plan is updated every 6-10 years. The 2020 Capital Improvement Plan for water facilities (in the 2020 Water System Plan) has projects related to the distribution system, source improvements, storage, and operations and maintenance to improve the system and accommodate growth.

Sanitary Sewer

The 2020 Sanitary Sewer Plan identifies existing gravity sewer deficiencies, though there are no pump station or force main deficiencies. The 2020 Capital Improvement Program for sanitary sewer shows a number of projects in the 20-year planning period (2018-2038) to

address system deficiencies and accommodate growth including sewer line extension, replacement, and relocation; wastewater treatment upgrades; pump and equipment replacement.

Stormwater Facilities

The 2020 Stormwater Capital Improvement Plan outlines recommended capital improvement projects based on existing deficiencies in the system. These projects are scheduled through 2026 and after 2026. Outlined projects include levee improvements, culvert replacements, and numerous other system improvements.

Parks Facilities

No existing deficiencies for active recreation facilities are identified based on the 2024 Sumner population, however, population and job growth will result in more facilities and system investment needed by 2044 to maintain the current levels of service. Projects identified in the adopted Sumner 2023-24 budget include replacement of Rainier View Park playground, continued funding of improvements to Seibenthaler Park and the proposed Bennet Park property, and projects to replace playground equipment, add shelters, and add picnic areas.

Fire Facilities

Staffing at Station 113 currently meets the minimum recommended firefighters per the 2015 CFP. In 2022, EPFR's urban response was slightly below target levels of service. The increase in the number of calls requiring dispatch means that Station 113 may struggle to meet minimum levels of service in coming years and staffing of fire stations serving the current area should be increased. Additional fire stations may also be required. A voter-approved bond passed in 2018 in the East Pierce Fire and Rescue district. This bond made it possible for EPFR to upgrade or re-construct five fire stations in the district. While none of the voter-approved bonds will go directly to Station 113 renovations, additional capacity, updated facilities, and new stations elsewhere in the district can increase the overall level of service within Sumner due to equipment, staff, and dispatch overlap.

Public School Facilities

Both Bonney-Lake and Dieringer School Districts have schools that are currently enrolled over their student capacity and are expected to need to add capacity to accommodate growth. Both districts have Capital Facilities Plans that include projects to add capacity (high school capacity for Bonney-Lake and elementary school capacity for Dieringer). However, both districts serve students outside of Sumner city limits, which will affect facility planning.

Public Streets & Roads Facilities

Overall, the analysis finds that most of the roadway study intersections operate at level of service (LOS) D or better during the weekday PM peak hour with the projected growth. Some intersections, however, are forecast to degrade below LOS D during the weekday PM hour. The pedestrian LOS analysis shows most of the future pedestrian network meets the standard. There are some key connections to trails south of SR 410 that are missing as well as corridors such as Elm Street and 160th Avenue E that have missing sidewalks. The bike LOS analysis shows that bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. The 2024 Transportation Plan contains numerous transportation improvements and projects that will be necessary to maintain the levels of service for vehicle, pedestrian, and cyclist networks as the city grows.

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Chapter 1: Introduction

The 1990 State Legislature approved the Growth Management Act (GMA), which directs local government to control and manage growth. The State Legislature recognized that uncoordinated and unplanned growth, together with a lack of common goals, could impact the environment and affect economic development and the high quality of life for Washington citizens.

GMA has significant requirements in the areas of facilities planning and capital improvement financing. GMA is to ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use, without decreasing current levels of service below locally established minimum standards.

The requirements for preparing a capital facilities plan under GMA have changed the way comprehensive planning generally has been done. Both the transportation element and the capital facilities element reinforce the requirement that comprehensive plans prepared according to GMA be realistic. The requirements for setting level of service standards, inventories, and forecasts of existing and needed capital facilities, six-year financing plans, and concurrency all require a more complex level of planning than what existed prior to GMA.

The Sumner Capital Facilities Plan (CFP) is a document that provides a list of proposed major capital expenditures throughout the City. It also provides a multi-year look at the strategies and financing requirements for major capital programs. The plan projects needs six years into the future for major construction, infrastructure improvements, and land acquisition, in addition to machinery and equipment purchases. The plan then provides a funding strategy and projected funding scenarios for each succeeding year. A CFP makes good business and planning sense.

The following are some of the benefits of a CFP:

- It provides policy makers with a current and future view of the capital needs
- It provides a mechanism for assessing the financial ramifications of funding or not funding programs
- It provides an opportunity to combine similar projects across departmental lines
- It supports good management that demonstrates the need for facilities and the need for revenues to pay for them
- It provides accessibility to various sources of revenues (i.e. grants, Public Works Trust Fund, impact fees, real estate excise taxes) that require a CFP in order to qualify for the revenue

The City of Sumner is responsible for providing facilities and services that are needed by the residents and businesses of the City for a safe, secure, and efficient environment within which to conduct their affairs. GMA defines public facilities to include: streets, roads, highways, sidewalks, street and road lighting systems, and traffic signals; domestic water systems; storm and sanitary sewer systems; parks and recreational facilities; and schools. It further defines public services to include fire protection and suppression, law enforcement, public health, education, recreation, environmental protection, and other governmental services.

As provided in GMA, capital facilities plans are a required part of the Comprehensive Plan and are to provide capital facilities for land development that is envisioned or authorized by the Land Use element. Capital facilities planning is grounded in local decisions. The City of Sumner defines what constitutes a capital facility, and sets overall levels of service, differential levels of service, contingencies, etc. based on local desires and needs. The capital facilities plan is meant to coordinate and provide consistency among the many plans for capital improvements, various master plans, and other studies. It should ensure the timely provision of adequate facilities as required by GMA.

The CFP is the element that makes the rest of the Comprehensive Plan come to life. By funding projects needed to maintain levels of service and concurrency, the CFP determines the quality of life in the community. The requirement to fully finance the CFP provides a reality check for the vision of the Comprehensive Plan.

Planning for capital facilities is a complex task. First, it requires an understanding of future needs; second, it must assess the various types of capital facilities that could be provided and identify the most effective and efficient array of facilities to support the needed services. Finally, it must address how these facilities will be financed.

Planning what is needed is itself only a beginning. Planning how to pay for these needs is another step. Only so much can and will be afforded. Securing the most effective array of facilities in light of limited resources and competing demands requires coordination of the planned facilities and their implementation. It also requires a thorough understanding of the fiscal capacity of the City to finance these facilities. Financial planning and implementation of capital facilities cannot be effectively carried out on an annual basis, since often the financing requires multi-year commitments of fiscal resources. As such, this plan is long-range in its scope.

Prioritization of the various projects has been done to set the funding package together. Each project proposal is matched against the criteria.

That criterion (in order) is:

- A legal or statutory requirement for carrying out the improvement (a legal mandate)
- An emergency repair
- A continuation of multi-year projects (contractual obligations, etc.)
- Implementation of legislative (Council) goals and objectives
- Ability to leverage outside sources (grants, mitigation, impact fees, low interest loans, etc.)
- An enhancement of or general repair of existing facilities
- An acquisition and development of new facilities

For financial and accounting purposes, municipal operations are divided into two broad categories: general governmental, and enterprise.

1. General governmental activities are primarily tax and user fee supported, while
2. Enterprise activities rely primarily on fees generated from the sale of goods and services for their operations (rate payers).

Capital improvements for police, fire, parks, administration, and transportation are traditionally general governmental in nature, while water, sanitary sewer, storm drain, and cemetery are enterprise.

Capital funding for both general governmental and enterprise categories emanates primarily from operating revenues, with grants, local improvement districts, latecomer, and impact fees frequently contributing substantial sums towards capital construction. General governmental and enterprise operations both use such debt financing strategies as bonding and leasing to help fund improvements like water, sewer, and storm drain rates or raising the connection charges or system development charges. In the general governmental area, however, Washington State law limits the revenue sources that municipalities can use, the tax rates, and the amount of general obligation debt capacity that can be issued to raise funds for capital improvements.

As a result of GMA, through proper legislation of the City Council, impact fees for various areas can be established. They include:

- public streets and roads;
- publicly owned parks, open space, and recreation facilities;
- school facilities; and
- fire protection facilities in jurisdictions that are not part of a fire district

The City of Sumner has adopted a Traffic Impact Fee (TIF) and school, parks, and trails impact fees, and adopted mitigation fees for fire protection.

Chapter 2: Concurrency of Capital Facilities

2.1 Introduction

Concurrency is a requirement that the capital facilities needed to serve new development are available concurrent with the impact of the new development on the community. This can be accomplished in several ways. It is based on maintaining a “level of service” (LOS) for these facilities that is adopted by the community in its comprehensive plan. In specific terms, the “concurrent” capital facilities must be constructed or have strategies in place (such as an impact fee program) at the time the new development is ready for occupancy. Alternatively, it is possible for a city to accept a performance bond to install the concurrent facilities within a six-year period of time after occupancy of the development. Concurrency is a comparison of the infrastructure needed by the new development (example: 4 lane road) to the existing infrastructure in place (example: 2 lane road) and providing for the construction of the new facilities needed (additional 2 lanes of road).

When concurrency is applied to a specific development, one of two outcomes is possible:

Outcome 1

When a new development requires capacity of capital facilities that are already in place, then that development has satisfied the concurrency test. Development and occupancy can then proceed.

Outcome 2

When a new development requires capital facilities that do not exist in order to maintain an adopted level of service, then that development does not satisfy the concurrency test. The new enhanced capital facilities must be strategized for, constructed, or bonded. Costs of the new facilities will be borne by the developer’s fair share impact, the City, and possibly other parties participating in the installation of facilities.

2.2 Concurrency – What is it?

Concurrency is synonymous with the provision of adequate public facilities for a particular development project. GMA gives numerous statements of standards to follow:

GMA Planning Goals 12 (RCW 36.70A.020)

“...public facilities and services. . . shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.”

Subdivisions (RCW 58.17.110 (2))

"A proposed subdivision and dedication shall not be approved unless the city, town, or county legislative body makes written findings that: (a) appropriate provisions are made for the public health, safety, and general welfare and for such open spaces, drainageways, streets or roads, alleys, other public ways, transit stops, potable water supplies, sanitary wastes, parks and recreation, playgrounds, schools, and school grounds. . ."

Comprehensive Plans - Mandatory Elements (RCW 36.70A.070 (6)(b))

". . . local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of services on a locally owned transportation facility to decline below the standards adopted in the transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development . . . For the purposes of this subsection, 'concurrent with the development' shall mean that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years."

Impact Fees (RCW 82.02.050 (1)(a))

"...It is the intent of the legislature . . . To ensure that adequate facilities are available to serve new growth and development."

Concurrency (WAC 365-196-840 (1)(b))

"...Concurrency describes the situation in which adequate facilities are available when the impacts of development occur, or within a specified time thereafter. Concurrency ensures consistency in land use approval and the development of adequate public facilities as plans are implemented, and it prevents development that is inconsistent with the public facilities necessary to support the development."

2.3 Concurrency Applied

Adopted policies in the Capital Facilities Element of the Comprehensive Plan and in the Transportation Plan address the topic of concurrency. Draft policies in the 2024 update continue to support the concurrency of development and adequate public facilities.

2.4 Absence of Concurrency

If a particular development fails to meet levels of service or other plan performance measures, development standards, impact, or mitigation fee charges, then that development should not be permitted for construction or occupancy. Furthermore, the city may enact a moratorium on new development if the level of service is not being met or will not be met in six years.

2.5 Comprehensive Plan Consistency

The Growth Management Act requires local capital facilities plans to ensure that their comprehensive plans' land use, transportation, and capital facilities elements are coordinated and consistent.

As the City's Land Use and Transportation Plans are set forth, capital facility system improvements needed to support growth can be adequately financed by the City through the Capital Facilities Plan (CFP). If, in the future, capital facilities (system improvements) needed to obtain concurrency for development are not funded by the CFP due to omission or lack of funds, one or more of five strategies must be employed to obtain consistency of plans and concurrency of necessary infrastructure:

Strategy 1: Unfunded infrastructure projects can be voluntarily fully-funded by a project developer. The provision to use fair-share payback arrangements such as latecomers' agreements would be available. Also, the LID process would be an alternative funding source.

Strategy 2: The City increases tax revenues, grants, and/or issue bonds to increase CFP funding and thereby construct needed infrastructure.

Strategy 3: The City amends the CFP to re-prioritize projects and thereby fund infrastructure projects needed to obtain concurrency.

Strategy 4: The City reassesses its Land Use Plan and zoning to lower land use densities and thereby decrease the demand for construction of new infrastructure.

Strategy 5: The City lowers its level of service standards for transportation and identifies minimum standards for other infrastructure through respective plan documents.

Strategy 6: The City Council may consider adopting a moratorium on development if concurrency cannot be met by the other strategies. Capital Facilities Defined

GMA requires a jurisdiction's capital facilities plan to discuss what existing capital facilities are owned and identify their locations and capacities. For the purposes of this CFP, a capital facility means a structure, improvement, piece of equipment, or other major asset that has a useful life of at least 10 years, costs at least \$50,000, and has a specified level of service defined by the Comprehensive Plan.

These capital facilities are provided for public purposes and services and are limited to: potable water, sanitary sewer; stormwater, parks and open space, police, fire, public schools, streets and sidewalks, and general government facilities. Table 2-1 illustrates what types of structures, improvements, equipment, and other major assets may be considered "capital facilities."

Table 2-1: Capital Facilities

Facility	Improvements, equipment, etc.
Potable Water System	New well/Springs Water tanks Treatment facilities/buildings Transmission/distribution pipeline system
Sanitary Sewer	Wastewater Treatment Facility Pump stations & standby generators Sewer collection and conveyance system
Stormwater	Regional detention/Treatment facilities Subdivision detention/treatment facilities (public) Pipeline/open channel conveyance systems
Parks and Open Space	Purchase of park property Construction of park facilities Construction of trail facilities
Police	Expansion of City Hall and/or construction of a police precinct facility
Fire	Expansion of fire station Construction of new fire station Purchase of apparatus over \$50,000 in cost
Public Schools	New school/administration buildings Expansion of schools
Streets and Sidewalks	Arterial street improvements Collector, residential & neighborhood streets Intersection improvements including traffic signals Sidewalks Traffic calming and street amenities and roundabouts
General Government	Expansion of City Hall, senior center, or library
Public Works Shops	Expansion of Public Works shops buildings or site Purchase of major piece of equipment over \$50,000 in cost (backhoe, etc.)

Chapter 3: Existing Facilities

3.1 Introduction

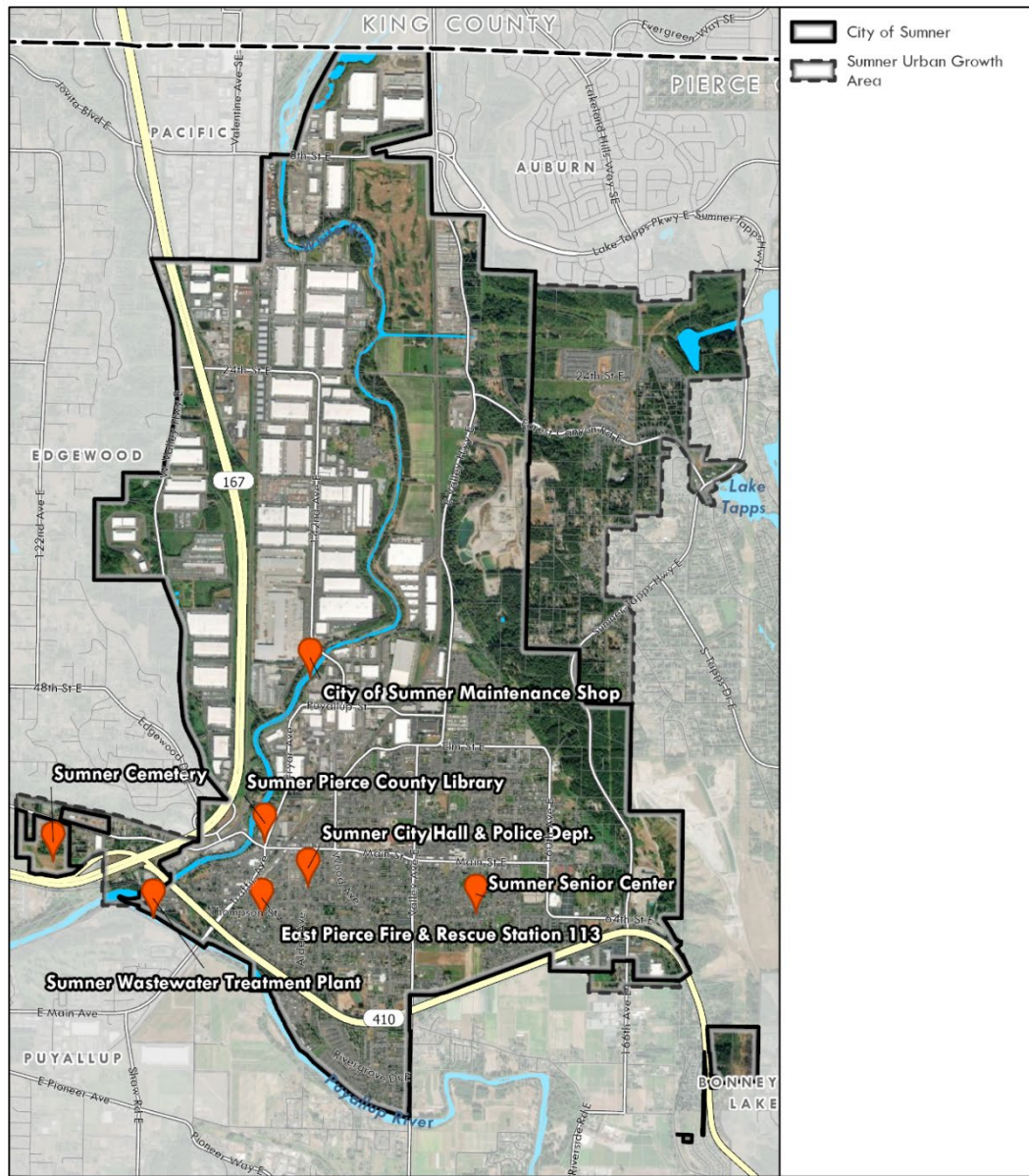
This chapter contains a summary of capacities and locations for existing capital facilities owned by the City of Sumner, East Pierce Fire & Rescue (EPFR), and the school districts.

3.2 General Government Facilities

General Government Buildings

General government facilities are mainly housed in City Hall at 1104 Maple Street (Figure 3-1). City Hall houses offices for the Administration, Finance, Community Development, Development Services, City Attorney, Human Resources, and Public Works Departments. The City Hall building area housing these services is 14,577 square feet (this does not include the Police Department that is also in the same building; see Police Facilities below).

Figure 3-1: General Government Facilities



CITY OF SUMNER

General Government Facilities

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: January 2024

Source: City of Sumner 2023; Parametrix 2023.

The current facilities square footage is outlined in Table 3-1 below:

Table 3-1: City Government Buildings

Facility	Building Area (s.f.)
General Government	14,577
Police	7,654
Public Works Shops	17,136
Cemetery Buildings	11,585
Senior Center	6,015
Sumner Library Building	10,802

Police Facilities

The Sumner Police Department (SPD) provides law enforcement services within city limits. SPD headquarters are located at Sumner City Hall in a building area of 7,654 square feet. The SPD currently employs 21 commissioned officers, 4 non-commissioned employees, and 1 special commissioned officer. In 2021, SPD responded to 15,800 calls for police service¹ and 14,530 calls in 2023 (slightly fewer due to reduced number of officers, who initiate many of the calls). Officers circulate throughout the City on patrol and respond to calls from a dispatch center in Tacoma through South Sound 911. The police facility in City Hall currently houses the communications center, holding cells, conference room, locker facilities, and sundry offices. Jail facilities are provided through an inter-local agreement with the City of Puyallup. Sumner's court services operate through Bonney Lake Municipal Court with Sumner judge presiding.

The animal control shelter is located at 1200 39th Ave S.E. in Puyallup in a building area of 3,080 sf. The shelter contains a combination of 16 kennels for dogs and 46 for cats and small animals. These include kennels for housing adoptable pets, stray dogs, and quarantine facilities. In day-to-day operations, these kennels may be used for different needs depending on demand. The shelter is provided by the City of Puyallup but operated by the City of Sumner. The facility provides animal sheltering and enforcement for seven agencies in the area.

¹ City of Sumner 2023-2024 Biennial Budget, 2023. Retrieved from <https://sumnerwa.gov/wp-content/uploads/2023/04/2023-2024-City-of-Sumner-Biennial-Budget-shrunk.pdf>.

Public Works Shop Facilities

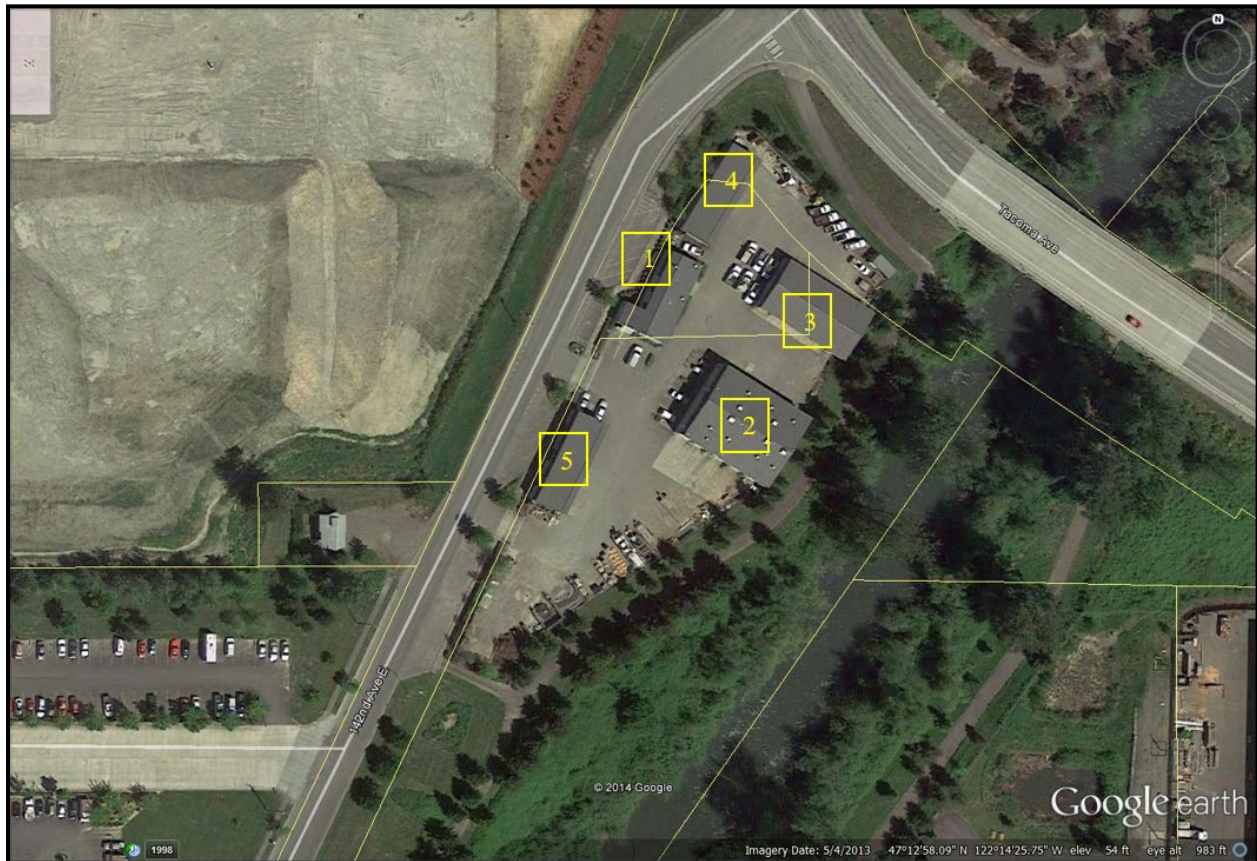
The existing Public Works shops are located at 4711 142nd Ave E (see Figure 3-2) on approximately 8.35 acres. The shops were constructed in 2000. This facility is made up of five buildings totaling 17,136 square feet (see summary in Table 3-2). A new Public Works Operations Facility located on 29th Street East is planned to begin construction in 2024. The facility will have approximately 88,000 s.f. of building space on a 7.6-acre site.

Table 3-2: Current Public Works Shop Buildings

Building No.	Description	Size (s.f.)
1	Offices, meeting rooms, restroom, lockers	2,520
2	Vehicle wash, repair, storage, sign shop, welding/fab shop.	5,880
3	Vehicle storage	4,032
4	Vehicle storage	2,352
5	Material storage (pipe, etc.)	2,352
Total		17,136

Source: City of Sumner Community Development Department, 2023

Figure 3-2: Public Works Shop Facilities - Current



Source: City of Sumner, 2015; Google Earth, 2015.

3.3 Water Facilities

A schematic of the Sumner Water System is in the *City of Sumner General Water Plan Update, August 2020*, and shows the size and location of pipes. The reader is directed to this large format map for a complete inventory of the system.

Water Facilities Service Area

The Sumner water utility service area is situated in the Puyallup/White River basin and is adjoined by the water services areas of the City of Bonney Lake, Mountain View-Edgewood, the City of Puyallup, Valley Water District, the City of Auburn, Tacoma Water, and the City of Pacific. The Sumner water system has interties with both the Pacific and Puyallup water systems. These interties are for use during emergencies only and do not provide additional water for daily demands. The future Sumner water service area, which is shown in Figure 3-3, is consistent with the *Pierce County Coordinated Water System Plan* and is located entirely within the Urban Growth Area (UGA) boundary established by Pierce County.

Table 3-3: Sumner Potable Water Source Capacities

DOH ID	Source Name	Source Type	Source Capacity (mgd)	Water Right (mgd)
SO 1	Sumner Springs	Free-flowing spring	1.15 ¹	4.04
SO 2	Weber Springs	Free-flowing spring	Flow and water rights are combined with Sumner Springs and County Springs	Flow and water rights are combined with Sumner Springs and County Springs
SO 3	Elhi Springs	Free-flowing spring	0.13 ²	0.52
SO 4	County Springs	Free-flowing spring	0.79 ¹	1.15
SO 5 ⁴	West Well	Artesian Well	0.36 ³	0.36
SO 6	South Well	Artesian Well	1.013	1.445
SO 7	Dieringer Well	Artesian Well	0.363	.14
SO-CW	Central Well	Artesian Well	1.51 ³	0.43/1.51 ⁶

Source: City of Sumner General Water Plan Update, 2020

¹. Source capacity based on historic station meter readings.

². Source capacity based on City records; Elhi Springs is typically not being utilized.

³. Source capacity based on well pump capacity.

⁴. The West Well is currently utilized primarily for irrigation.

⁵. Source pumping capacity is less than the City's Water Rights.

⁶. The City obtained a Temporary Water Right to use the Central Well as an additional point of withdrawal for the South and West Well water rights. Combined instantaneous withdrawal from the Central, South, and West Wells is not to exceed 1.8 mgd.

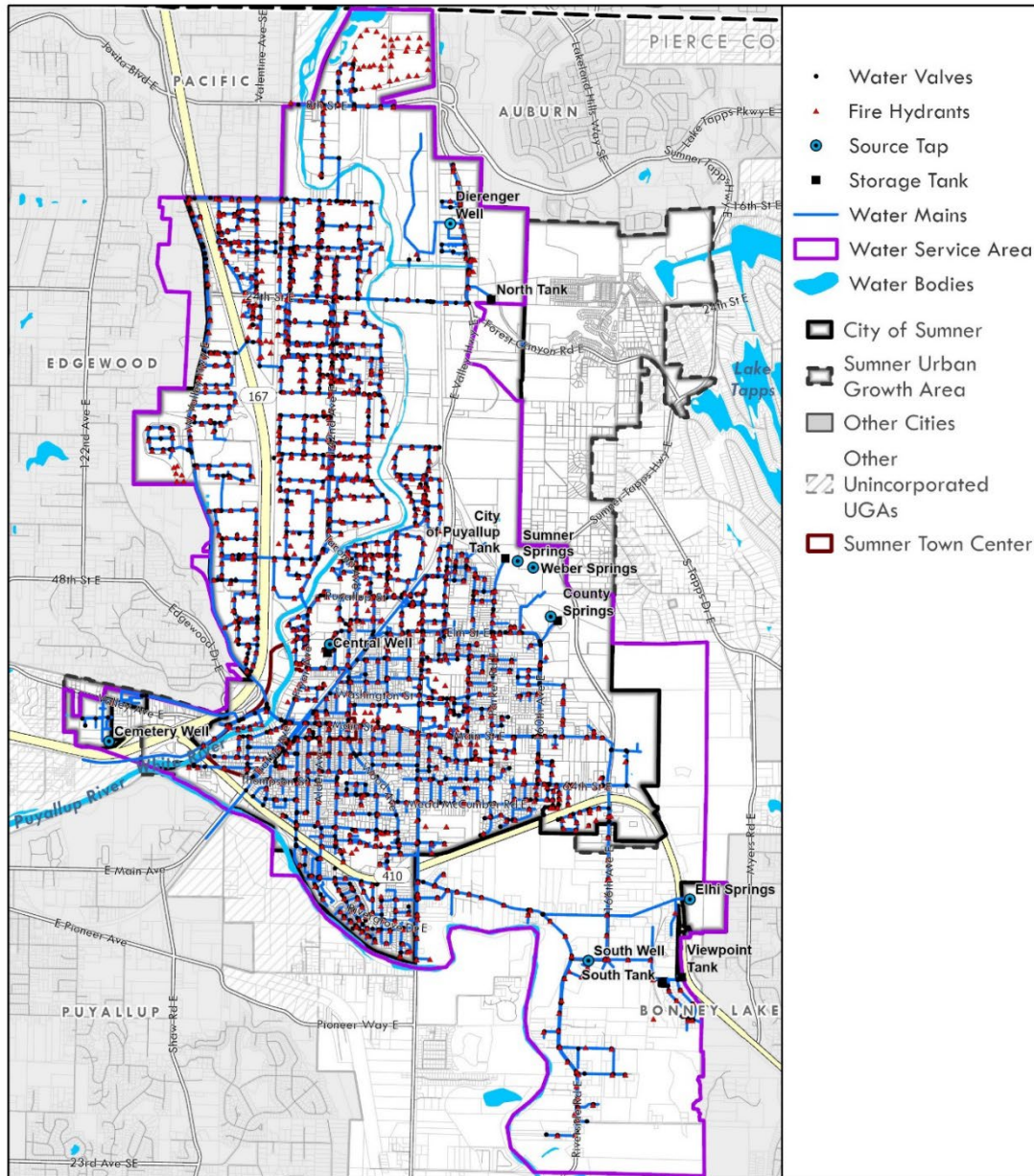
Water System Source

Sumner currently uses eight potable water sources, including four springs (County Springs, Sumner Springs, Weber Springs, and Elhi Springs) and four wells (South Well, Dieringer Well, West Well, and Central Well). The Sumner potable water sources' physical capacity inventory is in Table 3-3. These water sources are also served by chlorination facilities.

Water System Storage

The City has five (5) storage tanks, all but one being gravity-fed, with a total storage capacity of 5.398 million gallons; a summary of storage information is provided in Table 3-4. The tanks are in good condition, and in 1998 a 2.0 million gallon concrete post-tensioned cable wrap North Tank was constructed on the east hill to provide adequate fire flows to the North Sumner Industrial area. The 1.0 million-gallon welded steel Sumner Springs Tank was refurbished and repainted (inside and out) in 2023. The 2.0 million-gallon welded steel South Tank was repainted in 2005 and is scheduled to be repainted in 2024 or 2025. The Sumner Viewpoint tank was constructed in 2006 to serve a 120-lot subdivision

Figure 3-3: Water Service Area Map

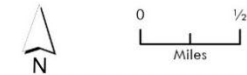


CITY OF SUMNER

Water Utility & Infrastructure Area

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: City of Sumner Water System Plan, 2020



Map Date: November 2023

Table 3-4: Water System Storage Information

Name	Functions	Total Volume	Working Volume ¹	Dimensions (Diameter)	Height (feet)	Overflow Elevation (feet)	Floor Elevations (feet)	Condition
Sumner Springs Tank Built in 1956 (steel) Repainted in 2002	Storage, Chlorine Contact	1.0 MG	1.0 MG	81 ft.	26.0	234.0	208.0	Good
County Springs Tank Built in 1986 Cast-in-place concrete	Primarily Chlorine Contact	68,000 gal	66,000 gal	20 ft.	28.0	234.0	207.0	Good
South Tank Built in 1973 (steel) To be repainted in 2005	Storage	2.0 MG	2.0 MG	104 ft.	32.0	234.0	202.0	Good
North Tank Built in 1998 Concrete post-tensioned	Storage	2.0 MG	2.0 MG	120 ft.	24.23	234.23	210.0	Good
Sumner Viewpoint Built in 2006	Storage, high pressure zone	330,000 gal	194,000 gal	26 ft.	85.00	392.00	310.0	Good

Source: General Water Plan Update, 2020

¹ To overflow elevation.

Water Distribution System

The distribution system piping ranges in size from a 2- to 18-inch diameter. The 90 miles of pipe also vary in age and material; most of the pipe installed before 1960 is cast iron with packed joints or small diameter steel pipe, while the pipe installed between 1960 and the mid-1980s is mostly asbestos cement pipe with O-ring rubber gasket couplers. All new water mains installed since the mid-1980s are Class 52 ductile iron pipe. All three pipe materials have a long design life. The system has a sufficient number of in-line valves to isolate small sections, in an effort to reduce the number of services out of water during repair events. Detailed maps of the distribution network are maintained and updated by the City. These water system maps show pipe diameters, pipe material, locations of hydrants, valves, and abandoned pipes, and give the year of installation for most pipes. Figure 3-3 is derived from these maps and shows the distribution network and other water system features as they currently exist. The approximate length and percentage of each pipe size in the distribution network is listed in Table 3-5.

Table 3-5: Water System Distribution Network Inventory (August 2017)

Pipe Sizes (Inches)	Length (Feet)	Percentage of Total System
2	6,706	1.4
3	2,739	0.6
4	6,198	1.3
6	104,199	22.0
8	165,270	34.8
10	6,889	1.5
12	160,116	33.7
14	11,338	2.4
16	6,246	1.3
18	4,903	1.0
Total:	474,603	100.0

Source: General Water Plan Update, 2020

3.4 Sanitary Sewer

The information in this section is based on the City of Sumner Sanitary Sewer Comprehensive Plan (City Sanitary Sewer Plan), adopted in August 2020 (BHC 2020), and the Wastewater Treatment Facility Capacity Increase Analysis completed in October 2009 (Gray & Osborne, Inc. 2009). The City Sanitary Sewer Plan analyzes the City's collection system, identifies any system deficiencies for existing and future flow conditions, and provides recommended

improvements and cost estimates. In preparing the plan, the City's wastewater collection system was analyzed for existing and future capacity.

Sanitary Sewer Service Area

The City of Sumner has operated a sanitary sewer system since 1927 and a wastewater treatment facility since 1957. The City's sanitary sewer service area includes the Sumner city limits, as well as portions of the Sumner UGA. As of 2020, the service area contains 7.4 miles of force mains, 52.4 miles of gravity sewer mains, and 16 pump stations (Table 3-6) for different drainage basins throughout the area. The service area is divided into basins to analyze capacity needs. The boundaries of the service area and its constituent basins are shown in Figure 3-4, along with the existing collection system for sanitary sewers.

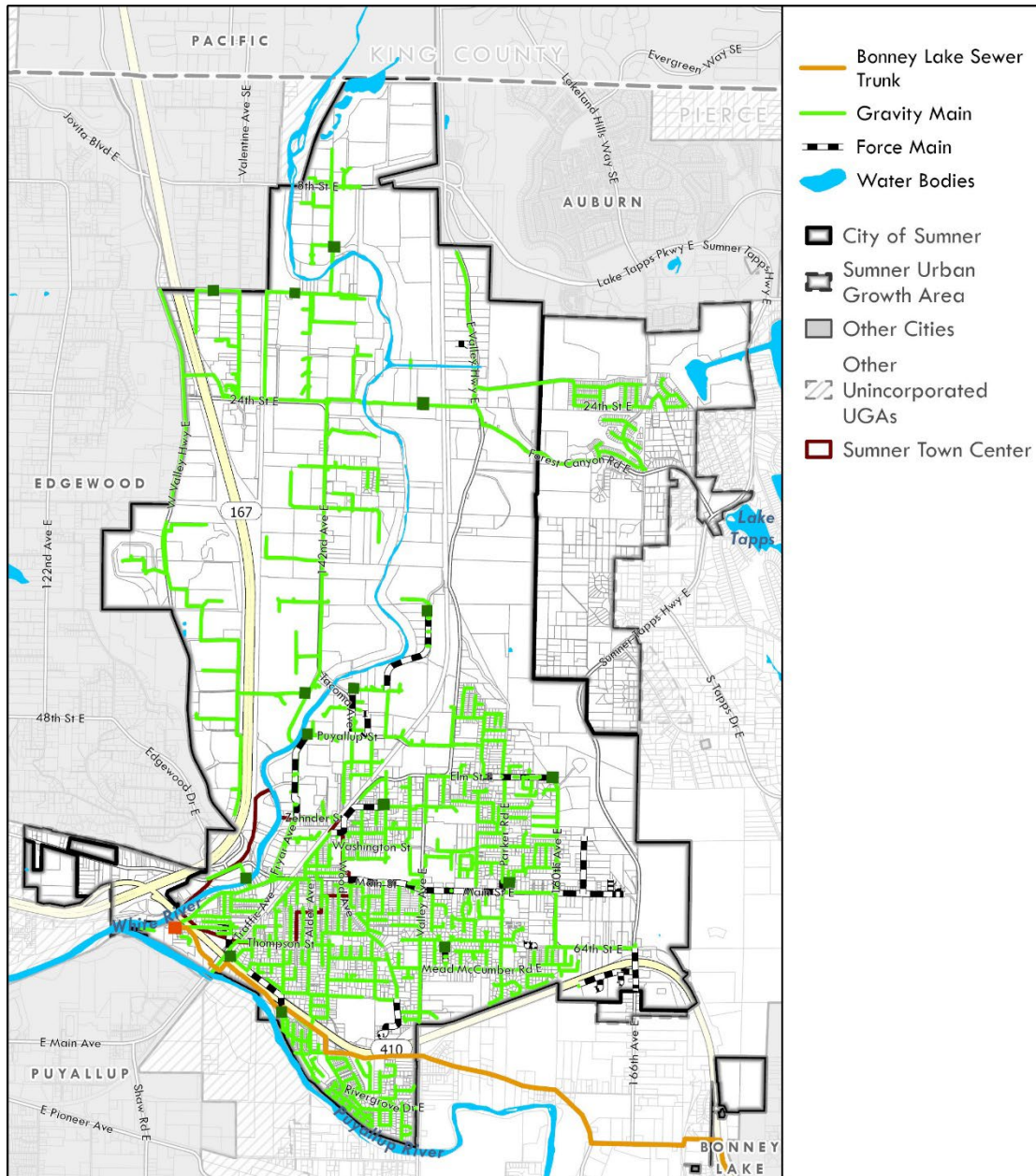
Table 3-6: Pump Station Characteristics

Pump Station	Station Name	Year Constructed	Last Year Rebuilt	Type	Station Design Capacity (Gallons per Minute)
PS-1	Tacoma	1982	2009	Submersible / Recessed Impeller	400
PS-2	North	1957	1987	Dry/wet well	500
PS-3	Van tassel	1977	2007	Submersible	250
PS-4	Jansen	1979	2006	Submersible / Recessed Impeller	130
PS-5	Parker	1963	2017	Submersible	1,330
PS-6	16th Street	1967	2017	Submersible	700
PS-7	Cherry	1966	2017	Submersible	1,180
PS-8	South	1966	2017	Submersible	775
PS-9	160th Street	1996		Submersible	130
PS-10	142nd Street	1998	2018	Submersible	1,500
PS-11	16th Ave 1	1998		Submersible	100
PS-12	16th Ave 2	1998		Submersible	100
PS-13	Cannery	2006		Submersible	213
PS-14	Forest Canyon	2007		Submersible	600
PS-15	North	2010		Submersible	500

Pump Station	Station Name	Year Constructed	Last Year Rebuilt	Type	Station Design Capacity (Gallons per Minute)
PS-16	Mastro	2012		Submersible / Recessed Impeller	200

Source: Sanitary Sewer Comprehensive Plan, 2020

Figure 3-4: Sanitary Sewers Facilities Map



CITY OF SUMNER Sewer System

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Map Date: November 2023

Source: City of Sumner, 2023; Parametrix, 2023.

Wastewater Treatment Facility (WWTF)

The Wastewater Treatment Facility (WWTF) is located at 13114 63rd Street East, at the confluence of the Puyallup and White (Stuck) rivers (Figure 3-5). The WWTF provides sanitary sewer treatment to all of the current plan area as well as the City of Bonney Lake. The City maintains an agreement with the City of Bonney Lake which allows Bonney Lake to use up to approximately 54% of the plant's capacity, while the remaining approximately 46% of the plant's capacity is reserved for flows from the Sumner service area.

The WWTF is a secondary treatment facility and discharges treated effluent to the White (Stuck) River. The last major upgrade to the WWTF was completed in 2016. Capacity measurements for treatment plants include wastewater flow (measured in gallons per day) and organic influent loadings (or solids). The most common measurements of organic loadings are 5-day biochemical oxygen demand (BOD₅) and total suspended solids (TSS). According to the 2020 General Sewer Plan, the WWTF treats an average wet weather wastewater flow of 1.67 MGD.

The resulting treatment capacity of the WWTF upgrade is as follows:

- Maximum Month (Design Flow): 6.10 MGD
- Peak Day Flow: 11.66 MGD
- Peak Hour Flow: 19.87 MGD
- Influent BOD₅: 10,900 lbs/day
- Influent TSS: 12,660 lbs/day

As City of Bonney Lake anticipates more rapid growth of its sewer area than Sumner in the future, another WWTF expansion may be necessary and would likely be funded heavily by the City of Bonney Lake. A WWTF Feasibility Study was completed in 2016, concluding that a maximum month WWTF capacity of 9.2 MGD was achievable at the existing treatment facility site.

Figure 3-5: Wastewater Treatment Facility - 13114 63rd Street East



Source: Google Earth, 2023.

3.5 Stormwater Facilities

The information in this section is based on the *City of Sumner 2011 Stormwater Comprehensive Plan Update* (City of Sumner 2011), which is an update to the *City of Sumner Stormwater Comprehensive Plan* adopted in 1992 and is incorporated in this study by reference. This section deals with the capacity issues associated with the physical stormwater collection and discharge system. Additionally, the City completed a *2020 Stormwater Capital Improvement Plan* to update the planned project list

The Sumner Valley has historically been drained to lower the natural water table, control flooding, and create land that was more conducive for agriculture. As more intensive commercial/industrial and residential development has occurred, expansion of the stormwater system has been necessary to collect and convey stormwater to the rivers and to prevent flooding.

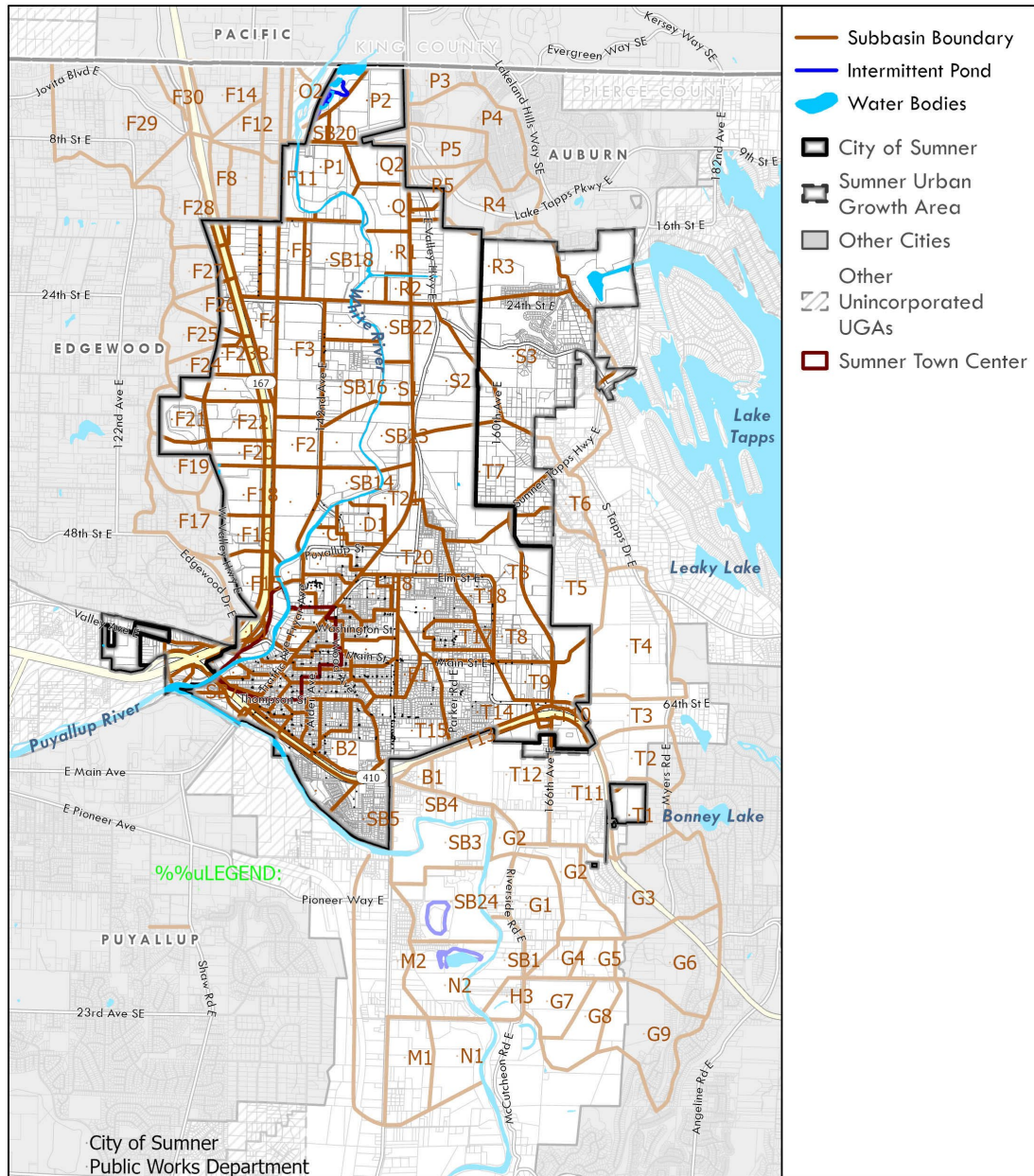
The Sumner Stormwater Comprehensive Plan was completed in 2011 and projects capacity infrastructure needs within the City's stormwater system based on changes in state and federal water quality regulations, stormwater retention and detention standards, and other parameters that have an effect on the overall system. The Stormwater Comprehensive Plan contains projects which try to offset the impact to surface waters that land uses have, and establishes a System Development Charge and monthly stormwater fee to fund construction and operation of the system. Sufficient revenue is needed to construct the new projects and to maintain the existing and new infrastructure.

The Washington State Department of Ecology (Ecology) issues an NPDES Phase II Stormwater Permit every 5 years with the current permit set to expire in 2024. The 2020 Stormwater Management Program is developed and implemented as part of the NPDES Permit and consists of 8 actions/activities, participation in a monitoring program, and additional work to remove Salmon Creek from Ecology's 303d impaired waters list by reducing fecal coliform levels.

[Stormwater Facilities Inventory](#)

The 1992 Stormwater Comprehensive Plan identified 44 drainage basins that generate and affect stormwater flows within the city limits. These basins were further divided into 115 sub basins. See Figure 3-6. The majority of these basins were modeled in 1992 for the 25-year, 24-hour event and the 100-year, 24-hour event using Type 1A precipitation distribution.

Figure 3-6: Stormwater Subbasins



CITY OF SUMNER

Stormwater Subbasin Boundaries

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: October 2023

Source: City of Sumner, 2023; Parametrix, 2023.

Hydraulic modeling was completed for the stormwater infrastructure to determine system deficiencies and identify potential capital improvement projects. The results of the modeling are contained in the 1992 Stormwater Comprehensive Plan.

The 2004 Stormwater Comprehensive Plan update included remodeling up to four of the sub-basins because of a significant change of land use designation (i.e., allowable development density) between 1992 and present. When remodeling was done based on the 2004 land use map and allowable land use densities, it was determined there was no significant increase in allowable density for developable areas located within the city limits over what was modeled in 1992.

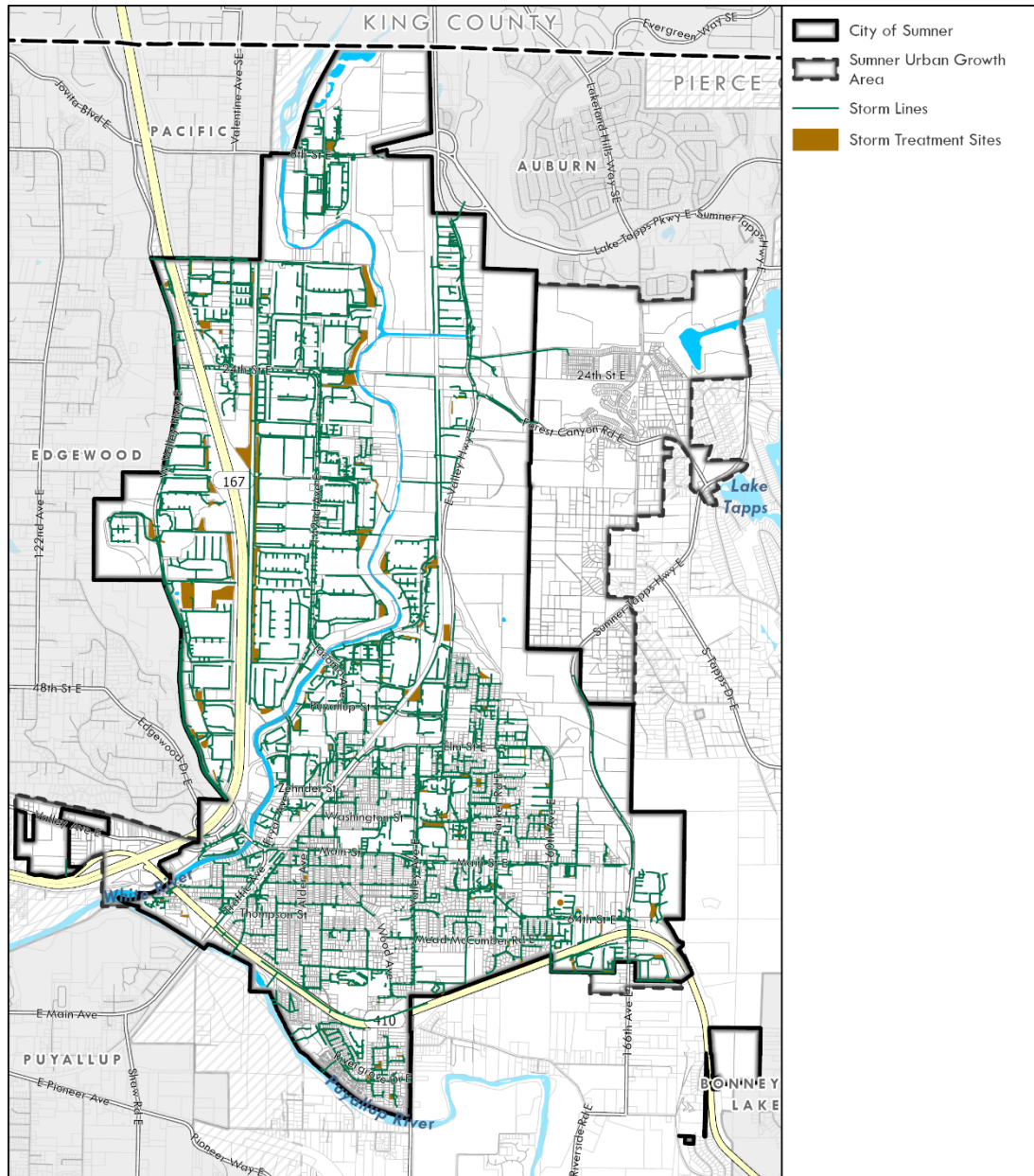
The 2004 Stormwater Comprehensive Plan identified stormwater capital improvement projects from the 1992 Stormwater Comprehensive Plan that had been completed, which projects were no longer needed, that needed to be carried forward, and additional projects that were needed. A Stormwater Comprehensive Plan Update was completed in 2011.

Low Impact Development

The 2013 NPDES permit required the City to update development regulations, code, and long range plans to make low-impact development the preferred and commonly-used approach to site development. This can range from capital projects identified in the 2020 Stormwater Capital Improvement Plan that infiltrate water at a level to mimic predeveloped condition or to changes that allow for denser development, reducing the overall impervious surface of a site. The permit requires annual evaluation of tactics to further increase the implementation of Low Impact Development. These annual evaluations typically involve review of City code and City Development Specifications and Standard Details.

The inventory of storm sewer facilities in the City of Sumner is shown in Figure 3-7.

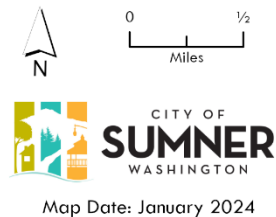
Figure 3-7: Stormwater Drainage Facilities Map



CITY OF SUMNER

Stormwater Drainage Facilities

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Source: City of Sumner 2023; BERK 2023.

Flood Protection

Most stormwater Capital Improvement Projects involve reduction of flooding related to storm events. Localized street flooding is an issue, but the City also faces a significant riverine flooding threat from the White River during storm events and subsequent releases from Mud Mountain Dam. In the 2011 Capital Improvement Plan, projects to combat riverine flooding were identified along the White River. Additionally, adoption of new FEMA maps has led to an increased identified need for floodplain restoration to protect threatened populated areas. This resulted in the expansion of levee and floodplain protection projects in a suite of projects identified as the White River Restoration project. These projects reserve 200+ acres of land along the White River which will be used to increase flood conveyance and prevent flooding of the manufacturing industrial center.

3.6 Parks Facilities

The City offers a variety of parks with amenities ranging from picnic areas to tennis courts and regulation softball fields. The schools in Sumner also provide a substantial number of fields and facilities for the community, including soccer fields. An inventory of park facilities and acreage is shown in Table 3-7 and mapped in Figure 3-8 (per the 2024 *Parks and Trails Plan*).

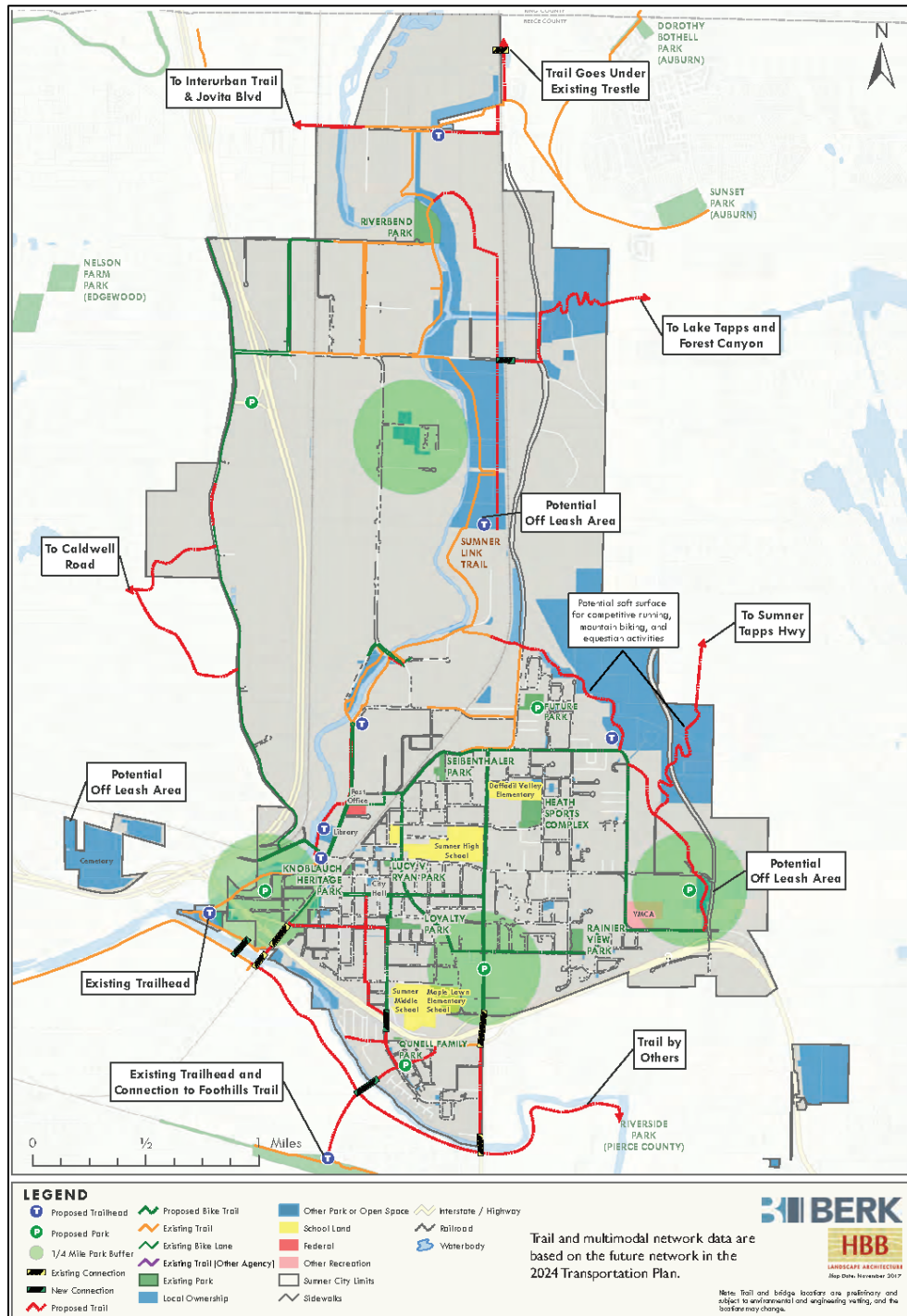
Table 3-7: Summary of City Park Spaces

Park Areas and Facilities	Acres
<i>Developed Local Parks</i>	9.8
Rainier View Park	3.9
Loyalty Park	3.3
Seibenthaler Park	2.3
<i>Undeveloped Local Parks</i>	4.5
Bennett Property	4.2
Qunell Family Park	0.3
<i>Special Facilities</i>	1.1
Reuben A. Knoblauch Heritage Park	0.8
Lucy V. Ryan Park*	0.4
<i>Regional Parks</i>	7.0
Bill Heath Sports Complex	7.0
<i>Linear Parks Along Sumner Link Trail</i>	16.7
Total City Parks Acreage	38.8
<i>Open Space Areas</i>	33.5
<i>Trails</i>	5.5 miles
Sumner Link Trail	5.5 miles

Source: City of Sumner Parks and Trails Plan, 2024

Notes: *The Ryan House is expected to be demolished, with the site remaining as a park.

Figure 3-8: Parks and Open Space Map



Source: Sumner Parks and Trails Plan, 2024.

The Parks and Open Space Element of the Comprehensive Plan sets forth policies relating to concurrency, requiring that new development that impacts the park system pay its fair share of the cost of providing new park facilities.

3.7 Fire Facilities

Inventory

In 2008, the City of Sumner and Pierce County Fire District 1 joined East Pierce Fire and Rescue District (EPFR). EPFR serves a population of more than 88,200 living in and around Bonney Lake, Sumner, Lake Tapps, the Ridge Communities, South Prairie, Edgewood, Milton, and Wilkeson. The district covers approximately 151 square miles and protects residents from eleven stations – five staffed stations and six volunteer stations. This includes 1 Fire Chief, 1 Deputy Chief, 4 Assistant Chiefs, 4 Battalion Chiefs, 9 administrative support staff, 34 career firefighter-EMTs, 49 career Firefighter-Paramedics, 44 volunteer firefighters, and 7 EMS-only volunteers. All full-time firefighters are cross trained as either emergency medical technicians (EMTs) or paramedics and can respond to both medical emergencies and fires. An independently elected board of citizens, called Fire Commissioners, governs the agency.

Three EPFR stations are located within and near the current plan area. Station 113 (Sumner Station) is located at 800 Harrison Street in Downtown Sumner (see Figure 3-9). This facility is approximately 8,200 square feet and includes sleeping quarters, a large drive-through apparatus bay, dayroom, conference room, and fitness space. The station is staffed by a minimum of 5 career personnel. Equipment available at Station 113 includes:

- 2 medic units
- 1 ladder truck
- 1 rescue vehicle
- 1 rescue trailer

Station 114 (West Tapps Station) is located within the East Hill UGA of the current plan area. The station is located at 3206 West Tapps Drive. Station 114 is approximately 3,616 square feet in size and is staffed by a minimum of 2 career fire personnel. Equipment available at Station 114 includes:

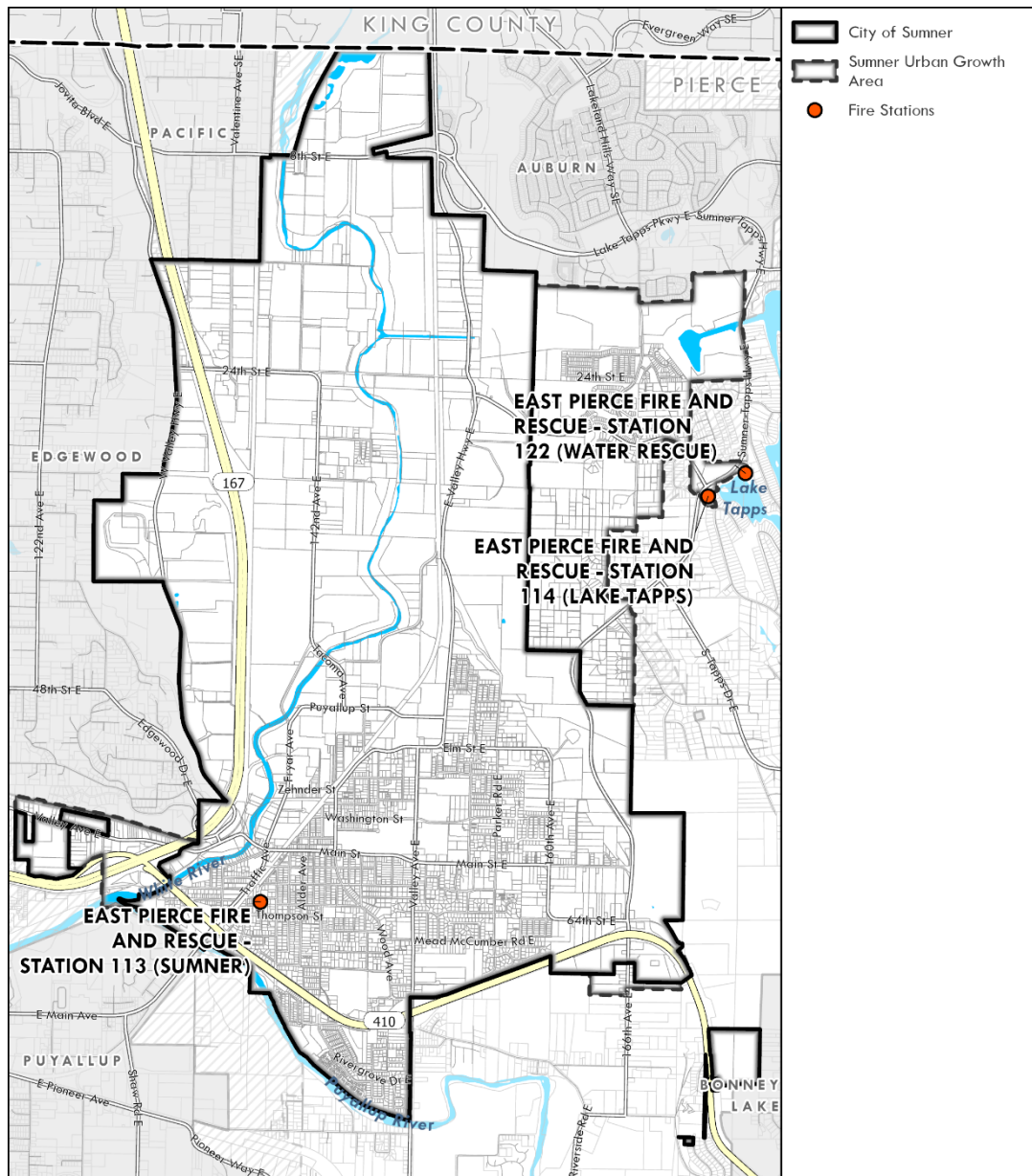
- 1 fire engine
- 1 medic unit

Station 122 (Boat House) is located at 2905 Sumner-Tapps Hwy. E. within the East Hill UGA and is used to store the following:

- 1 pontoon rescue boat.

(Source: EPFR Capital Facilities Plan)

Figure 3-9: Fire Facilities



CITY OF SUMNER

Fire Stations

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Source: Pierce County, 2023; City of Sumner, 2023; BERK, 2024.

3.8 Public School Facilities

Public schools are operated by local school districts and governed by State and federal laws and regulations. State funds provide a large part of school financing. School districts raise additional funds from local property taxes. State laws set standards for service levels and facility development, such as the site size and enrollment. They also specify funding methods. These laws perform much of the role of a functional plan for schools. For school districts to be eligible for development impact fees, the State GMA requires school capital facilities plans to be adopted and incorporated into city capital facilities plans.

The City of Sumner is served by the Sumner-Bonney Lake and Dieringer School Districts, which also serve surrounding cities and unincorporated areas.

According to the Washington State Office of the Superintendent of Public Instruction (OSPI), the Sumner-Bonney Lake School District had a districtwide enrollment of 10,622 students for the 2022-23 school year, with the four Sumner schools accounting for 3,651 students. Enrollment and capacity figures are shown in Table 4-9. Sumner Middle School is the only school under its enrollment capacity². The following schools serve the City of Sumner:

- Sumner High School
- Sumner Middle School
- Daffodil Valley Elementary
- Maple Lawn Elementary
- Elhi High School
- Early Learning Center

Sumner-Bonney Lake School District

The Sumner-Bonney Lake School District 2021-2027 Capital Facilities Plan was adopted in 2021. The Sumner-Bonney Lake School District operates within Sumner city limits and also encompasses the cities of Bonney Lake, portions of Edgewood, Pacific, and unincorporated Pierce County. The district consists of 16 schools total, 5 of which are in Sumner (see Figure 3-10); a performing arts center, community swimming pool, a public gymnasium, and a recreation department. The Sumner-Bonney Lake School District serves over 9,500 students. Table 2-9 shows existing schools in Sumner, in addition to locations, capacities of each, and support facilities serving the entire district.

² OSPI Report Card, 2023. Retrieved from <https://washingtonstatereportcard.ospi.k12.wa.us/ReportCard/ViewSchoolOrDistrict/100259>

Table 2-9: Inventory of Existing School Facilities

Name	Net Capacity (Number of Students)	Acres	Location
Schools			
Daffodil Valley Elementary	481	12.7	1509 Valley Avenue
Maple Lawn Elementary	454	8.5	230 Wood Avenue
Sumner Middle School	722	23.0	1508 Willow Street
Early Learning Center	168 [^]	- [^]	1508 Willow Street
Sumner High School	1,260	26.8	1707 Main Street
Elhi Hill Program*	NA	0.10	802 Alder Ave
Total	3,085	71.13	
Support Facilities			
Central Office (Administration)			1202 Wood Avenue
District Athletics Office			1707 Main Street
Sunset Stadium			1707 Main Street
Robert Miller Gym			1509 Valley Avenue

Source: Sumner-Bonney Lake School District Capital Facilities Plan 2021-2027

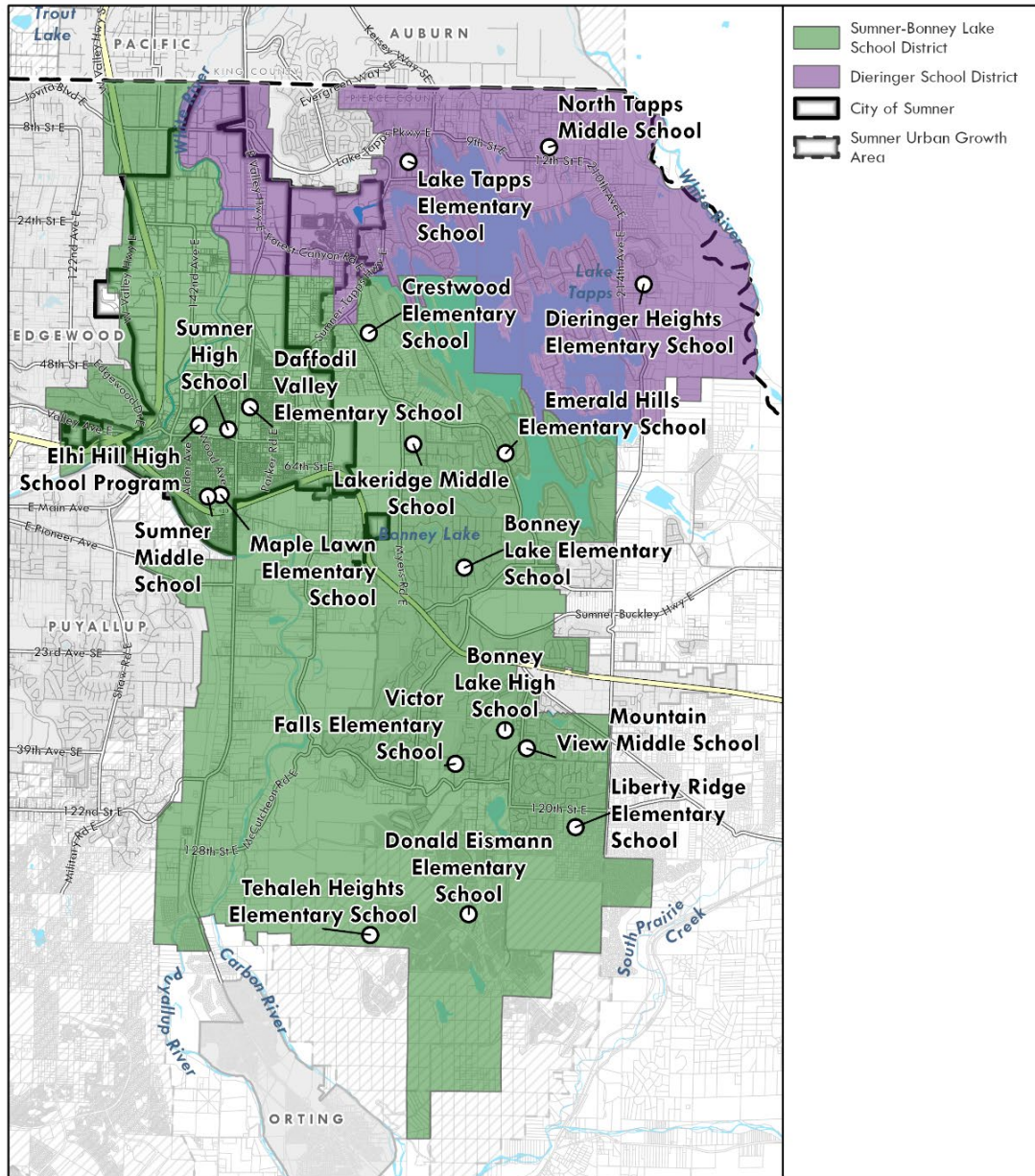
* Elhi Hill is a program offered to high school students who need services beyond the traditional school day.

[^]Includes kindergarten capacity only (not pre-K). The Early Learning Center is located within Sumner Middle School.

Dieringer School District

The Dieringer School District includes three schools: Lake Tapps Elementary School, Dieringer Heights Elementary School, and North Tapps Middle School, all of which are located outside of Sumner. The majority of Dieringer School District is located in unincorporated Pierce County, bounded by the eastern arm of the White River, on the west by the White River, on the north by the city of Auburn, and on the south by the cities of Bonney Lake and Sumner. The District surrounds the northern two-thirds of Lake Tapps and covers approximately 5.5 square miles (Dieringer School District, 2020). In the Sumner current plan area, the Dieringer School District serves the northeast Sumner city limits along East Valley Highway.

Figure 3-10: Schools and School Districts



CITY OF SUMNER
Public Schools

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.



Source: Pierce County, 2023; City of Sumner, 2023; BERK, 2024.

3.9 Transportation Facilities

The transportation system within the City of Sumner includes streets and highways, pedestrian and bicycle facilities, and transit and rail service. The city's functional classifications for roadways include principal arterials, minor arterials, collectors, and local streets. Arterial streets serve higher traffic volumes and may have few access points. Collector streets link arterials and local streets and may provide access to individual parcels. Collectors are also vital in connecting the residential areas to the central business district and are excellent candidates for multimodal facilities. Local streets provide neighborhood circulation and access to individual parcels.

The city also has two freeways, State Route (SR) 167 and 410 that run through it. The State has designated SR 167 as a Highway of Statewide Significance (HSS). HSS facilities provide and support transportation functions that promote and maintain significant statewide travel and economic linkages. Improvement plans for this HSS facility are developed from a statewide perspective. This planning includes policy development and accompanying funding support to represent a broad range of interests that depend on the facility. Because of its designation as an HSS facility, the State has the authority of setting the level of service (LOS) standards for SR 167. SR 410 is a State Highway of Regional Significance. LOS standards for SR 410 are established by the Puget Sound Regional Council (PSRC), in consultation with WSDOT.

Table 3-8 provides a summary of the key characteristics of the roadway serving Sumner.

Table 3-8: Characteristics of Key Roadways Serving Sumner

Roadway	Classification	Jurisdiction	# of Travel Lanes	Posted Speed Limit	Parking?	Sidewalks?	Bicycle Facilities
North-South Roadways							
SR 167	Freeway	WSDOT	4	60 mph	No	No	No
Valley Avenue	Minor/Principal Arterial ¹	Sumner	2 to 3	25 mph	No	Yes	Yes
Traffic Avenue	Minor Arterial ²	Sumner	4 to 5	25 mph	No	Yes	No
Fryar Avenue	Minor Arterial	Sumner	3	25 mph	No	Yes	Yes
142nd Avenue E	Minor Arterial	Sumner	5	35 mph	No	Yes	No
136th Avenue E	Minor Arterial	Sumner	3	30 mph	No	Yes	No
East Valley Highway	Minor Arterial ³	Sumner	2 to 3	25 mph	No	No	No

Roadway	Classification	Jurisdiction	# of Travel Lanes	Posted Speed Limit	Parking?	Sidewalks?	Bicycle Facilities
West Valley Highway	Minor Arterial	Sumner	2 to 4	35 mph	No	Yes	No
Sumner-Tapps Highway	Minor Arterial	Sumner	2	45 mph	No	No	No
Cannery Way (formerly Bridge Street)	Minor Arterial	Sumner	2	25 mph	No	Yes	No
Valley Avenue E	Minor Arterial	Sumner	2	25 mph	No	No	No
160th Avenue E	Minor Arterial ⁴	Sumner	2	25 mph	Yes	No	No
Sumner Heights Drive	Collector	Sumner	2	25 mph	No	Yes	No
Alder Avenue	Collector	Sumner	2	25 mph	Yes	Yes	No
Wood Avenue	Collector	Sumner	2	25 mph	Yes	Yes	No
158th Avenue E	Collector	Sumner	2	25 mph	No	Yes	No
Parker Road	Collector	Sumner	2	25 mph	No	Yes	No
East-West Roadways							
SR 410	Freeway	WSDOT	4	55 mph	No	No	no
24th Street E	Minor Arterial	Sumner	2 to 5	35 mph	No	Yes	No
Main Street	Minor Arterial	Sumner	2	25 mph	Yes	Yes	No
Stewart Road	Principal Arterial	Sumner	2-5	35 mph	No	Yes	No
Puyallup Street	Minor Arterial	Sumner	2	25 mph	No	Yes	No
Forest Canyon Road	Minor Arterial	Sumner	2	25 mph	No	No	No

Roadway	Classification	Jurisdiction	# of Travel Lanes	Posted Speed Limit	Parking?	Sidewalks?	Bicycle Facilities
64th Avenue E	Minor Arterial	Sumner	2	25 mph	Yes	Yes	No
Zehnder Street	Collector	Sumner	2	25 mph	No	Yes	No
Thompson Street	Collector	Sumner	2	25 mph	Yes	Yes	No
Elm Street	Minor Arterial Collector ⁵	Sumner	2 to 3	25 mph	No	Some ⁶	No
Meade-McCumber Road	Collector	Sumner	2	25 mph	Yes	Yes	No
Washington Street	Collector	Sumner	2	25 mph	No	Yes	No
Rivergrove Drive	Collector	Sumner	2	25 mph	Yes	Yes	No
Riverside Drive	Collector	Sumner	2	35 mph	No	No	No

Note: WSDOT = Washington State Department of Transportation; mph = miles per hour

1. Principal arterial south of SR 410

2. Principal arterial south of Thompson Street

3. Principal arterial north of Forest Canyon Road

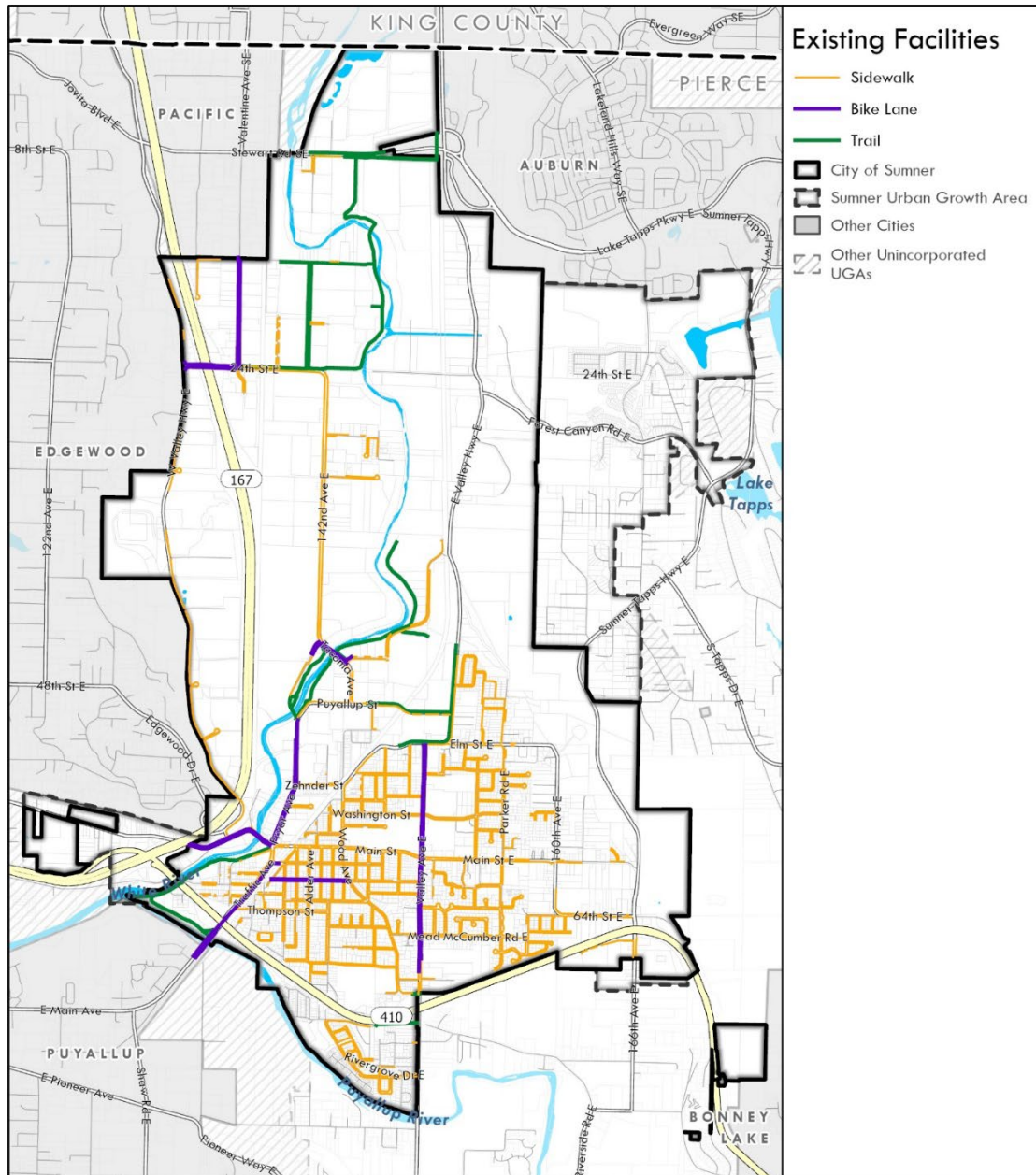
4. Collector north of Main Street E

5. Minor Arterial between Valley Avenue and East Valley Highway and Collector Arterial from Valley Avenue and Wood Avenue and East Valley Highway and 160th Avenue E.

6. Elm Street does not have sidewalks on portions between Valley Avenue and Wood Avenue

Sumner is also striving to create a fully integrated system for pedestrian and bicycle modes. The existing transportation network provides access for people on foot, bike, and other modes primarily with sidewalks, bike lanes, and off-street trails (see Figure 3-11). Sidewalks are located intermittently around the city, mostly along arterial roadways in the Sumner downtown and nearby neighborhoods. Bicyclists mostly share the roads with motorized traffic or use paved roadway shoulders where available, however formal bike lanes are present along Valley Avenue, Fryar Avenue, and Academy Street. The Sumner Link Trail also serves bicycle and pedestrian modes. See the City's Transportation Plan for more details on the Sumner non-motorized transportation network.

Figure 3-11: Existing Non-Motorized Facilities



CITY OF SUMNER

Existing Non-Motorized Facilities



CITY OF SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

Chapter 4: Planning Assumptions and Levels of Service

4.1 Introduction

GMA Administrative Code (WAC 365-195-315) recommends that local capital facilities plans include a discussion on “ . . .the selection of levels of service or planning assumptions for the various facilities to apply during the planning period (twenty years or more) and which reflect community goals.” This chapter will constitute that discussion for the Sumner Capital Facilities Plan.

Table 4-1 describes the population and employment assumptions used to calculate current and future levels of service. The population and employment assumptions are consistent with those to be used in the draft 2024 Comprehensive Plan and account for growth for the next 20 years. In 2022, Sumner’s estimated population was 10,800. The City is planning for a 2044 population of 15,525 based on anticipated housing growth. The City’s Urban Growth Area (UGA) has an estimated 2022 population of 1,839 and is expected to grow to approximately 3,030 residents by 2044.

Table 4-1: Population and Employment Assumptions

	2022 City	2022 Unincorporated UGA	2044 City	2044 Unincorporated UGA
Population	10,800	1,839	15,525	3,030
Housing Units	4,575	618	6,477	1,018
Employment	18,861*	411*	23,419	493

Source: Census 2020, OFM April 1 Population and Housing Estimates 2022, OFM Small Area Estimates 2022, Pierce County CPPs Appendix A, CensusOnTheMap

Notes: *2022 data not available for employment. Numbers shown are from 2021 (CensusOnTheMap). Unincorporated UGA numbers are estimates based on share of growth allocated in 2030, as Pierce County has yet to release allocations for specific UGAs.

4.2 General Government Facilities

General government planning assumptions are based on the projected population growth for the City and UGA. Table 4-2 shows the 2022 and 2044 needs for general government, police, and public works facilities based on the adopted levels of service. If the City were to annex the UGA within the planning period, total service population could reach 18,555 residents and these facility needs would increase.

General Government

The 2015 adopted level of service (LOS) for general government facilities is 1.13 square feet of building space per capita. This is to house City functions including Administration, Finance, Community Development, and Public Works. However, this LOS (adopted 2015) appears to be low, based on current space deficiencies at City Hall, and does not account for additional space needed for a range of services provided by the City that are not directly correlated with a “per capita” LOS. Other factors that should be considered in establishing a realistic LOS:

- The above services are conducted in City Hall, which was built for different functions in 1935, and has a high proportion of non-office, non-service-related square footage, such as large lobbies, unusable dormer/attic space, etc.
- Between 2020-2023, the City hired a number of additional staff at City Hall, who are currently sharing office space due to lack of useable floor area. There are 50 non-police related employees at city hall.
- Parks staff (5 FTE) are currently not housed at City Hall but are using temporary construction trailers off-site.
- Based on an estimate of City Hall floor area that can be used for functional office space needed to house staff that provide a range of services, the general government 2022 LOS would be closer to 170-180 square feet per employee (see separate discussion related to space needs for the Police Department). With 50 non-police department employees, the existing ratio of gross square foot per employee is 294, the same as the Police Department.
- An adjusted **LOS of 1.36 square foot per capita** based on current building size and population would increase the needed building area in 2044.

Table 4-2: City Government Buildings Level of Service

City Facility	Req'd LOS	Exist. Area (s.f.)	2022 need (City Pop. 10,800)	2044 need (City Pop. 15,525)	2044 with UGA annexed (Pop. 18,555)
General Gov.	1.36 (s.f./capita)	14,577	14,577	21,114	25,235
Police	294 s.f./employee	7,654	7,654	11,466	13,524
Public Works Shops	1.80 (s.f./capita)	17,136	19,440	27,945	33,399

Source: City of Sumner Comprehensive Plan 2021; Sumner 2023; BERK 2023.

Police Services

The Police Department building area has a 2015 adopted level of service of 0.44 square feet per capita. However, this LOS appears to be low based on current space deficiencies and does not account for additional space needed for ancillary functions (e.g. evidence storage, processing area, locker facilities, interview rooms, etc.). Table 4-2 shows a LOS that is Building Area/Employee that is needed to accommodate both the office and other functional spaces and ancillary spaces. **The LOS is calculated at 294 s.f. per employee.** Table 4-3 shows the LOS demand for commissioned officers and the resulting need for non-commissioned staff and support and total employment. The area needs for the Police Department are based on these projected employment needs as the City grows.

The police service demands are a factor of population demographics, employment growth, and types of business and land use. Statewide data from the 2022 Crime in Washington annual report suggests some offenses, including violent crime and some kinds of property crime, overwhelmingly occur at residences, so residential areas may have more demand for police and court services. Generally, industrial development does not generate the same service demands, but there is a significant demand for police service due to property crime, theft, and vehicle collisions. The current LOS of 2 officers per 1,000 population therefore is too low to account for service in non-residential areas. Of the total number of calls for police service noted above, approximately 24% of those calls are to the Manufacturing-Industrial Center. Therefore, the projected LOS standards for police should be reevaluated relative to not just population but also employment growth expected in Sumner. Further, Sumner's service demands are also affected by its geographic location between two State highways and borders with much larger cities. Level of service standards as proposed in the 2024 Comprehensive Plan are as follows:

7. Provide and maintain a police system sufficient to meet the community's public safety needs. This system may include normal police functions, responding to calls for service, community policing, care and custody of prisoners, and animal control.
- 7.1 Level of Service:
 - i. **Maintain a ratio of at least two (2) commissioned officers per 1,000 population.**
 - ii. Maintain a ratio of not less than 1 commissioned patrol officer for every 1000 calls for service per year. Patrol Officers should have at least 40% of their patrol shift available for proactive policing activities.
 - iii. Provide one sergeant for every 5 commissioned patrol officers.
 - iv. Provide and maintain one detective position at a ratio of 1/400 part A offenses.

Table 4-3 shows the 2022 and 2044 commissioned officer needs based on the existing and projected population in the city. The 2044 need is projected to be 31 officers. If the City were to annex the UGA within the planning period, this could increase to 37 officers to meet the needs of a total population of 18,555.

Table 4-3: Police Level of Service

Staffing	Req'd LOS	Existing	2022 need (City Pop. 10,800)	2044 need (City Pop. 15,525)	2044 with UGA annexed (Pop. 18,555)
Commissioned Officers	2 per 1,000 population	21	22	31	37
Special Commissioned Officers	NA	1	1	2	2
Non Commissioned Staff	NA	4	4	6	7
Total Employees	NA	26	26	39	46

Source: City of Sumner Comprehensive Plan 2021; Sumner 2023; BERK 2023.

Public Works Shops

The Public Works Shops have a **LOS of 1.80 square feet per capita**. See Table 4-2 for 2022 and 2044 needs compared to existing square footage.

4.3 Water Facilities

The Sumner General Water Plan projected demands look out 20 years to 2038 and a residential population within the water service area of 13,343 and 5,436 connections and a total average daily demand of 1.99 MGD (see Table 4-4). Using water consumption records from 2014 to 2017, the City's single family residential usage rate was estimated to be 189.6 gallons per day.

Table 4-4: Projected Max Day Demand and Peak Hour Demand with DSL

	2018	2024	2028	2038
Residential Population ¹	11,044	11,793	12,321	13,343
Average-Day Demand (ADD) (MGD) ²	1.77	1.81	1.87	1.99

	2018	2024	2028	2038
Maximum Daily Demand (MDD): --DOH Guideline Method (MGD) ³	3.36	3.52	3.64	3.89
Peak-Hour Demand (PHD): --DOH Guideline Method (gpm) ^{4 5}	3,764	3,979	4,111	4,389

¹. Population projections based on the City's 2020 General Water Plan Update.

². Average-demand requirement are calculated based on the per capita usage rates of the residential and employment population from 2014 to 2017.

³. DOH Water System Design Manual, August 2001. MDD = 2*ADD.

⁴. gpm = gallons per minute.

⁵. PHD = (MDD/1,440)[1.6*N+225] + 18. Use peak to average day factor in MDD.

The City of Sumner must comply with water quality regulations on both the federal and state level. State regulations enforced by the Washington State Department of Health (DOH) may be the same as or more stringent than the federal regulations. DOH regulates water quality of public water systems under the State Drinking Water Regulations, WAC 246-290-300 through 320. The DOH also has enforcement responsibility for federal regulations included in primacy agreements with the United States Environmental Protection Agency (EPA). Water quality regulations are currently evolving, and will continue to evolve, becoming more stringent due to implementation of the Safe Drinking Water Act and other state and federal legislation.

These water quality regulations address contaminant levels for inorganic chemicals, organic chemicals, heavy metals, pesticides, coliform, and other substances. The water system is regularly monitored to address levels of contamination and corrective actions are taken as needed to remain in compliance with state and federal laws.

4.4 Policy in the Comprehensive Plan

The Capital Facilities Element of the Comprehensive Plan contains the following policies in accordance with the Water System Plan:

11. Maintain an efficient water system to meet the needs of the community's residential, commercial, and industrial community as set forth in the City's most recently adopted Water System Plan.

- 11.1 Establish the following Levels of Service for water supply:

Demand

Residential Demand - 72.73 gpd

Employee Demand - 25.28 gpd/employee

Fire Flow

Use	Min. Flow (gpm)	Required Duration (hours)
Medium and low density residential	1,000	2
High density residential and commercial	1,500	2
Industrial	3,500	3
Several existing buildings	4,500	4

Water System Reliability LOS

Criteria	Level of Service			
	A	B	C	F
Conveyance Reliability; Loop (min. 6" pipe) System	95% + of services on loop lines	90% + of services on loop lines	80% + of services on loop lines	Less than 80% of services on loop lines
Source Reliability;	Meets peak day w/ largest supply out	Meets peak day w/all supplies on	Meets 95% of peak day - use storage	Water restriction required
Distribution System Reliability; Isolation valves a min of 660 ft.	95% + of services meet these criteria	90% + of services meet these criteria	80% + of services meet these criteria	<80% of services meet these criteria
Power Backup for Supply Pumps;(standby generators)	100% of pumps with backup gen.	Sufficient backup for meeting MMADF	Sufficient backup for avg. daily flow	Less backup than needed for ADF
Emergency Response by Repair Crew	< 4 hrs. on 24-7 basis	< 8 hrs. on 24-7 basis	< 24 hrs on a 24-7 basis	> 24 hrs on a 24-7 basis

The minimum LOS for reliability is "B" as outlined above.

11.2 Deliver a high degree of water quality that satisfies federal, state, and local regulations as follows:

LOS "A": Water quality that meets both Primary and Secondary Public Health Standards

LOS "B": Water quality meets only Primary Drinking Water Standards

For water quality, Sumner chooses a LOS "A".

The following is the level of service standard in the draft 2024 Comprehensive Plan, Capital Facilities and Public Services Element:

11.3 Require water services for new development, unless otherwise allowed by state or county regulations.

11.3.1 Encourage the design, siting, construction, operation, and relocation or closure of water infrastructure in a manner that is cost effective, environmentally sensitive, appropriate to the location and need, minimizes and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.

11.3.2 Require all new development to avoid or mitigate adverse impacts to functioning water, sanitary sewer, or septic systems.

11.4 Implement water conservation programs for residential, commercial, and industrial users consistent with the Sumner Water Plan.

11.4.1 Require new and existing businesses to use water at or below the average per capita employee level and businesses that use higher than average rates of water to mitigate their impacts.

11.4.2 Implement water service technologies, such as “smart meters,” that assist customers in monitoring and reducing water usage.

11.4.3 Support existing public education and outreach campaigns to address and promote water conservation.

Average 2044 daily water demand is estimated using factors in the Water System Plan (72.73 gpd/resident and 25.28 gpd/employee). Using the peaking factor of 2.05 established in the Water System Plan, the total additional maximum daily water demand for residents and employees is approx. 1.01 mgd by 2044.

4.5 Sanitary Sewer

The City has discretion in setting performance and design criteria and standards for its sewer system, so long as they meet or exceed the minimum standards for public sewers as set forth by the Washington State Department of Ecology (DOE) through Chapters 90.48, 90.52, and 90.54 of the Revised Code of Washington (RCW). The criteria focus on planning, design parameters, and other details that have been developed to establish consistency and to ensure that adequate levels of service are provided throughout the system. The criteria also provide the planning process with measuring tools to identify areas of the existing system that need to be improved to achieve the desired level of customer service. The sewer system

is regularly monitored to address concerns and corrective actions are taken as needed to remain in compliance with state and federal laws.

The following is the level of service standard as identified in the draft 2024 Comprehensive Plan, draft Capital Facilities and Public Services Element:

12. Provide a sanitary sewer system adequate to meet the demands of the community, that ensures public health and safety, and protects the environment.

12.1 Establish and provide for a Level of Service as defined in the adopted Sanitary Sewer Plan.

12.2 Require sanitary sewer services for new development, unless otherwise allowed by state or county regulations.

12.2.1 Encourage the design, siting, construction, operation, and relocation or closure of sanitary sewer infrastructure in a manner that is cost effective, environmentally sensitive, appropriate to the location and need, minimizes, and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.

12.2.2 Require all new development to avoid or mitigate adverse impacts to functioning water, sanitary sewer, or septic systems.

12.3 SEPTIC SYSTEMS Ensure existing on-site septic systems may continue to serve existing residents as long as they are properly functioning, well maintained, and remain in compliance with Tacoma-Pierce County Health Department requirements.

12.3.1 Allow interim onsite Tacoma-Pierce County Health Department approved septic systems where sewer facilities are not available, but prohibit on-site treatment in new development.

12.3.2 Encourage homeowners to connect to the sanitary sewer system where available.

12.3.3 Require homeowners to connect to the sanitary sewer system if existing onsite septic systems fail to maintain compliance with Tacoma-Pierce County Health Department requirements.

The Sanitary Sewer Plan establishes the following per capita flows to project future flows:

- Residential per capita flow: 68 gpd/resident
- Commercial and industrial per employee flow: 23 gpd/employee

Table 4-5: Existing and Projected WWTF Sumner Influent Flows (mgd)

	Average Annual Flow	Maximum Month Flow	Peak Day Flow	Peak Hour Flow
WWTF Rated Capacity ¹	4.27	6.10	11.66	19.87
Sumner Allocated WWTF Capacity ²	1.74	2.80	6.02	7.64
Existing 2016 Flows	1.06	1.71	6.67	4.66
Year 2024 Flows	1.23	1.86	3.93	5.00
Year 2038 Flows	1.53	2.32	4.38	5.56
2038 Surplus/(Deficit) Based on Sumner's Allocated Capacity	0.21	0.48	1.64	2.08

¹ The rated WWTF capacity numbers are taken from the City of Sumner Wastewater Treatment Facility Final Comprehensive Facility Plan Addendum No. 2 approved by Ecology.

² The maximum month flow of 2.8 mgd is the only specified capacity for Sumner stated within the WWTF Operating Agreement between the Cities of Sumner and Bonney Lake. Other values are interpolated using the peaking factors for flow established within Chapter 6 of the 2020 Sanitary Sewer Comprehensive Plan for purposes of illustrating hydraulic adequacy of the existing WWTF to meet future projections. Sources: BHC Consultants (Table 8-1), 2020; BERK, 2020.

Based on the per capita flow rates from the Sanitary Sewer Plan (68 gpd/resident and 23 gpd/employee), the total additional maximum month flow for residents and employees (using the peaking factor of 1.61 established in the 2020 Plan) is approx. 0.73 mgd by 2044. It may be possible that the anticipated deficit can be accommodated through regular monitoring and capital planning.

As Bonney Lake anticipates more rapid growth of its sewer service area than Sumner in the future, another plant expansion might become necessary. In anticipation of this need, the Wastewater Treatment Facility Phase III Feasibility Study was completed in 2016 and examines a service area that includes the city limits and the entire UGA. This study concluded that a maximum month WWTF capacity of 9.2 mgd was achievable on the current site. At such a time that influent flows necessitate the initiation of another expansion, the agreement would need to be updated to reallocate new capacity shares (BHC Consultants, 2020).

Per the Sanitary Sewer Plan, with the completion of the WWTF expansion in 2016, the WWTP has sufficient capacity to accommodate projected influent 5-day BOD5 and TSS loads through 2038. The 2038 projected maximum month influent loadings to the WWTF are 8,620 pounds/day for 5-day BOD5 and 9,400 pounds/day for TSS, approximately 2,280 and 3,260 pounds/day less than the respective permitted capacities (BHC Consultants, 2020, pp. 5-9, 8-2).

4.6 Stormwater Facilities

The following is the level of service standard as identified in the draft 2024 Comprehensive Plan, Capital Facilities and Public Services Element:

15. In conjunction with existing system providers, provide surface and storm drainage collection and discharge systems to protect water quality, public and private property, and the natural environment.

15.1 Establish and maintain the Level of Service as the 25-year storm event, except in those areas where the 100-year storm design is appropriate to protect the natural environment.

15.2 Require new development to provide for facilities to reduce water quantity and quality impacts associated with new development.

15.2.1 Encourage the design, siting, construction, operation, and relocation or closure of storm drainage infrastructure in a manner that is cost effective, environmentally sensitive, appropriate to the location and need, minimizes and mitigates impacts on adjacent land uses, and prioritizes action to protect vulnerable populations.

15.2.2 Encourage the use of low impact development (LID) and stormwater best management practices to manage stormwater runoff where feasible.

The Sumner Municipal Code reflects adoption of the Department of Ecology Stormwater Management Manual for Western Washington, adoption of the minimum requirements in Appendix I of the NPDES Phase II Permit with some exceptions, and adoption of the Puget Sound Partnership (PSP) Low Impact Development Technical Guidance Manual for Puget Sound.

In addition to program elements required under existing regulations, it is anticipated that additional steps will be necessary to protect habitat and promote salmon recovery, both under the federal Endangered Species Act and the salmon restoration initiatives undertaken by the Governor and the legislature and to meet the NPDES II permit requirements.

4.7 Parks Facilities

Minimum levels of service for parks include the following:

- Investment: Maintain a level of investment per capita (resident equivalent) that is consistent with the current value of the system per person. The 2024 value is \$1,652 per resident equivalent, as may be adjusted periodically for system value, inflation, or annexation.
- Recreation Facilities: Provide for a mix of parks and recreation facilities at a level consistent with the community's current level of facilities:

- Active Recreation Facilities (fields, courts, skate parks, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 0.4 facilities per 1,000.
- Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): Sumner facility per 1,000 resident equivalents consistent with the 2024 ratio of 3.4 facilities per 1,000.
- Parks: Sumner park acres per 1,000 resident equivalents consistent with the 2024 ratio of 3.2 acres per 1,000.

Target levels of service for parks include the following:

- Investment: Achieve a level of investment per capita (resident equivalent) that is consistent with a 30% increase in the current value of the system per person. The 2024 value is \$2,148 per resident equivalent, as may be adjusted periodically for system value, inflation, or annexation.
- Recreation Facilities:
 - Active Recreation Facilities (fields, courts, skate parks, and similar): 0.5 facilities per 1,000 resident equivalents.
 - Informal Recreation Facilities (playgrounds, picnic shelters, open lawn areas, and similar): 4.4 facilities per 1,000 resident equivalents.
 - Parks: 5.4 acres per 1,000 resident equivalents.
- Open Space (including increases to tree canopy cover): 3.8 acres per 1,000 resident equivalents.
- Access: 10-minute maximum walk to a park for all Sumner residents.

Resident equivalent population is a calculation based on the number of residents and number of jobs in Sumner, considering an individual's estimated time available to use parks in a given week.

The City collects a Park Mitigation Fee to address level of investment per capita. Adoption of the fee by the City Council is done under a separate action and not as part of the adoption of the Capital Facilities Plan.

Table 4-6 illustrates the existing and future level of service for recreation facilities compared to the required level of service.

Table 4-6: Existing Park Facilities and Minimum LOS

Activity	Req'd LOS (2024 conditions)	Exist. #	2044 Demand
Active Recreation Facilities	0.4 per 1,000 resident equiv.	5	7
Informal Recreation Facilities	3.4 per 1,000 resident equiv.	41	56
Parks	3.2 acres per 1,000 resident equiv.	38.8 acres*	53

Source: Parks and Trails Plan, 2024; Sumner Public Works, 2024.

* Includes 16.7 acres along the Sumner Link Trail maintained by Parks staff that are commonly used for picnics and other recreation activities.

Deficits are expected for active recreation facilities, informal recreation facilities, and park acreage in 2044 based on the current facilities. The City will need to add 2 more active recreation facilities, 15 more informal recreation facilities, and more than 14 acres of parks to meet the community's needs.

To reach target levels of service, the City would need to invest in 4 active recreation facilities, 32 informal recreation facilities, and 52 acres of parks over the 2024 system inventory, as well as 31 acres of open space or tree canopy, and targeted investments to ensure all residents have access to a park within a 10-minute walk.

4.8 Fire Facilities

The City of Sumner contracts with East Pierce Fire and Rescue District (EPFR) and therefore adopts the fire district's level of service standards. These standards are based on first unit arrival time and the arrival of minimum acceptable (effective) response. The adopted fire service and EMS minimum level of service was reiterated as part of the most recent EPFR Unit and Response Benchmarks.

Sufficient "first alarm" staff and unit deployment for each different fire or emergency medical incident under Sumner's contract with EPFR has been summarized in Chapter 7 of the 2022 Standards of Cover Study. This study published on the EPFR website highlights recommended minimum staffing needed to mitigate active incidents but notes that additional staff and units may be required to handle complex rescues, fires, or medical emergencies.

When applied to the arrival of the first unit, the 2023 EPFR Unit and Response Benchmarks document states that for urban areas the established benchmark is 90% of calls will have a first unit on site within 8 minutes and 30 seconds. The same document states that 90% of calls will have an effective response force (ERF) in urban areas within 13 minutes and 30 seconds.

When applied to the arrival of the minimum ERF, the 2022 standards of coverage document describes an effective first alarm response force (ERF) by call type in Table 4-7 below:

Table 4-7: Effective Response Force Personnel by Call-Type

Incident Type	Low Risk	Medium Risk	High Risk
Structure Fire	16	21	27-28
Emergency Medical Services	2-5	5	8-10
Rescue	4	10-15	17-20
HazMat	3	-	17-20
Wildland Fire	6		24
Risk Definitions	Incidents involving small fires (fire flow less than 250 gallons per minute), single patient non-life-threatening medical incidents, minor rescues, small fuel spills, and small wildland fires without unusual weather or fire behavior.	Incidents involving fires in single-family dwellings and equivalently sized commercial office properties (fire flow between 250 gallons per minute to 1,000 gallons per minute), life threatening medical emergencies, hazardous materials emergencies requiring specialized skills and equipment, rescues involving specialized skills and equipment, and larger wildland fires.	Incidents involving fires in larger commercial properties with sustained attack (fire flows more than 1,000 gallons per minute), multiple patient medical incidents, major releases of hazardous materials, high risk rescues, and wildland fires with extreme weather or fire behavior.

Incident Type	Low Risk	Medium Risk	High Risk

Source: EPFR Unit and Response Benchmarks, 2023 <https://www.eastpiercefirer.org/wp-content/uploads/EPFR-Unit-and-Response-Benchmarks.pdf>

As of 2009, EPFR was meeting its 5-minute response time goal only 60% of the time for fire response, though its 90% performance was 5 minutes and 37 seconds. For EMS-only responses, the district met its goal only 59% of the time, and its 90% performance was 6 minutes and 4 seconds.

Between the 2014 EPFR Standards of Cover report and 2023 Standards of Cover Report, the district has opted to raise the minimum travel time for first unit and ERF from 5 minutes to 8 minutes and 30 seconds for a Fire and EMS calls. This standard excludes medic unit specific calls which have an 11 minute first unit travel time target and HazMat, water, tech, and wildland calls which all have 12 minute first unit travel time targets.

In 2022 EPFR's urban response was slightly below target levels of service for each call type measured. 8,292 calls were made in urban areas and 48% were EMS incidents. Benchmarks and achievements in 2022 are listed in Table 4-8.

Table 4-8: 2022 EPFR Minimum Response Times by Incident Type and Count

2022 Call Type	Benchmark (mm:ss)	90 th Percentile	Total Incidents	% Achieving Benchmark
Turn out times	2:00	2:32	12,653*	74%
Travel Time 1 st Unit (Urban)				
Fire (All)	8:30	9:24	151	76.9%
EMS (All)	8:30	8:59	4014	87.7%
Medic Unit (All)	11:00	12:27	4044	86%
HazMat	12:00	12:37	39	87.2%
Water Rescue	12:00	8:32	2	100%
Technical Rescue	12:00	4:30	1	100%
Wildland Fire	12:00	13:07	41	85.4%

Source: EPFR 2022 Annual Report, BERK 2023

Of the 12,653 calls received within EPFR district and the associated 22,000 turnouts, 2,846 were responded to by Station 113 - Sumner. This is the highest number of calls by station within the district. The vast majority of these 12,653 calls were emergency medical calls (73.7%).

Currently, EPFR staffs the Sumner Fire Station (Station 113) with 5 personnel 24 hours per day. Based on the number of Sumner housing units as well as housing units within the unincorporated UGA there are roughly 2,527 citizens for each staff firefighter/EMS at any given moment in Sumner and its UGA. In projecting growth over the next 20 years, the city and UGA are estimated to grow by 5,916 residents to reach a total of 18,555 residents. To maintain the same level of service, 2 additional fire personnel will likely be needed at Station 113.

Given the size of the station as noted in the section Inventory, there is ample space for these additional staff but an additional apparatus for these staff may be required to meet the growing need in the service area.

The 2022 EPFR Annual Report also notes the aging population throughout the EPFR service area and the increased likelihood for older adults to require EMS response. The report states that in the service area, adults over 65 years of age call for EMS response 2-3 times more often than those under 65. While population and level of service can be extrapolated linearly to 2044, the growth in the population over age 65 could result in call volumes increasing at a higher rate than the rate of population growth, which could increase staffing and equipment needs.

The City collects mitigation fees for fire protection. Adoption of fees by the City Council is done under a separate action and not as part of the adoption of the Capital Facilities Plan.

4.9 Public School Facilities

Sumner-Bonney Lake School District

The *Sumner-Bonney Lake School District's 2021-2027 Capital Facilities Plan* provides for a variety of district standards intended to meet state requirements and provide for a quality education.

Class Size Standards

Standards are anticipated to remain approximately the same as the 2017 class size standards:

Grade level:		Students/Classroom (Average):
Kindergarten	-	19
Grades 1	-	21
Grades 2	-	22
Grades 3	-	22

Grade 4-5	-	27
Grade 6-12	-	30

School Size

In general, the District seeks to design new schools to have the following student capacity:

- Elementary School: 500-650 Students
- Middle School: 750-950 Students
- High School: 1,700-1,800 Students

Generally, the District seeks to acquire school sites of the following sizes in order to comply with development regulations:

- Elementary School: 15 acres
- Middle School: 25 acres
- High School: 40 acres

Enrollment and Capacity

Currently, most of the Sumner-Bonney Lake School District schools in Sumner are at or over capacity, with the exception of Sumner Middle School, which is operating 6 percent under student capacity (Table 4-9).

Table 4-9: Sumner School Enrollment and Capacity

School	Capacity (Students)	2022-23 Enrollment (Students)	Percent Over/Under Capacity
Sumner High School	1,260	1,844	46%
Sumner Middle School	722	681	-6%
Daffodil Valley Elementary	481	492	0.2%
Maple Lawn Elementary	454	634	40%
Sumner Early Learning Center	168	--	--

Source: Enrollment: OSPI Report Card, 2023.

The Sumner-Bonney Lake School District maintains student generation numbers to determine the number of students that can be expected from new residential construction. These numbers are shown in Table 4-10.

Table 4-10: Student Generation Rates, Sumner-Bonney Lake School District

School Type	Single Family	Multifamily
Elementary School	0.403	0.095
Middle School	0.140	0.043
High School	0.099	0.033

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021.

Enrollment Projections: The Sumner-Bonney Lake School District Capital Facilities Plan includes district-wide enrollment projections based on a Demographic Study prepared for the District. See Table 4-11.

Table 4-11: Enrollment Projections for Sumner-Bonney Lake School District

	2021	2022	2023	2024	2025	2026	2027	Change
Daffodil Valley Elementary	430	449	456	451	448	450	453	+23
Maple Lawn Elementary	569	637	624	618	611	614	626	+57
Sumner Middle School	725	702	708	741	773	796	809	+84
Sumner High School	1594	1661	1741	1768	1760	1772	1806	+212

Source: Sumner-Bonney Lake School District Capital Facilities Master Plan, 2021-2027, 2021. Retrieved from <https://www.sumnersd.org/cms/lib/WA01919505/Centricity/Domain/253/Master%20Copy%20SBLSD%20CFP%202021-2027.pdf>.

¹ Projections were calculated by Educational Data Solutions for a Demographic Study for Sumner-Bonney Lake School District

Beyond 2027, Sumner is expected to continue to grow, resulting in more students at Sumner schools by 2044, impacting school capacity. Table 4-12 shows estimated student growth between 2020 and 2044, based on the housing capacity in the district and assumed student generation rates.

Table 4-12: Sumner-Bonney Lake School District: Student Growth 2020-2044

Additional Students (1,975 new housing units in the City portion of district)	
Sumner-Bonney Lake School District	682
<i>Elementary School</i>	413
<i>Middle School</i>	156
<i>High School</i>	113

Source: Sumner-Bonney Lake School District 2022; Dieringer School District 2021; Sumner 2023; BERK 2023.

With growth in the city, the Sumner-Bonney Lake School District could see a total of approximately 682 new students from Sumner city limits. This could include 413 elementary school students, 156 middle school students, and 113 high school students. As shown in Table 4-9, all Sumner-Bonney Lake School District schools located in the City of Sumner are over or nearing capacity (as of the 2022-23 school year). Based on planned growth, it is likely the schools located in Sumner will further exceed their capacities. Growth is also expected to occur outside of city limits in the Sumner UGA, which could further impact Sumner school capacity. The reader is referred to the Sumner-Bonney Lake School District's Capital Facilities Plan for additional discussion of assumptions and LOS standards.

The City is authorized to collect mitigation fees for schools (see Appendix E). Adoption of school mitigation fees by the City Council is done under a separate action and not as part of the adoption of the Capital Facilities Plan. A summary table of impact fees is contained in Appendix E.

[Dieringer School District](#)

Enrollment and Capacity

Dieringer School District schools are close to or over capacity for the 2022-2023 school year. Lake Tapps Elementary school is 26 percent over capacity, while Dieringer Heights Elementary School and North Tapps Middle School are slightly under capacity (Table 4-13).

Table 4-13: Dieringer School District - Enrollment and Capacity

School	Capacity	2022-23 Enrollment	Percent Over/Under Capacity
Lake Tapps Elementary School	357	451	26%
Dieringer Heights Elementary School	508	472	-7%
North Tapps Middle School	536	521	-3%

Source: Enrollment: OSPI Report Card, 2023. Capacity: Dieringer School District Capital Facilities Plan, 2020.

The Dieringer School District establishes student generation rates for the purposes of facility planning, see Table 4-14.

Table 4-14: Student Generation Rates, Dieringer School District

School Type	Single Family	Multifamily
Elementary School	0.322	0.172
Middle School	0.13	0.07

Source: Dieringer School District Capital Facilities Plan, 2021-2026, 2020.

Based on Sumner's planned growth, the Dieringer School District is likely to serve more students in 2044 than it does currently (Table 4-15). There may be approximately 4 new students from housing growth in Sumner city limits including 3 elementary students and 1 middle school student.

Table 4-15: Dieringer School District: Student Growth 2020-2044

Preferred Alternative: Additional Students (10 new housing units in the City portion of district)	
Dieringer School District	4
<i>Elementary School</i>	3
<i>Middle School</i>	1

Source: Sumner-Bonney Lake School District 2022; Dieringer School District 2021; Sumner 2023; BERK 2023.

4.10 Transportation Facilities

Multimodal level of service standards are required for non-motorized transportation facilities, locally owned arterials, and transit routes that serve urban growth areas, to serve as a gauge to judge system performance and to help achieve the statewide goal of environmental justice. LOS standards establish the basis for the concurrency requirements in the GMA and are used to evaluate impacts as part of the State Environmental Protection Act (SEPA). Agencies are required to show concurrency—i.e., to “adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a transportation facility to decline below the standards adopted in the transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with development” (RCW 36.70A.070(6)(b)).

Vehicle

Level of service is both a qualitative and quantitative measure of roadway and intersection operations. Vehicle level of service uses an “A” to “F” scale to define the operation of roadways and intersections as follows:

LOS A: Primarily free flow traffic operations at average travel speeds. Vehicles are completely unimpeded in their ability to maneuver within the traffic stream. Control delays at intersections are minimal.

LOS B: Reasonably unimpeded traffic flow operations at average travel speeds.

LOS C: Stable traffic flow operations. However, ability to maneuver and change lanes may be more restricted than in

LOS B, and longer queues may contribute to lower-than-average travel speeds.

LOS D: Small increases in traffic flow may cause substantial increases in approach delays and decreases in speed.

LOS E: Significant delays in traffic flow operations and lower operating speeds.

LOS F: Traffic flows at extremely low speeds. Intersection congestion is likely, with high delays and extensive vehicle queuing.

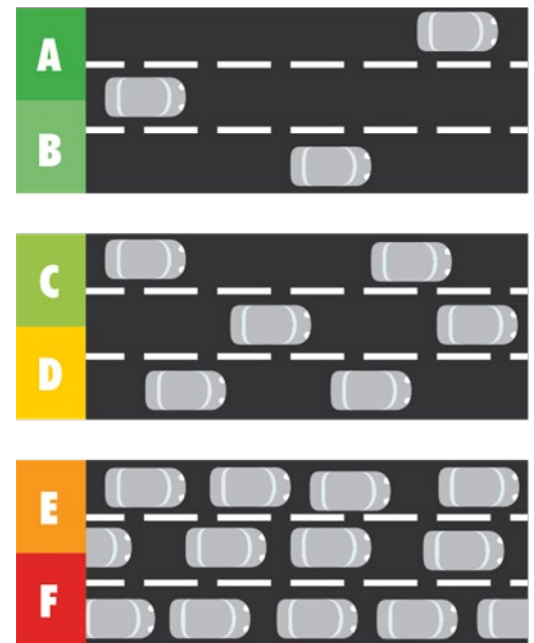


Figure 4-1: Illustration of Vehicle LOS

Sumner LOS Standards

Sumner has established intersection LOS standards. The standards are applied to the weekday PM peak hour and to other time periods as appropriate based on the type and location of development. The LOS standards are:

- Signalized, Roundabout, and All-way Stop Controlled Intersections
 - LOS D based on average performance of all traffic movements consistent with the current HCM method:
 - Exception is LOS F at the following:
 - Traffic Avenue/Main Street/Fryar Avenue (Signal)
 - Main Street/Alder Avenue (Signal)
 - Valley Avenue East/Main Street (Signal)
 - West Valley Highway East/Valley Avenue/Sumner Heights Drive (Signal)
- Two-way, Stop Controlled, Unsignalized Intersections
 - LOS D or better based on the average delay per vehicle for each approach or separate traffic movement at the intersection using the latest methodologies in the Highway Capacity Manual

- Exception allows left turns and through movements on side streets intersecting with arterials to operate below the adopted LOS D standard when the LOS affects relatively low traffic volumes and may not meet warrants for traffic signals.

State Highway LOS Standards

The City of Sumner is served by SR 167 and SR 410. SR 167 is classified as a Highway of Statewide Significance (HSS). Per WSDOT's Highway Systems Plan, the LOS standards for HSS facilities are set forth by State law. State law sets LOS D for HSS facilities in urban areas and LOS C for HSS facilities in rural areas. Since SR 167 is located within the Sumner urban area, the LOS D standard applies. GMA concurrency requirements do not apply to HSS facilities, per State legislation.

SR 410 is a State Highway of Regional Significance, Tier 2. The level of service standard for regionally significant state highways in the central Puget Sound region is set by PSRC in consultation with WSDOT and the region's cities and counties. PSRC established LOS D for SR 410 in Sumner. PSRC notes that it will measure the level of service for regionally significant state highways on a one-hour PM peak period basis. Furthermore, PSRC notes that local agencies will need to decide whether to apply concurrency to state highways of regional significance.

Traffic Operations

Traffic operations were evaluated based on intersection operations and the HCM methodology consistent with the existing conditions analysis. Intersection improvements were assumed based on the transportation improvement list outlined at the beginning of this. Traffic signal timing was optimized in consideration of changes that would occur with intersection maintenance to address growth in traffic volumes.

Overall, the analysis finds that most of the study intersections operate at LOS D or better during the weekday PM peak hour with the projected growth. Table 4-16 summarizes the existing and projected operations at intersections where further review and potential improvements may be needed. The key finding of the analysis is that the city should consider potentially changing the adopted LOS standards. The 2015 Comprehensive Plan LOS policy changed the LOS standard to F at several intersections where operations were forecast to be LOS F with little or no feasible improvement projects. Due to shifts in traffic patterns and decreases in traffic volumes, operations at some intersections have improved. In addition, feasible improvements can be identified at intersections that are projected to operate at LOS E or F.

Table 4-16: Weekday PM Peak Hour LOS Summary

Intersection	Current LOS Standard	2023 Existing			2044 Draft EIS Alternative 1/Preferred Alternative		
		LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Stewart Road SE/Butte Avenue SE	D	F	186	SB	C	33	-
E Valley Highway E/Forest Canyon Road E	D	F	>180	WB	F	>180	WB
Puyallup Street/Tacoma Avenue	D	C	19	-	F	84	-
E Valley Highway E/Elm Street E	D	D	30	NBL	F	57	NBL
Valley Avenue/Elm Street E	D	D	31	NBL	E	43	NBL
Sumner Heights Drive E/W Valley Highway E	F	C	29	-	D	41	-
Traffic Avenue/Main Street	F	D	43	-	E	58	-
Alder Avenue/Main Street	F	B	11	-	B	14	-
Valley Avenue/Main Street	F	C	23	-	C	32	-
Parker Road E/Main Street E	D	C	24	SB	F	56	SB
160th Avenue E/Main Street (60th Street E)	D	C	16	-	E	47	-
Sumner-Tapps Highway E/SR 410 WB Ramp	D	F	61	WB	A	7	0.54

Intersection	Current LOS Standard	2023 Existing			2044 Draft EIS Alternative 1/Preferred Alternative		
		LOS ¹	Delay ²	V/C ³ or WM ⁴	LOS	Delay	V/C or WM
Valley Avenue/SR 410 EB Ramp	D	F	80	-	B	12	0.87
Valley Avenue/74th Street E	D	F	110	EB	F	>180	EB

Source: Transpo, 2024.

Notes:

1. Level of service, based on 2010 Highway Capacity Manual methodology.
2. Average delay in seconds per vehicle.
3. Volume-to-capacity ratio reported for signalized intersections.
4. Worst movement reported for unsignalized intersections.

As shown in Table 4-16, the following intersections are anticipated to improve compared to existing conditions during weekday PM peak hour with the planned and funded improvements:

- **Stewart Road SE/Butte Avenue SE** - Completion of the traffic signal is anticipated to improve operations to LOS D
- **Sumner-Tapps Highway E/SR 410 WB Ramp** - The planned roundabout results in LOS A conditions
- **Valley Avenue/SR 410 EB Ramp** - The planned roundabout results in LOS B conditions

There are currently three intersections (Sumner Heights Drive E/W Valley Highway E, Alder Avenue/Main Street, and Valley Avenue/Main Street) that have a LOS F standard but are forecast to operate at LOS D or better during the weekday PM peak hour. One intersection, Traffic Avenue/Main Street, has a LOS F standard but is forecast to operate at LOS E.

The remaining intersections summarized in Table 4-16 are forecast to degrade below LOS D during the weekday PM peak hour. Most of the poor intersection operations during the weekday PM peak hour are projected along E Valley Highway and Valley Avenue. This is consistent with the observed regional cut-through traffic, which avoids congestion along SR 167 and uses routes through Sumner. Other intersections impacted by shifts in traffic and growth in the City of Sumner are the Parker Road E/Main Street E and 160th Avenue E/Main Street E intersections. Potential improvements at these intersections and the Traffic Avenue/Main Street intersection are discussed in Chapter 5.

Pedestrian

The pedestrian network has been identified through a series of Primary or Secondary Routes. Corridors identified as Primary or Secondary Routes are not indicative of a hierarchy or priority for future non-motorized transportation sidewalk facility development, rather they are used to make a distinction between routes that are more regional or that extend completely through the community (primary), and those that serve to make the second leg of the journey to connect to destinations, extend into neighborhoods, or complete a loop (secondary).

The sidewalk LOS standards shown in Figure 4-2 emphasize system completion of sidewalks, pathways, or multi-use trails on arterial and collector roadways. The LOS designations are shown in green, orange, and red.

A green LOS indicates a facility meets adopted roadway standards. An orange LOS indicates a facility has sidewalks on only one side of the roadway when both sides are the standard. A red LOS indicates no designated facilities are provided for sidewalk users and is considered unacceptable.

Figure 4-2: Pedestrian LOS Standard

LOS	Primary Route	Secondary Route
	Meets City standards, facilities on both sides	Meets City standards, facilities on one or both sides
	Facilities exist, but only on one side	N/A
	No facilities exist, does not meet standards	No facilities exist, does not meet standards

Source: Transpo Group, 2023

The City has established level of service standards for its pedestrian network based on the methodology in Figure 4-2 and the future network identified on Figure 4-3. A green LOS is the standard for secondary routes, while an orange LOS is the standard for primary routes. The city utilizes these standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the Sumner land use plan.

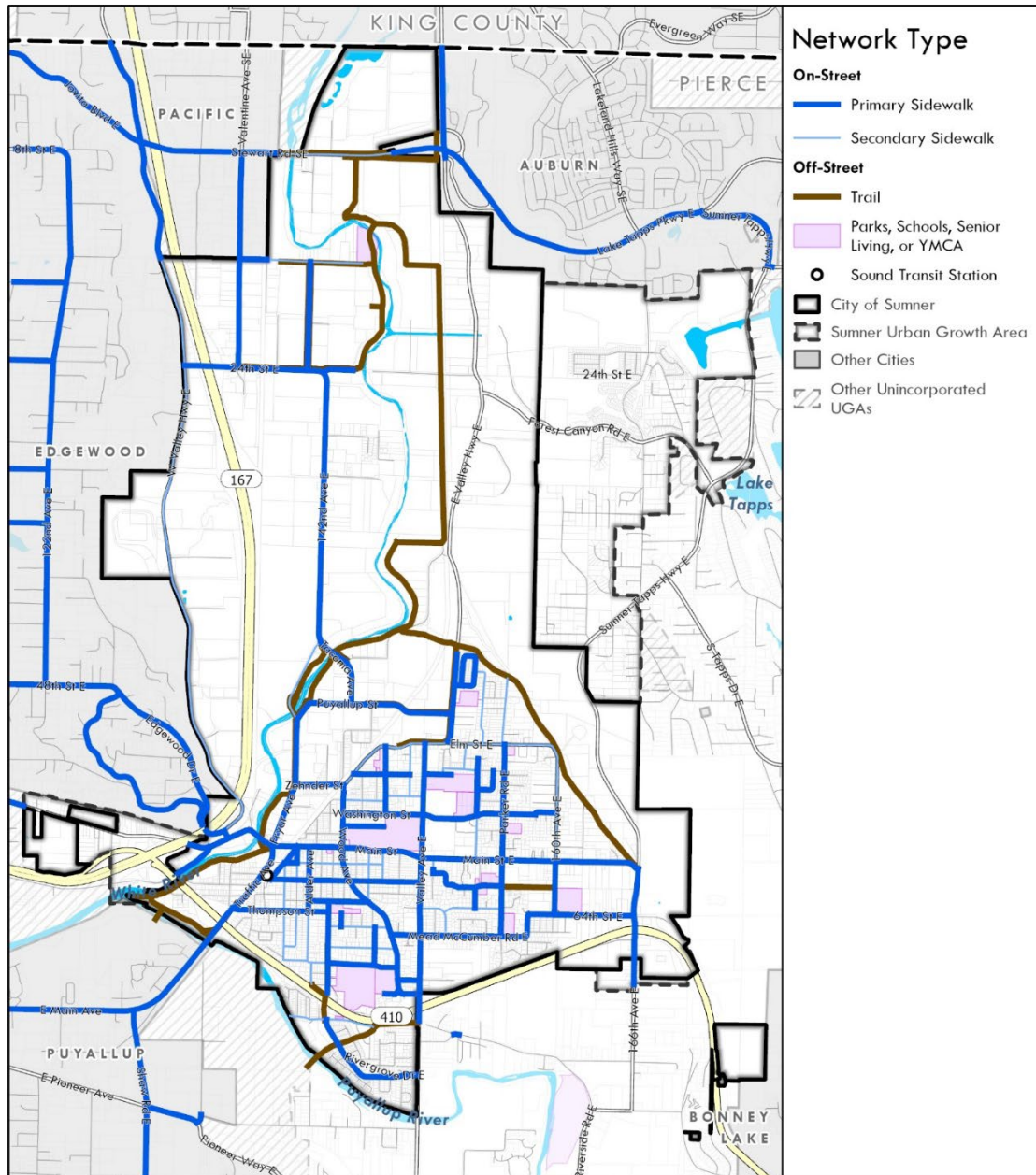
Applying the standards described above, the pedestrian LOS analysis is shown on Figure 4-5. The LOS is determined by comparing the 2044 future pedestrian network to the existing, planned, and funded pedestrian network. The pedestrian LOS analysis shows most of the future pedestrian network meets standard. There are some key connections to trails south of SR 410 that are missing as well as corridors such as Elm Street and 160th Avenue E that have missing sidewalks. The long-term project list identified in the Transportation Plan Chapter 5 would implement the orange LOS for primary routes and green LOS for secondary routes.

Bike

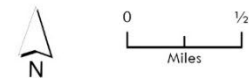
A future bike network was identified and is shown on Figure 4-4. The bike LOS was identified through an understanding of the availability of bike facilities along designated routes. Bike facilities could include sharrows, dedicated bike lanes, or protected bike lanes. A green LOS is the standard for the bike routes. Like the pedestrian LOS, Sumner utilizes these bike standards to prioritize investments in the non-motorized transportation network and identify where significant gaps in the system need to be addressed to serve the City's land use plan.

The LOS analysis for the bike network is shown on Figure 4-6. The LOS is determined by comparing the 2044 future bike network to the existing, planned, and funded bike network. The bike LOS analysis shows that bike connectivity east-west is limited and there is a lack of facilities within the east part of Sumner. The East Sumner Subarea Plan envisioned additional bike connectivity in this area as development occurred. The long-term project list identified in Table 6-7 would implement the green LOS for bike routes.

Figure 4-3: Future Pedestrian Network



CITY OF SUMNER
Future Pedestrian Network

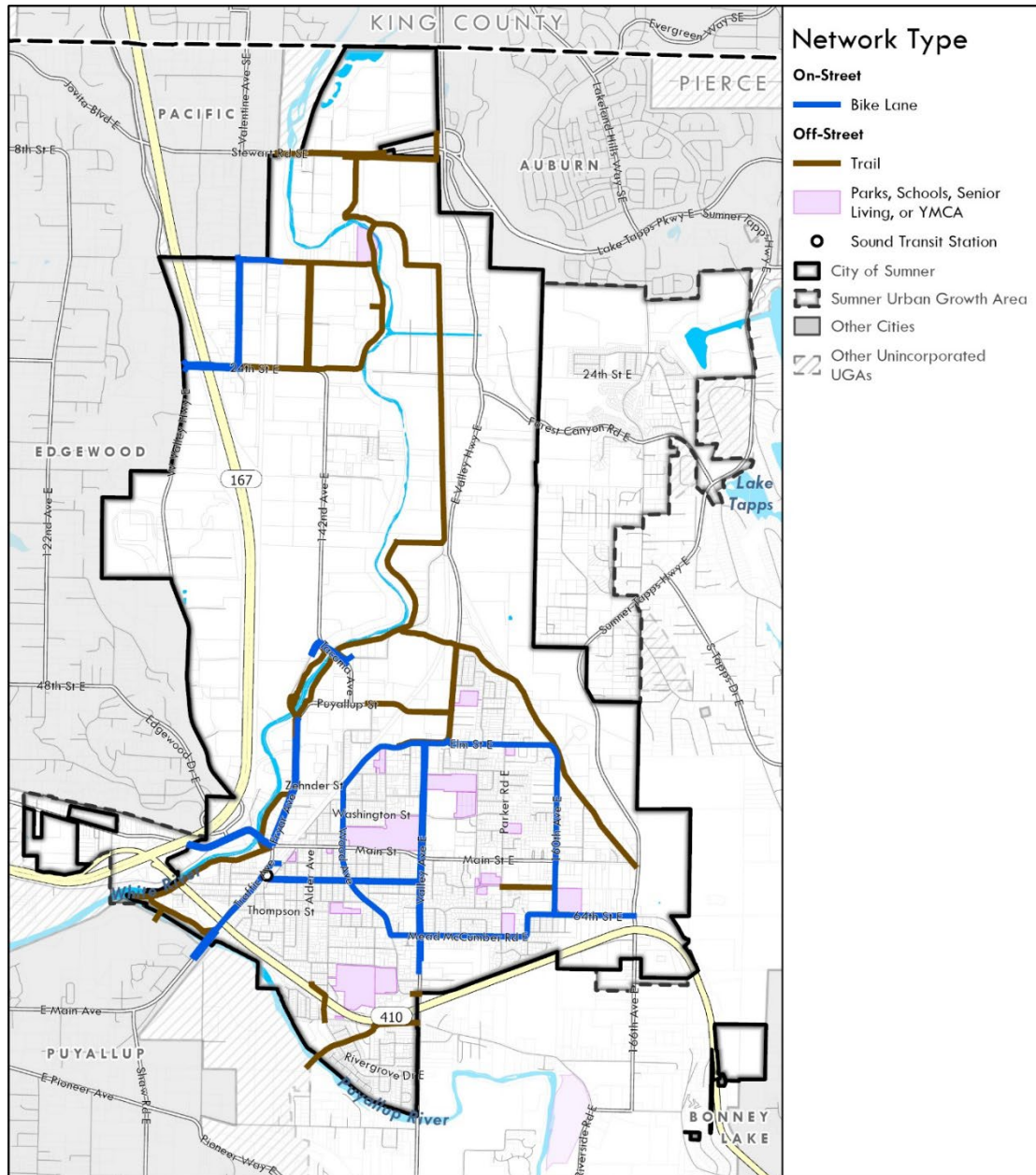


Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

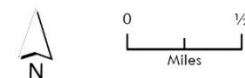
Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

Figure 4-4: Future Bicycle Network



CITY OF SUMNER Future Bike Network

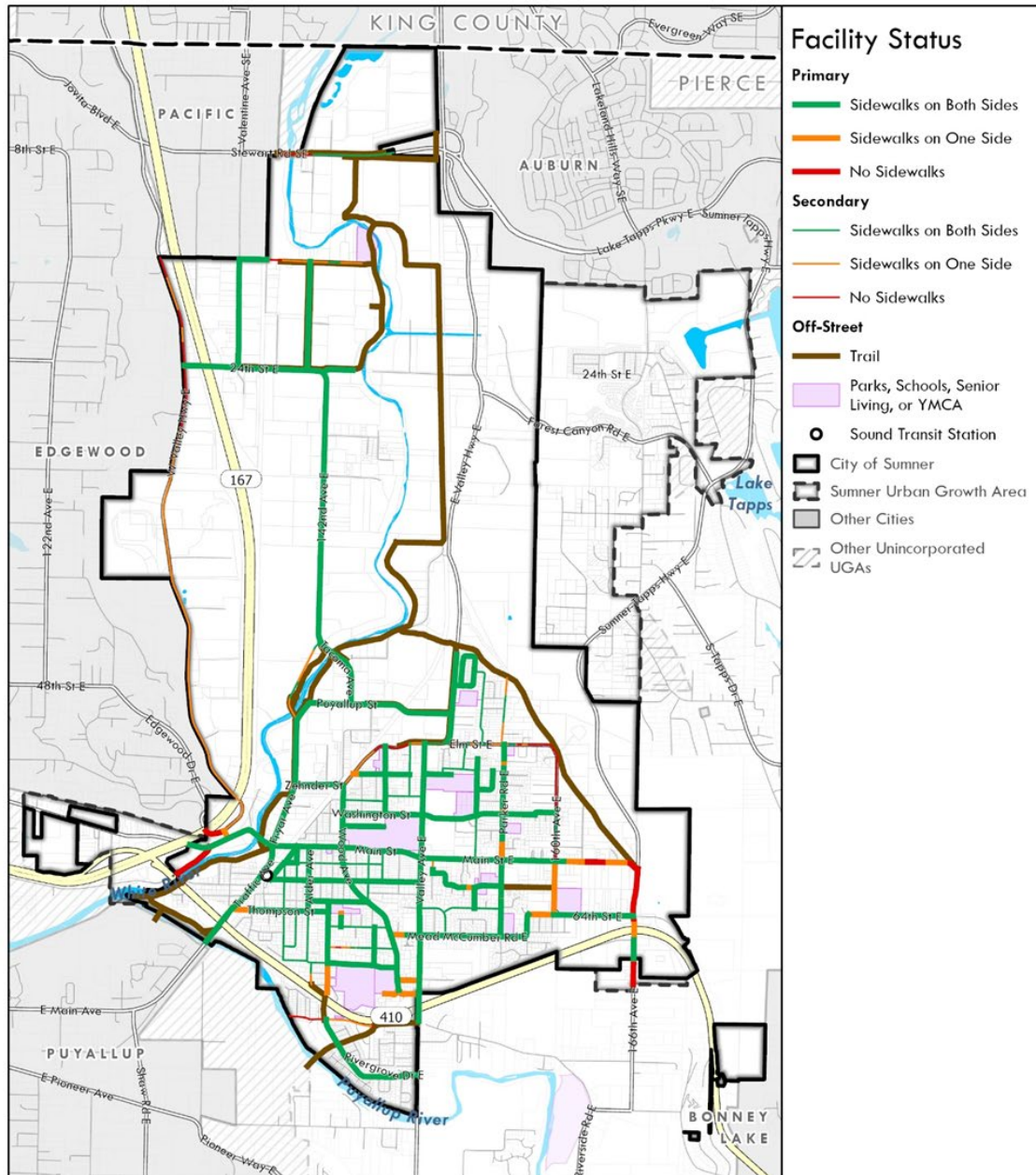


Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

Figure 4-5: Future Pedestrian Level of Service



CITY OF SUMNER

Future Pedestrian Level of Service



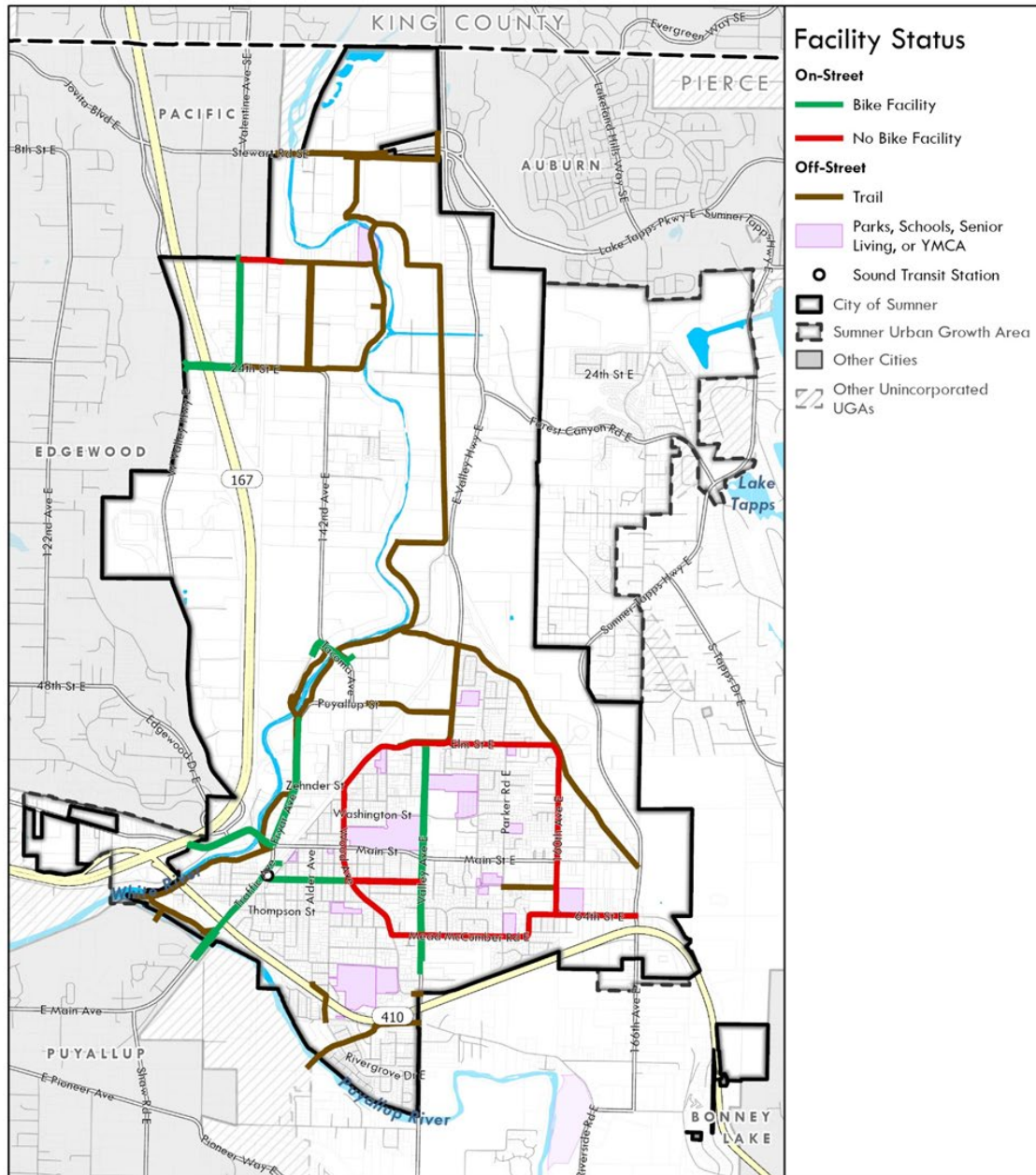
CITY OF SUMNER
WASHINGTON

Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

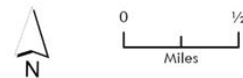
Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

Figure 4-6: Future Bike Level of Service



CITY OF SUMNER
Future Bike Level of Service



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

Chapter 5: Existing Deficiencies, Future Needs, and Recommendations

5.1 Introduction

The Capital Facilities Plan is required by GMA to identify deficiencies in capital facilities, which are not eligible for development impact fee support. City facilities that are deficient are those that do not now exist in number, size, or location to satisfy levels of service as set forth in City plans for its existing populations.

This chapter also identifies deficits that may occur in the future if new facilities are not added as the City grows through 2044 and recommendations to address these deficits.

5.2 General Government Facilities

Existing Deficiencies

There is currently a deficit of 1 police officer, as shown in Table 5-2. The City has also identified existing capacity issues for general government and police facilities. Space for general government is at capacity, with some staff working from temporary construction trailers. The Police Department has identified needs beyond office space provided in the current area at City Hall including secure evidence storage, prisoner holding cells, a BAC processing area, secure records storage, an exercise area, restroom, locker facilities, private interview rooms, and secure police vehicle storage and equipment storage.

Future Needs and Recommendations

There is expected to be a deficit of 6,537 square feet of general government buildings by 2044 based on the updated LOS and city population (see Table 5-1). Police facilities are expected to have a deficit of 3,812 s.f. Public Works Shops would also see a deficit by 2044 with the current facilities, but the City is in the process of replacing the existing shops with a new 83,050 square-foot facility, which exceeds 2044 needs.

Table 5-1: City Government Buildings LOS Deficits

	Required LOS (s.f./capita)	Exist. Area (s.f.)	2022 need (City Pop. 10,800)	2044 need (City Pop. 15,525)	Surplus/Deficit (s.f.)	
					2022	2044
General Government	1.36	14,577	14,577	21,114	-	(6,537)
Police	294 s.f./employee	7,654	7,654	11,466	-	(3,812)
Public Works Shops	1.80	17,136	19,440	27,945	(2,304)	(10,809)

Table 5-2: Police LOS Deficits

	Required LOS	Existing	2022 need (City Pop. 10,800)	2044 need (City Pop. 15,525)	Surplus/Deficit (s.f.)	
					2022	2044
Police Officers	2 per 1,000 population	21	22	31	(1)	(10)

10 additional police officers will also be needed to serve the 2044 population at 2 commissioned officers per 1,000 population.

If the City were to annex the UGA during the planning period, square footage and police officer needs would increase to 13,524 s.f. and 37 police officers.

5.3 Water Facilities

Existing Deficiencies

Deficiencies in the water system are identified in the 2020 Water System Plan, summarized in the excerpts below:

Distribution System

"The City plans to continue to expand the water system as development occurs. The City also has existing pipes that need replacement due to age, disrepair, or lack of capacity."

Source Improvements

"The City of Sumner's existing source water rights capacity is sufficient to meet the projected MDD through 2038. The City has filed application G2-30534 to increase the approved combined withdrawal rate from the West, South, and Central Wells from 1,250 gpm to 2,250

gpm. Pending approval of this application by 2024, the City will have sufficient production capacity to meet the source reliability criteria...”

Storage Improvements

“The City of Sumner has adequate storage capacity projected through 2038. Storage improvement projects detailed herein are not related to storage capacity, but address tank site and functionality improvements.”

Operations and Maintenance

“Although the City continues to operate and maintain the system, additional projects have been identified to increase the operational effectiveness of the system. The Water Use Efficiency Program also implements requirements for additional operations and maintenance projects.”

Future Needs and Recommendations

The Sumner Water System Plan anticipates growth to 2068 and associated strategies and investments. Growth assumptions for the 2068 high growth scenario in the Water System Plan are higher than the planned growth, and it is possible that the 2044 growth could be accommodated. Growth timing can be addressed through regular monitoring and capital planning, as the Water System Plan is updated every 6-10 years.

5.4 Sanitary Sewer

Existing Deficiencies

Table 7-3 in the 2020 Sanitary Sewer Plan describes existing gravity sewer deficiencies. There are no pump station or force main deficiencies.

Future Needs and Recommendations

The 2020 Sanitary Sewer Plan identifies projected deficiencies through 2038 (Section 7.8.4). Population and job growth to 2044 generally aligns with the projected growth rate through 2038 in the Sanitary Sewer Plan.

Chapter 10 of the 2020 Sanitary Sewer Plan lists capital projects to correct deficiencies and upgrade and expand the system. This includes a 20-year capital improvement program through 2038.

5.5 Stormwater Facilities

The 2020 Stormwater Capital Improvement Plan outlines recommended capital improvement projects based on existing deficiencies in the system.

5.6 Parks Facilities

Existing Deficiencies

No existing deficiencies for parks and recreation facilities are identified based on the 2024 Sumner resident equivalent population and minimum levels of service, as the level of service is based on 2024 conditions.

Future Needs and Recommendations

City population and job growth to 2044 is likely to result in deficits for active recreation facilities, informal recreation facilities, and parks.

The City will also need to invest \$1,652 per resident equivalent to meet the minimum LOS, which could amount to more than \$7.5 million for growth occurring through 2044.

To achieve the City's target LOS, Sumner would need to make further investments in active recreation facilities, informal recreation facilities, parks, and open space and tree canopy, in addition to targeted investments to ensure all residents have access to a park within a 10-minute walk. To meet the target level of investment of \$2,148 per resident equivalent, the City would need to invest more than \$9.8 million in the parks system through 2044.

5.7 Fire Facilities

Existing Deficiencies

Staffing at Station 113 meets the minimum recommended firefighters per the 2015 CFP. In 2022, EPFR's urban response was slightly below target levels of service.

Future Needs and Recommendations

The increase in number of calls requiring dispatch means that Station 113 may struggle to meet minimum levels of service in coming years. To meet LOS standards for first-due response units and minimum ERF through 2044, EPFR's staffing of fire stations serving the current area should be increased by at least 2 / 3 fire personnel.

For EPFR to achieve all the LOS standards necessary to accomplish critical tasking, mount an effective response force, and achieve acceptable response times, additional fire stations strategically located in the current plan area may also be required. Plans for additional stations are described in Chapter 6.

5.8 Public School Facilities

Sumner-Bonney Lake School District

Existing Deficiencies

As described in Table 4-9, Sumner High School, Daffodil Valley Elementary, and Maple Lawn Elementary are currently enrolled over their student capacity.

Future Needs and Recommendations

Based on school capacity, current enrollment, and projected additional students, the Sumner-Bonney Lake School District is expected to need to add capacity in Sumner before 2044, particularly for elementary and high school students. See Table 5-3.

Table 5-3: Sumner-Bonney Lake School District Projected Capacity Deficit/Surplus

School Type	Total Capacity (Students)	2022-2023 Total Enrollment (Students)	2044 Projected Additional Students (City only)	2044 Projected Total Students	2044 Projected Capacity Deficit/Surplus
Elementary School	935	1,126	413	1,539	(604)
Middle School	722	681	156	837	(115)
High School	1,260	1,844	113	1,957	(697)

Source: Sumner-Bonney Lake School District Capital Facilities Plan 2021-2027; BERK, 2024.

Note: The total student count and deficit/surplus accounts for existing students and growth in Sumner. It does not account for growth outside of city limits.

The Sumner-Bonney Lake School District updates its Capital Facilities Plan typically annually, which allows the district to plan for future capacity needs. The district will consider projected growth in Sumner and in other parts of the service area in planning future projects.

The 2021-2027 Sumner-Bonney Lake School District Capital Facilities Plan identifies a project in 2023 to add net capacity for 1,660 high school students at Sumner High School, which is expected to be enough capacity to serve growth through 2044 within Sumner city limits. However, Sumner High School serves areas outside of Sumner, and the district will need to consider how growth in those locations will affect capacity long-term. The school district also allows waivers from other schools, which will also affect facility planning.

No projects are identified by the district for middle school or elementary capacity increases in Sumner before 2027. The plan does anticipate districtwide needs for two more elementary

schools, a new middle school, and potentially new or expanded high school facilities beyond 2027. This facility planning is in part due to development of the Tehaleh planned community, located outside of Sumner.

Dieringer School District

Existing Deficiencies

As shown in Table 4-13, Lake Tapps Elementary school is already enrolled over capacity by 26 percent.

Future Needs and Recommendations

The Dieringer School District is also expected to need to add capacity by 2044. While growth in Sumner is expected to only add a few students (since most of Sumner is not within the Dieringer School District), there will be growth in other parts of the district that will further affect capacity. See Table 5-4.

Table 5-4: Dieringer School District Projected Capacity Deficit/Surplus

School Type	Total Capacity (Students)	2022-2023 Total Enrollment (Students)	2044 Projected Additional Students (City only)	2044 Projected Total Students	2044 Projected Capacity Deficit/Surplus
Elementary School	865	923	3	926	(61)
Middle School	536	521	1	522	14

Source: Dieringer School District Capital Facilities Plan, 2021-2026, 2020; BERK, 2024.

Note: The total student count and deficit/surplus accounts for existing students and growth in Sumner. It does not account for growth outside of city limits.

The Dieringer School District updates its Capital Facilities Plan every few years, which is an opportunity to plan for future needs. The district will consider impacts of growth in Sumner and in other parts of its service area in its capital facilities planning process. The district's 2020 plan identifies a project for a new elementary school ("Elementary #3"), adding capacity for 433 more students, which will help address elementary school needs. There are no projects identified through 2026 for capacity increases for middle schools—while growth in Sumner city limits is not expected to cause capacity issues, this growth combined with growth in other parts of the service area could cause a deficit. The district will need to address 2044 projected needs in their future Capital Facilities Plan updates.

5.9 Transportation Facilities

Existing Deficiencies

The Transportation Plan sets forth the current and future deficiencies in the city's transportation network. See the Transportation Improvement Program in **Appendix D**.

Future Needs and Recommendations

The Transportation Plan sets forth a list of 20-year Transportation Improvement Projects to address projected growth, shown in Table 6-7.

Chapter 6: Capital Facilities Plan Projects and Financial Plans

6.1 Capital Facilities Plan Projects

General Government Facilities

The City has identified several projects relating to general government facilities over the next six years (Table 6-1).

Table 6-1: General Government Facilities Capital Improvement Plan–2023-2028

Project	Funding Source	2023	2024	2025	2026	2027	2028	Total
City Hall - HVAC Replacement	Facilities Capital Fund	25,000	25,000	-	-	-	-	50,000
City Hall - Roof Replacement	Facilities Capital Fund	350,000	-	-	-	-	-	350,000
Senior Center - Exterior Painting	Facilities Capital Fund	40,000	-	-	-	-	-	40,000
		540,000	25,000	0	0	0	0	565,000

Source: Sumner 2023-2024 Budget.

The above projects do not add square footage to any facility and therefore do not impact LOS. However, the City's new public works facility, not included above, will also start construction in 2024-25, which will provide capacity above and beyond the adopted public works shops LOS for the projected 2044 population. As discussed above in Chapter 5, the City will also need to add square footage of general government facilities before 2044 to meet the adopted level of service. Additional police officers will also be needed.

The City will be considering options for increasing general government capacity that include expansion of existing facilities, acquiring land and building new facilities, or locating offices within other city facilities such as the planned Operations Facility or new events building at Heritage Park. These options need to be evaluated in a detailed facilities needs analysis that considers staffing demands, etc. Finally, funding plans for additional general government facilities will need to be considered based on the preferred options. There is not enough detail in the capital facilities plan to assess those details.

Water Facilities

The 2020 Capital Improvement Plan for water facilities (in the 2020 Water System Plan) has projects related to the distribution system, source improvements, storage, and operations and maintenance. The total for the 20 year duration of the Plan (2018-2038) is: \$32.88 million.

Appendix B contains the Water System Capital Improvement Plan and Schedule.

Sanitary Sewer

The 2020 Capital Improvement Program for sanitary sewer shows a number of projects in the 20-year planning period (2018-2038) including sewer line extension, replacement, and relocation; wastewater treatment upgrades; pump and equipment replacement; totaling \$8.81 million from 2018-2023 and \$17.75 million from 2024-2038.

Appendix C contains the 2020 Sewer Capital Improvement Plan and Schedule.

Stormwater Facilities

The 2020 Stormwater Capital Improvement Plan includes projects scheduled through 2026 and projects for after 2026. These projects include levee improvements, culvert replacements, and numerous other system improvements totaling \$82.7 million.

Table 6-2 contains the 2020 Stormwater Management Plan Capital Improvement Projects.

Table 6-2: Proposed Capital Improvement Projects, Stormwater

Capital Improvement Project	Project Priority ¹	Total Cost Year 2019	Year of Completion
CIP No. 1–Railroad Street Improvements	Medium	\$353,000	2023
CIP No. 2 – 63rd Street Court E Improvements	High	\$221,000	2022
CIP No. 3–151st Avenue E and 152nd Avenue E Improvements	Medium	\$918,000	2026
CIP No. 4–63rd Street Court E Improvements	Medium	\$293,000	2022
CIP No. 5–North 160th Avenue E Improvements	High	\$1,051,000	2022
CIP No. 6–Willow Street Interceptor and Tributary Improvements	Medium	\$2,098,000	2026
CIP No. 7–Meade McCumber Street Improvements	Medium	\$282,000	2025

Capital Improvement Project	Project Priority ¹	Total Cost Year 2019	Year of Completion
CIP No. 8–162 nd Ave E (Poole Road) Outfall Improvements	Low	\$143,000	After 2026
CIP No. 9–47th Street Court E Culvert Improvements (CEG Site E)	High	\$125,000	2024
CIP No. 10–160th Avenue E Culvert Improvements (CEG Sites H, I, 106 th Ave E)	High	\$1,451,000	2022
CIP No. 11–162nd Avenue E Culvert Improvements (CEG Sites J, K, L)	High	\$365,000	2024
CIP No. 12–East Main Street Culvert Improvements	High-Medium	\$41,000	2024
CIP No. 13–Salmon Creek Restoration	Medium	\$675,000	2024
CIP No. 14–64th Street E Culvert Improvements	High-Medium	\$675,000	2024
CIP No. 15–White River Levee Improvements	High-Medium	\$3,800,000	2024
CIP No. 16– 24 th Street Setback Levee	High-Medium	\$45,123,000	After 2026
CIP No. 17–Rivergrove Puyallup River Improvements	Medium	\$15,611,000	2026
CIP No. 18 - 24 th and 142 nd Intersection Treatment	High	\$171,000	2021
CIP No. 19 - Stewart Road Pond Repair and Enhancement (full project)	High	\$356,000	2022
CIP No. 20 - Treatment in Drainage District 11	Medium	\$98,000	2026
CIP No. 21 - Wood Ave Conveyance, Zehnder to 16 th	Low	\$157,000	After 2026
CIP No. 22 - Meade Ave improvements one block south of Main St	High-Medium	\$170,000	2023
CIP No. 23 - Sumner-Tapps Highway and 60 th Street East	High	\$100,000	2021
CIP No. 24 - SR 410/166 th Ave E I/C	Medium	\$4,427,000	2025
CIP No. 25 - Main Street and 160 th Ave	Medium	\$296,000	2023
CIP No. 26 - 62 nd St: 166 th Ave to 160 th Ave E	Medium	\$1,476,000	2022

Capital Improvement Project	Project Priority ¹	Total Cost Year 2019	Year of Completion
CIP No. 27 – Elm St: East Valley Highway to 160 th Ave East	Medium	\$1,063,000	2023
CIP No. 28 – Parker Road: 62 nd to 63 rd	Medium	\$114,765	2023
CIP No. 29 – Parker Road: Main to 50 th	Medium	\$583,000	2024
CIP No. 30 – Sidewalk Replacement Program	High-Medium	\$22,000	2024
CIP No. 31 – Volunteer Sidewalk Program	High-Medium	\$35,000	2024
CIP No. 32 – Mountain Circle Outfall Replacement	Medium	\$507,000	2024
Total Capital Asset Funds (Includes inflation) (City-funded only–exclude developer or LID-funded projects)		\$82,728,000	

Source: 2020 Stormwater Capital Improvement Plan

High = Completed 0-5 years; Medium = Completed 5-10 years; low = Completed within 10-20 years

Parks Facilities

Parks and Opens Space capital projects biennium are listed in Table 6-3 and are based on the adopted 2023-24 Sumner budget. Projects outlined in the budget include replacement of Rainier View Park playground, continued funding of improvements to Seibenthaler Park and the proposed Bennet Park property, and projects to replace playground equipment, add shelters and picnic areas, totaling \$5.13 million.

The City's Parks and Open Space Plan also identified capital projects through 2030, which are outlined in Table 6-4. Table 6-5 updates the project cost estimates with the most recent information and includes amounts potentially eligible to use impact fees. Impact fees can only be used for projects that add capacity to serve growth.

Table 6-3: Improvement Plan for Parks and Open Space — 2023-2028

Facility	Funding Sources	2023	2024	2025	2026	2027	2028	Total
Seibenthaler Park	Parks & Trail Capital		1,525,000					1,525,000
Loyalty Park Improvement		250,000						250,000
Rainier View Park		795,545						795,545
Bennett Park Property			868,170					868,170
TC: Heritage Park Remediation		860,000						860,000
Trails - Fryar Ave		453,696	378,696					832,392
		2,359,241	2,771,866	0	0	0	0	5,131,107

Source: Sumner 2023/2024 Adopted Budget

Table 6-4: 2024 Parks and Trails Plan Capital Projects

Site/Project	RCO*	2024	2025	2026	2027	2028	2029	2030
Rainier View								
Covered Court (Funded)	A, D, G, H, I	\$ 937,000						
Misc Site Improvements			\$ 100,000					
Heritage								
Alley	I, J, K		\$ 2,160,000					
Park & Playground	A, G, H, I				\$ 5,415,000			
Building	K					\$ 7,000,000		
Lucy V. Ryan								
Master Plan	A, K		\$ 25,000					
Demo			\$ 185,000					
Development	A, K			\$ 100,000				
Loyalty								
Drainage & Site Improvements	A, G, H, I		\$ 109,000					
Picnic/Shade Shelter	A, G, H, I		\$ 25,000					
Expansion & Parking	A, G, H, I		\$ 700,000					
Heath Sports								
Field	A, D, E, I			\$ 3,000,000				
Lighting	A, D, I			\$ 600,000				
Fencing	A, D, I			\$ 375,000				
Pump & Sk8	A, D, I							\$ 995,000
Picnic & Pathways	A, D, I				\$ 365,000			
Seibenthaler								
Site Improvements (phases)	A, D, F, G, H, I			\$ 3,750,000			\$ 3,750,000	\$ 2,910,529
ROW Improvements					\$ 352,700			
Bennett								
Site Improvements (phases)	A, D, F, G, H, I			\$ 2,250,000			\$ 3,575,000	\$ 2,792,317
Qunell								
Master Plan	A, D, F, G, H, I		\$ 35,000					
Site Improvements	A, D, F, G, H, I				\$ 1,090,000			
New & Expanding Parks								
Master Site Plan						\$ 200,000		
Acquisition						\$ 1,000,000		
Minimum Park Standard Investment						\$ 1,000,000		
TOTALS		\$ 937,000	\$ 3,339,000	\$ 10,075,000	\$ 7,222,700	\$ 9,200,000	\$ 7,325,000	\$ 6,697,846

A RCO WWRP Local Parks
 B RCO WWRP Trails
 C RCO WWRP Habitat
 D RCO Youth Athletic Facilities
 E RCO Community Outdoor Athletic Facilities
 F RCO Land Water Conservation Fund

G RCO No Child Left Behind
 H RCO Outdoor Learning Grants
 I Sumner Park Impact Fees
 J Sumner Transportation Improvement Program
 K Dept. of Commerce Economic Development Grant

Source: Sumner 2024 Parks & Trails Plan.

Table 6-5: Updated Park Project Estimates and Impact Fees

Project	Park	Updated Estimate (2024\$)	Amount Potentially Eligible for Impact Fees
Covered Court (Funded)	Rainier View	\$937,000	\$0 (already completed)
Misc Site Improvements	Rainier View	\$100,000	\$0
Alley	Heritage	\$1,673,412	\$1,673,412
Park & Playground	Heritage	\$1,253,458	\$1,253,458
Building	Heritage	\$11,700,000	\$0
Master Plan	Lucy V. Ryan	\$75,000	\$0
Demo	Lucy V. Ryan	\$185,000	\$0
Development	Lucy V. Ryan	\$100,000	\$100,000
Drainage & Site Improvements	Loyalty	\$109,000	\$0
Picnic/Shade Shelter	Loyalty	\$25,000	\$25,000
Expansion & Parking	Loyalty	\$700,000	\$700,000
Field	Heath Sports	\$3,000,000	\$1,000,000
Lighting	Heath Sports	\$600,000	\$0
Fencing	Heath Sports	\$375,000	\$0
Pump & Sk8	Heath Sports	\$1,200,000	\$1,200,000
Picnic & Pathways	Heath Sports	\$365,000	\$91,250
Site Improvements (phases)	Seibenthaler	\$9,756,000	\$3,219,480
ROW Improvements	Seibenthaler	\$352,700	\$0
Site Improvements (phases)	Bennett	\$10,157,000	\$10,157,000
Master Plan	Qunell	\$35,000	\$0
Site Improvements	Qunell	\$1,090,000	\$1,090,000
Master Site Plan	New & Expanding Parks	\$200,000	\$0
Acquisition	New & Expanding Parks	\$1,000,000	\$1,000,000
Minimum Park Standard Investment	New & Expanding Parks	\$1,000,000	\$1,000,000
Total		\$45,988,570	\$22,509,600

Fire Facilities

A voter-approved bond passed in 2018 in the East Pierce Fire and Rescue district. This bond made it possible for EPFR to upgrade or re-construct five fire stations in the district. In Autumn 2021, station 118 broke ground and is near completion. Construction of Bonney Lake Fire Station (headquarters) began in Autumn 2022 and is anticipated to be completed in early 2024. Two more stations, Station 117, and Station 114 will begin construction in 2023 and fire station 124 is slated for a renovation in 2024. A Full list of EPFR projects and their status can be found on the EPFR website or below in Table 6-6.

Table 6-6: Improvement Plan for Fire and Emergency Services — 2023 - 2024

Station	Status	Cost Estimate	Estimated Date of Completion	Notes
118	Under Construction	8,367,000	2023	Construction of new 17,100 sq. foot fire station and apparatus storage area
111	Under Construction	18,950,000	2024	Construction of new 36,000 sq. foot, two-story fire station with administrative offices for EPFR headquarters and fire apparatus storage.
117	Contract Awarded	9,266,000	2024	Construction of new 16,000 sq. foot fire facility and fire apparatus storage area.
114	Contract Awarded	7,425,000	2024	demolition of existing fire station, construction of new 10,000 sq. foot fire station and apparatus storage area
124	Invitation to Bid out	N/A	2024	Kitchen, Electrical, and Plumbing renovations for Station 124.

Source: East Pierce Fire and Rescue 2018 Capital Facilities Plan

While none of the voter-approved bonds will go directly to Station 113 renovations, additional capacity, updated facilities, and new stations elsewhere in the district can increase the overall level of service within Sumner due to equipment, staff, and dispatch overlap. Most

recent data show that Station 113 was at 80%-unit reliability meaning that the station's staff responded to 80% of calls within the City of Sumner. The remaining 20% of calls were responded to from elsewhere in the fire district and updated facilities elsewhere in the district can help close the level of service deficits that are both ongoing and would be exacerbated in the coming decades without intervention.

[Public School Facilities](#)

The 2021-2027 Sumner-Bonney Lake School District Capital Facilities Plan is adopted in this plan by reference. Portion of qualifying improvements can be paid for through school mitigation fees. The fees are intended to cover the cost of development between the time of the impact and the time taxes from developed properties begin to cover costs. The City Council has elected to adopt the school mitigation fee and to determine how much the fee will be.

The district's financing plan shows various sources of funding identified for the District, including State school money and impact fees. Appendix E shows capital improvement projects planned for the next six years and their estimated costs and funding sources. The local funding sources listed in the capital projects and finance plan include bond revenue, impact fees, and other District funds. Longer-term capital projects are still in early planning phases and estimated costs and funding sources have yet to be determined.

The 2021-2026 Dieringer School District Capital Facilities Plan is also adopted in this plan by reference. The plan includes several capital projects to add student capacity and a summary of revenue sources and use of funds from 2020-2025.

Appendix E contains the summary of the Sumner Bonney-Lake School District and Dieringer School District calculations for school impact fees, which are collected through an ordinance adopted by the City.

[Transportation Facilities](#)

The 2024 Transportation Plan contains numerous transportation improvements and projects that will be necessary to maintain the level of service. The projects will be funded through a combination of federal, state, and local general fund monies.

Appendix D contains the Six-year Transportation Improvement Program. Table 6-7 includes a list of 20-year needs and costs from the Transportation Plan.

Table 6-7: 20-Year Transportation Improvement Projects and Costs

Map ID ¹	Title and Location	Description	Project Cost ²
SP1	E Valley Highway E/Forest Canyon Road E	Construction of a new signal or roundabout	\$3,000,000
SP2	Puyallup Street/Tacoma Avenue and overlay Puyallup Street to White River Bridge (WSDOT SUM-30)	Plane, repair, and overlay, complete intersection channelization improvements, add an eastbound left-turn pocket on Puyallup Street at Tacoma Avenue. Add a signal at the Puyallup Street/Tacoma Avenue intersection	\$2,600,000
SP3	E Valley Highway E/Elm Street E	New signal when warranted	\$1,500,000
SP4	Valley Avenue/Elm Street E	New signal when warranted	\$1,500,000
SP5	Traffic Avenue/Main Street	Add EB right-turn overlap. Convert W Main Street to one-way facility westbound.	\$150,000
SP6	Parker Road E/Main Street E	New signal when warranted	\$1,650,000
SP7	160th Avenue E/Main Street (60th Street E)	New signal or RAB when warranted	\$3,000,000
SP8	Valley Avenue/74th Street E	Add EB/WB left-turn restrictions. Shift WB left-turns to U-turning movement at Valley Avenue/SR 410 EB Ramp RAB	\$75,000
SP9	Sumner Tapps Highway/60th Street E	Signalization of the intersection. Construct EB right-turn lane	\$3,400,000
<i>Sport/Intersection Subtotal</i>			<i>\$16,875,000</i>
RW1	166th Avenue E Widening; SR 410 WB ramps to 64th St E (WSDOT SUM-24)	Widen to 4-5 lanes, includes new roundabouts at WB ramp and 64th Street E	\$19,000,000

Map ID ¹	Title and Location	Description	Project Cost ²
RW2	160th Avenue E; Main Street to 64th Street E	Improve and widen streets to minor arterial standards with bike paths and sidewalks	\$500,000
RW3	Valley Avenue; South City Limits to Main Street	Overlay existing roadway surface, ADA upgrades	\$1,850,750
RW4	Stewart Rd Corridor ITS improvements; SR 167 to Lakeland Hills (WSDOT SUM- 27)	Connect traffic signals and railroad crossings to coordinate signal timing	\$3,500,000
RW5	160th Avenue E; Elm St to Main Street	Improve to collector standards with curb, gutter, sidewalks on both sides, and bike facilities	\$2,900,000
RW6	Elm Street; E Valley Hwy to 160th Avenue E	Improve to collector standards with curb, gutter, sidewalks on both sides, and bike facilities	\$2,600,000
RW7	Parker Road E; 62nd Street to 63rd Street	Construct curb, gutter, and sidewalk on east side of street	\$250,000
RW8	Parker Road E; Main Street to Elm Street	Improve to collector standards with curb, gutter, and sidewalks on both sides	\$1,300,000
RW9	Zehnder Street; Pease Avenue to Wood Avenue	Railroad Crossing Improvements	\$1,000,000
RW10	162nd Avenue E Segment Extension; 64th Street to 60th Street	Construct 2-lane facility	\$3,000,000
RW11	164th Avenue Court E Segment Extension; 160th Avenue E to existing 164th Avenue Court E	Construct 2-lane facility	\$2,000,000

Map ID ¹	Title and Location	Description	Project Cost ²
RW12	Systemic Horizontal Curve and Roadway Departure Safety Improvements (WSDOT SUM-28)	East Valley Highway, West Valley Highway, Sumner-Tapps Highway/166th Avenue E, 142nd Avenue E/24th Street E. Install static and/or dynamic curve warning signs, speed feedback signs, centerline and edge lie profiled striping, rumble strips, reflective markers on-pavement as appropriate to delineate roadside objects, channelization, guardrail/roadway shouldering, and street lighting	\$903,000
-	Stewart Road SW: Butte Avenue SE to 140th Avenue Court E4	Widen to 5 lanes including a center two-way left-turn lane	-
		<i>Roadway Subtotal</i>	<i>\$38,803,750</i>
NM1	West Valley Highway Sidewalks	Complete missing sidewalk facilities on the east side between 16th Street E and SR 167 SB Ramps	\$1,000,000
NM2	16th Street E Ped/Bike	Construct ped/bike facilities between Valentine Avenue and 138th Avenue E	\$2,000,000
NM3	White River Restoration Tail	#9 Ditch to area north of 16th Street	\$3,000,000
NM4	Tacoma Avenue Trail	New trail facilities between the White River and 45th Street E	\$150,000
NM5	Salmon Creek Trail	New trail between current end at 149th Avenue E and Sumner-Tapps Highway E	\$3,000,000
NM6	Edgewood Drive Sidewalks	Complete missing sidewalk facilities between SR 167 and Sumner Heights Drive E	\$550,000
NM7	Fryar Avenue Trail (WSDOT SUM-17)	West Main Street to Puyallup Street	\$7,200,000
NM8	Zehnder Street/Elm Street Sidewalks	"Construct pedestrian and bike facilities. Bike lanes from Valley Avenue to Main Street Complete missing sidewalk facilities between Pease Avenue and Wright Avenue"	\$1,600,000
NM9	Academy Street Bike Facilities	Construct bike facilities between Wood Avenue and Valley Avenue E	\$800,000

Map ID ¹	Title and Location	Description	Project Cost ²
NM10	Wood Avenue/Meade McCumber Road	Construct bike facilities between Main Street E and Valley Avenue	\$1,800,000
NM11	62nd Street Court E Trail	Construct trail east of 62nd Street Court E between Parker Road and 160th Avenue E	\$1,000,000
NM12	Main Street E Sidewalks	Construct missing sidewalk facilities between 162nd Avenue E and Sumner-Tapps Highway E	\$575,000
NM13	Puyallup River Crossing	Over White River. Two-part project: 1. Study best location for trail crossing 2. Construct ped/bike trail crossing	\$4,000,000
NM 14	Construct sidewalks on one side of 72nd Street E	Between River Street and 143rd Avenue E	\$250,000
NM15	Rivergrove Pedestrian Bridge (WSDOT SUM-29)	Trail overpass connecting the vicinity of Alder Ave. to 143rd Ave. E over SR 410	\$11,200,000
NM16	Puyallup River Trail Bridge	Bridge and trail connections to the Foothills Trail. Trail overpass connecting 144th Ave E to 143rd Ave E	\$6,000,000
NM17	Mead McCumber Road/64th Street E Non-motor	Construct pedestrian and bike facilities between Valley Avenue E and Sumner-Tapps Highway	\$900,000
NM18	Sumner-Tapps Highway Sidewalks	Construct missing sidewalk facilities between Main Street E and the southern City Limits	\$1,000,000
NM19	Rainier Street Sidewalks	Construct missing sidewalk facilities between Sumner Avenue and Guptil Avenue	\$150,000
NM20	Traffic Avenue Pedestrian Signal (WSDOT SUM-25)	Replace existing pedestrian rectangular rapid flashing beacon with pedestrian signal	\$616,753
NM21	Alder Avenue Sidewalks	Construct pedestrian and bike facilities between SR 410 and Academy Street	\$950,000
NM22	Houston Road E Sidewalks	Construct pedestrian facilities between Valley Avenue E and the west City limits	\$850,000

Map ID ¹	Title and Location	Description	Project Cost ²
		<i>Non-Motorized Subtotal</i>	\$48,591,753
		Total	\$104,270,503

Notes for Table 6-7:

BOLD indicates a **new** project that has been identified based on the transportation analysis of the land use alternatives.

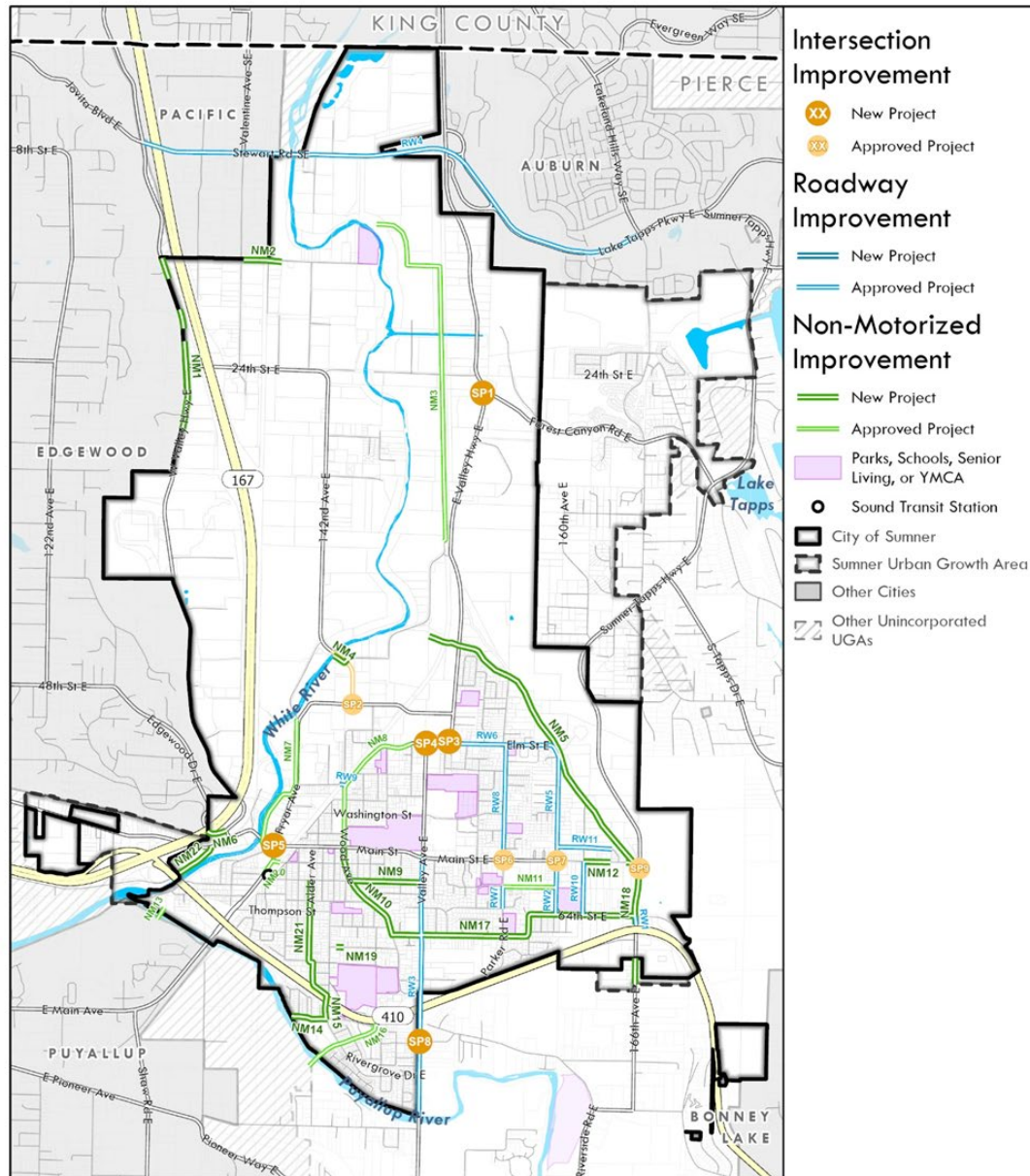
1. Map identification references to Exhibit 5-6, 20-Year Transportation Improvement Projects.

2. Project cost represents 2023 dollars. Source:
Transpo Group 2023

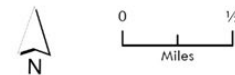
3. Identifies current WSDOT or grant funding.

4. This project is fully funded and will be completed before 2044; however, to remain eligible for transportation impact fees already set aside for the project, it is included on the 20-year project list.

Figure 6-1: 20-Year Improvement Projects



CITY OF SUMNER 20-Year Improvement Projects



Disclaimer: Map features are approximate only. The City of Sumner does not guarantee the accuracy of this map nor assume any liability from the use of or reliance on the information herein.

Map Date: February 2024

Source: City of Sumner, 2024; Transpo, 2024.

6.2 Financial Analysis

Overview

The revenue analysis of the Capital Facilities Plan supports the financing for providing facilities and services, as required by [RCW 36.70A.070\(3\)\(d\)](#). Revenue estimates, using assumptions that are based on historical trends, are used to represent realistic expectations for revenue that may be available for capital funding.

This revenue analysis looks at the City of Sumner's capital facility revenues for municipal services. Through identifying fiscal constraints in the future, and potential gap funding options, project prioritization can be incorporated into the capital planning process.

The revenue analysis provides an approximate forecast of future revenue sources. The numbers projected in this analysis are for planning purposes and do not account for sensitivities such as local, state, and federal policy, economic trends, and other factors.

Funding the Capital Facilities Plan

Estimated future revenues are projected for the Plan's 2024 – 2044 planning period, in year of expenditure dollars. The following revenue analysis is organized according to the following categories:

- **General Capital Revenues.** Revenues under the category of general capital revenues are the revenues required by law to be used for capital projects. The general capital revenues in Sumner consist of REET 1 and REET 2.
- **Dedicated Capital Revenues.** Dedicated revenues are required to be used for certain types of capital spending, outlined by the law. The dedicated capital revenues in Sumner include transportation impact fees, park impact fees, grants, interlocal awards, and other capital contributions.
- **Operating Transfers.** Operating transfers are revenue sources that are transferred to capital improvement funds from operating funds. Although these are not dedicated sources to be relied on for capital funding, it has been the historical practice of the City to regularly make transfers into capital improvement funds for projects. Any operating transfers from the General Fund for capital projects are defined through the regular biennial budget process.
- **Potential Policy Options.** There are additional policy tools and sources available to fund capital projects.

Assumptions

The assumptions used in this analysis may not align with the City's future budget assumptions around the same revenue sources as the purpose of the two analyses is different. The City's budget estimates how much money the City will have available for spending in the coming biennium while this CFP revenue analysis estimates how much revenue, that will be specifically allocated to capital projects, the City is likely to receive in total over the next six and 20 years.

The City's 2023-2024 budget identifies revenue sources for capital projects in this timeframe. Revenues are projected for 2025 to 2044 using various methodologies, depending on trends in historical revenues and best available information. These methodologies are as follows:

- Projecting revenues based on a historical per capita rate and growing based on population growth.
- Projecting revenues based on projected housing unit growth rates.
- Projecting revenues based on a constant historical value.
- Projecting revenues based on existing revenue projections.

Projected revenue amounts are shown in year of expenditure (YOE) dollars, meaning they are adjusted for future inflation. The inflation rate used in this analysis is 3.34%, which is the ten-year historical average inflation rate for Seattle-Tacoma-Bellevue. Population growth and housing unit growth is assumed to be consistent with projections outlined in the City's Comprehensive Plan Land Use Element.

General Capital Revenues

REET 1 and 2

Real Estate Excise Tax (REET) revenues are collected on property sales at the point of sale. They are required by law to be spent on capital projects. REET is based on the total value of real estate transactions in a given year, and the amount received annually can vary significantly based on fluctuations in the real estate market and trends in the economy.

Sumner is authorized by the state to impose two separate REET levies. REET 1 and REET 2 each allow for a levy of 0.25% on the assessed value of a sale, for a total tax of 0.5% of total assessed value. All proceeds must be used for capital spending or limited maintenance, as defined in [RCW 35.43.040](#). REET 2 is more restricted than REET 1, as it may not be spent on acquisition of land for parks, recreation facilities, law enforcement facilities, fire protection facilities, trails, libraries, or administrative or judicial facilities ([RCW 82.46.035](#)). REET 2,

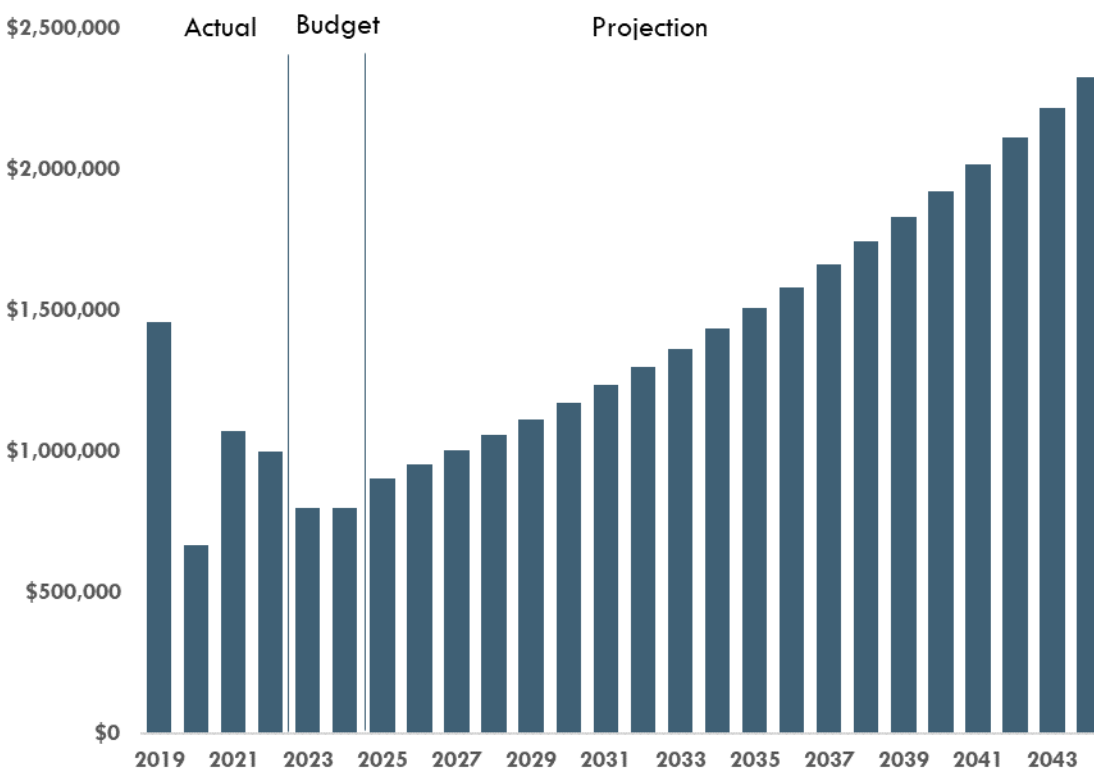
specifically, can only be levied by those cities and counties that are planning under GMA. For REET 2, the capital projects must be those specifically listed in [RCW 82.46.035\(5\)](#):

Public works projects of a local government for planning, acquisition, construction, reconstruction, repair, replacement, rehabilitation, or improvement of streets, roads, highways, sidewalks, streets and road lighting systems, traffic signals, bridges, domestic water systems, storm and sanitary sewer systems, and planning, constructions, reconstruction, repair, rehabilitation, or improvement of parks.

Sumner typically uses REET revenues to support City capital projects, leveraging REET funds as matches to generate successful grant applications from other sources.

REET revenues have historically averaged approximately \$840,000 annually from 2018 to 2022. The projections in Figure 6-2 are based on the historical average amount annually adjusted for inflation.

Figure 6-2: REET Revenues, 2019-2044 (YOE\$)



Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period; annual amounts shown above are not meant to reflect actual expected revenues in each specific year. Amounts are rounded to the nearest \$1,000.

Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Dedicated Capital Revenues

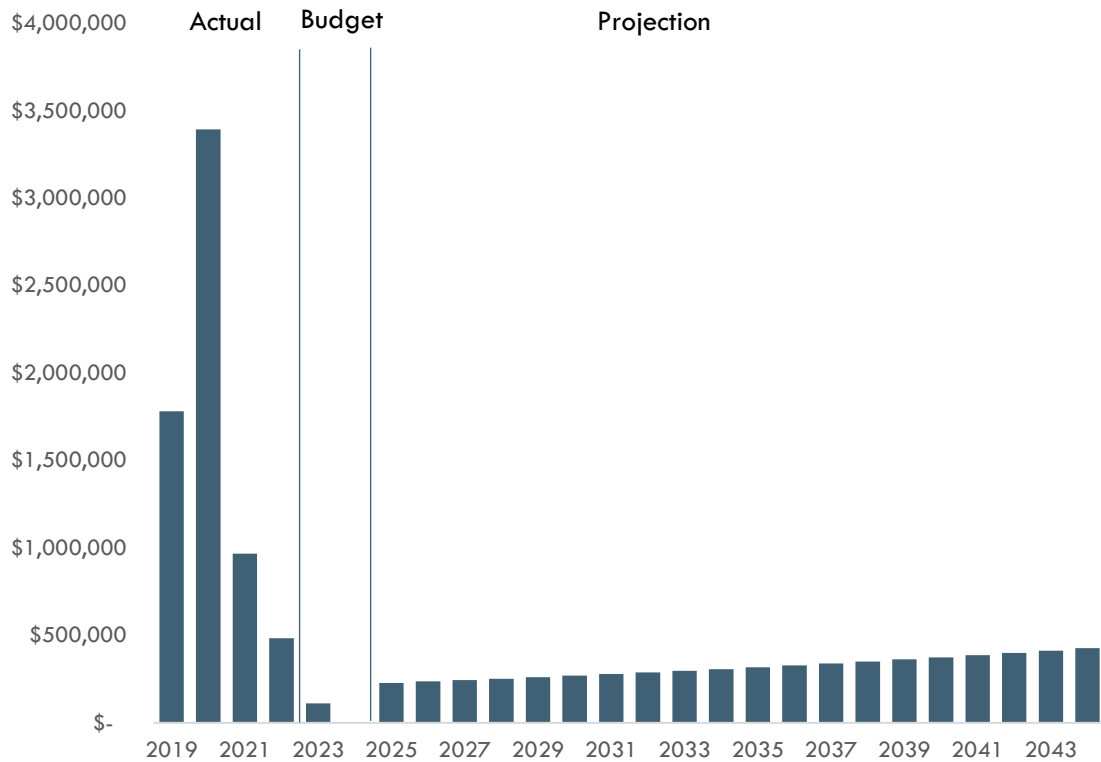
Transportation

The City has two capital funds for Transportation Projects: the Street Capital Fund and the Sidewalk Construction Fund. The Street Capital Fund accounts for capital expenditures relating to the City's transportation infrastructure. Funding sources for the Street Capital Fund include REET 1 and REET 2, impact fees, grants, and intergovernmental revenues from operating funds. The Sidewalk Construction Fund pays for sidewalk improvements and ADA-related projects. Funding sources for the Sidewalk Construction Fund include impact fees, grants, and intergovernmental revenues.

Transportation Impact Fees

Transportation impact fees are assessed on new development and used for projects to serve additional growth in the City. These revenues are collected in the Development Impact Fee Fund and transferred to the Street Capital Fund and Sidewalk Fund. Future transportation impact fee revenues are projected using the current (2024), single-family transportation impact fees (which are adjusted for inflation across future dates), and an estimate of annual housing units added through 2044. The Transportation Impact Fee is being adjusted in early 2025; see the 2025 Transportation Plan for details. This projection is relatively conservative because it is based on the development of housing units and does not include commercial or industrial development. The large amount of impact fee revenue collected between 2019 and 2022 reflects a higher level of development activity than is projected over the planning period. See Figure 6-3.

Figure 6-3: Transportation Impact Fee Revenues, 2019-2044 (YOE\$)

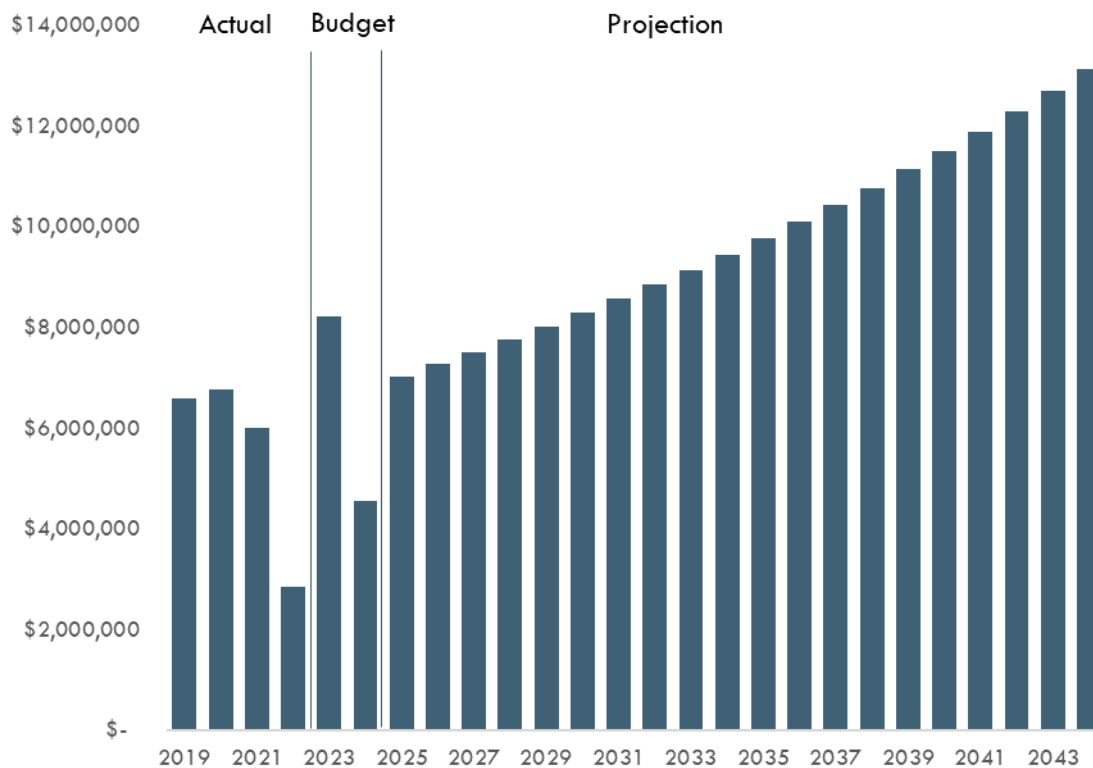


Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period; annual amounts shown above are not meant to reflect actual expected revenues in each specific year. Amounts are rounded to the nearest \$1,000. Future transportation impact fees are projected using past rates, which are being adjusted in 2025.
Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Transportation Grants

The City receives state and local grants to support transportation projects. These revenues have historically represented approximately \$659 per capita, on average, from 2018 to 2022. Projections are based on the per capita average amount, annually adjusted for inflation. See Figure 6-4.

Figure 6-4: Transportation Grant Revenues, 2019-2044 (YOE\$)



Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period; annual amounts shown above are not meant to reflect actual expected revenues in each specific year. Amounts are rounded to the nearest \$1,000.

Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Parks

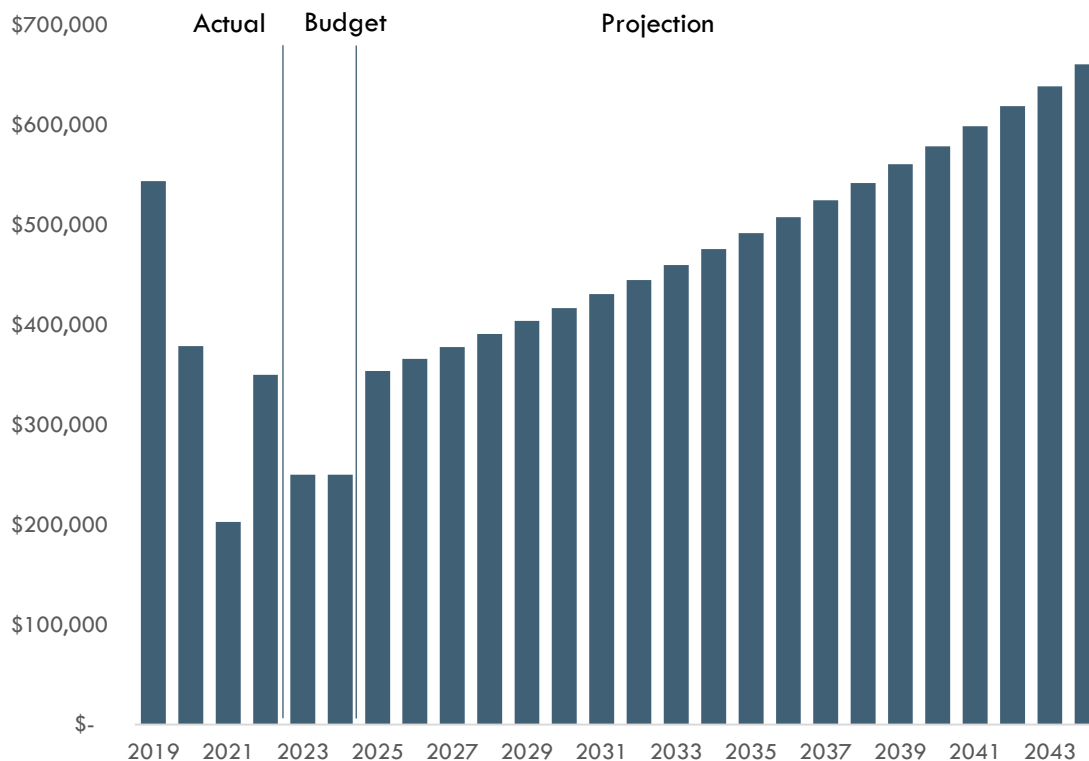
The City's Parks and Trails Capital Fund pays for parks and recreation capital projects. Funding sources for the Parks Capital Fund consist of REET 1 and 2, park impact fees, grants, and transfers in from operating funds.

Park Impact Fees

Park impact fees are collected on new residential dwelling units and on new commercial/industrial development. Park impact fees are restricted for the establishment of parks, open spaces, and recreational facilities to serve the expanding population of the city. These revenues are collected in the Development Impact Fee Fund and transferred to the Parks Capital Fund. Future parks impact fee revenues are projected using the current (2024), single-family park impact fees (which are adjusted for inflation across future dates) and an estimate of annual housing units added through 2044. This projection is relatively

conservative because it is based on the development of housing units and does not include commercial or industrial development. The Park Impact Fee is also expected to change in 2025 to reflect new analysis. The large amount of impact fee revenue collected between 2019 and 2022 reflects a higher level of development activity than is projected over the planning period. See Figure 6-5.

Figure 6-5: Park Impact Fee Revenue, 2019-2044 (YOES\$)



Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period; annual amounts shown above are not meant to reflect actual expected revenues in each specific year. Amounts are rounded to the nearest \$1,000. Future parks impact fees are projected using past rates, which are being adjusted in 2025.

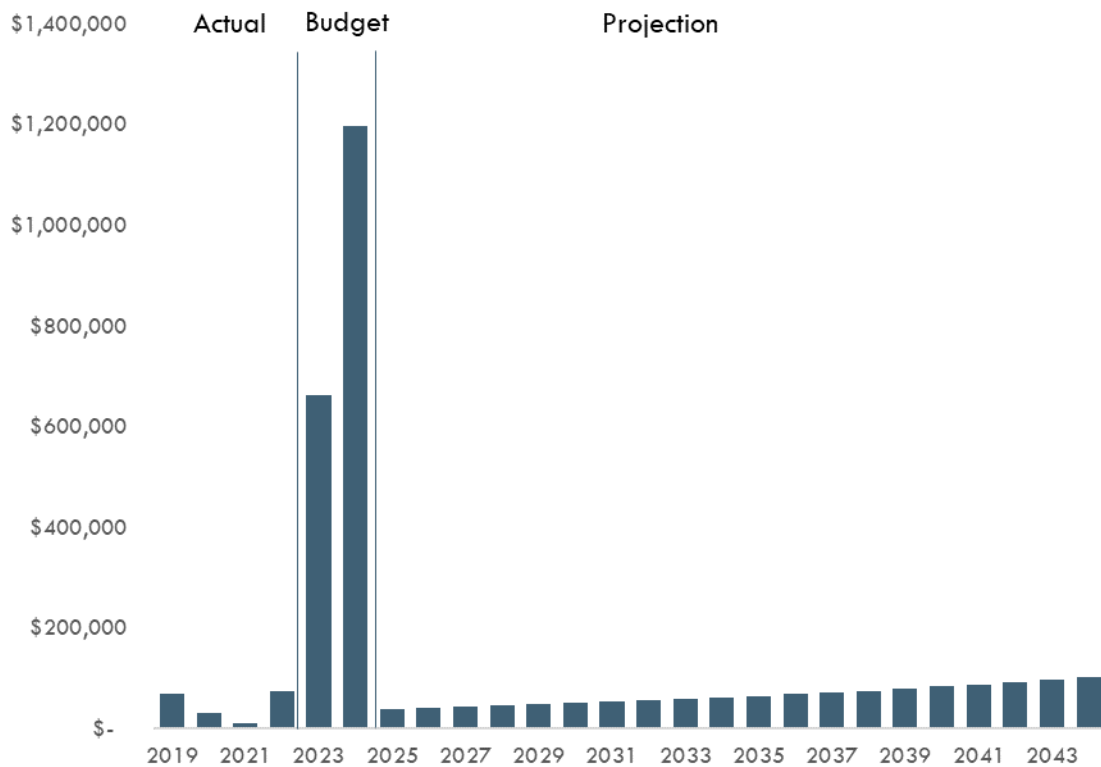
Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Parks Grants

The City receives state and local grants to support parks projects. These revenues have historically represented approximately \$4 per capita, on average, from 2018 to 2022. Projections are based on the per capita average amount, annually adjusted for inflation. See Figure 6-6. Grant revenue can vary significantly from year to year. The City is including a large amount of grant revenue from the State and Pierce County in the 2023-2024 budget. Future

projections reflect the historical average, which is smaller than this budgeted amount. The City noted that recreation grants are competitive and that Sumner does not always score highly when projects are reviewed.

Figure 6-6: Parks Grant Revenues, 2019-2044 (YOE\$)



Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period; annual amounts shown above are not meant to reflect actual expected revenues in each specific year. Amounts are rounded to the nearest \$1,000.

Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Six-Year Cost and Revenue Comparison

This six-year comparison looks at the total dedicated revenue sources with the City's planned project costs for the six-year planning horizon of 2024-2029 in order to understand the difference between future dedicated capital costs and potential future revenues. This analysis is done for the six-year period rather than the 20-year period because project lists are constantly evolving, and a longer-term outlook would provide an increasingly less accurate estimate of a potential funding gap or surplus.

Table 6-8 details total estimated dedicated capital revenues and total estimated dedicated capital costs for the City over the six-year period. The City is projected to have sufficient revenues to pay for planned capital projects over the six-year period. Impact fees for transportation and parks are also expected to change in early 2025 to reflect new analysis and be better aligned with projected needs based on growth (see adopted Transportation Plan and Park Impact Fee Rate Study for details). The project costs reflect budgeted expenditures in the City's 2023-2024 budget and do not include costs from parks and transportation planning documents.

Table 6-8: Projected Total Capital Revenues and Costs, 2024-2029 (YOE\$)

Category	Revenues and Costs
Estimated General Capital Revenues	\$5,841,000
Estimated Transportation Dedicated Capital Revenues	\$59,208,000
Estimated Parks Dedicated Capital Revenues	\$3,723,000
Total Capital Revenues Available	\$68,772,000
Total Capital Costs	\$31,202,000
Estimated Funding Surplus / (Deficit)	\$37,570,000

Notes: Projections shown above are designed to estimate expected cumulative revenues for the planning period. Amounts are rounded to the nearest \$1,000. Analysis is based on 2024 adopted transportation and park impact fees, which are expected to change in 2025.
Sources: City of Sumner, 2023; City of Sumner 2023 - 2024 Biennial Budget; BERK, 2023.

Policy Options and Other Funding Sources

There are additional policy tools and sources available to the City to fund capital projects. These policy tools and sources include:

- **Property Tax Levy Lid Lift.** Per [RCW 84.55.050](#), cities may increase property taxes by more than one percent with a levy lid lift. A levy lid lift occurs when taxing jurisdictions with a tax rate less than their statutory maximum rate ask voters to increase their tax rate to an amount equal to or less than the statutory maximum rate, effectively lifting the lid on the levy rate. Levy lid lifts are authorized through public vote, which requires a simple majority to pass. The use of the revenue would be defined at the time of the vote but could fund capital improvements or maintenance.
- **Special Taxing Districts.** The City could establish a special taxing district to collect additional revenue for capital projects or maintenance. One option is a Metropolitan Park District (MPD), which is formed to manage, maintain, or acquire park and recreation

facilities. The formation of an MPD requires voter approval. It is funded by a regular property tax levy. Another option is a Transportation Benefit District (TBD), which is funded by a vehicle license fee and/or a sales tax. TBD revenue may be used for transportation improvements included in a local, regional, or state transportation plan. Improvements can range from roads and transit service to sidewalks and transportation demand management. Construction, maintenance, and operation costs are eligible.

- **Automated Traffic Safety Cameras.** The City could use automated traffic safety cameras to detect violations.
- **Bonds.** The City has used and can use bonds to support capital facilities funding. The City anticipates issuing debt in the 2023-2024 budget to fund the Public Works Operations Facility.
- **Local Improvement District/Road Improvement District (LID/RID).** The City has the authority to create LIDs and RIDs. These are districts used to levy additional property tax to cover debt service payments on the sale of bonds purchased to finance projects within the district. Revenues from the levy must be used for local, clearly defined areas where the landowners are being assessed the additional tax benefit. LIDs, by law, can be used for water, sewer, and stormwater projects. RIDs may be used for road funding and street improvements.
- **State Infrastructure Authorities.** The City has options for creating specialized authorities to fund public infrastructure, such as Public Facility Districts and Public Development Authorities. These authorities each have specific purposes and formation requirements. In 2021, the Washington State Legislature authorized local jurisdictions to form tax increment financing (TIF) districts. Under this new authority, the City can have up to two TIF districts at any one time. As authorized, TIF districts can collect incremental increases in property taxes within a defined area to pay for public improvements.
- **Grants.** State and Federal grant programs can be pursued for competitive regional priorities for infrastructure investments. Pursuing grant opportunities requires resources, and success is not guaranteed.
- **Public-Private Partnerships.** Public-private partnerships are joint agreements between a governmental jurisdiction and private corporation (including 501(c)3s). Public-Private Partnerships have legal requirements and issues of control that must be considered on a case-by-case basis. Washington State's constitutional restriction on public entities giving or lending funds and credit to private enterprises requires that public entities need to

demonstrate that any partnership with a private entity will generate public good worth more than the value provided to the private entity.¹

- **Development Project Mitigation.** Under the Washington State Environmental Policy Act, the City can require mitigation measures from individual private development projects. These mitigation measures can take the form of fees, specified public infrastructure, or changes to project design.

Appendix "A" Glossary of Terms

Adequate public facilities. Facilities that have the capacity to serve development without decreasing levels of service below locally established minimums.

Assessed Valuation. Refers to how much the total real estate and personal property within a jurisdiction is worth. The value is established by the County Assessor at 100% of appraised market value and adjusted by the State to account for variations in assessment practices among counties.

Available public facilities. Facilities or services are in place or that a financial commitment is in place to provide the facilities or services within a specified time. In the case of transportation, the specified time is six years from the time of development.

Bonding. Is the act of issuing the debt to finance capital projects and other expenditures.

Budget. A plan of financial operation embodying an estimate of proposed expenditures for a given period and the proposed means of financing them.

Capital Program. A plan for capital expenditures to be incurred each year over a fixed period of years to meet capital needs arising from the long-term work program or otherwise. It sets forth each project or other contemplated expenditure in which the government is to have a part and specifies the full resources estimated to be available to finance the projected expenditures.

Centennial Clean Water Program ("CCWP"). In 1986, legislation was passed that provides grants to public entities for financing water pollution control activities and facilities to protect surface and underground water from pollution. In addition, a State revolving loan program was established to provide loans or combinations of grants/loans to finance public facilities.

Community Park. Those parks so designated in the City of Sumner Parks and Recreation Plan.

Concurrent or Concurrency. Means that adequate public facilities are available when the impacts of development occur. This definition includes the two concepts of "adequate public facilities" and "available public facilities" as defined above.

Councilmanic General Obligation Debt. Councilmanic bonds refer to bonds issued with the approval of the Council, as opposed to voted bonds, which must be approved by vote of the public. Councilmanic bonds must not exceed 0.75 percent of the assessed valuation and voted bonds 1.75 percent.

Debt Limit. The maximum amount of gross or net debt that is legally permitted under state law. Debt is an obligation resulting from the borrowing of money.

Development Activity. Any construction or expansion of a building, structure, or use any change in use of a building or structure, or any change in the use of land, that creates additional demand and need for public facilities.

Encumbered. To reserve, set aside, or otherwise earmark, the impact fees in order to pay for commitments, contractual obligations, or other liabilities incurred for public facilities.

Enterprise Fund. Governmental services supported mainly by rates and user fees. A fund established to account for operations: (a) that are financed and operated in a manner similar to private business enterprises - where the intent of the governing body is that the costs (expenses, including depreciation) of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital, maintenance, public policy, management control, accountability, or other purposes (i.e. (water, sewer, stormwater).

Fee in Lieu of Charge ("FILO"). Charges are contributions made by developers toward future improvements of City facilities resulting from the additional demand on the City's facilities generated from the development. See also **Mitigation Fees.**

General Obligation Debt. Debt that will be repaid mainly by taxes and other general governmental revenues. This debt includes limited and unlimited general obligation bonds, capital leases, and other notes and contracts issued with the full faith and credit of the government.

Guaranty Fund. A fund established by a bond issuer that is pledged as security for the payment of one or more bond issues. Normally used for Local Improvement Districts (LID).

Impact Fee. A fee assessed on new development that creates additional demand and need for public facilities.

Infiltration of stormwater. Groundwater that seeps into the wastewater collection system through pipe cracks, faulty joints, and faulty manholes.

Inflow of stormwater. Consists of water that may enter the wastewater system through illegal connections such as roof gutters, area drains, catch basins, and unplugged clean out openings.

Infrastructure. The underlying foundation, especially the basic installations and facilities on which the continuance and growth of a jurisdiction depends, i.e., streets, and roads, sewer, and water systems.

Latecomer Fees. Fees paid by developers or future service users for their share of past improvements financed by others.

Leasing. A financing technique whereby ownership of the project or equipment remains with the financing entity, and where title may or may not transfer to the City at the end of the lease.

Levy Lid. A statutory restriction on the annual increase in the amount of property tax a given public jurisdiction can assess on regular or excess levies.

Local Improvement District ("LID"). A method of carrying out a specific improvement by allocating the costs among the benefiting properties. The project is usually financed through a long term bond issue, the repayment of which is mainly from the collection of special assessments from the benefiting properties.

Mitigation Fees. Contributions made by developers toward future improvements of City facilities resulting from the additional demand on the City's facilities generated from the development. See also **Fee in Lieu of Charge.**

Public Facilities. The capital facilities owned or operated by the City or other governmental entities.

Public Works Trust Fund ("PWTF"). A low-interest revolving loan fund that helps local governments finance critical public works needs. To be eligible for trust fund financing, the applicant must be a local government entity that has a long-term plan for financing public works needs. If the applicant is a city or county, it must be imposing the optional one-quarter percent real estate excise tax for capital purposes. Eligible projects include streets and roads, bridges, storm sewers, sanitary sewers, and water system. Loans will only be made for the purpose of repairs, replacement, reconstruction, or improvements of existing eligible public works systems to meet current standards and to adequately serve the needs of the existing populations. New capital improvement projects are not eligible. The maximum loan amount has been one million with a minimum local match of ten percent. Interest rates vary from one to three percent, depending on the match.

Real Estate Excise Tax ("REET"). A tax upon the sale of real property from one person or company to another.

Revenue Bonds. Bonds whose principal and interest are payable exclusively from earnings of an enterprise fund.

Special Assessment. A compulsory levy made against certain properties to defray part or all of the cost of a specific improvement or service deemed to primarily benefit those properties. See also **Utility Local Improvement District**.

System Improvement. Public facilities included in the Capital Facilities Plan and designed to provide service within the community, in contrast to project improvements.

Transportation Improvement Account ("TIA"). Provides funding for transportation projects through two programs: The urban program and the small cities program. Urban projects must be attributable to congestion caused by economic development or growth. They must be consistent with State, regional, and local transportation plans (including transit and rail) and be partially funded by local contributions. Through its urban program project selection process, the TIA requires multi-agency planning and coordination and public/private cooperation to further the goal of achieving a balanced transportation system in Washington State. Small cities program projects are primarily selected on the basis of pavement condition and substandard roadway width. Funding is 1-1/2 cents a gallon on the State gas tax.

Transportation Improvement Board ("TIB"). The purpose of the TIB is to administer funding for local governments for transportation projects. Revenues are from the State fuel tax, local matching funds, and private sector contributions.

Utility Local Improvement District ("ULID"). Created for improvement to sewer, water, and other utilities and differs from a LID in that all assessment revenues is pledged for payment of debt service of bonds issued to finance the improvements. See also Special Assessment.

Appendix "B" 2020 Water System Plan Capital Improvement Plan

Table 8-1 Capital Improvement Plan Schedule ⁽¹⁾													
Project Number - Description	Total Cost	Year of Completion											
		2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029-2038
Distribution System Improvements													
D1 - 8th Street East and East Valley Highway Loop	\$600,000		\$600,000										
D2 - Riverside Drive and 151 st Avenue	\$680,000	\$60,000	\$620,000										
D3 – Autoclave Meters and Vault	\$100,000		\$100,000										
D4 - Viewpoint Tank to 171 st Avenue Court East	\$1,040,000							\$150,000		\$890,000			
D5 - Water Main Replacement Program	\$10,000,000		\$250,000	\$750,000	\$250,000	\$750,000	\$250,000	\$750,000	\$250,000	\$750,000	\$250,000	\$750,000	\$5,000,000
Subtotal	\$12,420,000	\$60,000	\$1,570,000	\$750,000	\$250,000	\$750,000	\$250,000	\$900,000	\$250,000	\$1,640,000	\$250,000	\$750,000	\$5,000,000
Distribution System Extensions													
D7 – Extend from 149 th Avenue to East Valley Highway	\$1,024,240										\$102,424	\$409,696	\$512,120
D8 – East Valley Highway from Salmon Creek to CTI	\$3,100,000						1,550,000	1,550,000					
Subtotal	\$4,124,240	\$0	\$0	\$0	\$0	\$0	\$1,550,000	\$1,550,000	\$0	\$0	\$102,424	\$409,696	\$512,120
Water Utility Construction with City Projects													
C1 – Bridge Street Bridge	\$256,780	\$206,780	\$50,000										
C2 – Stewart Road Bridge	\$435,000							\$435,000					
C3 – Lower White River Restoration Project	\$550,000		\$125,000	\$425,000									
C4 – 64 th & Sumner Tapps Highway Intersection (Design Only)	\$50,000		\$50,000										
C5 – Operations Facility	\$1,750,000		\$500,000	\$250,000	\$250,000	\$250,000	\$250,000	\$250,000					
Subtotal	\$3,041,780	\$206,780	\$725,000	\$675,000	\$250,000	\$250,000	\$250,000	\$685,000	\$0	\$0	\$0	\$0	\$0
Source Improvements													
S1 - Additional Water Rights Acquisition	\$4,845,500	\$41,000	\$200,000	\$200,000	\$744,000	\$3,660,500							
S2 - Central Well Treatment Capacity Expansion	\$2,630,000												\$2,630,000
S3 - South Well Improvements	\$770,000				\$770,000								
S4 - Dieringer Well Improvements	\$100,000												\$100,000
S5 - West Well Improvements	\$16,000									\$16,000			
S6 - Sumner Springs Improvements	\$63,000									\$63,000			
S7 - County Springs Improvements	\$500,000												\$500,000
Subtotal	\$8,924,500	\$41,000	\$200,000	\$200,000	\$1,514,000	\$3,660,500	\$0	\$0	\$0	\$79,000	\$0	\$0	\$3,230,000

Table 8-1 Capital Improvement Plan Schedule ⁽¹⁾													
Project Number - Description	Total Cost	Year of Completion											
		2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029-2038
Storage Improvements													
ST1 - Earthquake Control Valves and Foundation Improvements	\$2,400,000		\$270,000	\$2,130,000									
ST2 - Viewpoint BPS Improvements	\$200,000			\$200,000									
ST3 - North Tank Improvements	\$400,000						\$400,000						
ST4 - Viewpoint Tank Detention Pond	\$550,000									\$550,000			
ST5 – Springs Tank Improvements	\$340,000				\$340,000								
Subtotal	\$3,890,000	\$0	\$270,000	\$2,330,000	\$340,000	\$0	\$400,000	\$0	\$0	\$550,000	\$0	\$0	\$0
Operations and Maintenance Improvements													
O&M1 - Hydrant and Isolation Valve Upgrades - 20 Years	\$480,000		\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000					
Subtotal	\$480,000	\$0	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$80,000	\$0	\$0	\$0	\$0	\$0
TOTAL WATER FUND	\$32,880,520	\$307,780	\$3,060,000	\$4,035,000	\$2,434,000	\$4,740,500	\$2,530,000	\$3,215,000	\$250,000	\$2,269,000	\$352,424	\$1,159,696	\$8,742,120
Notes: 1) All OPCCs shown are in 2018 dollars. ENR CCI 10939.													

Appendix "C" 2020 Sewer Capital Improvement Plan and Schedule

Table ES-5 Opinion of Probable Project Costs, 6-Year CIP (2018-2024)		
CIP No.	Project	Opinion of Probable Project Cost
C-1	PS-2 Force Main Modifications	\$90,000 ¹
C-2	PS-2 Improvements	\$548,000 ¹
C-3	PS-10 Improvements	\$652,000 ¹
C-4	Pump Station Improvements	\$1,215,000 ¹
C-5	PS-8 AC Force Main Replacement	\$540,000 ¹
C-6	I/I Reduction and Rehabilitation	\$600,000 ²
C-7	Centrifuge Replacement	\$1,200,000 ²
C-8	WWTP O&M	\$1,200,000 ²
C-9	Solids Hauling Dump Trucks	\$500,000 ²
C-10	Portable Screw Sucker Pump	\$65,000 ²
C-11	Emergency Pipe Replacement	\$600,000 ²
C-12	Pretreatment Program Implementation	\$200,000 ²
Total Opinion of Probable Project Cost		\$7,410,000
Notes: 1) Opinion of probable project cost developed by BHC Consultants and included in Appendix G. 2) Opinion of probable project cost provided by the City.		

Table ES-6 Opinion of Probable Project Costs, 20-Year CIP (2024-2038)		
CIP No.	Project	Opinion of Probable Project Cost
C-101	PS-9 (160 th) Abandonment	\$560,000
C-102	PS-11 (16th Ave 1) Replacement	\$820,000
C-103	PS-12 (16th Ave 2) Replacement	\$800,000
C-104	PS-4 (Jansen) Replacement	\$830,000
C-105	PS-13 (Cannery) Replacement	\$910,000
C-106	PS-3 (Van Tassel) Replacement	\$1,000,000
C-107	PS-14 (Forest Canyon) Replacement	\$800,000
C-108	PS-1 (Tacoma) Replacement	\$1,000,000
C-109	PS-15 (North) Replacement	\$990,000
C-110	PS-16 (Mastro) Replacement	\$1,000,000
C-111	PS-2 (North) Replacement	\$1,610,000
C-112	PS-10 (142 nd) Replacement	\$1,830,000
C-113	I/I Reduction and Rehabilitation	\$1,400,000
C-114	WWTP O&M	\$2,800,000
C-115	Emergency Pipe Replacement	\$1,400,000
Total Opinion of Probable Project Cost		\$17,750,000

Implementation of the projects identified in Table ES-5 and Table ES-6 will allow the City to address the capacity, obsolescence, O&M, and redundancy limitations identified within the City's wastewater system based on the projected flows and loads over the 20-year planning horizon.

The opinions of probable cost herein are based on our perception of current conditions at the project location. This opinion reflects our professional opinion of current construction costs and is subject to change as the project design matures.

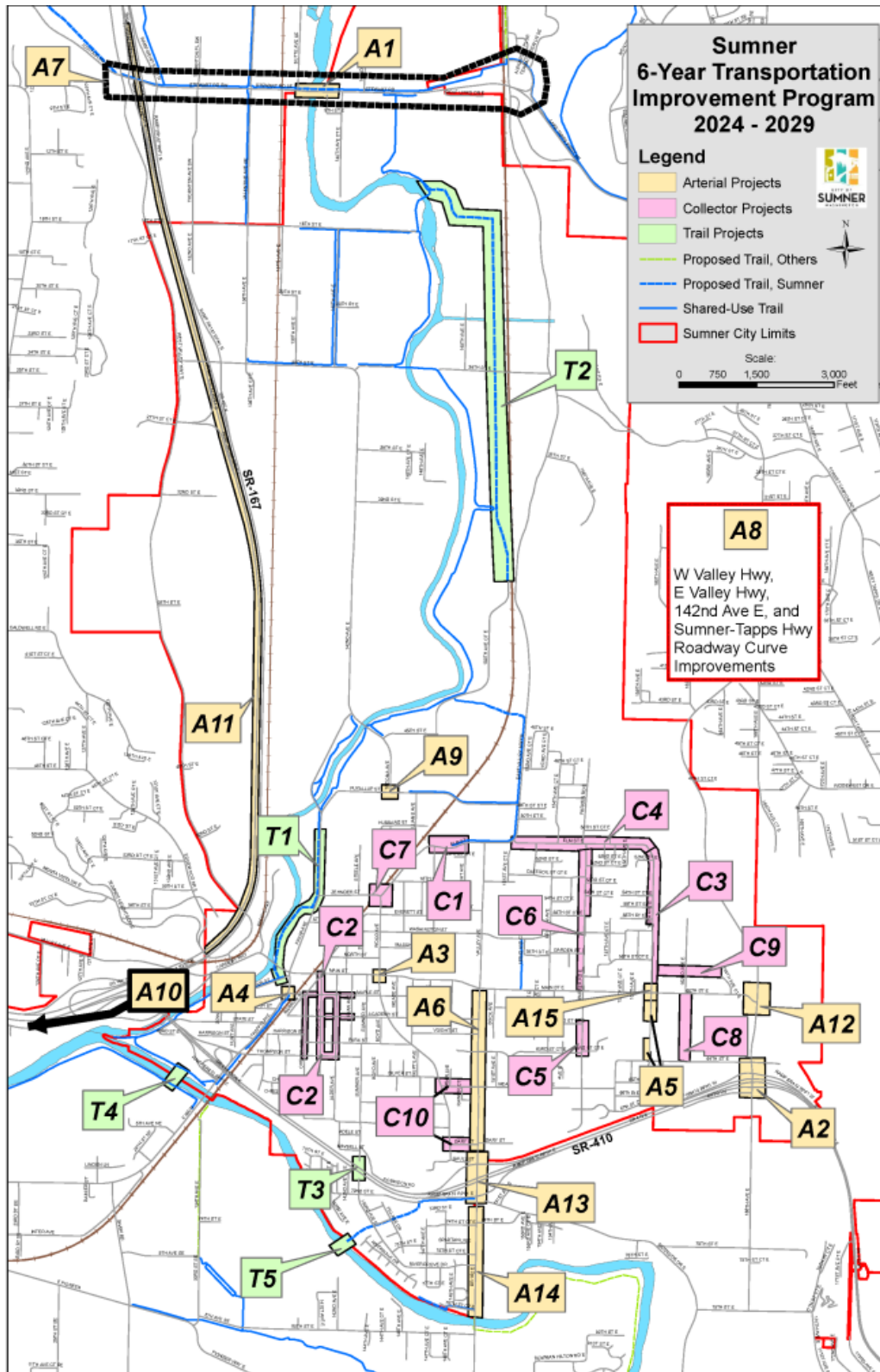
Table 10-1 6-Year CIP (2018-2024)							
CIP No.	Project	Type	Replacement	Upgrade	Expansion	Eligible for Connection Fee	Project Description
C-1	Collections Equipment	O&M		☒			▪ Purchase the following equipment: ○ ¾ Crew Cab ○ Utility truck replacement ○ 6" portable screw sucker pump ○ Camera van ○ Saw cut machine ○ Mud cart ○ Bigger roller ○ Skid steer rubber tracks ○ Small dump truck ○ 12-yard dump truck ○ Diesel gator addition ○ Articulating boom truck ○ Forklift ○ Valve exerciser
C-2	Golf Course STEP System	General			☒	☒	▪ Extension of the STEP system in the northeast of the City.
C-3	Radio System Conversions	Obsolescence	☒	☒			▪ Replace radio systems at lift stations to match current City standards.
C-4	LS-2 Electrical Control Panel	Obsolescence	☒	☒			▪ Replace panel with new above grade panel.
C-5	LS-6 Electrical Control Panel, Generator Panel, Hatch	Obsolescence	☒	☒			▪ Replace control panel, generator panel, and hatch.
C-6	LS-10 Pump Replacement	Obsolescence	☒	☒			▪ Replace one pump and two VFDs.
C-7	LS-11 Hatch Replacement	Obsolescence	☒	☒			▪ Replace hatch with ductile iron hatch.
C-8	LS-5, LS-8, and LS-9	Obsolescence	☒				▪ Replace obsolete equipment.
C-9	White River Restoration Project (LS-14 and Force Main)	General	☒				▪ Relocate sewer lines and LS-14 to accommodate White River Restoration project.

Table 10-1 6-Year CIP (2018-2024)							
CIP No.	Project	Type	Replacement	Upgrade	Expansion	Eligible for Connection Fee	Project Description
C-10	Bridge Street Bridge	General	☒				Extension of sanitary sewer infrastructure through the right-of-way disturbed during the construction of the Bridge Street Bridge Project.
C-11	410 and Traffic Avenue	Obsolescence	☒	☒			Replace asbestos concrete force main. A new bridge across SR410 in Traffic Avenue right-of-way is being built within the next several years that will substantially limit the ability to access and replace the forcemain and gravity sewer connected to the pump station from the west. Rehabilitation of this portion of the pipeline should be prioritized to occur with the bridge replacement.
C-12	64 th and Tapps Highway	Obsolescence	☒				Replacement of aging sanitary sewer collection and forcemain infrastructure in the vicinity of the 64th and Lake Tapps Highway intersection to be completed in conjunction with surface improvements planned for the area.
C-13	Insertable Flow Meter	O&M			☒		Purchase insertable flow meter to monitor flow in gravity collection system.
C-14	Pretreatment Program Implementation	O&M		☒			Consultant to implement a pretreatment program to establish local limits.
C-15	Wastewater Treatment Plant Upgrades	O&M, Obsolescence, Redundancy	☒	☒			- Access walkway onto digester roof - Replacement centrifuge dewatering scroll assembly - Equipment - Biosolids dewatering improvements - Headworks TOC analyzer - Headworks platform - Rechannel primary splitter box - Aeration basin (ORP monitor, baffles) - Dryer (Platform) - Electric swing gate - Operations building
C-16	Auto Lane Force Main Upgrade	Capacity		☒			This project replaces a 410 LF section of 2" force main extending from Auto Lane into the 4" force main within 166th Avenue East. The replacement force main will be upsized to a 4" diameter pipe. Cleanouts and valving will be installed in both the Auto Lane force main and the 166th force main allowing crews to jet the force mains.

Table 10-2 20-Year CIP (2024-2038)							
CIP No.	Project	Type	Replacement	Upgrade	Expansion	Eligible for Connection Fee	Project Description
C-101	PS-9 (160 th) Abandonment	Obsolescence	☒				▪ Abandon and demolish pump station. ▪ Install 800 feet of 8-inch PVC gravity sewer pipe to reroute flows to PS 5.
C-102	PS-11 (16 th Ave 1) Replacement	Obsolescence	☒		☒		▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Increase pump station capacity from 100 gpm to 130 gpm.
C-103	PS-12 (16 th Ave 2) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 100 gpm.
C-104	PS-4 (Jansen) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 130 gpm.
C-105	PS-13 (Cannery) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 213 gpm.
C-106	PS-3 (Van Tassel) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 250 gpm.
C-107	PS-14 (Forest Canyon) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 600 gpm.
C-108	PS-1 (Tacoma) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 400 gpm.
C-109	PS-15 (North) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 500 gpm.
C-110	PS-16 (Mastro) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 200 gpm.

Table 10-2 20-Year CIP (2024-2038)							
CIP No.	Project	Type	Replacement	Upgrade	Expansion	Eligible for Connection Fee	Project Description
C-111	PS-2 (North) Replacement	Obsolescence	☒				▪ Replace pumps and mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Replace wet well. ▪ Maintain existing firm capacity of 500 gpm.
C-112	PS-10 (142 nd) Replacement	Obsolescence	☒				▪ Replace mechanical equipment. ▪ Replace and upgrade electrical and control equipment. ▪ Maintain existing firm capacity of 2,280 gpm.
C-113	I/I Reduction and Rehabilitation	Obsolescence	☒				▪ Reduce I/I through a variety of means such as slip lining, cured-in-place pipe (CIPP), pipe replacement, manhole lining, and other methods.
C-114	WWTP O&M	Obsolescence	☒				▪ General WWTP improvements, including but not limited to roof replacements, painting, replacement of mechanical equipment, and replacement of electrical, instrumentation, and controls equipment.
C-115	Emergency Pipe Replacement	Obsolescence	☒				▪ Replace and repair broken pipes as needed.

Appendix "D" 2024 6-Year Transportation Improvement Program



Arterials

A1 – Stewart Rd (8th St) White River Bridge

Replace existing 2-lane bridge with new bridge with two unequal length spans. New structure will accommodate 4 vehicle lanes, a sidewalk, and a trail crossing.

- Location: Stewart Road at White River
- Total Cost: \$35,000,000
- Funded: Yes
- Planning: Complete
- Design: 2023
- ROW/Permit: 2023
- Construction: 2024-2027
- Remarks: Project funded by Federal STP Grant, FMSIB Grant, Pierce County, Port of Tacoma, TIB, Congressional Allocation, NHFP and City of Auburn.

A2 – 166th Ave E Widening

Widen 166th Ave E to 4-5 lanes through the identified corridor and improve lane configuration and intersection control at the two existing intersections.

- Location: SR 410 WB ramp terminals to just north of 64th St E
- Total Costs: \$18,000,000
- Funded: Partial
- Planning: Complete
- Design: 2022-2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Design is funded by Federal STP and Port of Tacoma Grants

A3 – Main St. and Wood Ave. Intersection Improvements

Construct pedestrian improvements and upgrade signal to current standards

- Location: Main St. and Wood Ave. intersection
- Total Cost: \$3,580,000
- Funded: Yes
- Planning: Complete
- Design: Completing in 2022
- ROW/Permit: Completing in 2022
- Construction: 2022-2023

- Remarks: Funding Secured. Project schedule for construction Summer 2022.

A4 – Maple Street Pedestrian Signal and Citywide Signal Backplates

Replace existing pedestrian-activated rectangular rapid flashing beacons with signal (expected to be a High Intensity Activated Crosswalk (HAWK) signal), add retroreflective back plates to upgrade signal heads citywide.

- Location: Traffic Avenue and Maple Street Ped Signal, Backplates Various Locations Citywide
- Total Cost: \$431,000
- Funded: Yes
- Planning: Complete
- Design: Complete
- ROW/Permit: Complete
- Construction: 2023 – 2024
- Remarks: Over 90% funded by a Highway Safety Improvement Program grant.

A5 – 160th Ave. E

Improve and widen streets to minor arterial standards with bike paths and sidewalks.

- Location: Main Street to 64th St. E.
- Total Cost: \$500,000
- Funded: No
- Planning: Complete
- Design: Complete
- ROW/Permit: Complete
- Construction: 2027
- Remarks: Sidewalk on east side of 160th completing in 2021. Remaining upgrades unfunded. Installing sidewalk on west side of 160th. Project is unfunded. Sidewalks on east side of 160th were completed in 2022.

A6 – Valley Avenue

Overlay existing roadway surface, complete required ADA upgrades

- Location: From SR 410 to Main Street
- Total Cost: \$1,500,000
- Funded: Partial
- Planning: Complete
- Design: 2025

- ROW/Permit: N/A
- Construction: 2026
- Received STP grant funding for the section between SR 410 and Meade McCumber.

A7 – Stewart Road Corridor ITS Improvements

Connect traffic signals and the railroad crossing to coordinate signal timing to increase vehicular traffic flow and reduce peak-hour delay.

- Location: Stewart Road from SR 167 toward Lakeland Hills
- Total Cost: \$3,500,000
- Funded: Partial
- Planning: Complete
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Received STP grant funding for design in 2025.

A8 – Systemic Horizontal Curve and Roadway Departure Safety Improvements

Install curve warning signs, speed feedback signs, rumble strips, profiled striping, reflective markers, guardrail, street lighting and shouldering to improve safety conditions on north-south roadways that have a history of vehicle departures

- Location: East Valley Highway, West Valley Highway, 142nd Ave. E, and Sumner-Tapps Highway
- Total Cost: \$903,000
- Funded: Yes
- Planning: 2023
- Design: 2024
- ROW/Permit: 2024
- Construction: 2026
- Remarks: Received HSIP funding to complete the project, reimbursing 100% of project costs

A9 – Puyallup Street and Tacoma Avenue Intersection Improvements

Evaluate intersection for an upgrade to a signal and provide sidewalks/ADA improvements.

- Location: Intersection of Puyallup Street and Tacoma Avenue
- Total Cost: \$1,500,000
- Funded: No

- Planning: Complete
- Design: 2023 - 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Seeking grant funding for design phase of the project.

A10 - SR 167 / I-5 Connection Project

WSDOT Gateway Program Project - The SR 167 Completion project will build the remaining four miles of SR 167 between Meridian and I-5, completing a long-planned connection to I-5. The project also includes a two mile connection from I-5 to the Port of Tacoma.

- Location: Puyallup to Fife
- Total Cost: \$1,000,000,000*
- Funded: Yes
- Planning: Complete
- Design: 2017-2025
- ROW/Permit: 2017-2025
- Construction: 2019-2030
- Remarks: WSDOT-led regional project. Sumner has agreed to commit \$500,000 as a local agency contribution to the project

A11 - SR 167

- Add southbound HOT lane
- Location: From SR 410 Interchange to 15th St SW (Auburn)
- Total Cost: Unknown*
- Funded: No
- Planning: Complete
- Design: 2023-2025
- ROW/Permit: N/A
- Construction: 2025-2027
- Remarks: This is a WSDOT-led project on a state highway. Sumner has not taken an active role in WSDOT's project and has not committed any funds to the project to date.

A12 - Sumner Tapps Highway/60th St E Intersection Improvements

Rebuild existing intersection to improve roadway geometrics and add a traffic signal to increase allowable movements

- Location: Sumner Tapps Highway and 60th St E Intersection

- Total Cost: \$3,400,000
- Funded: No
- Planning: 2026
- Design: 2027
- ROW/Permit: 2028
- Construction: 2029
- Remarks: Potential for partial funding through TIF.

A13- SR 410 / SR 162 Interchange Improvements

Construct a one-lane roundabout configuration at each of the interchange ramps.

- Location: Interchange ramps at SR 410
- Total Cost: \$6,650,000*
- Funded: Yes
- Planning: Complete
- Design: 2026
- ROW/Permit: 2028
- Construction: 2030
- Remarks: WSDOT-led project that will improve traffic flow at the existing interchange. Sumner has not taken an active role in WSDOT's project and has not committed any funds to the project to date.

A14 - Hwy. 162 Improvements

Construct one additional southbound lane on SR 162.

- Location: From southern city limits to SR410 EB On/Off Ramps
- Total Cost: \$7,400,000*
- Funded: No
- Planning: Complete
- Design: 2026
- ROW/Permit: 2028
- Construction: 2030
- Remarks: This is a WSDOT-led project on a state highway. Sumner has not taken an active role in WSDOT's project and has not committed any funds to the project to date.

A15 - Main Street and 160th Intersection Improvements

Evaluate intersection for an upgrade to a signal and provide sidewalks/ADA improvements

- Location: Main Street and 166th Ave E. Intersection
- Total Cost: \$2,000,000
- Funded: No
- Planning: 2026
- Design: 2027
- ROW/Permit: 2028
- Construction: 2029
- Remarks: This is a future project that will be evaluated in the coming years.

* Denotes that project is largely funded by WSDOT, and City has either committed a small percentage contribution or no contribution to date.

** Denotes that project is largely funded by City of Pacific, and Sumner has either committed a small percentage contribution or no contribution to date.

[Collector Street Program](#)

C1 - Elm Street Sidewalk Improvements

Extend the sidewalk on the north side of Elm Street to connect to Bonney Ave and Seibenthaler Park

- Location: Bonney Ave to Wright Ave
- Total Cost: \$550,000
- Funded: Yes
- Planning: Complete
- Design: 2023
- ROW/Permit: 2023
- Construction: 2024
- Remarks: Project funded by TIB grant.

C2 - Alder & Kincaid Utility Improvements Phase 2

Replacement of aging utilities in support of the Town Center Plan redevelopment.

- Location: Cherry Ave, Maple St and Academy St
- Total Cost: \$3,000,000
- Funded: Yes
- Planning: Complete
- Design: 2023
- ROW/Permit: N/A
- Construction: 2024-2025

- Remarks: Budget includes roadway restoration.

C3 – 160th Ave. E.

Improve 160th Ave. E. to Collector St. standards with curb, gutter and sidewalks on each side. Portions may be completed as parts of development prior to this time.

- Location: Elm St. to Main St.
- Total Cost: \$2,700,000
- Funded: partial by developers
- Planning: Complete
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Project partially completed by developers.

C4 – Elm St.

Improve Elm St. to Collector St. standards with curb, gutter and sidewalks on each side. Work will include storm drainage facilities and utility replacement

- Location: E. Valley Highway to 160th Ave. E.
- Total Cost: \$2,400,000
- Funded: partial by developers
- Planning: Complete
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Project partially completed by developers.

C5 – Parker Rd E

Construct curb, gutter and sidewalk on east side of the street

- Location: 62nd St. to 63rd St.
- Total Cost: \$250,000
- Funded: Partial
- Planning: Complete
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027

- Remarks: Funding will likely come from a combination of developer-built improvements, Street and Storm funds.

C6 – Parker Rd E

Reconstruct Parker Road to Collector St. standards with curbs, gutters, sidewalks, and drainage utilities. Portions have been completed by developer projects and sidewalk grants.

- Location: From Main St. to Elm St.
- Total Cost: \$1,300,000
- Funded: Partial
- Planning: Complete
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Funding will likely come from a combination of developer-built improvements, Street and Storm funds.

C7 – Zehnder St

Railroad Crossing Improvements to at-grade BNSF rail crossing

- Location: From Pease Ave to Wood Ave
- Total Cost: \$1,000,000
- Funded: No
- Planning: 2025
- Design: 2025
- ROW/Permit: 2026
- Construction: 2027
- Remarks: Identified Road-Rail conflict point where upgrades could be beneficial.

C8 – 162nd Ave. E Segment Extension

Construct new 2-lane roadway section with sidewalks

- Location: 64th St. E to 60th St. E
- Total Cost: \$3,000,000
- Funded: No
- Planning: 2026
- Design: 2027
- ROW/Permit: 2028
- Construction: 2029

- Remarks: Element of East Sumner Neighborhood Plan, likely completed by development or LID.

C9 – 164th Ave. Ct. E Segment Extension

Construct new 2-lane roadway section with sidewalks

- Location: 160th Ave. E to Existing 164th Ave. Ct. E
- Total Cost: \$2,000,000
- Funded: No
- Planning: 2026
- Design: 2027
- ROW/Permit: 2028
- Construction: 2029
- Remarks: Element of East Sumner Neighborhood Plan, likely completed by development or LID.

C10 – Meade McCumber & Gary Street Sidewalk Improvements

Complete the sidewalk gaps at these two locations

- Location: Wood Ave to Valley Ave
- Total Cost: \$650,000
- Funded: No
- Planning: Complete
- Design: 2026
- ROW/Permit: 2027
- Construction: 2028
- Remarks: This is a future project that will be evaluated in the coming years.

Trail Projects

T1 – Fryar Ave. Trail

- Location: West Main St. to Puyallup St.
- Complete trail connection through town.
- Total Cost: \$7,200,000
- Funded: Partial
- Planning: Complete
- Design: Completing in 2023
- ROW/Permit: 2024
- Construction: 2025

- Remarks: Design and ROW partially funded by federal grant. No construction funding identified.

T2 - White River Restoration Trail

- Location: #9 Ditch to area north of 16th Street
- Construct 8000 LF trail in conjunction with adjacent development
- Total Cost: \$3,000,000
- Funded: Partial
- Planning: Complete
- Design: Completing 2023
- ROW/Permit: N/A
- Construction: 2026
- Remarks: Partially funded by developers

T3 - Rivergrove Pedestrian Bridge

Construct trail bridge to provide a new trail connection between Sumner Town Center and the Rivergrove neighborhood over SR 410.

- Location: Trail overpass connecting the vicinity of Alder Ave. to 143rd Ave. E
- Total Cost: \$11,200,000
- Funded: Partial
- Planning: Complete
- Design: 2025
- ROW/Permit: N/A
- Construction: 2026
- Remarks: Design funding provided by ST3 grant. No construction funding identified.

T4 - Puyallup River Crossing

Provides improved connection with the Puyallup and Foothills trail system

- Location: From Sumner Wastewater Treatment Facility to Puyallup trail
- Total Cost: \$4,000,000
- Funded: No
- Planning: 2027
- Design: 2028
- ROW/Permit: 2029
- Construction: 2030
- Remarks: Potential joint project with Puyallup. Eligible for federal CMAQ funding.

T5 – Puyallup River Trail Bridge

Construct a trail bridge and trail connections to provide a connection to the Foothills Trail per the Sumner Parks and Trails Plan.

- Location: Trail overpass connecting 144th Ave E to 143rd Ave E
- Total Cost: \$6,000,000
- Funded: No
- Planning: 2027
- ROW/Permit: 2028
- Design: 2029
- Construction: 2030
- Remarks: Identified in Draft Parks and Trails Plan. No funding source secured

Recurring Annual Programs

R1 – Street Overlay Program

Overlay and rebuild existing streets throughout the City.

- Annual Costs: \$150,000
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R2 – Roadway Paint Line Application

Program to repaint lane lines within the City

- Total Costs: \$40,000
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R3 – Pavement Repairs

Repair spot surface and subgrade failures through dig-outs throughout the City.

- Total Costs: \$66,150
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R4 – Roadway Plastic Marking Application

Program to replace crosswalk, stop bar, and arrow markings within the City

- Total Costs: \$56,100
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R5 – Chip Seal Application

Program to apply a chip seal treatment to asphalt roads throughout the City.

- Total Costs: \$136,500
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R6 – Crack Seal Application

Maintain roads with crack seal throughout the City

- Total Costs: \$78,750
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R7 – Neighborhood Traffic Control Program

Modify residential streets to enhance pedestrian safety, slow traffic, and minimize cut-through traffic on collector and local roadways.

- Total Cost: \$28,000
- Funded: Yes
- Remarks: Street Operating General Fund Budget

R8 – ADA Transition Plan

Address the projects identified in the ADA Transition Plan

- Total Cost: \$40,000
- Funded: Yes
- Remarks: Sidewalks Construction Capital Fund Budget

R9 – Sidewalk Maintenance Program

Replace/rebuild existing failing sidewalks due to damage caused by street trees.

- Total Cost: \$250,000
- Funded: Yes
- Remarks: Sidewalks Construction Capital Fund Budget. Formerly the Volunteer Sidewalk Program.

R11 – Safe Routes to School

Fill in gaps in sidewalks, provide repairs to existing ADA ramps, and replace ramps that do not meet current code. Continue educational components and install speed feed back signs.

- Total Cost: N/A
- Funded: No
- Remarks: City will fund local match as needed. Continue to apply for SRTS Grants.

*Project is largely funded by WSDOT, and City of Sumner has either committed a small percentage **contribution or no contribution to date.**

****Project is largely funded by City of Pacific, and the City of Sumner has either committed a small percentage contribution or no contribution to date.**

TRANSPORTATION PROJECTS COMPLETING IN 2023

Stewart Rd (8th St.) Railroad Crossing

Widen Stewart Rd from 2 lanes to 4/5 lanes, widen the Union Pacific Railroad Crossing, Install a new signal at Butte Avenue

- Location: Valentine Ave to Butte Ave (in the City of Pacific)
- Total Cost: \$6,000,000
- Estimated Completion: 2023
- Remarks: Project was run by City of Pacific. City of Sumner contributed \$700,000 of TIF funds to the project.

Alder & Kincaid Utility Improvements Phase 1

Replacement of aging utilities in support of the Town Center Plan redevelopment

- Location: Park St. to Main St.
- Total Cost: \$6,000,000
- Estimated Completion: 2023
- Remarks: Project includes Heritage Park woonerf construction.

Academy Street: Bicycle Lanes

Improve and reconfigure existing Academy Street to accommodate dedicated bicycle lanes.

- Location: Narrow St. to Wood Ave
- Total Cost: \$875,000
- Estimated Completion: 2023

- Remarks: Design funding provided by ST3 grant.

Appendix "E" School Districts Impact Fees

Table 8. Single Family Impact Fee Calculation

SITE ACQUISITION COSTS (A)	COST PER ACRE	NUMBER OF ACRES	NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$500,000	15	550	0.403	\$5,495.45
Middle School	\$500,000	25	750	0.140	\$2,333.33
Senior High	\$3,100,000	2	400	0.099	\$1,534.50
Total					\$9363.29
CONSTRUCTION COSTS (B)	FACILITY COST		NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$50,0000.00		550	0.403	\$36,636.36
Middle School	\$14,040.00		155	0.140	\$12,681.29
Senior High	\$60,000,000		545	0.099	\$10,899.08
Total					\$60,216.74
TEMPORARY FACILITY COSTS (C) (Double-Wide)	PURCHASING COST		NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$600,000		23	0.403	\$10,513.04
Middle School	\$600,000		30	0.140	\$2,800.00
Senior High	\$600,000		30	0.099	\$1,980.00
Total					\$15,293.04
STATE MATCHING CREDIT (D)	BOECKH INDEX	SQ FT PER STUDENT	STATE MATCH	STUDENT FACTOR	TOTAL COST
Elementary	\$242.26	90	0.5851	0.403	\$5,141.14
Middle School	\$242.26	117	0.5851	0.140	\$2,321.80
Senior High	\$242.26	130	0.5851	0.099	\$1,824.28
Total					\$9,287.22
	PRESENT VALUE FACTOR	BOND LEVY RATE	ASSESSED VALUE OF UNIT	BOND INTEREST	TOTAL CREDIT
TAX PAYMENT CREDIT (TC)	9.767809	\$2.353	\$503,812	3.477%	\$11,334.24
NET COST (A+B+C-D)-TC					\$64,251.60
DISCOUNT IS 50%, RATE IS 0.50 IMPACT FEE PER UNIT (NET COST-TC)*DISCOUNT RATE)					\$32,125.80
LESS OTHER CREDITS (FC)					0
NET IMPACT FEE PER UNIT					\$32,125.80

Note: High School Site Acquisition reflects property needs at SHS.

Table 9. Multi-family Family Impact Fee Calculation

SITE ACQUISITION COSTS (A)	COST PER ACRE	NUMBER OF ACRES	NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$500,000	15	550	0.095	\$1,295.45
Middle School	\$500,000	25	750	0.043	\$716.67
Senior High	\$3,100,000	2	400	0.033	\$511.50
Total					\$2,523.62
CONSTRUCTION COSTS (B)			NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$50,000,000		550	0.095	\$8,636.36
Middle School	\$14,040,000		155	0.043	\$3,894.97
Senior High	\$60,000,000		545	0.033	\$3,633.03
Total					\$16,164.36
TEMPORARY FACILITY COSTS (C)	PURCHASING COST		NUMBER OF STUDENTS	STUDENT FACTOR	TOTAL COST
Elementary	\$600,000		23	0.095	\$2,478.26
Middle School	\$600,000		30	0.043	\$860.00
Senior High	\$600,000		30	0.033	\$660.00
Total					\$3,998.26
STATE MATCHING CREDIT (D)	BOECKH INDEX	SQ FT PER STUDENT	STATE MATCH	STUDENT FACTOR	TOTAL COST
Elementary	\$242.26	90	0.5851	0.095	\$1,211.93
Middle School	\$242.26	117	0.5851	0.043	\$713.13
Senior High	\$242.26	130	0.5851	0.033	\$608.09
Total					\$2,533.15
	PRESENT VALUE FACTOR	BOND LEVY RATE	ASSESSED VALUE OF UNIT	BOND INTEREST	TOTAL CREDIT
TAX PAYMENT CREDIT (TC)	9.7705	\$2.353	\$552,298	3.477%	\$12,428.49
NET COST (A+B+C-D)-TC					\$7,724.60
DISCOUNT IS 50%, RATE IS 0.50 IMPACT FEE PER UNIT (NET COST-TC)*DISCOUNT RATE)					\$3,862.30
LESS OTHER CREDITS (FC)					0
NET IMPACT FEE PER UNIT					\$3,862.30

Note: High School Site Acquisition reflects property needs at SHS.

School Impact Fee Calculation 6/20				DISTRICT Dieringer School District			
School Site Acquisition Cost:							
((AcresxCost per Acre)/Facility Capacity)xStudent Generation Factor							
	Facility	Cost/	Facility	Student	Student		
	Acreage	Acre	Capacity	Factor	Factor	Cost/	Cost/
				SFR	MFR	SFR	MFR
Elementary #3	12.00	\$438,613	433	0.322	0.172	\$3,909	\$2,091
Middle				0.130	0.070		
					TOTAL	\$3,909	\$2,091
School Construction Cost:							
((Facility Cost/Facility Capacity)xStudent Generation Factor)x(permanent/Total Sq Ft)							
		Facility	Facility	Student	Student		
		Cost	Capacity	Factor	Factor	Cost/	Cost/
				SFR	MFR	SFR	MFR
Elementary #3		\$25,275,000	433	0.322	0.172	\$18,796	\$10,040
				0.130	0.070		
					TOTAL	\$18,796	\$10,040
Temporary Facility Cost:							
((Facility Cost/Facility Capacity)xStudent Generation Factor)x(Temporary/Total Square Feet)							
	%Temp/	Facility	Facility	Student	Student	Cost/	Cost/
	Total Sq.Ft	Cost	Size	Factor	Factor	SFR	MFR
				SFR	MFR		
Elementary		\$0	0	0.322	0.172		
Middle		\$0	0	0.130	0.070		
					TOTAL	\$0	\$0
State Matching Credit:							
Boeckh Index X SPI Square Footage X District Match % X Student Factor							
	Boeckh	SPI	District	Student	Student		
	Index	Footage	Match %	Factor	Factor	Cost/	Cost/
				SFR	MFR	SFR	MFR
Elementary							
Middle							
					TOTAL	\$0	\$0
Tax Payment Credit:						SFR	MFR
Average Assessed Value 2020						\$653,162	\$480,235
Capital Bond Interest Rate (est) 5/20						0.40%	0.40%
Net Present Value of Average Dwelling						\$6,390,194	\$4,698,367
						10	10
Property Tax Levy Rate 2020						\$2.2460	\$2.2460
Present Value of Revenue Stream						\$14,352	\$10,553
Fee Summary:				Single	Multiple		
				Family	Family		
Site Acquisition Costs				\$3,909.23	\$2,090.76		
Permanent Facility Cost				\$18,795.73	\$10,039.95		
Temporary Facility Cost				\$0.00	\$0.00		
State Match Credit				\$0.00	\$0.00		
Tax Payment Credit				(\$14,352.38)	(\$10,552.53)		
FEE				\$8,353	\$1,578		
FEE WITH DISCOUNT OF 50%				\$4,176			
FEE WITH DISCOUNT OF 50%					\$789		

Note that the adopted fees for Sumner-Bonney Lake School District as of 2023 are as follows:

- Single Family: \$4791.83
- Mobile Homes: Same as above
- Multi-Family: \$2351.32
- Zero lot line houses: Same as above

Appendix "F" City Council Final Ordinance [to be included after adoption]



STAFF REPORT

DATE: December 2, 2024
TO: SUMNER CITY COUNCIL
FROM: Ryan Windish, Director of Economic and Community Development
RE: **2024 Comprehensive Plan Update and Environmental Impact Statement**
File #: CPA-2024-0001

I. BACKGROUND

Purpose: The City Council is being asked to take action on Ordinance No. 2906 adopting the 2024 Comprehensive Plan update and the Environmental Impact Statement (EIS) and the 2024 Transportation Management Plan (TMP) and 2024 Capital Facilities Plan (CFP).

The Comprehensive Plan Update consists of the Comprehensive Plan with 18 Elements, an Environmental Impact Statement, updated Transportation Management Plan, Capital Facilities Plan, new regulations to implement the Comprehensive Plan, and a public outreach effort. City council reviewed Elements 1-10 at its October 16, 2024 meeting and reviewed Elements 11 through 15 at its October 28, 2024 meeting and reviewed Transportation, Capital Facilities and Utilities at the November 12, 2024 study session.

Why amendments are being proposed

The State Growth Management Act (GMA) requires cities to periodically update their Comprehensive Plans. The State also requires cities to complete a "10-year periodic update," which must occur by December 31, 2024. The process for amending the City Comprehensive Plan is specified in the Sumner Municipal Code section 18.56.147 and in the state Growth Management Act (GMA) (RCW 36.70A). The Planning Commission is designated as the first review body, and makes recommendations to the City Council who makes the final decision on proposed amendments.

This 10-year periodic update involves extensive revisions to the Comprehensive Plan and regulations to reflect new laws and changes that have occurred over the last decade. Major changes at the state and regional level have shaped this 2024 update including:

- New regional growth targets have been established by the State and County, requiring each city to plan for its fair share of jobs and housing growth. The assigned growth targets for Sumner for 2020-2044 are 1,985 housing units, 5,313 jobs, and 4,904 residents.
- Sumner is required to plan for increased housing capacity and capacity for housing that is affordable to all income bands, particularly low- to moderate-income households.
- The Comprehensive Plan must address racially disparate impacts, displacement and inclusion (HB1220).
- The Comprehensive Plan must include a climate change/resiliency element (HB 1181).

The policies proposed in the 2024 Sumner Comprehensive Plan are intended to address these and other mandates under GMA, new State laws and Countywide Planning Policies. The updates are described in more detail in the 2024 Draft Comprehensive Plan (Volume I) dated November 2024 (**Exhibit A**), and the Draft Environmental Impact Statement (DEIS) for the 2024 Comprehensive Plan (Volume II) dated March 1, 2024 (**Exhibit B**), attached.

Public meetings and participation

In January 2023, the City Council opened the Comprehensive Plan amendment cycle for 2023-2024. The City published notice of the open amendment cycle to allow private individuals and firms the opportunity to submit applications for changes. No applications from private parties were received during the open amendment cycle; the 2024 amendments are all proposed by City staff.

A Public Participation Plan (PPP) was developed for the 2024 Comprehensive Plan Update. The PPP was developed by staff, approved by the Planning Commission on March 2, 2023, and reviewed by the City Council in March 2023. A summary of public outreach efforts as of March 1, 2024 is included in the Draft EIS (DEIS).

The Planning Commission had a number of study sessions on the 2024 Comprehensive Plan during 2023-2024, and held a public hearing on April 4, 2024. Background materials have been provided in Commission meeting packets. Prior to the Planning Commission public hearing, a public notice for the 2024 Comprehensive Plan/DEIS package was published March 1, 2024 with a public comment period from March 1 to April 30, 2024. An additional 15-day notice of the Planning Commission public hearing was published on March 12 with a comment period ending March 27. All comments received were forwarded to the Planning Commission prior to their final recommendations. Comments received and staff responses will be contained in the Final EIS. In addition to these efforts, the City provided a dedicated project website for the 2024 Comprehensive Plan Periodic Update that contained documents, schedules, notices, and other pertinent information that was timely, accessible and readily available to the public. A final meeting with the Planning Commission was held on September 19, 2024 where the Commission voted unanimously to recommend approval by the City Council all updates to the Comprehensive Plan, EIS, TMP, and CFP associated plans.

II. SUMMARY OF PROPOSAL

The proposed 2024 Comprehensive Plan consists of amendments to each element (chapter) of the Comprehensive Plan, a new Transportation Management Plan, and Capital Facilities Plan. It also includes a Draft Environmental Impact Statement (DEIS). The update process includes amendments to development regulations that implement the Comprehensive Plan.

A summary of the key Comprehensive Plan amendments is provided below. More details are included in the published 2024 Comprehensive Plan dated November 2024, and Draft Environmental Impact Statement dated March 1, 2024.

1. Introduction

- Minor updates to text, background, chronology.

2. Community Vision (not policies)

- Updates to reflect more current city characteristics, demographics, etc., since 2015
- Emphasis on walkable neighborhoods
- Removed protection of views, which Sumner does not regulate
- De-emphasized focus on single-family only, include residents not just owners
- Added allowing other housing types
- Higher density in Town Center and East Sumner anticipated
- Includes protection of natural resources
- New text includes consideration of environmental justice in projects
- Includes support for visual/cultural arts & awareness of history

- Added encouragement for innovative incubator business.
3. Community Values (not policies)
 - Updates to reflect more current city characteristics, demographics, etc.
 - More inclusive statements related to diversity
 - Added text about treating each other with respect and helping with community safety
 - Added text about maintaining and recruiting businesses
 - Added text about having a fair and fiscally responsible government
 - Added text about providing an inclusive educational system.
 4. Plan Monitoring and Amendment Element
 - New policy adding State-required wording for emergency amendments
 - New policy to avoid reducing the UGA unless the areas cannot be served.
 5. Governance and Permit Process Element
 - Consideration of decision impacts on historically underserved populations
 - Raising awareness related to diversity, equity and inclusion
 - Updating how City business is communicated to the public, improving accessibility
 - Streamlining permit processes
 - New policy providing for tribal government participation in land use decisions
 6. Community Character Element
 - Clarify wording in Design Guidelines policy to respect historic context and use high quality materials
 - Change emphasis on single family dwellings to emphasis on small-scale residential character
 - New policy about Sign Code to allow reasonable advertising for owners while protecting the community from adverse impacts
 - New policy to support a graffiti removal program
 - New policy to clarify that East Sumner encourages mixed use development (in current code)
 - New policy that supports alternative approaches to parking in East Sumner (in current code)
 - New policy supporting neighborhood centers (focal point) and encouraging services within walking distance of these
 - New policy to distribute streetscape amenities equitably across neighborhoods
 - New policy supporting transit linkages from neighborhoods to the transit station
 - Replaced specific historical society reference with generic historic preservation organizations; replaced specific downtown & chamber group names with generic names
 - New policy to clarify what is actual area of "historic downtown" term used elsewhere
 - Added policy to implement the 2021 Main Street Visioning Plan
 - New policy that supports alternative approaches to parking in Town Center (in current code)
 - Clarified policy about creating gateways by adding the adopted concept plan sketch
 - New policy to implement the adopted East Main Street Design Strategy
 - New policy to maintain Tree City USA designation
 - New policies about providing pedestrian connections to transit and services, and working to reduce through-traffic
 - New policy to require development in Manufacturing Industrial Center (MIC) to provide adequate screening.
 7. Family and Human Services Element
 - Extensive updates to clarify City's role in the various community programs (provided mostly by other agencies and school district); examples: promoting healthy behaviors
 - Wording changed throughout the chapter to put City in a supporting role working with other agencies, not as provider
 - Removed policy about human services committee since City does not have such a committee
 - New policy asserting City role to "support funding" for the school district recreation programs
 - New policy to support food programs through information and supportive regulations

- New policy to prohibit marijuana/cannabis businesses
- New policy to support housing programs and regulations for underserved populations
- New policy to provide incentives for affordable senior housing.
- New policy to develop emergency response procedures for senior center patrons
- New policy to promote programs for older adults to work and volunteer
- New policy to distribute parks facilities equitably throughout the community
- New policy to maintain sidewalk system that connects services
- New policies to further climate resiliency and emergency preparedness.

8. Economic Development and Employment Element

- Policy updated to identify redevelopment opportunities as land supply decreases
- Policy updated to encourage agritourism
- Update to encourage industries that are sustainable and environmentally responsible
- New policy to coordinate economic development regionally
- Updated policy wording to support infrastructure and programs that promotes qualified workforce
- New policy to monitor policy impacts on underserved communities
- Policies added about improving the resiliency of the local economy to withstand climate change and reduce carbon emissions
- New policy to invest in programs that enhance downtown public safety
- Updates references to specific downtown organizations to be more generic
- Added policies from existing MIC area plan about supporting the MIC.

9. Land Use Element

- New policy about considering impacts to tribal treaty rights in land use decisions (Countywide policies)
- Clarifying policies to implement the Town Center Plan and the MIC goals
- New policy to encourage “healthy communities” in land use, design and programs
- New policy to plan for standards/programs to reduce wildfire risk
- New policy to support small-scale agriculture and non-profit community gardens
- Updates to descriptions of land use designations to reflect proposed density increases and allow more housing types.

9. Essential Public Facilities Element

- Extensive policy updates and new policies to establish guidelines for siting facilities and complying with new State guidelines.

10. Historic & Cultural Resources Element

- Updates to support preventing or mitigating impacts to historic/cultural resources
- Updated policy to require documentation of how impacts were avoided
- New policy requires consultation with DAHP on sites in Town Center with structures over 45 years old
- New policies related to inadvertent discoveries of artifacts
- New policy to encourage measures to protect culturally significant plants and foods
- Updates to reflect Sumner’s current practices and agency roles, changing references to historic preservation organizations to be more generic
- Updated references to the Ryan House and modifying “mandate” language to provide more flexibility in implementing policies and to make Comprehensive Plan policies consistent with the demolition of the Ryan House in Lucy V. Ryan Park.
 - Numerous changes are proposed to reflect the City Council decision in September 2023 to proceed with demolition of the Ryan House, and Superior Court’s March 2024 ruling that demolition is not consistent with the policies in the Comprehensive Plan
- New policy addressing adaptation of historic sites vulnerable to climate change
- New policy to encourage cultural arts that reflect various ethnic groups’ history.

11. Environment Element

- New policies related to environmental stewardship, education
- New policy to consider environmental justice in project decisions
- Added policies related to preparedness for extreme weather events
- New policy related to air quality impacts on overburdened populations
- New policies related to protecting water quality with buffers
- Policy added to protect vegetation as a means to protect groundwater recharge
- Policy added to consider diversity and accessibility in emergency notification plans
- Numerous new policies on floodplain protection and mitigation, adding references to current programs
- New policies related to urban forest management and protecting forested hillsides
- Policies added related to reducing greenhouse gas emissions and supporting alternative energy technologies

12. Climate Change and Resiliency Element

- This required Plan element contains no new policies; rather it is a list of existing policies throughout the Plan that address climate change and resiliency topics.

13. Housing Element

- Extensive updates to outdated language
- Removal of policies that contradict new State requirements for housing
- New policy to support the preservation of manufactured home parks as affordable housing
- Updated policies to plan for adequate housing supply for all income bands and to allow for various housing types
- New policy to allow 2 dwelling units per lot per State requirement
- New policy to allow triplexes and fourplexes on larger residential lots
- Added policies to allow ADUs and streamline process
- New policy to maintain multifamily zones for multifamily units (not single family)
- Various policies related to supporting affordable housing
- New policy to re-establish SEPA review thresholds to streamline housing developments
- Added policies related to encouraging energy efficiency and reducing greenhouse gases
- Change in policies to apply MFTE tax credit in Town Center and East Sumner for affordable units only
- New policies to help support protections for tenants vulnerable to displacement.

14. Parks and Open Space Element

- Policies from the recently adopted 2024 Parks and Trails Plan have been added.

15. Transportation Element and Transportation Management Plan (See **Exhibit C**)

- Extensive revisions to clean up redundancies and outdated info
- New policy stressing importance of maintenance
- New policy supporting food truck parking on streets where appropriate
- Added existing policies from Town Center Plan and East Sumner Plan to support the street design and circulation guidelines in those plans
- New policy to pursue the expansion of the Pierce Transit district to Sumner
- Updated and new policies to support multimodal (ped and bike) modes
- New policy to prioritize commuter connections to MIC as primary employment center
- Added policies to consider transportation decision impacts on underserved populations
- Strengthen policies related to reducing environmental impacts and considering environmental justice in decisions about transportation/streets
- Updated existing and added new policies about improving air quality to emphasize reducing greenhouse gas emissions
- Added policy to consider in prioritizing projects the needs of underserved communities
- New policy that supports charging a multimodal transportation impact fee (new State allowance)
- Transportation Management Plan:
 - Updates to Level of Service (LOS) at various intersections
 - Integrating additional pedestrian/bicycle routes into the mapped system

- Revised project costs/revenues for various transportation projects
- Revised Traffic Impact Fees (TIFs), including a potential increase in TIFs.

16. Capital Facilities Element and Capital Facilities Plan (See **Exhibit D**)

- New policies related to social equity in capital facilities planning and programs
- Update policies to advance actions that reduce carbon footprint, greenhouse gases and promote climate resiliency
- New policy to specifically address actions to protect the Rivergrove neighborhood from flooding
- Updated policies to address more current Police Level of Service (LOS). New LOS is recommended based on new demographics of population, number of calls for service and other factors
- Updated policies to match current Fire District LOS
- Updated policies related to Government Services LOS. New LOS is recommended to replace 2015 estimate based on current data.
- Updated policies to align current LOS for water and sewer with adopted plans
- New policies to address regional coordination and emergency response to utility issues
- Added policies to promote equitable access to utility services for underserved populations.

17. Utilities Element

- Extensive revisions to clean up redundancies and outdated info
- New policies to support alternative energy and technology
- New policy to encourage undergrounding of utilities, particularly in Town Center
- New policy to require telecommunications facilities to avoid impacts to residential areas
- Added policies to support utility access to underserved communities
- New policies to support cooperative planning amongst providers.

18. Shoreline Master Program Element

- Introduction text modified for clarity, but no changes to shoreline policies or regulations.

The full scope of the proposed amendments is described in detail in the attached Exhibits.

III. DRAFT EIS AND PREFERRED ALTERNATIVE

The 2024 Comprehensive Plan Draft Environmental Impact Statement (DEIS) evaluated three Alternative growth scenarios. These focus primarily on alternative approaches to accommodating State and regional requirements for housing capacity and housing affordability. The Planning Commission reviewed the range of Alternatives at its meeting on June 6, 2024, and voted to accept the recommended “Preferred Alternative,” which guides the Comprehensive Plan’s policies and new regulations. In summary, the Preferred Alternative that was selected is a modification of Alternative 2 in the DEIS. Under the Preferred Alternative, the city revises its policies, particularly its housing and land use approach, to meet new state requirements.

Growth and Targets

The Preferred Alternative plans for the Pierce County targets of 1,985 new housing units, 5,313 new jobs, and 4,904 new residents between 2020 and 2044. This is in alignment with Pierce County’s adopted growth targets. Housing growth is focused mostly in Town Center and East Sumner, though is also distributed throughout the city as middle housing. Job growth is primarily in the Sumner-Pacific Manufacturing Industrial Center (MIC).

Housing Capacity and Affordability

The Preferred Alternative includes new policies that increase housing capacity for all income levels and improve affordability:

- Affordability incentives in Town Center and East Sumner (including limiting the Town Center MFTE to affordable projects and expanding the affordability MFTE incentive to all of East Sumner).
- Two units per residential lot allowed citywide. This would allow duplexes in all Low Density Residential (LDR) designations.

- Two accessory dwelling units (ADUs) per lot allowed citywide, in any combination of detached and attached.
- Triplexes and fourplexes allowed on larger lots (more than 1.5 times the minimum parcel size) in LDR 8.5 and 12.
- Multiplexes / small apartments allowed in all Medium Density Residential (MDR) and High Density Residential (HDR) areas.
- Prohibiting new single-family dwellings in HDR (high density residential) district
- Maximum density raised in MDR (from 15 dwelling units an acre to 22 dwelling units an acre).
- Policies supporting religious organizations building affordable apartment housing.
- Other updates in alignment with state housing law, such as new anti-displacement policies and policies to remove barriers to middle housing, multifamily housing, and ADUs.

Climate Change

The Preferred Alternative includes a new Climate Change Resiliency element with policies that address resiliency and greenhouse gas emissions reduction. This is in alignment with new requirements for climate planning in the GMA.

Transportation

Transportation policies are added to reduce emissions and vehicle miles traveled.

CAO Update

The Preferred Alternative includes an update to the City's Critical Areas Ordinance to include best available science.

Consistency with GMA, VISION 2050, and Pierce County CPPs

The Preferred Alternative includes updates for consistency with the regional and state planning frameworks.

The original 3 Alternatives are described in detail in the Draft EIS for the 2024 Comprehensive Plan dated March 1, 2024 (**Exhibit B**).

IV. 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)). Below is an analysis of how the proposal meets the criteria:

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.

The proposed amendments would resolve inconsistencies between the Sumner Comprehensive Plan and new State legislation, State GMA, Multi-county Planning Policies (Vision 2050) and Countywide Planning Policies requirements.

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.

Conditions have so changed since the adoption of the Comprehensive Plan that the text updates are necessary. The Comprehensive Plan has not undergone an extensive periodic review since 2015. There are new State requirements that must be addressed; there are also new development conditions and demographics in the community that have significantly changed over the years. Many of the existing policies use outdated language, do not reflect new City practices or new technologies, nor address emerging needs related to climate change, underserved communities, or needs for affordable housing. The proposed update would make the Plan text more consistent with the Zoning Code.

3. *The proposed amendment is consistent with the overall intent of the goals of the Sumner Comprehensive Plan.*

The existing Comprehensive Plan includes goals related to maintaining Sumner's character, encouraging housing, supporting seniors and youth, promoting economic development, and protecting the community's natural environment. The proposed amendments support and are consistent with all of these goals, while addressing new State requirements and changes as described above.

4. *The proposed amendment is consistent with chapter 36.70A RCW, the county-wide planning policies for Pierce County, and the applicable multi-county planning policies.*

Consistency with Growth Management Act (RCW 36.70A)

The proposed Comprehensive Plan text amendments are consistent with the GMA. The text updates will address the new requirements of the GMA and State legislation, such as increasing housing density and types as required, addressing equity and disparate impacts, and addressing climate change and "Best Available Science" for protecting critical areas. Based on this, the proposal is consistent with the Growth Management Act.

Consistency with countywide planning policies

The County-wide planning policies (CPPs) for Pierce County, which Sumner and other cities have ratified, establish goals and policies related to such issues as: Transportation facilities, allocation of housing and affordable housing, equity and inclusion, healthy communities, and climate resiliency. The CPPs also allocate population, housing, and employment growth targets to Sumner and other cities for the 2020-2044 period. The proposed Sumner Comprehensive Plan text amendments include extensive updates in order to be consistent with the CPPs.

Consistency with multi-county planning policies (Vision 2050)

VISION 2050 contains multicounty planning policies, as required by GMA, and a regional growth strategy through the year 2050. It is the multi-county-level planning document for King, Kitsap, Pierce, and Snohomish Counties. VISION 2050 calls for focusing housing and job growth within regional growth centers and near high-capacity transit, such as in Sumner's Town Center and in the Sumner-Pacific Manufacturing Industrial Center (MIC). The CPPs are developed by Pierce County jurisdictions to be consistent with VISION 2050, and Sumner's Comprehensive Plan amendments have been developed to be consistent with the CPPs and VISION 2050.

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 are no proposed amendments to the map.

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

Potential impacts of the proposed 2024 Comprehensive Plan text amendments have been addressed through the Draft Environmental Impact Statement (DEIS) for the 2024 Comprehensive Plan (Volume II) published March 1, 2024 (see **Exhibit B**). This document is also available for review on the City's website at: <https://connects.sumnerwa.gov/planning-sumners-future>. The DEIS analyzes impacts related to the environment including: earth, water quality, plants and animals, noise, land use, transportation and housing. The preliminary determination in the DEIS is that any potential effects are not significant or are addressed through mitigation measures.

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

The potential ramifications of the proposed amendments to other Comprehensive Plan elements have been addressed. The proposed amendments have been evaluated for consistency across Plan elements and supporting plans. The Comprehensive Plan update also includes updates to the Transportation Management Plan and the Capital Facilities Plan that support the proposed amendments in the land use and housing elements. Potential ramifications and impacts have been evaluated in the Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II) issued March 1, 2024, which concludes the proposed text amendments will have a negligible impact.

CONCLUSION:

The proposal is consistent with the criteria for a Comprehensive Plan amendment. Additional analysis is contained in the Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II), issued March 1, 2024 (see **Exhibit B**).

V. PUBLIC & AGENCY COMMENTS

The public notice for the 2024 Comprehensive Plan and Draft EIS was issued March 1, 2024, with a public comment period from March 1 to April 30, 2024. An additional 15-day notice of the Planning Commission public hearing was published on March 12. Comments received were forwarded to the Planning Commission prior to final recommendations.

VI. SEPA ENVIRONMENTAL REVIEW

The State Environmental Policy Act (SEPA) establishes a process for SEPA review of Comprehensive Plan updates. In compliance with State SEPA environmental regulations, the 2024 Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II) were issued March 1, 2024 for a 60-day public review through April 30, 2024. Comments received during the comment period were forwarded to the Planning Commission for consideration before final recommendations.

VII. PLANNING COMMISSION RECOMMENDATION

The Planning Commission voted unanimously to recommend that the City Council "Move to approve of Ordinance No. 2906 for the 2024 Comprehensive Plan and Environmental Impact Statement.

VIII. EXHIBITS & REFERENCES

- A. Ordinance No. 2906: 2024 Comprehensive Plan and Environmental Impact Statement dated September 10, 2024.
- B. Draft 2024 Comprehensive Plan (Volume I) dated November 2024
- C. Draft Transportation Plan dated October 2024
- D. Draft Capital Facilities Plan dated November 2024
- E. Draft Environmental Impact Statement (DEIS) for the 2024 Comprehensive Plan (Volume II) dated March 1, 2024

Documents are also available for review on the City's website at: <https://connects.sumnerwa.gov/planning-summers-future>

See also Staff reports for: Housing regulations, Historic and cultural resources regulations, and Critical Areas regulations

SUBJECT: Ordinance No. 2907 - Zoning Code Text Amendments on Housing and Land Use Regulations

CATEGORY: Ordinance

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Ordinance No. 2907- Zoning Code Amendments / Housing and Land Use Regulations
2. Staff Report

STAFF CONTACT: Ryan Windish, Community & Economic Development Director

SUMMARY BACKGROUND:

Ordinance No. 2907 would adopt city-wide Zoning and Municipal Code amendments related to Housing and Land Use regulations as part of the 2024 Comprehensive Plan Periodic update. The revised regulations would update housing types and densities allowed in residential zones, Town Center and East Sumner. See the attached staff report for a summary of proposed amendments. Note that this agenda item is related to the regulations only; policies related to housing and land use are contained in the Draft 2024 Comprehensive Plan (Ordinance No. 2906).

The Council held a public hearing on December 2, 2024.

COUNCIL COMMITTEE/STUDY SESSION: Study session reviews occurred on October 16, 2024, October 28, 2024, November 12, 2024 and December 9, 2024.

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION: Do Pass

STAFF RECOMMENDATIONS/MOTION:

Move to approve Ordinance No. 2907 updating the Zoning and Municipal Code regarding housing and land use regulations, as part of the 2024 Comprehensive Plan Periodic Update.

**ORDINANCE NO. 2907
CITY OF SUMNER, WASHINGTON**

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, AMENDING ZONING REGULATIONS FOR HOUSING IN CHAPTER 18.04 DEFINITIONS; AMENDING CHAPTERS 18.12, 18.14, 18.16, AND 18.30 TO ACCOMMODATE A VARIETY OF HOUSING TYPES SUCH AS ACCESSORY DWELLING UNITS, MANUFACTURED HOME PARKS, AND AFFORDABLE HOUSING, AND TO ALLOW COMMUNITY GARDENS; AMENDING CHAPTER 18.14 TO INCREASE MEDIUM DENSITY RESIDENTIAL ZONE DENSITY TO 22 DWELLING UNITS PER ACRE; AMENDING CHAPTER 18.24 TO ALLOW ADDITIONAL AFFORDABLE HOUSING DEVELOPMENT THROUGH A PLANNED RESIDENTIAL DEVELOPMENT (PRD); AMENDING CHAPTER 18.40 TO REMOVE DESIGN REVIEW REQUIREMENT FOR ACCESSORY DWELLING UNITS; AND AMENDING STANDARDS FOR PERMANENT SUPPORTIVE HOUSING, TRANSITIONAL HOUSING, EMERGENCY SHELTERS AND EMERGENCY HOUSING AT CHAPTERS 18.12, 18.14, 18.16, 18.18, 18.29 AND 18.30.

WHEREAS, the State legislature has mandated through updates to the Growth Management Act that cities identify sufficient land for a variety of housing types, and make adequate provisions for the housing needs for all economic segments of the community.

WHEREAS, through the coordinated planning efforts of the City, Pierce County, and Puget Sound Regional Council, Sumner’s adopted growth targets for 2020-2044 are 5,313 jobs; 4,904 residents; and 1,985 housing units; and

WHEREAS, per State requirements that cities accommodate housing accessible to all income bands, Sumner has been assigned its “fair share” of affordable housing at 659 housing units accessible to households making 30-80% of the Area Median Income;

WHEREAS, the City recognizes that meeting housing capacity and affordable housing targets will require a range of strategies, such as expanding allowances for Accessory Dwelling Units, duplexes and multiplexes, and small-scale apartments; allowing a moderate density increase in the Medium Density Residential Zone to accommodate infill and “middle housing;” supporting measures to minimize displacement of low-income residents; and creating incentives for affordable housing through bonuses and tax credits; and

WHEREAS, the Planning Commission held study sessions on the proposed amendments on September 7, 2023; November 16, 2023; June 6, 2024; and September 5, 2024; and held a duly-advertised public hearing on April 4, 2024; and

WHEREAS, on September 19, 2024, the Planning Commission voted unanimously to recommend adoption by the City Council of the proposed zoning regulations updates as set forth in this ordinance; and

WHEREAS, the City Council reviewed the proposed amendments at study sessions on October 28, 2024 and held a duly-advertised public hearing on December 2, 2024; and

WHEREAS, the proposal was forwarded to the Washington State Department of Commerce for the required 60-day State review per the Growth Management Act on March 1, 2024; and

WHEREAS, the City Council finds the proposed amendments to be consistent with the Sumner Comprehensive Plan and the Sumner Municipal Code criteria for Zoning Code amendments;

**NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON
DO ORDAIN AS FOLLOWS:**

Section 1. Amended Section. Sumner Municipal Code Chapter 18.04 Definitions is hereby amended as follows:

18.04.0035 Accessory unit

“Accessory unit” means a second dwelling unit located on the same lot as a single-family housing unit, duplex, triplex, or townhome, either in or added to the principal unit ~~an existing single family detached dwelling~~, or in a separate accessory structure on the same lot as the ~~main dwelling principal unit~~, for use as a complete, independent living facility with provision within the accessory apartment for cooking, eating, sanitation, and sleeping. Such a dwelling is an accessory use to the main dwelling. Accessory units are also commonly known as “mother-in-law” units or “carriage houses.”

18.04.0115 Apartments. “Apartments” means a building designed for the purpose of human habitation containing ~~two or more~~ more than two dwelling units where units are stacked vertically one upon another, but does not include a multiplex such as a triplex or fourplex.

18.04.0375 Family. “Family” means ~~an individual, or two or more persons related by blood, marriage, or adoption. For the purposes of this title, “family” includes a group of not more than five persons who are not related, but a group of persons who may be related who are living and sharing kitchen facilities together as a single housekeeping unit. (Six or more unrelated persons living together constitutes a “Group residence.” See “Group residence.”)~~

18.04.0262 Community Garden. “Community garden” means a garden for growing produce that serves the local community and is managed by and located on the premises of a public agency, non-profit organization, or private development.

Section 2. Amended Section. Sumner Municipal Code Chapter 18.12 Low Density Residential District, Section 18.12.020 Principal Uses, is hereby amended as follows:

18.12.020 Principal uses.

The following uses are permitted outright by right in the LDR district:

- A. Small group homes;
- B. Manufactured homes subject to the standards of SMC 18.12.080(N), but not to exceed one dwelling on any one lot, except for accessory dwellings as provided in SMC 18.12.030;
- C. Minor utility facilities;
- D. Single-family detached dwellings, but not to exceed one detached dwelling on any one lot, except for accessory dwellings as provided in SMC 18.12.030;
- E. Duplexes, on any one lot in lieu of one single family detached dwelling;
- F. Streets;
- G. Wireless communication facilities...

- H. Existing automotive and motorized vehicle sales and rental agencies lawfully operating as of June 1, 2000 and in accordance with SMC 18.12.080(M);
- I. Wetland mitigation banks...
- J. Multiplexes; provided that in the LDR 8.5 and LDR 12 zones on parcels more than 1.5 times the minimum lot size, one multiplex per parcel with up to four units in lieu of one detached single family dwelling;
- K. Community Gardens.

Section 3. Amended Section. Sumner Municipal Code Chapter 18.12 Low Density Residential District, Section 18.12.030 Accessory Uses, is hereby amended as follows:

18.12.30 Accessory uses.

Accessory uses permitted in the LDR district are uses and structures customarily appurtenant to the principally permitted uses, such as:

A. Accessory dwelling units subject to the following criteria:

1. ~~One~~ Two accessory dwelling units shall be allowed per legal building lot as a subordinate use in conjunction with the one-single-family detached dwelling allowed under SMC 18.12.020(D) ~~which, for the purposes of this section, is the primary dwelling unit; except that no accessory dwelling units are allowed where the building lot is below the minimum lot size specified for the zone.~~

2. ~~Either the primary dwelling unit or the accessory dwelling unit must be occupied by the owners of the property. In addition, Accessory dwelling units shall not be subdivided or otherwise segregated in ownership from the primary dwelling unit, except in accordance with subsections (A)(14) and (15) of this section. The owners shall sign an affidavit affirming that the owners will occupy the main building or the accessory dwelling unit as their primary residence for at least six months of every year. The owners shall sign a covenant agreeing to the conditions of this section which shall be recorded with the Pierce County auditor. The form of the affidavit and covenant shall be specified by the development services department;~~

3. ~~The accessory dwelling unit and primary dwelling unit together may account for a total of two families established by the definition of "family" in this title.~~

- 2 The accessory dwelling unit shall contain a maximum floor area of 1,000 square feet, excluding any related garage area used for vehicle parking...

Repealed by Ord. 2300;

3. There shall be one off-street parking space provided for per accessory dwelling units, except that no off-street parking shall be required for accessory dwelling units that are located within one-half mile of the Sumner transit station ~~if the applicant demonstrates that on-street parking is available.~~

4. Accessory dwelling units may be located as an attached unit in the same building as the primary dwelling unit or in a detached accessory building, ~~except that, in the LDR 4,000~~

~~zone, accessory dwelling units shall be located only in the same building as the primary dwelling unit;~~

5. ~~General appearance and layout regulations for accessory dwelling units are as follows:~~
Accessory dwelling units constructed concurrently with a subdivision shall be subject to subdivision Design Review pursuant to SMC 18.40.020.
 - ~~a. Detached accessory dwelling units for which any portion of the structure is located closer to the front of the lot than the rear of the primary dwelling unit shall be consistent with the exterior architectural style of the primary dwelling unit, including style of siding and windows;~~
 - ~~b. The entrance for an attached accessory dwelling unit shall be located either on the rear or the side of the primary dwelling unit;~~
6. Height. Detached accessory dwelling units shall have a maximum building height of 24 ~~18~~ feet, unless the principal dwelling unit is less than 24 feet in height, in which case the height of the ADU shall not exceed the height of the principal dwelling unit. In no case shall the second story contain exterior walls exceeding five feet in height on more than 50 percent of the perimeter of the second story. Attached accessory dwelling units may match the height of the primary dwelling unit, except that attached units located closer than 30 feet to the rear property line shall have a maximum building height of ~~18~~ feet;
7. Setbacks, Detached Units. Minimum yard setbacks for detached accessory dwelling units are as follows:
 - a. Front yard setback: equal to or greater than existing front setback of the primary dwelling unit;
 - b. ~~Rear yard setback:~~ All other setbacks: minimum of 15 feet, same as required for the primary dwelling unit, except when:
 - i. The rear property line is abutting an alley, in which case the ADU may be located at the lot line the setback shall be that required for garage ingress and egress per SMC 18.12.080(E); or,
 - ii. The ADU is a maximum of 18 feet in height, in which case it may be located 15 feet from the rear property line, and 7.5 feet from interior side yard lot lines.
 - ~~c. Interior side yard: minimum of five feet, except as follows:~~
 - ~~i. If the interior side property line is abutting an alley with vehicular access to a garage, then the setback is per SMC 18.12.080(E).~~
 - ~~ii. If the interior side property line is the rear property line of an adjacent lot, the side yard shall be a minimum of 15 feet;~~
 - ~~d. Street side yard: same as required for the primary dwelling unit;~~
8. Setbacks, Attached Units. Minimum yard setbacks for attached accessory dwelling units shall be the same as the setback requirements for the primary dwelling unit...
9. Windows...
10. The accessory dwelling unit shall meet all technical code standards...
11. The accessory dwelling unit may be subdivided from the original parcel...

12. Accessory dwelling units that are subdivided from the original parcel shall meet the off-street parking standards...
13. **Conversion of existing accessory structure to ADU.** Existing accessory structures may be converted into an accessory dwelling unit, subject to the following provisions:
- ~~a. An accessory structure can be converted to an accessory dwelling unit so long as the building height, setbacks, and other provisions of this subsection (A) are met, unless otherwise provided in this section;~~
 - ~~b. Setbacks. No conversion of an accessory structure to an accessory dwelling unit shall encroach further into the setbacks established in this subsection (A) for accessory dwelling units; except for preexisting structures as provided in subsection (A)(16)(e) of this section;~~
 - a. The converted structure does not encroach further than the existing accessory structure into the setbacks established in section 10;
 - b. The converted structure does not further violate lot coverage requirements;
 - c. The converted structure meets all other development standards as required in 18.12.030(A).
 - d. The original structure to be converted was legally constructed prior to the adoption of this code.
 - ~~e. Where the structure to be converted was constructed prior to 2012, the converted unit may have a minimum rear yard of three feet, and a minimum interior side yard of three feet, if located in the rear 33 percent of the lot, or in back of the front 75 feet of the lot; except as follows:~~
 - ~~i. An accessory structure with vehicular access from an alley shall have a rear setback and interior side setback established by SMC 18.12.080(E); unless the interior side property line is the rear property line of an adjacent lot, in which case the setback shall be a minimum of 10 feet at the abutting rear yard;~~
 - ~~ii. The converted unit shall be no taller than one story and 16 feet; and~~
 - e. The structure to be converted shall be of sound condition and meet current fire, building and safety regulations, as determined by the building official;
 - f. Parking. If off-street parking spaces for the primary dwelling unit are removed as part of converting an existing accessory structure to an accessory dwelling unit, the applicant shall demonstrate on a site plan how the provisions in subsection (A)(6) of this section and the parking requirements in SMC 18.12.070(J)(K) are being met;
 - g. Conversion of a nonconforming structure to an accessory dwelling unit shall not result in an increase in the nonconformity; and
 - h. An accessory structure conversion may be expanded beyond its existing footprint and setbacks up to a maximum of 1,000 square feet in area, provided:
 - i. the finished structure shall comply with the maximum building height in 18.12.030(A)(9); and
 - ii. the expanded portion of the structure shall meet the setbacks established in 18.12.030(A)(10).

Section 4. Amended Section. Sumner Municipal Code Chapter 18.12 Low Density Residential Districts, Section 18.12.040 Conditional Uses is hereby amended as follows:

18.12.040 Conditional uses.

The following uses in the LDR district require a conditional use permit or, where specifically required, a planned residential development approval from the city:
[...]

G. Manufactured housing subdivisions development:

- a. Manufactured home parks subject to SMC 18.34; and
- b. Manufactured housing subdivisions subject to SMC Title 17;

[...]

M. Assisted, senior and affordable housing

1. Assisted living facilities, board and care homes, hospices or nursing homes that meet building height and other standards in the zone require a conditional use permit.
2. Multifamily senior housing, including retirement homes, senior apartments and continuing care communities may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC;
3. Affordable multifamily housing on properties owned by a religious organization may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC.

[...]

S. Permanent supportive housing that exceeds ~~one two~~ dwellings on any one lot, subject to the performance standards in SMC 18.12.080(R); and

T. Transitional housing that exceeds ~~one two~~ dwellings on any one lot, subject to the performance standards in SMC 18.12.080(R).

Section 5. Amended section. That Sumner Municipal Code Chapter 18.12 Low Density Residential Districts, Section 18.12.080 Performance Standards, is hereby amended as follows:

18.12.080 Performance standards

The following special performance standards shall apply to properties located in the LDR district:

[...]

R. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in this chapter;
2. Be limited to occupancy set by the City fire code ~~by one family per dwelling unit;~~
3. Comply with the maximum housing density for the zone ~~except that in no case shall density exceed a maximum of 10 housing units on any single parcel of land;~~ and
4. Where the number of housing units exceeds one unit per lot, such housing shall not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use; or any permanent supportive housing or transitional housing use.

Section 6. Amended section. That Sumner Municipal Code Chapter 18.14 Medium and High Density Residential Districts, Section 18.14.20 Principal Permitted Uses, is hereby amended to read as follows:

18.14.020 Principal permitted uses.

The following uses are permitted in all MDR and HDR districts unless otherwise specified:
[...]

H. One new single-family dwelling on each building site in the MDR zone only, subject to maximum lot size in 18.14.070. Single-family dwellings legally constructed prior to the adoption of this code are permitted in the MDR and HDR zones.

[...]

L. One manufactured homes per lot in the MDR zone only, subject to the standards of SMC 18.14.080(N), except when placed in a manufactured home park, pursuant to SMC 18.14.040(K).

[...]

N. Apartments up to three stories in the medium density and high density residential zone south of East Main and 60th Street East, except for senior housing subject to SMC 18.14.040

O. Triplexes and fourplexes.

P. Community Gardens.

Section 7. Amended Section. That Sumner Municipal Code 18.14 Medium and High Density Residential Districts, Section 18.14.030 Accessory Uses, is hereby amended to read as follows:

18.14.030 Accessory uses.

Accessory buildings and uses permitted in the MDR and HDR districts are those uses customarily incidental or appurtenant to the principal permitted uses.

[...]

H. Accessory Dwelling Units, subject to 18.12.030(A).

Section 8. Amended Section. That Sumner Municipal Code Chapter 18.14 Medium and High Density Residential Districts, Section 18.14.40 Conditional Uses, is hereby amended to read as follows:

18.14.040 Conditional uses.

The following uses are conditionally permitted uses in all MDR and HDR districts unless otherwise specified...

[...]

~~B. Dwellings constructed for and occupied by households with at least one member being physically handicapped may exceed allowable dwelling unit densities by 50 percent of that permitted by the respective zone. A title notice indicating occupancy by the physically handicapped is required;~~

[...]

K. ~~Manufactured home parks~~ Manufactured housing development:

1. Manufactured home parks subject to SMC 18.34; and
2. Manufactured housing subdivisions subject to SMC Title 17;

[...]

- S. Senior housing and low income housing
1. Multifamily senior housing, including senior apartments, retirement homes and continuing care communities exceeding the maximum density and other standards for the zone may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC;
 2. Affordable multifamily housing on properties owned by a religious organization exceeding the maximum density and other standards for the zone may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC.

Section 9. Amended section. That Sumner Municipal Code Chapter 18.14 Medium and High Density Residential Districts, Section 18.14.070 Property Development Standards is hereby amended, as follows:

18.14.070 Property development standards for MDR/HDR.

The following Table 18.14.070 sets forth the required development standards applicable to properties located in the MDR and HDR zones:

Table 18.14.070

	MDR	HDR
A. Minimum lot area per building site in square feet ¹		
[...]		
C. Maximum development density in dwelling units per net acre	15 <u>22</u>	25
[...]		

Section 10. Amended section. That Sumner Municipal Code Chapter 18.14 Medium and High Density Residential Districts, Section 18.14.080 Performance Standards, is hereby amended as follows:

18.14.080 Performance Standards for MDR/HDR

The following special requirements and performance standards shall apply to properties in the multifamily districts:

[...]

N. Manufactured homes shall meet all of the following conditions:

- ~~1. Manufactured homes shall be new;~~
2. Manufactured homes shall be set upon a permanent foundation and the space from the bottom of the home to the ground shall be enclosed by ~~concrete or an approved concrete~~ a product which can be either load-bearing or decorative;
3. Manufactured homes shall be thermally equivalent to the State Energy Code;
4. Manufactured homes shall have exterior siding similar in appearance to siding materials commonly used on site built single-family homes;
5. The roofs of manufactured homes shall be constructed with a shake or shingle, coated metal, or similar material ~~with a nominal roof pitch of 3:12;~~ and
6. Manufactured homes shall be comprised of at least two fully enclosed parallel sections each of not less than 12 feet wide by 36 feet long.

[...]

P. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in this chapter;
2. Comply with the maximum housing density for the zone and occupancy limits set by the City fire code, ~~except that in no case shall density exceed a maximum of 10 housing units on any single parcel of land;~~ and
3. Not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use; or any permanent supportive housing or transitional housing use.

Section 11. Amended section. That Sumner Municipal Code Chapter 18.16 Commercial Districts, Section 18.16.020 Principal and Conditional Uses, is hereby amended as follows:

18.16.020 Principal and conditional uses.

The following table details permitted and conditionally permitted uses in the commercial districts. Where a “P” is indicated, the respective use in the same row is permitted in the zone classification in the same column. Where a “CUP” is indicated, the respective use in the same row is conditionally permitted in the zone classification in the same column. A conditional use permit shall be required and in full force and effect in order to establish the conditional uses. Where a “PRD” is indicated, the respective use in the same row is permitted through a planned residential development. A planned residential development shall be required and in full force and effect in order to establish the use.

		NC	GC	IC
1.	Accessory parks and recreation facilities for use by on-site employees or residents	P	P	P
[...]				
34a.	Multifamily dwellings, rooming houses and boarding houses, senior apartments, retirement homes, assisted living facilities, continuing care communities, board and care homes, hospices, or nursing homes subject to the standards and locations as applicable in SMC 18.16.040	P	P	
34b.	Senior apartments, retirement homes or continuing care communities that exceed allowable densities or that do not meet other standards of the respective zone may be allowed through a planned residential development, pursuant to chapter 18.24 SMC, subject to the standards and locations as applicable in SMC 18.16.040	PRD	PRD	
<u>34c.</u>	<u>Affordable multifamily housing on properties owned by a religious organization exceeding the maximum density and other standards for the zone may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC, subject to SMC 18.16.040.</u>	<u>PRD</u>	<u>PRD</u>	
[...]				
<u>76.</u>	<u>Community gardens</u>	<u>P</u>	<u>P</u>	<u>P</u>

Section 12. Amended section. That Sumner Municipal Code Chapter 18.16 Commercial Districts, Section 18.16.080 Performance Standards, is hereby amended as follows:

18.16.080 Performance Standards

The following special requirements and performance standards shall apply to properties located in the commercial districts:

[...]

W. Indoor emergency shelters and indoor emergency housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with occupancy limits set by the City fire code ~~Be limited to no more than five families or 20 occupants, whichever is fewer; and~~
3. Not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use; or any permanent supportive housing or transitional housing use.

X. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with the maximum residential density and mixed use requirements for the zone as specified in SMC 18.16.040 and occupancy limits set by the City fire code; ~~except that in no case shall density exceed 25 dwelling units per acre; and~~
3. Not be located within 880 feet ~~one-half mile~~ of any emergency shelter or emergency housing use; or any other permanent supportive housing or transitional housing use.

[...]

Section 13. Amended section. That Sumner Municipal Code Chapter 18.18 Manufacturing Districts, Section 18.18.060 Performance Standards, is hereby amended as follows:

18.18.060 Performance standards.

The following special requirements and performance standards shall apply to properties located in the manufacturing districts:

[...]

V. Indoor emergency shelters and indoor emergency housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with occupancy limits set by the City fire code ~~Be limited to no more than five families or 20 occupants, whichever is fewer; and~~
3. Not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use; or any permanent supportive housing or transitional housing use.

W. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with occupancy limits set by the City fire code ~~Not exceed a maximum housing density of 25 dwelling units per acre;~~
3. In no case exceed a maximum of 10 housing units on any single parcel of land; and

4. Not be located within 880 feet ~~one-half mile~~ of any emergency shelter or emergency housing use; or any other permanent supportive housing or transitional housing use.

Section 14. Amended section. That Sumner Municipal Code Chapter 18.24 Planned Residential Development, Section 18.24.020 Districts Where Permitted, is hereby amended as follows:

18.24.020 Districts where permitted.

- A. Planned residential development (PRD) may be permitted in the following residential districts:
 1. LDR, low density residential district;
 2. MDR, medium-density residential district;
 3. HDR, high-density residential district.
- B. A senior housing or affordable multifamily housing on properties owned by a religious organization PRD may be permitted in the following districts:
 1. LDR, low density residential district;
 2. MDR and ESUV/MDR, medium-density residential districts;
 3. HDR and ESUV/HDR, high-density residential districts;
 4. NC, neighborhood commercial district;
 5. GC, general commercial district;
 6. ESUV/NC, East Sumner urban village neighborhood commercial;
 7. ESUV/GC East Sumner urban village general commercial.

Section 15. Amended section. That Sumner Municipal Code Chapter 18.24 Planned Residential Development, Section 18.24.030 Permitted Uses in a PRD, is hereby amended as follows:

18.24.030 Permitted uses in a PRD.

The following uses are allowed in planned residential developments:

- A. Within the LDR districts, allowable residential uses shall include only the following:
 1. Single-family residences or detached condominiums; or
 2. Senior housing, including senior apartments or combination of senior housing types, provided at least 20 percent of the dwelling units are maintained as affordable housing.
 3. Affordable multifamily housing on properties owned by a religious organization.
- B. Within the MDR or HDR and ESUV/MDR or ESUV/HDR districts, residential development of all types regardless of the type of building in which such residence is located, such as single-family residences, manufactured homes, duplexes, triplexes, fourplexes, townhouses, condominiums or senior apartments or other senior housing types; provided, that:
 1. Senior housing shall maintain at least 20 percent of the units as affordable housing; ~~and~~
 2. Hotels, motels and mobile home parks are excluded; and
 3. Affordable multifamily housing on properties owned by a religious organization shall include 100 percent of the units as designated affordable housing.
- C. Within commercial districts, allowable residential uses in a planned residential development shall only include;

1. Senior housing, subject to location requirements specified in each district; provided, that at least 20 percent of the dwelling units are maintained as affordable housing.
2. Affordable multifamily housing on properties owned by a religious organization, subject to SMC 18.16.040; provided, that 100 percent of the units as designated affordable housing.

[...]

Section 16. Amended section. That Sumner Municipal Code Chapter 18.24 Planned Residential Development, Section 18.24.060 Permitted Uses in a PRD, is hereby amended as follows:

18.24.060 Property development standards in a PRD

A. Acreage Minimum. The minimum site for a planned residential development shall be as follows:

1. For low density residential zones, one acre.
2. For medium density residential zones, one-half acre.
3. For a senior housing PRD on a property owned or controlled by a religious organization ~~church~~, public housing authority, or government agency that includes other uses, the site devoted to senior housing uses shall be a minimum of one-half acre. Density shall be calculated based on the area devoted to senior housing uses.
4. For an affordable multifamily housing PRD on a property owned by a religious organization that includes other uses, the site devoted to affordable housing shall be a minimum of one-half acre. Density shall be calculated based on the area devoted to affordable housing uses.

[...]

D. Density Standards. The maximum density permitted in the underlying zone shall serve as the base density. The base density may be adjusted based on conformance with the following:

1. Density Standards for General Residential Development. The total density for a planned residential development that does not include senior housing or affordable housing shall be the same as the density of the base zone, except that the allowed density may be clustered on the site.
2. Density Standards for Senior Housing and Affordable Multifamily Housing on Properties Owned by a Religious Organization. The base density for senior housing and religious organization affordable housing may be increased according to the zone in which it is located, as follows:
 - a. Low density residential (LDR) zone: up to 50 dwelling units per acre to a total maximum of 200 units.
 - b. Medium density residential and high density residential (MDR, HDR, ESUV/MDR, ESUV/HDR) zones: up to 50 dwelling units per acre.
 - c. Neighborhood commercial (NC, ESUV/NC) zones: up to 50 dwelling units per acre.
 - d. General commercial (GC, ESUV/GC) zones: up to 50 dwelling units per acre.

E. Building Height for Senior Housing and Affordable Multifamily Housing on Properties Owned by a Religious Organization. The maximum building height permitted in the underlying zone shall serve as the base height. Base height for senior housing and religious

organization affordable housing may be increased according to the zone in which the development is located, as follows:

1. Low density residential (LDR) zone: Up to 35-foot building height; provided, that buildings greater than a 30-foot height have increased setbacks...
2. Medium density residential and high density residential (MDR, HDR, ESUV/MDR, ESUV/HDR) zones: Up to 50-foot building height; provided, that buildings greater than a 35-foot height have increased setbacks...
3. Neighborhood commercial (NC, ESUV/NC) zones: up to 50-foot building height.
4. General commercial (GC, ESUV/GC) zones: up to 50-foot building height.

F. Open Space. The minimum open space established in SMC 18.41.200 may be reduced as follows:

1. A single-family dwelling planned residential development shall provide not less than 30 percent of the lot area for common open space.
[...]
3. Senior apartments and affordable multifamily housing on properties owned by a religious organization may have reduced private open space to zero, provided the area in common open space is not less than 20 percent of the lot area devoted to senior housing or affordable multifamily housing uses.
[...]

Section 17. Amended section. That Sumner Municipal Code Chapter 18.29 Town Center Code, Section 18.29.060 Performance Standards, is hereby amended as follows:

18.29.060 Performance standards.

The following special requirements and performance standards shall apply to properties located in the manufacturing districts:

[...]

G. Indoor emergency shelters and indoor emergency housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the district;
2. Comply with occupancy limits set by the City fire code ~~Be limited to no more than five families or 20 occupants, whichever is fewer;~~ and
3. Not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use; or any permanent supportive housing or transitional housing use.

H. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the district;
2. Comply with occupancy limits set by the City fire code where applicable; and in no case shall ~~Not~~ exceed a maximum housing density of 25 dwelling units per acre; and
3. Not be located within 880 feet ~~one-half mile~~ of any emergency shelter or emergency housing use; or any other permanent supportive housing or transitional housing use.

[...]

Section 18. Amended section. That Sumner Municipal Code Chapter 18.30 East Sumner Urban Village Overlay District, Section 18.30.030 Principal and Conditional Uses, is hereby amended as follows:

18.30.030 Principal and conditional uses.

A. Residential Districts...

B. Commercial Districts. Those uses listed below shall govern the uses permitted and conditionally permitted where the base designations GC and NC are combined with the ESUV overlay district. Where a “P” is indicated, the respective use in the same row is permitted in the zone classification in the same column. Where a “CUP” is indicated, the respective use in the same row is conditionally permitted in the zone classification in the same column. A conditional use permit shall be required and in full force and effect in order to establish the conditional uses. Where a “PRD” is indicated, the respective use in the same row is permitted through a planned residential development. A planned residential development shall be required and in full force and effect in order to establish the use.

		NC/ESUV	GC/ESUV
1.	Accessory parks and recreation facilities for use by on-site employees or residents	P	P
...	...		
34a.	Senior housing including retirement homes and senior apartments, assisted living facilities, continuing care communities, board and care homes, hospices, or nursing homes, subject to density maximums and locations specified in SMC 18.30.080(B) and 18.30.090	P	P
34b.	Senior housing that exceeds the density maximums and other standards of SMC 18.30.080(B), subject to the locations specified in SMC 18.30.090	PRD	PRD
34c.	<u>Affordable multifamily housing on properties owned by a religious organization exceeding the maximum density and other standards for the zone may be allowed only through a planned residential development, pursuant to chapter 18.24 SMC, subject to to SMC 18.16.040.</u>	<u>PRD</u>	<u>PRD</u>
[...]	[...]		
<u>57.</u>	<u>Community gardens</u>	<u>P</u>	<u>P</u>

Section 19. Amended section. That Sumner Municipal Code Chapter 18.30 East Sumner Urban Village Overlay District, Section 18.30.090 Performance Standards, is hereby amended as follows:

18.30.090 Performance standards.

A. Required Landscaping. For each development in the urban village district...
[...]

G. Indoor emergency shelters and indoor emergency housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with the performance standards of SMC 18.30.090, including location requirements;
3. Comply with occupancy limits set by the City fire code ~~Be limited to no more than five families or 20 occupants, whichever is fewer;~~ and
4. Not be located within 880 feet ~~one-half mile~~ of any other emergency shelter or emergency housing use, or any permanent supportive housing or transitional housing use.

H. Permanent supportive housing and transitional housing shall:

1. Comply with all applicable setbacks, height and other dimensional standards as required in the zone;
2. Comply with the performance standards of SMC 18.30.090, including location;
3. Comply with occupancy limits set by the City fire code ~~Not exceed a maximum housing density of 25 dwelling units per acre; and~~
4. Not be located within 880 feet ~~one-half mile~~ of any emergency shelter or emergency housing use; or any other permanent supportive housing or transitional housing use.

Section 20. Amended section. That Sumner Municipal Code Chapter 18.40 Design and Development Guidelines, Section 18.40.020 Types of Review, is hereby amended as follows:

18.40.020 Types of Review

All development which falls under the thresholds provided in this section shall be subject to design review as provided for in chapter 18.56 SMC, Procedures for Land Use Permits.

B. Administrative Review. The following types of projects shall require design review according to the procedures for Type III.b decisions, chapter 18.56 SMC, Procedures for Land Use Permits:

1. Sign permits for permanent signs which are regulated by the design guidelines.
 - ~~2. Accessory units in residential zones.~~
- [...]

Section 21. Severability. If a section, subsection, paragraph, sentence, clause, or phrase of this ordinance is declared unconstitutional or invalid for any reason by any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. If the provisions of this ordinance are found to be inconsistent with other provisions of the Sumner Municipal Code, this ordinance is deemed to control.

Section 22. Effective date. This ordinance shall take effect five (5) days from the date of publication in the City's official newspaper.

Section 23. Corrections by City Clerk or Code Reviser. Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Passed by the City Council and approved by the Mayor of the City of Sumner, Washington, at a regular meeting thereof this ____ day of _____

Mayor Kathy Hayden

ATTEST:

APPROVED AS TO FORM:

City Clerk Michelle Converse, CMC

Andrea Marquez, City Attorney

First Reading:
Date Adopted:
Date of Publication:
Effective Date:



STAFF REPORT

DATE: December 2, 2024
TO: Mayor Hayden and City Council
FROM: Ryan Windish, Director of Economic and Community Development
RE: **Zoning Code Text Amendment: Housing and Land Use Regulations**
File #: CTA-2024-0001

I. BACKGROUND

Purpose: The City Council is being asked to take action on Ordinance No. 2907, for the 2024 Comprehensive Plan updating land use regulations related to Housing and Land Use.

Why amendments are being proposed

The State Growth Management Act (GMA) requires cities to complete a "10-year periodic update" of their Comprehensive Plans. Sumner's 10-year update involves extensive revisions to the Comprehensive Plan and regulations to reflect new State laws and changes that have occurred over the last decade.

The GMA, Countywide Planning Policies (CPPs) and the Regional VISION 2050 Plan include providing a variety of housing types, and affordable housing, as one of many planning goals. The Pierce County Countywide Planning Policies and VISION 2050 emphasize equity, growth near transit, housing options, homeownership opportunities, infill development, and anti-displacement. In addition, there have been recent bills passed by the State legislature that require cities to update local codes with less-restrictive accessory dwelling units (ADU) standards, to allow a minimum of 2 ADUs per single-family lot, and to allow 2 dwelling units per lot. New regional growth targets have been established by the State and County, requiring each city to plan for its fair share of jobs and housing growth. The assigned growth targets for Sumner for 2020-2044 are 1,985 housing units, 5,313 jobs, and 4,904 residents. The policies proposed in the 2024 Sumner Comprehensive Plan are intended to address GMA, new State laws and growth projections. New regulations described below are proposed to implement these policies.

The Planning Commission reviewed the proposed housing/land use amendments, along with other 2024 Comprehensive Plan and regulations updates, during 2023 and 2024, and held a public hearing on the Plan and regulations on April 4, 2024.

II. SUMMARY OF PROPOSAL

The proposed amendments to Sumner Municipal Code Title 18 Zoning Code would update regulations related to housing types and densities allowed in residential zones, and the Town Center and East Sumner subareas. Key changes are described below.

- A. Updates to definitions for consistency with State law and case law, such as: Definition of family, which

cannot limit the number of unrelated persons.

B. Increased housing density in residential zones

- 1) Allow 2 Accessory Dwelling Units (ADUs) per single-family residential lot (per State law).
- 2) Update design standards for ADUs to simplify and make less restrictive (per State law), including:
 - Maximum size of 1,000 s.f.
 - Attached or detached allowed
 - Maximum building height of 24 feet or same as principal dwelling
 - Setbacks not more restrictive than for principal dwelling
 - Conversions of existing accessory structures allowed, with fewer restrictions.
- 3) Allow duplexes on any one lot in lieu of one single family detached dwelling (per State law requirement to allow 2 dwelling units). Duplexes are already allowed in Medium Density Residential (MDR) and High Density Residential (HDR) zones.
- 4) Prohibit new single-family homes in the HDR zone and establish a maximum lot size in MDR for new single-family homes.
- 5) Allow triplex and fourplex buildings on "larger" single-family lots in the LDR 8.5 and LDR 12 zones (on parcels more than 1.5 times the minimum lot size).
- 6) Allow small-scale (3-story) apartments in the MDR zone.
- 7) Increase the density allowed in MDR zone to better accommodate multiplexes and small apartments: Maximum density would change in MDR from 15 to 22 dwelling units per acre.

C. Add allowances for affordable housing developments by religious organizations: Allow affordable housing apartments by religious organizations through density and height bonuses (similar to affordable senior housing process).

D. Change the current use of Multifamily Tax Exemptions (MFTE) credits in Town Center:

- Offer the Multi-family Tax Exemption only for affordable housing in the Town Center, to create an incentive for affordable housing.
- Note: Affordable means affordable to low-moderate income households, which are those whose income is between 80%-115% of the median income in Pierce County.

E. Expand the current MFTE allowance for a targeted area in East Sumner to apply to all development in the East Sumner Urban Village boundary, to create incentives for affordable housing.

F. Change regulations to create more allowances for manufactured homes:

- Allow a manufactured home to be placed on a single-family lot, even if the home is not new.
- Allow manufactured home parks as a conditional use in all residential zones.
- Note: The City is now required by State law to include policies and strategies for anti-displacement of vulnerable and low-income residents.

G. Update provisions (per State law) for permanent supportive housing, transitional housing, and emergency housing/shelters:

- Conditional Use Permit still required.
- Change current occupancy limits to instead be based on fire/building code.
- Changes spacing requirements to no closer than 880 feet from another (versus 1,000 feet).

III. ANALYSIS

Sumner code requires that proposals to amend the Zoning Code include an explanation of how the proposed amendment implements the comprehensive plan (SMC 18.56.149(C)(2)). Relevant sections and policies related to the proposed text amendment are presented below.

LAND USE ELEMENT – DESIGNATIONS

- Purpose of medium density designation: The medium density designation is intended to provide for

multi-family living to ensure that opportunities to obtain reasonable-cost housing exist for community residents...

- Purpose of high density designation: This designation allows for higher density multi-family developments to allow for a broad range of housing choices in areas with existing and planned infrastructure, and to allow for infill development and the reduction of sprawl.
- The Planned Residential Development (PRD) process..."offers greater flexibility to develop a mix of housing types with varying lot sizes and dimensions, increased density as appropriate, adequate open space, and building setbacks and heights that are compatible with adjacent residential uses..."
- Proposed code updates to the uses, housing types, and densities in these zones are consistent with the stated purpose of these designations.

LAND USE ELEMENT

- 1.1 Ensure appropriate transitions so that more intensive uses do not adversely impact adjacent uses.
 - 1.1.1 Maintain the design guidelines and ordinances to achieve compatible and attractive new residential, commercial, and industrial uses.
 - 1.1.2 Maintain zoning and subdivision regulations to ensure adequate setbacks, landscaping, and buffering are required where land use conflicts and impacts may occur.
- 1.2 Encourage infill development on vacant properties with existing public services and public utilities, and new development in areas with existing or planned public facilities.
- 1.3.1 Annually review development regulations to remove unnecessary requirements and to balance environmental protection, public participation, and housing and economic development goals.

COMMUNITY CHARACTER ELEMENT

- 1.7 "Preserve the single-family residential scale and historic character of existing residential streetscapes through various means such as floor area ratio and setback requirements."
- 2.6 "In recognition of the need for a variety of housing, allow through the Comprehensive Plan and Zoning Code a mix of residential uses as appropriate to the neighborhood character."

HOUSING

Goal 1. Encourage the maintenance and preservation of existing housing stock and residential neighborhoods.

- 1.4 In order to balance the protection of viable neighborhoods and the need to provide for a range of housing to all life stages and economic segments, allow for accessory units in single-family neighborhoods.
- 1.5 "Accommodate local non-profit housing agencies' efforts to purchase and rehabilitate housing to meet affordable housing needs and special needs of the community."

Goal 2. Provide a range of housing types for all life stages and economic segments of the Sumner community.

- 2.1.1 "Develop a housing strategy to implement fair share objectives..." and a phased approach to meet the community's fair share housing allocation.
- 2.2 "Plan for an adequate supply of land in appropriate land use designations and zoning categories to accommodate projected household growth."
- 2.3 "Encourage a variety of housing available to all economic segments of the community."
- 2.3.1 "Review the Zoning Code, Subdivision Code, Building Codes, and other development-control ordinances to identify and remove excessive, duplicative, or unnecessary regulations..."
- 2.3.3 Consider implementing strategies such as an inclusionary housing program, minimum densities, density bonuses, adaptive re-use, and others to promote affordable housing.
- 2.4 Provide for a jobs and housing relationship that satisfies the local need for housing and affordability.
- 2.5 Promote fair and equal access to housing for all persons in accordance with state law.
- 2.8 Provide incentives for developing senior housing in the downtown such as permit fee waivers and reductions, parking requirement reductions, and multi-family tax exemptions.

Goal 4. Provide for a variety of housing types and densities in the town center in close proximity to the train station.

- 4.1 Promote the construction of housing stock in the Town Center by at least 500-1000 dwelling units by 2035.
- 4.7 Adopt a Multi-family Tax Exemption allowance per RCW 84.14 that would create substantial incentives for re-development in the Town Center by providing property tax relief for qualified multifamily and affordable housing developments for 8-12 years.

FAMILY AND HUMAN SERVICES

- 2.2 As prescribed in the City of Sumner's Housing Element, support the development and implementation of programs that offer housing for all stages of life.
- 2.2.1 Support programs that develop adequate access to emergency and temporary housing.

CONCLUSION

Sumner's Comprehensive Plan provides a general policy basis for promoting housing that offers a variety of options and types. Proposed code amendments will further the policies in the Comprehensive Plan by expanding opportunities for various types of housing and housing that is affordable to a range of incomes. The amendments bring Sumner's regulations into compliance with new State legislation's requirements for housing. The amendments also include development standards to minimize impacts of increased density, such as for ADUs, multiplexes, and small-scale apartments, and will support efforts of non-profit agencies to provide affordable housing and will help meet Sumner's housing targets. The amendments, overall, are consistent with the goals and policies related to the environment within the City's Comprehensive Plan, including the policies discussed above. Additional analysis is contained in the Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II), issued March 1, 2024.

IV. PUBLIC & AGENCY COMMENTS

The public notice for the Draft Comp Plan and Draft EIS was issued March 1, 2024, with a public comment period from March 1 to April 30, 2024. An additional 15-day notice of the Planning Commission public hearing was published on March 12. Comments received were forwarded to the Planning Commission prior to final recommendations.

V. SEPA ENVIRONMENTAL REVIEW

The State Environmental Policy Act (SEPA) establishes a process for SEPA review of Comprehensive Plan and regulations updates. In compliance with State SEPA environmental regulations, the 2024 Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II) were issued March 1, 2024 for public review through April 30, 2024. The EIS consists of an evaluation of the potential impacts of proposed policy and regulation changes, and is available for review on the City's website at: <https://connects.sumnerwa.gov/planning-sumners-future>.

VI. PLANNING COMMISSION RECOMMENDATION

The Planning Commission voted unanimously to recommend that the City Council "Move to approve of Ordinance No. 2907 for the 2024 Comprehensive Plan Housing/Land Use Regulations dated September 10, 2024."

VII. EXHIBITS & REFERENCES

- A. Ordinance No. 2907: Housing/Land Use Regulations dated September 10, 2024

SUBJECT: Ordinance No. 2908 -Zoning Code Text Amendments on Historic & Cultural Preservation Regulations

CATEGORY: Ordinance

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Ordinance No. 2908 -Zoning Code Text Amendments on Historic & Cultural Preservation Regulations
2. Staff Report

STAFF CONTACT: Ryan Windish, Community & Economic Development Director

SUMMARY BACKGROUND:

Ordinance No. 2908 would adopt Historic/Cultural Resource Regulations as a part of the 2024 Comprehensive Plan periodic update. Key changes include new regulations that apply only to Town Center Plan area and includes a DAHP recommendation and requirements. The proposed amendments to Sumner Zoning Code, Title 18, will update regulations related to protection of historic and cultural resources. Currently, the City does not have historic preservation requirements.

See the attached staff report for a summary and analysis of proposed amendments. Note that this agenda item is related to the regulations only; policies related to historic/cultural resources are contained in the Draft 2024 Comprehensive Plan (Ordinance No. 2906).

A Council Public Hearing was held on December 2, 2024.

COUNCIL COMMITTEE/STUDY SESSION: Study session reviews occurred on October 16, 2024, October 28, 2024, November 12, 2024 and December 9, 2024.

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION: Do Pass

STAFF RECOMMENDATIONS/MOTION:

Approve Ordinance No. 2908 - Zoning Code Text Amendment on Historic and Cultural Resources Regulations, as part of the 2024 Comprehensive Plan Periodic Update.

**ORDINANCE NO. 2908
CITY OF SUMNER, WASHINGTON**

**AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER,
WASHINGTON, AMENDING THE ZONING CODE CHAPTER 18.39 HISTORIC
PRESERVATION AND SECTION 18.39.020 PURPOSE AND ADDING A NEW
SECTION 18.39.140 HISTORIC AND CULTURAL RESOURCE REVIEW
REQUIREMENTS.**

WHEREAS, Sumner has many historic buildings, structures and sites that are valued by the community as contributing to its quality of life, community character, economic vitality, and an understanding of Sumner's history; and

WHEREAS, growth and development continue at a pace that may increase pressure on historic structures to be converted or demolished, and increase the likelihood of impacts to culturally significant tribal sites; and

WHEREAS, a variety of historic preservation organizations and agencies have expertise and a role to play in promoting historic preservation in Sumner; and

WHEREAS, City codes and permit processes, and consultation with the State Department of Archeology and Historic Preservation, can encourage owners and developers to consider, avoid and mitigate impacts to sites with historic and cultural resource value;

WHEREAS, the Planning Commission held study sessions on the proposed amendments on August 3, 2023; September 21, 2023; and June 6, 2024; and held a duly-advertised public hearing on April 4, 2024; and

WHEREAS, on September 19, 2024, the Planning Commission voted unanimously to recommend adoption by the City Council of the proposed zoning regulations updates as set forth in this ordinance; and

WHEREAS, the City Council reviewed the proposed amendments at study sessions on October 28, 2024 and held a duly-advertised public hearing on December 2, 2024; and

WHEREAS, the proposal was forwarded to the Washington State Department of Commerce for the required 60-day State review per the Growth Management Act on March 1, 2024; and

WHEREAS, the City Council finds the proposed amendments to be consistent with the Sumner Comprehensive Plan and the Sumner Municipal Code criteria for Zoning Code amendments;

**NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON,
DO ORDAIN AS FOLLOWS:**

Section 1. Amended Section. Sumner Municipal Code Section 18.39.020 is hereby amended as follows:

18.39.020 Purpose.

The purpose of the historic preservation ordinance is to provide for the identification, evaluation, designation, and protection of designated historic and prehistoric resources within ~~boundaries of city of~~ Sumner and preserve and rehabilitate eligible historic properties within the ~~city of~~ Sumner for future generations through special valuation, a property tax incentive, as provided in chapter 84.26 RCW, and through guidance for property owners and developers in order to:

- A. Safeguard the heritage of the city as represented by those buildings, districts, objects, sites and structures which reflect significant elements of the city of Sumner history;
- B. Foster civic and neighborhood pride in the beauty and accomplishments of the past, and a sense of identity based on the city of Sumner history;
- C. Stabilize or improve the aesthetic and economic vitality and values of such sites, improvements and objects;
- D. Assist, encourage and provide incentives to private owners for preservation, restoration, redevelopment and use of outstanding historic buildings, districts, objects, sites and structures;
- E. Promote and facilitate the early identification and resolution of conflicts between preservation of historic resources and alternative land uses; and
- F. Conserve valuable material and energy resources by ongoing use and maintenance of the existing built environment.

Section 2. New Section. Sumner Municipal Code Chapter 18.39 is hereby amended to add a new section, as follows:

18.39.140 Historic and Cultural Resources Review Requirement.

1. Projects involving demolition of a building or structure more than 45 years old or identified by the State Department of Archeology and Historic Preservation (DAHP) as potentially eligible for listing, or new construction that is not categorically exempt from SEPA environmental review, on sites located in Town Center, shall be required to include a request for a consultation with DAHP to determine whether the property is considered a historic resource. If the property is found to be a historic resource, mitigation measures that are recommended by DAHP within 30 days of a requested consultation will be considered and implemented only as appropriate.
 - a. The consultation request shall be submitted on form(s) approved by the Director.
 - b. Mitigation measures shall be applied as appropriate to the scale and impact of the project and as appropriate to the significance of the resource(s), as determined by the Director in consultation with a state or local organization or agency with expertise in historic preservation.
2. The City shall require Inadvertent Human Remains Discovery Language recommended by DAHP as a condition of project approval and consistent with RCWs 68.50.645, 27.44.055, and 68.60.055 as follows:

“If ground disturbing activities encounter human skeletal remains during the course of construction, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance until the State provides notice to proceed. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the

most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to the Department of Archaeology and Historic Preservation (DAHP) who will then take jurisdiction over the remains. The DAHP will notify any appropriate cemeteries and all affected tribes of the find."

3. All permits and statements of exemption shall contain provisions that require developers to immediately stop work and notify the City of Sumner, the State Department of Archaeology and Historic Preservation (DAHP), the Puyallup Tribe of Indians, and the Muckleshoot Tribe if any artifacts of possible historic, cultural, or archaeological value are uncovered during site work. In such cases, the developer shall be required to provide for a site inspection and evaluation by a professional archaeologist or historic preservation professional, as applicable, in coordination with the state and/or affected tribes to ensure that all possible valuable historic, cultural, or archaeological artifacts are properly protected or salvaged.

Section 3. Severability. If a section, subsection, paragraph, sentence, clause, or phrase of this ordinance is declared unconstitutional or invalid for any reason by any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. If the provisions of this ordinance are found to be inconsistent with other provisions of the Sumner Municipal Code, this ordinance is deemed to control.

Section 4. Effective date. This ordinance shall take effect five (5) days from the date of publication in the City's official newspaper.

Section 5. Corrections by City Clerk or Code Reviser. Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Passed by the City Council and approved by the Mayor of the City of Sumner, Washington, at a regular meeting thereof this ____ day of _____

Mayor Kathy Hayden

ATTEST:

APPROVED AS TO FORM:

City Clerk Michelle Converse, CMC

Andrea Marquez, City Attorney

First Reading:
Date Adopted:
Date of Publication:
Effective Date:



STAFF REPORT

DATE: December 2, 2024
TO: SUMNER CITY COUNCIL
FROM: Ryan Windish, Director of Economic and Community Development
RE: **Zoning Code Text Amendment – Historic & Cultural Resource Regulations**
File #: CTA-2024-0002

I. BACKGROUND

Purpose: The City Council is being asked to take action on Ordinance No. 2908, for the 2024 Comprehensive Plan Historic & Cultural Resource Regulations

Why amendments are being proposed

The State Growth Management Act (GMA) requires cities to complete a “10-year periodic update” of their Comprehensive Plans. Sumner’s 10-year update will involve extensive revisions to the Comprehensive Plan and regulations to reflect new State laws and changes that have occurred over the last decade.

The GMA lists Historic Preservation as one of its many planning goals: “Identify and encourage the preservation of lands, sites, and structures, that have historical or archaeological significance” (RCW 36.70A.020). The GMA does not require that cities adopt specific regulations to protect historic/cultural resources. However, policies proposed in the 2024 Sumner Comprehensive Plan are intended to strengthen and promote the review, consideration and avoidance of potential impacts to historic/cultural resources. New regulations are proposed to implement these policies.

The Planning Commission reviewed the proposed amendments, along with other 2024 Comprehensive Plan and regulation updates, in August and September 2023, and June 2024. The Commission held a public hearing on the Plan and regulations on April 4, 2024.

II. SUMMARY OF PROPOSAL

The proposed amendments to Sumner Municipal Code Title 18 Zoning Code will update regulations related to protection of historic and cultural resources. Currently, the City does not have historic preservation regulations. Key changes include:

- New regulations apply only to Town Center Plan area (i.e. downtown) (see **Exhibit A**).
- Add a requirement that applicants proposing a demolition of structures more than 45 years old, or significant new construction in the Town Center Plan area, must request a consultation with the State Department of Archeology and Historic Preservation (DAHP). Projects would not be considered

“significant” if exempt from SEPA environmental review (e.g. a new porch, minor repairs, window replacement, etc.).

- Add a requirement that DAHP’s recommended mitigation measures (if received within 30 days) must be considered and implemented only if appropriate to the site/project. The 30-day timeline corresponds to DAHP’s typical review process.
- Require Inadvertent Human Remains Discovery Language to be included in permits; require provisions in permits to immediately stop work and notify appropriate agencies if artifacts are uncovered during site work.

III. ANALYSIS

Sumner code requires that proposals to amend the Zoning Code include an explanation of how the proposed amendments implement the comprehensive plan (SMC 18.56.149(C)(2)). Relevant sections and policies related to the proposed text amendments are presented below.

HISTORIC ELEMENT

Goal 1. Identify, preserve, and enhance the historic and prehistoric cultural resources of Sumner.

- 1.2 Through the environmental review process, consider potential impacts to archaeological resources.
- 1.4 Coordinate with community organizations, property owners and local citizens to protect, acquire, and/or restore key historic properties.

Goal 3. Recognize the heart and historic meaning of Downtown. 3.1 Ensure Downtown’s historic character is retained as new businesses and buildings are established, such as through design standards, historic preservation ordinances, or other means.

- 3.1 Ensure Downtown’s historic character is retained as new businesses and buildings are established, such as through design standards, historic preservation ordinances, or other means.

ECONOMIC DEVELOPMENT ELEMENT

Goal 5. Promote downtown as the town’s cultural, historic and activity center of the entire community.

COMMUNITY CHARACTER ELEMENT

- 1.5 Encourage in the community a continuous commitment to maintaining Sumner's character and quality of place, including land conservation and stewardship, wise management of streetscapes and public viewsheds, property maintenance, and historic preservation.
- 3.20 Adopt a “form-based code” in the Town Center to ensure that the design standards for multi-family and mixed use development are specific enough to create high quality designs and were appropriate to be compatible with the historic architectural context, and scale of Main Street.
- 5.1 In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complements the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.
- 6.1 Promote a compact development pattern that exhibits variety in building types and scale. Historic and vernacular architectural styles should be respected. Both sides of the streetscape should complement each other.

CONCLUSION:

The amendments would make Sumner’s regulations consistent with State guidelines for the protection of historic and cultural resources. The amendments, overall, are consistent with the goals and policies related to historic preservation within the City’s Comprehensive Plan, including the policies discussed above. Additional

analysis is contained in the Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II), issued March 1, 2024.

IV. PUBLIC & AGENCY COMMENTS

The public notice for the Draft Comprehensive Plan and Draft EIS was issued March 1, 2024, with a public comment period from March 1 to April 30, 2024. An additional 15-day notice of the Planning Commission public hearing was published on March 12. Comments received were forwarded to the Planning Commission prior to final recommendations

V. SEPA ENVIRONMENTAL REVIEW

The State Environmental Policy Act (SEPA) establishes a process for SEPA review of Comprehensive Plan and regulations updates. In compliance with State SEPA environmental regulations, the 2024 Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II) were issued March 1, 2024 for public review through April 30, 2024. The EIS consists of an evaluation of the potential impacts of proposed policy and regulation changes, and is available for review on the City's website at: <https://connects.sumnerwa.gov/planning-sumners-future>.

VI. PLANNING COMMISSION RECOMMENDATION

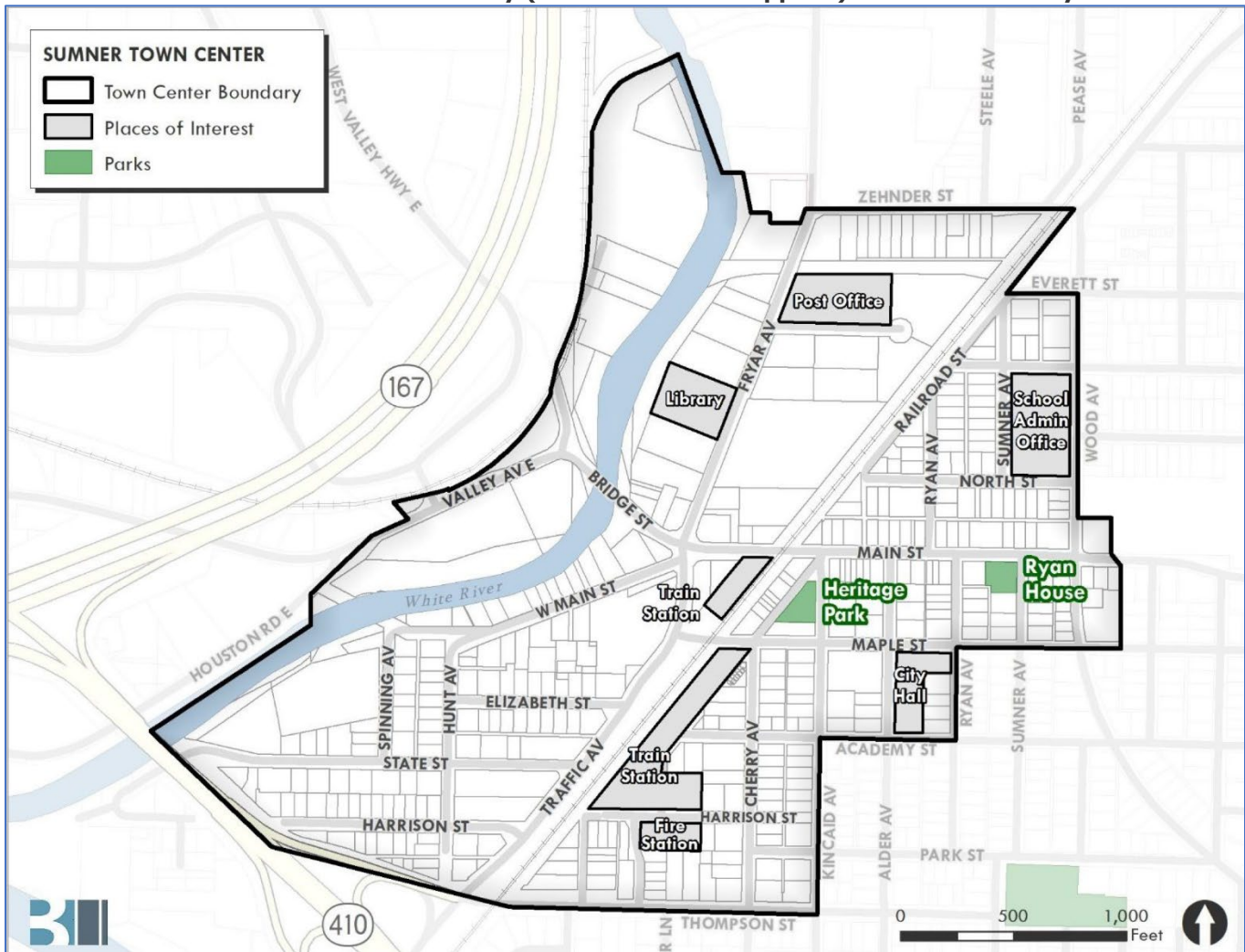
The Planning Commission voted unanimously to recommend that the City Council "Move to approve of Ordinance No. 2908 for the 2024 Comprehensive Plan Historic and Cultural Resources Regulations dated September 25, 2024."

VII. EXHIBITS & REFERENCES

- A. Ordinance No. 2908: Historic and Cultural Resources Regulations dated September 25, 2024

EXHIBIT A

Town Center Plan Boundary (area where code applies) for reference only



Source: Town Center Plan adopting ordinance 2018

SUBJECT: Ordinance No. 2909 - Critical Areas Regulations Amendments

CATEGORY: Ordinance

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Ordinance No. 2909 - Critical Areas Regulations Amendments
2. Staff Report

STAFF CONTACT: Ryan Windish, Community & Economic Development Director

SUMMARY BACKGROUND:

Ordinance No. 2909 would update the Critical Areas Regulations related to wetland and stream buffer protection and are part of the 2024 Comprehensive Plan Periodic update. Key changes proposed include buffer width adjustments including increasing stream buffers, updating definitions and section titles to be consistent with current state code, and adding a section for partial exemptions and clarifying criteria for variance approval.

See the attached staff report for a summary and analysis of proposed amendments. Note that this agenda item is related to the regulations only; policies related to environmental resource protection are contained in the 2024 Draft Comprehensive Plan (Ordinance No. 2906).

A Council Public Hearing was held on December 2, 2024.

COUNCIL COMMITTEE/STUDY SESSION: Study session reviews on October 16, 2024, October 28, 2024, November 12, 2024, December 9, 2024

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION: Do Pass

STAFF RECOMMENDATIONS/MOTION:

Move to adopt Ordinance No. 2909 amending Critical Areas Regulations, as part of the 2024 Comprehensive Plan Periodic Update.

**ORDINANCE NO. 2909
CITY OF SUMNER, WASHINGTON**

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, AMENDING SMC TITLE 16 ENVIRONMENT – DIVISION III NATURAL RESOURCE LANDS AND CRITICAL AREAS; AMENDING CHAPTER 16.40 REGULATION FRAMEWORK AND DEFINITIONS; 16.40.100 EXEMPTIONS; ADDING SECTION 16.40.105 PARTIAL EXEMPTIONS; AMENDING 16.40.120 VARIANCES; AMENDING 16.40.125 NONCONFORMING USES; AMENDING CHAPTER 16.46 WETLANDS, INCLUDING 16.46.030 DEFINITIONS, 16.46.090 EXEMPTIONS, 16.46.150 FUNCTIONALLY DISCONNECTED BUFFERS, 16.46.170 WETLAND IMPACTS AND 16.46.180 MITIGATION PLANS; AND AMENDING CHAPTER 16.46 (FISH AND) WILDLIFE HABITAT AREAS, INCLUDING 16.56.050 APPLICABILITY, 16.56.080 HABITAT MANAGEMENT PLANS, AND 16.56.100 (STREAM) BUFFERS, STREAM BUFFER INCREASES AND NEW REQUIREMENTS FOR BUFFER REDUCTIONS.

WHEREAS, the State Growth Management Act requires all cities and counties to adopt development regulations that protect critical areas; and

WHEREAS, all critical areas must be designated, and their functions and values protected using the best available scientific information, as defined by WAC 365-195-900 through 925; and the proposed updates to Sumner’s regulations are based on current Best Available Science; and

WHEREAS, critical areas regulations help minimize adverse environmental impacts of development, and help protect the natural environment, maintain fish and wildlife habitat, protect drinking water and help reduce exposure to risks such as landslides or flooding, thereby protecting the public health, safety and welfare; and

WHEREAS, the City forwarded the proposed amendments to agencies with environmental expertise, such as WA Dept. of Fish and Wildlife, WA Dept. of Ecology, and tribal fisheries departments, for a preliminary review on March 1, 2024; and

WHEREAS, the Planning Commission held study sessions on the proposed amendments on October 5, 2023; January 4, 2024 and June 6, 2024; and held a duly-advertised public hearing on April 4, 2024; and

WHEREAS, on September 19, 2024, the Planning Commission voted unanimously to recommend adoption by the City Council of the proposed zoning regulations updates as set forth in this ordinance; and

WHEREAS, the City Council reviewed the proposed amendments at study sessions on October 28, 2024; and held a duly-advertised public hearing on December 2, 2024; and

WHEREAS, the proposal was forwarded to the Washington State Department of Commerce for the required 60-day State review per the Growth Management Act on March 1, 2024; and

WHEREAS, the City Council finds the proposed amendments to be consistent with the Sumner Comprehensive Plan and the Sumner Municipal Code criteria for Zoning Code amendments;

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section 1. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.030 is hereby amended as follows:

16.40.030 Purpose.

The purpose of this chapter is to regulate the use of land in and around critical areas and, natural resource lands, wildlife habitat, and natural hazard areas lying within the corporate limits of the city, ~~to bring the city into compliance with the Washington State Growth Management Act (chapter 36.70A RCW). RCW 36.70A requires cities to adopt development regulations to classify, designate, and protect critical areas and to assure the conservation of designated agricultural, forest, and mineral lands of long-term commercial significance.)~~; RCW 36.70A.172(1) requires to incorporate appropriate “best available science” be included in policies into the and regulations to protect the functions and values of critical areas and give special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries, resource lands, wildlife habitat, and natural hazard areas(RCW 36.70A.172(1)) These regulations are ; and to promote the public health, safety and general welfare in accordance with the standards established by the federal government, state and the city, and to:

- A. Protect areas of land with valuable and nonrenewable resources for future generations...
 - B. Regulate development on and around critical areas in order to protect lives, property and public infrastructure;
 - C. Prevent development which is incompatible with certain critical areas which are particularly susceptible to water quality, noise, and air quality impacts associated with nearby development;
 - D. Establish mechanisms to inform present and future landowners of their location on or near natural resource lands or critical ~~lands~~-areas;
- [...]

Section 2. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.060 is hereby amended as follows:

16.40.060 Definitions.

[...]

"Adaptive management" means using scientific methods to evaluate how well regulatory and nonregulatory actions protect the sensitive area. An adaptive management program is a formal and deliberate scientific approach to taking action and obtaining information in the face of uncertainty. Management policy may be adapted based on a periodic review of new information.

"Anadromous fish" means fish species that spend most of their lifecycle in salt water but return to freshwater to reproduce.

"Aquifer recharge area" or "Critical aquifer recharge area" means areas that have a critical recharging effect on groundwaters-aquifers used for potable water, including areas where an aquifer that is a source of drinking water is supplies and/or that demonstrate a high level of susceptibility or vulnerability vulnerable to groundwater contamination that would affect the potability of the water, or is susceptible to reduced recharge from land use activities.

Examples of aquifer recharge areas include:

1. Wellhead protection areas delineated pursuant to the Federal Safe Drinking Water Act; and
2. Recharge areas for sole source aquifers designated pursuant to the Federal Safe Drinking Water Act;
3. Areas established for special protection pursuant to a groundwater management program, chapters 90.44, 90.48, and 90.54 RCW, and chapters 173-100 and 173-200 WAC;
4. Other areas meeting the definition of "areas with a critical recharging effect on aquifers used for potable water" in WAC 365-190.

Other areas with a high level of susceptibility or vulnerability to contamination as demonstrated through the use of the DRASTIC model.

"Best available science (BAS)" means information from research, inventory, monitoring, surveys, modeling, synthesis, expert opinion, and assessment that is used to designate, protect, or restore sensitive areas. As defined by WAC 365-195-900 through 925, best available science is derived from a process that includes peer-reviewed literature, standard methods, logical conclusions and reasonable inferences, quantitative analysis, and documented references to produce reliable information.

"Best management practices (BMPs)" mean physical, structural, and/or managerial practices, that when used singly or in combination, prevent or reduce water pollution, erosion, groundwater contamination, slope instability and similar impacts of construction, development and other actions. Source control BMPs include those which keep the pollutant from ever coming in contact with stormwater, and stormwater treatment BMPs include those which consist of various methods of treating stormwater. BMPs could include, but are not limited to, use of hay bales and plastic coverings to reduce erosion, education programs for employees regarding the use and disposal of chemicals, signage for customers regarding use of gasoline fueling facilities, and use of grass-lined swales to reduce pollutants in stormwater.

- (a) Control soil loss and reduce water quality degradation caused by high concentrations of nutrients, animal waste, toxics, or sediment;
- (b) Minimize adverse impacts to surface water and ground water flow and circulation patterns and to the chemical, physical, and biological characteristics of wetlands;
- (c) Protect trees, vegetation, and soils designated to be retained during and following site construction and use native plant species appropriate to the site for re-vegetation of disturbed areas; and
- (d) Provide standards for proper use of chemical herbicides within critical areas.

[...]

"Critical areas" are those areas established as wetlands, volcanic hazard areas, wetlands, critical aquifer recharge areas (CARAs), frequently flooded hazard areas (special flood hazard areas), fish and wildlife habitat areas, seismic hazard areas, landslide hazard areas, erosion hazard

areas, seismic hazard areas, volcanic hazard areas, and fish and wildlife habitat conservation areas aquifer recharge areas.

[...]

"Frequently flooded areas" means lands in the floodplain subject to a one percent or greater chance of flooding in any given year and those lands that provide important flood storage, conveyance, and attenuation functions, as determined by the city in accordance with WAC 365-190-080(3). Classifications of frequently flooded areas include, at a minimum, the one hundred (100) year floodplain designations of the Federal Emergency Management Agency and the National Flood Insurance Program. Also known as special flood hazard areas (see SMC 15.52).

"Geologically hazardous areas" means areas that because of their susceptibility to erosion, sliding, earthquake, or other geological events, are not suited to the siting of commercial, residential, or industrial development consistent with public health or safety concerns, per WAC 365-190-120.

[...]

"Riparian management zone" means the regulated buffer area that includes the land from the ordinary high water mark to a specified distance as measured horizontally in each direction.

[...]

"Wellhead protection area" (WHPAs) means protective areas associated with public drinking water sources established by water systems and approved or assigned by the state department of health WAC-190-030, WAC 246-290-020, WAC 246-290-135. (Ord. 2788 § 13, 2021; 1Ord. 2439 § 11, 2013; Ord. 2071 § 2, 2003; Ord. 1539 § 1 (part), 1992). They are:

- Group A wells serve 15 or more service connections or 25 or more people at least 60 days per year.
- Group B wells serve fewer than 15 connections and fewer than 25 people per day. means the area within the 10-year time-of-travel zone boundary of a group A public water system well, as delineated by the water system purveyor or its designee, pursuant to WAC 246-290-135.

Section 3. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.090 is hereby amended as follows:

16.40.090 Permitted uses.

Uses permitted on properties designated as critical areas or natural resource lands shall be the same as those permitted by the underlying zone classification and the Sumner shoreline master program unless specifically regulated by this division. (Ord. 1539 § 1 (part), 1992) See Section 16.40.135 Application and review process for RWHA (Resource, Wildlife, and Hazard) permit.

Section 4. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.100 is hereby amended as follows:

16.40.100 Exemptions.

The following activities shall be exempt from the application and permit requirements at SMC 16.40.135 unless specifically modified in SMC 16.46.090, SMC 16.56.100 or other sections of this division. All activities in critical areas must comply with SMC 16.40.110, ~~Best~~ best

management practices, regardless of exemption status. These exemptions apply specifically to activities regulated by the ~~city~~ City of Sumner. Other state and federal permits and approvals may still apply.

[...]

F. ~~Operation, m~~Maintenance or reconstruction ~~repair or improvements~~ of existing structures or infrastructure (e.g. roads, bridges, and associated storm drainage facilities); provided, that reconstruction activities does not alter or increase impacts to critical areas and there is no increased risk to life or property ~~involve expansion of facilities~~;

G. The following utility line activities, if there is no other practical alternative to the proposed development with less impact on the critical areas; when the proposal is consistent with other applicable regulations and standards; the proposal does not pose an unreasonable threat to the public health, safety, or welfare on or off the development proposal site; and the proposal attempts to protect and mitigates impacts to the critical area functions and values consistent with the best available science:

[...]

H. ~~Reconstruction, remodeling, Interior remodeling~~ or maintenance of existing ~~single-family residential structures, accessory structures, where legally preexisting;~~ provided, that a ~~cumulative expansion of the building footprint, developed area and impervious surface area does not increase by more than 25 percent; and provided further, that the new construction or related activity does not further intrude into~~ the activity does not impact the critical area or buffer;

I. ~~Reconstruction, remodeling, or maintenance of structures, where legally preexisting, other than single-family structures and accessory structures; provided, that such reconstruction, remodeling, or maintenance does not increase the building footprint or height, or increase developed or impervious surface area;~~

[...]

K. Emergency action necessary to prevent imminent threat or danger to public health or safety, or to public or private property, or serious environmental degradation, in a timeframe too short to allow for compliance with the requirements of the critical areas regulations. The director shall review all proposed emergency actions to determine the existence of the emergency and reasonableness of the proposed actions taken. The action may require necessary permits after the fact, including any restoration or mitigation;

[...]

N. Projects with the primary purpose of restoring or enhancing wetlands, streams, or fish and wildlife habitat conservation areas; provided, that:

1. Such projects are part of an approved local, state, or federal restoration or enhancement plan; and
2. The project would not result in adverse impacts to any critical area;

[...]

Section 5. New Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework is hereby amended to add a new section as follows:

16.40.105 Partial Exemptions.

The following activities require a RWHA permit processed as a Type I decision, pursuant to SMC 18.56.030(B):

Reconstruction, remodeling, or maintenance of existing structures; and accessory structures where legally preexisting; provided, that the new construction or related activity does not increase the building footprint, development area, impervious surface area or construction impacts within the critical area or its buffer.

Section 6. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.120 is hereby amended as follows:

16.40.120 Variances.

- A. The purpose of a variance is strictly limited to granting relief to specific development standards set forth in this division. A variance is also appropriate where there are extraordinary or unique circumstances relating to the property such that the strict implementation of this division would impose unnecessary hardships on the applicant. These provisions should be applied in a manner, which while protecting the environment, will assure that a person will be able to use his/her property in a fair and equitable manner. Other state and federal permits and approvals may still apply.

[...]

- D. Criteria for Granting Variances. Variances for development that will be located ~~landward of the ordinary high water mark, within a wetland buffer, stream buffer, or landslide or erosion hazard area~~ may be authorized provided the applicant can demonstrate all of the following:

1. That the strict requirements of the development standards set forth in this division preclude or significantly interfere with a reasonable use of the property...
2. That the hardship described above is specifically related to the property, and is the result of unique conditions ...and not, for example, from deed restrictions, ~~or and not from the applicant's own actions.~~
3. That the design of the project will be compatible with other permitted activities in the area and will not cause adverse effects to adjacent properties or the critical area.
4. That the variance authorized does not constitute a grant of special privilege not enjoyed by other properties in the area, and will be the minimum necessary to afford relief.
5. That the public interest will suffer no substantial detrimental effect, and the proposal does not pose an unreasonable threat to the public health, safety, or welfare on or off the development proposal site. ~~Variances for development that will be located either waterward of the ordinary high water mark or within regulated wetlands may be authorized provided the applicant can demonstrate all the criteria stated above as well as the following:~~
 - a. ~~That the strict application of the development standards set forth in this division precludes all reasonable use of the property; and~~
 - b. ~~That the proposal is consistent with the criteria established under subsections (D)(1) through (4) of this section.~~

- E. Criteria for Granting In-Water and Wetland Variances. Variances for development that will be located either waterward of the ordinary high water mark or within regulated wetlands may

be authorized provided the applicant can demonstrate compliance with all the criteria stated above as well as the following:

1. That the strict application of the development standards set forth in this division precludes all reasonable use of the property; and
2. The impact is both unavoidable and necessary due to site-specific constraints not caused by the applicant.
3. The proposal is consistent with other applicable regulations and standards, at the local, state and federal levels.

E.F. In the granting of all variances, consideration shall be given to the cumulative impact of additional requests for like actions in the area...

F. G. The U.S. Fish and Wildlife Service and the National Marine Fisheries Service or agencies with jurisdiction shall be sent a notice of application for any variance requesting the reduction of buffer widths on Type III-F streams.

Section 7. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.125 is hereby amended as follows:

16.40.125 Nonconforming uses, structures, activities.

- B. Expansion, reconstruction, maintenance or modification of ~~a nonconforming an existing structure, accessory structure, use or activity, where legally preexisting,~~ located in a critical area or its associated buffer may be allowed, provided, that the structure, use or activity does not remove native vegetation, or increase the activity footprint, developed area, or impervious surfaces, or create other construction impacts within the critical area or its associated buffer.
- ~~1. Further expand or intensify the footprint of activity; or~~
 - ~~2. Increase impervious surface area; or~~
 - ~~3. Remove vegetation; within the critical area or its associated buffer area.~~

Section 8. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.135 is hereby amended as follows:

16.40.135 Application and review process for RHWHA permit.

- A. Activities which require resource, wildlife and hazard area (RWHA) approval shall be processed as Type I or Type II decisions pursuant to chapter 18.56 SMC, Procedures for Land Use Permits. ...
[...]

Section 9. Amended Section. Sumner Municipal Code Chapter 16.40 Resource, Wildlife and Hazard Area Regulation Framework, Section 16.40.150 is hereby amended as follows:

16.40.150 Relationship to other regulations.
[...]

- D. Whenever conflicts exist between federal, state, or local laws, ordinances, or rules, the more restrictive provision shall apply.

[...]

Section 10. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection is hereby amended as follows:

**Chapter 16.46
WETLANDS PROTECTION**

Section 11. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.030 is hereby amended as follows:

16.46.030 Definitions.

[...]

~~22. “Regulated wetlands” means ponds 20 acres or less, including their submerged aquatic beds, and those lands defined as wetlands under the federal Clean Water Act, 33 U.S.C. 1251 et seq., and rules promulgated pursuant thereto, and shall be those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Regulated wetlands generally include swamps, marshes, bogs, and similar areas. Wetlands created as mitigation and wetlands modified for approved land use activities shall be considered as regulated wetlands. Regulated wetlands do not include those artificial wetlands intentionally created from nonwetland sites, including, but not limited to, irrigation and drainage ditches, grass-lined swales, canals, detention facilities, wastewater treatment facilities, farm ponds, and landscape amenities.~~

[...]

28. “Wetlands” or “wetland areas” means areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support...

Section 12. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.060 is hereby amended as follows:

16.46.060 Mapping.

- A. The approximate location and extent of wetlands in the city is displayed on the City of Sumner, WA Public Webmap, the National Wetland Inventory (US Fish and Wildlife Service), and the Priority Habitat and Species Map (Washington Department of Fish and Wildlife Service) ~~map titled “Wetland Inventory Map, 2007.”~~ This-These maps are inventory is general and not designed to support permit applications and does not establish jurisdictional boundaries. Furthermore, as site conditions change (due to natural and human processes), wetland areas and characteristics may change as well.
- B. The exact location of the wetland boundary shall be determined by the applicant through the performance of a field investigation by a qualified wetland professional applying the regulated wetland definition provided for in this chapter.

Section 13. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.070 is hereby amended as follows:

16.46.070 Wetlands rating.

[...]

- B. Rating. Wetlands shall be rated according to the Washington Department of Ecology wetland rating system, as set forth in the *Washington State Wetland Rating System for Western Washington: 2014 Update* (Ecology Publication No. 14-06-029...

[...]

4. Category IV. Category IV wetlands have the lowest levels of functions (scoring fewer than 16 points) and are often heavily disturbed. These are wetlands that are good candidates for replacement and improvement. However, we should be able to replace, or in some cases to improve. However, experience has shown that replacement cannot be guaranteed in any specific case. These wetlands may provide some important functions and should be protected to some degree.

[...]

Section 14. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.080 is hereby amended as follows:

16.46.080 Regulated activities.

A resource, wildlife, and hazard area (RWHA) approval shall be obtained prior to undertaking the following in a ~~regulated~~ wetland or its buffer unless authorized by SMC 16.46.090:

[...]

- G. The destruction or alteration of wetlands vegetation through clearing, harvesting, shading, intentional burning, or planting of vegetation within a ~~regulated~~ wetland or its buffer that would alter the character of a regulated wetland...
- H. Activities adjacent to a ~~regulated~~ wetland or its buffer that result in a significant change of water temperature, a significant change of physical or chemical characteristics of wetlands water sources...

Section 15. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.090 is hereby amended as follows:

16.46.090 Exemptions and allowed uses in wetlands.

- A. The following wetlands may be exempt from the requirement to avoid impacts (SMC 16.46.170(A)(1)), and they may be filled if the impacts are fully mitigated based on the remaining actions in SMC 16.46.170(A)(2) through (6)...

1. All isolated Category IV wetlands less than 4,000 square feet that:

- a. Are not associated with ~~riparian~~ fish and wildlife habitat conservation areas or their buffers.
- b. Are not associated with shorelines of the state or their ~~associated~~ buffers.

[...]

2. Wetlands less than 1,000 square feet that meet the above criteria and do not contain federally listed species or their critical habitat are exempt from the buffer provisions contained in this chapter.
- B. In addition to those activities listed in SMC 16.40.100, the following activities shall be allowed within a wetland or wetland buffer without having to obtain a RWHa permit provided they are conducted using best management practices, except where such activities result in the conversion of a ~~regulated~~ wetland or wetland buffer to a use to which it was not previously subjected or have the potential to result in a loss of the functions, values or area of a wetland or wetland buffer:
1. The harvesting of wild crops in a manner that is not injurious to natural reproduction of such crops...or the wetland by changing existing topography, water conditions or water sources...
 2. Ongoing agricultural activities, provided they implement applicable ~~best management practices (BMPs)~~ contained in the latest editions of the USDA Natural Resources Conservation Service (NRCS) Field Office Technical Guide (FOTG); or develop a farm conservation plan in coordination with the local conservation district, and forest clearing and other forest practices regulated under the State Forest Practices Act...
 3. The maintenance of drainage facilities and new drainage facilities provided they are an integral part of an ongoing agricultural activity and approved by the director;
 4. The following uses are allowed within ~~wetlands and/or~~ wetland buffers; provided, that written notice at least 10 days prior to the commencement of such work has been given to the director; and provided, that wetland impacts are minimized and that disturbed areas are immediately restored:
 - a. Normal maintenance, repair, or operation of existing serviceable legally established structures, facilities, or improved areas. Maintenance and repair does not include any modification that changes the character, scope, or size of the original structure, facility, or improved area and does not include the construction of a maintenance road;
 - b. Minor modification of existing serviceable legally established structures within a wetland buffer ~~zone~~ where modification does not adversely impact wetland functions or increase the size of the structure's footprint;

[...]
 8. Normal and routine maintenance and repair of any legally established ~~existing~~ public or private facilities within an existing right-of-way; provided, that the maintenance or repair does not expand the footprint of the facility or right-of-way; and has no adverse effect on the wetland or buffer.
 9. Stormwater Management Facilities. A wetland or its buffer can be physically or hydrologically altered to meet the requirements of an LID, runoff treatment or flow control BMP if all of the following criteria are met:
 - a. The wetland is classified as a Category IV or a Category III wetland with a habitat score of three to five points; and
 - b. There will be "no net loss" of functions and values of the wetland; and
 - c. The wetland does not contain a breeding population of any native amphibian species; and
 - d. The hydrologic functions of the wetland can be improved as outlined in questions 3, 4, 5 of Chart 4 and questions 2, 3, 4 of Chart 5 in the "Guide for Selecting Mitigation Sites Using a Watershed Approach" (Ecology Publication No. 09-06-

032, or as revised and approved by Ecology~~available here:~~
<http://www.ecy.wa.gov/biblio/0906032.html>); or the wetland is part of a priority restoration plan ~~that intended to~~ achieves restoration goals identified in a shoreline master program or other local or regional watershed plan; and
 [...]

Section 16. New Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, is hereby amended to add a new section, as follows:

16.46.150 Buffer requirements.
 [...]

- N. Functionally Disconnected Buffer Area. Buffers may exclude areas that are functionally and effectively disconnected from the wetland by an improved public street or legally established development, as determined by the director. Functionally and effectively disconnected means that the street or other significant development blocks the protective functions provided by a buffer. The director shall evaluate whether the interruption will affect the entirety of the buffer, considering the following:
1. Significant development includes public streets and railroads, and private developments such as homes or commercial structures and parking lots.
 2. Linear development extending across a buffer results in a different variation of buffer interruption than isolated features such as houses or accessory structures. Linear development such as roads and continuous parking lots typically result in the greatest interruption of buffer functions.
 3. Individual structures, such as a house, often do not fully interrupt buffer functions. In such cases, the allowable buffer exclusion should be limited to just the portion of the buffer that is within the footprint of the isolated structure and its contiguous improvements such as a paved driveway.
 4. A critical area report (CAR) shall be submitted to the director, evaluating the buffer functions and impact of intervening structures. If the CAR demonstrates that functions are greatly reduced by the intervening structure, the director may waive or reduce the required buffer width based on the information provided in the CAR.
 5. Any future modifications to buffers shall be consistent with regulations outlined in SMC 16.46.150(A).

Section 17. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.170 is hereby amended as follows:

16.46.170 Minimizing and replacing wetlands impacts.
 [...]

H. Wetland Mitigation Ratios.¹

Category and Type of Wetland	Creation or Reestablishment	Rehabilitation	<u>Preservation^a or Enhancement</u>
Category I: Bog, natural heritage site ^a	<u>Case by case^b</u> Not considered possible	Case by case ^b	Case by case ^b

Category and Type of Wetland	Creation or Reestablishment	Rehabilitation	Preservation ^a or Enhancement
Category I: Mature forested	6:1	12:1	24:1
Category I: Based on functions	4:1	8:1	16:1
Category II	3:1	6:1	12:1
Category III	2:1	4:1	8:1
Category IV	1.5:1	3:1	6:1

1 Ratios for rehabilitation and enhancement may be reduced when combined with 1:1 replacement through creation or reestablishment. See Table 1a, *Wetland Mitigation in Washington State – Part I: Agency Policies and Guidance – Version 1* (Ecology Publication No. 06-06-011a, Olympia, WA, March 2006 or as revised). See also subsection (C)(4) of this section for more information on using preservation as compensation.

a Areas proposed for preservation must be unique, high quality wetlands systems such as bogs, meeting criteria found in *Wetland Mitigation in Washington State Part I (version 2) and II* (Ecology Publication No. 21-06-003 and 06-06-011b, or as revised)

b Complete avoidance of bogs and natural heritage sites is required unless overriding project need and lack of practicable options results in unavoidable impacts. In those cases, the proposed mitigation must include 24:1 preservation of the same wetland type (e.g., bog) at a minimum of a 24:1 ratio, plus protective buffer of sufficient width to protect the unique water quality conditions that support these unique wetlands. Additional wetland creation, rehabilitation and enhancement would be considered in determining the final mitigation ratios.

- I. Credit/Debit Method. To more fully protect functions and values, and as an alternative to the mitigation ratios found in the joint guidance *Wetland Mitigation in Washington State Part s-I (version 2) and II* (Ecology Publication No. 21-06-003 and 06-06-011a-b, Olympia, WA, March 2006 or as revised), the administrator may allow mitigation based on the “credit/debit” method developed by the Department of Ecology in *Calculating Credits and Debits for Compensatory Mitigation in Wetlands of Western Washington: Final Report* (Ecology Publication No. 10-06-011, Olympia, WA, March 2012, or as revised).

[...]

- K. Advance Mitigation. Mitigation for projects with pre-identified impacts to wetlands may be constructed in advance of the impacts if the mitigation is implemented according to federal rules, state policy on advance mitigation, and state water quality regulations consistent with *Interagency Regulatory Guide: Advance Permittee-Responsible Mitigation* (Ecology Publication No. 12-06-015, Olympia, WA, December 2012 or as revised).

[...]

L. Alternative Mitigation Plans. The administrator may approve alternative wetland mitigation plans that are based on best available science, such as priority restoration plans that achieve restoration goals identified in the SMP. Alternative mitigation proposals must provide an equivalent or better level of protection of wetland functions and values than would be provided by the strict application of this chapter. The administrator shall consider the following for approval of an alternative mitigation proposal:

1. The proposal uses a watershed approach consistent with *Selecting Wetland Mitigation Sites Using a Watershed Approach (Western Washington)* (Ecology Publication No. 09-06-32, Olympia, WA, ~~December 2009~~ or as revised).
- [...]

Section 18. Amended Section. Sumner Municipal Code Chapter 16.46 Wetlands Protection, Section 16.46.180 is hereby amended as follows:

16.46.180 Mitigation plans

All wetland and buffer restoration, creation, and/or enhancement projects required pursuant to this chapter either as a permit condition or as the result of an enforcement action shall follow a mitigation plan prepared by qualified wetland professionals approved by the director and shall contain the following:

[...]

- C. Establish specific criteria/performance standards (including water quality standards, survival rates of planted vegetation, species abundance and diversity targets, or other ecological, geological or hydrological criteria) for evaluating the mitigation proposal relative to the objectives of this chapter and the goals and objectives of the city's comprehensive plan;
- [...]

- H. Include provisions for monitoring the mitigation area to determine whether the mitigation plan is successful. Monitoring of the area shall include:
- [...]

3. Five years of monitoring and maintenance shall be required for mitigation of impacts. Monitoring reports shall be submitted by the qualified wetland professional to the city during the following years: one, three, and five for a five-year monitoring period. Monitoring and maintenance may be extended if performance standards are not met, the applicant remains responsible for managing the mitigation project until the goals of the mitigation plan are achieved.

Section 19. Amended Section. Sumner Municipal Code Chapter 16.48 Aquifer Recharge Area is hereby amended as follows:

Chapter 16.48

CRITICAL AQUIFER RECHARGE AREAS

Section 20. Sumner Municipal Code Chapter 16.50 Landslide and Erosion Hazard Area is hereby amended as follows:

Chapter 16.50
LANDSLIDE AND EROSION GEOLOGICALLY HAZARDOUS AREAS

Section 21. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Area is hereby amended as follows:

Chapter 16.56
FISH AND WILDLIFE HABITAT CONSERVATION AREAS

Section 22. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Areas, Section 16.56.030 is hereby amended as follows:

16.56.030 Purpose.

The purpose of this chapter is to regulate development and the use of land in order to preserve and protect areas of critical and endangered fish, including anadromous or resident salmonid species, and wildlife habitat; and to conform with the Washington State Growth Management Act. (Ord. 2071 § 33, 2003; Ord. 1546 § 1 (part), 1992)
[...]

Section 23. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Areas, Section 16.56.050 is hereby amended as follows:

16.56.050 Applicability.

Fish and wildlife habitat conservation areas are those areas identified as being of critical importance to sustain needed habitats and species for the functional integrity of the ecosystem and which, if altered, may reduce the likelihood that the species will persist over the long term; these areas may include:

- A. Designated critical habitat for federally or state-listed endangered, threatened, or sensitive species of fish, wildlife, or plants;

[...]

- H. Fish and wildlife habitat conservation areas do not include such artificial features or constructs as irrigation delivery systems, irrigation infrastructure, irrigation canals, or drainage ditches that lie within the boundaries of and are maintained by a port district or an irrigation district or company.

Section 24. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Areas, Section 16.56.060 is hereby amended as follows:

16.56.060 Mapping and documentation.

Fish and wildlife habitat conservation areas shall be identified in the following documents:

- A. The Washington Department of Natural Resources water typing maps;
B. The Washington Department of Wildlife Priority Habitats and Species (PHS) Program;
C. The Washington Department of Natural Resources Natural Heritage Program...
D. The effective Flood Insurance Rate Map (FIRM); and
E. Other appropriate documents prepared by state or federal agencies...

Section 25. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Areas, Section 16.56.080 is hereby amended as follows:

16.56.080 Habitat management plans.

[...]

- B. The habitat management plan for sites within 300 feet of documented habitat for threatened, endangered, or sensitive fish or wildlife species (SMC 16.56.070(A)), or sites containing a wetland, wetland buffer, stream, or stream buffer (SMC 16.56.070(B)), shall contain at a minimum:

[...]

7. A discussion of ongoing management practices which will protect fish and wildlife habitat after the project site has been fully developed, including ~~proposed~~ monitoring, adaptive management, and maintenance programs;

[...]

- E. Annual monitoring reports shall be provided to the city by the property owner until the mitigation and/or restoration has been in place for at least 10 years and the success standards have been met. Monitoring and maintenance may be extended if performance standards are not met. The applicant remains responsible for managing the mitigation project until the goals of the mitigation plan are achieved. The city shall forward the monitoring reports annually to the federal agencies with expertise...

[...]

Section 26. Amended Section. Sumner Municipal Code Chapter 16.56 Wildlife Habitat Areas, Section 16.56.100 Buffers is hereby amended as follows:

16.56.100 Buffers.

[...]

~~C. Buffers, consisting of undisturbed native vegetation, shall be required along all streams, lakes and ponds as classified by the DNR water typing classification system (WAC 222-16-030). The buffer shall extend landward from the ordinary high water mark of the water body. The buffer shall not extend landward beyond a public right of way that contains an improved street. The buffer shall be separated from adjacent private property by a physical barrier such as, but not limited to, a pathway, berm, vegetation, or fence. The barrier shall be designed to allow for the movement of fish and wildlife and shall be approved by the director. The width of the buffer shall be established by the chart below. The buffer shall be established by a permanent protective easement, public or private land trust dedication, or similar protective mechanism as approved by the director. An easement shall also be provided by the underlying property owner that grants the city access to the buffer for the placement of further conservation/restoration measures.~~

C. Buffers, consisting of undisturbed native vegetation, shall be required along all streams, as classified by the DNR water typing classification system (WAC 222-16-030).

1. The buffer shall extend landward from the ordinary high water mark of the water body, except as provided in Subsections D and E below.

2. The buffer shall be separated from adjacent private property by a physical barrier such as, but not limited to, a pathway, berm, vegetation, or fence. The barrier shall be designed to allow for the movement of fish, including salmonid habitat, and wildlife and shall be approved by the director.
3. The buffer shall be established by a permanent protective easement, public or private land trust dedication, or similar protective mechanism as approved by the director. An easement shall also be provided by the underlying property owner that grants the city access to the buffer for the placement of further conservation/restoration measures.
4. Enhancement of the buffer shall not be required unless a buffer reduction is proposed pursuant to SMC 16.56.100(G).
5. The width of the buffer shall be as established by the chart below.

DNR Water Type	Buffer Width in Feet
<u>Fish Bearing (F)</u>	<u>100 feet</u>
<u>Non-Fish Bearing perennial (Np)</u>	<u>50 100 feet</u>
<u>Non-Fish Bearing seasonal (Ns)</u>	<u>25 100 feet</u>

- C. Functionally Disconnected Buffer Area. The director may waive or reduce the required buffer due to intervening structures, pursuant to SMC 16.46.150(N).

~~D~~E. For projects in areas subject to the requirements of the Sumner Shoreline Master Program, the buffer widths and applicable regulations shall be established in the Sumner Shoreline Master Program.

~~E. Buffers for Type Np and Ns streams which are not required by other regulations may be modified by the director upon a showing that the following are satisfied:~~

- ~~1. Fish, wildlife and plant habitat will not be harmed by the reduction in buffer area based on the proposed use and site development proposed;~~
- ~~2. The buffer area includes enhancement measures to improve the functional attributes of the buffer through the use of plantings of native plant species. The improvements must be shown to improve the habitat conditions for wildlife;~~
- ~~3. A best management practices plan addressing the proper design, layout, construction and use of the site is provided which is sufficient to mitigate impacts to wildlife and habitat areas;~~
- ~~4. Under no circumstance shall the buffer be reduced below those shown in the table below:~~

DNR Water Type	Buffer Width in Feet
Np	25
Ns	20

- F. Buffers for Non-Typed or Unknown Waters shall be the same as those for fish bearing streams. Applicants or landowners may apply for a water type modification as outlined by Washington State Department of Natural Resources.

GF. Buffer reductions. Buffers for ~~Type F~~ streams which are not required by other regulations may be modified upon approval of a ~~variance per SMC 16.40.120~~ by the director, under procedures for Type II permits in chapter 18.56 SMC, Procedures for Land Use Permits and a showing that the following are satisfied:

1. ~~The subject parcel is less than 200 feet in depth as measured perpendicular from the ordinary high water mark~~ There are no feasible alternatives to the site design or development that could be accomplished without buffer reduction; and
2. ~~The buffer is not reduced below 75 feet and there is not net loss of buffer function; and~~
3. ~~The impervious surface of the reduced portion of the buffer shall not exceed 10 percent unless the following measures are taken:~~
 - a. ~~The removal of an equivalent amount of existing impervious surface within the sub-basin of the Type F stream; and~~
 - b. ~~The permanent setting aside and habitat restoration of area(s) where impervious surface has been removed;~~
3. Buffers shall provide conservation or protection measures necessary to preserve or enhance anadromous fisheries including measures that protect habitat important for all life stages of anadromous fish, including, but not limited to, spawning and incubation, juvenile rearing and adult residence, juvenile migration downstream to the sea, and adult migration upstream to spawning areas. Habitat protection measures should be based on the best available science relevant to stream flows, water quality and temperature, spawning substrates, instream structural diversity, migratory access, estuary and nearshore marine habitat quality, and the maintenance of salmon prey species.
4. Appropriate state and federal agencies shall be consulted if requirements of subsection (F)(2) or (3) of this section are not possible and appropriate state agencies may be consulted; and
5. Documentation provided demonstrates that fish, wildlife and plant habitat will not be harmed by the reduction in buffer area based on the proposed use and site development proposed; and
6. The buffer area includes enhancement measures to improve the functional attributes of the buffer through the use of plantings of native plant species. The improvements must be shown to improve the habitat conditions for wildlife and shall be monitored per SMC 16.56.080(C);
7. Design and management measures in Table 1 are implemented; and

Table 1 – Required Measures to Minimize Impacts to Streams

<u>Disturbance</u>	<u>Required Measures to Minimize Impacts</u>
<u>Lights</u>	<u>Direct lights away from stream</u>
<u>Noise</u>	<u>Locate activity that generates noise away from stream</u>

<u>Disturbance</u>	<u>Required Measures to Minimize Impacts</u>
	<u>If warranted, enhance existing buffer with native vegetation plantings adjacent to noise source</u> <u>For activities that generate relatively continuous, potentially disruptive noise, such as certain heavy industry or mining, establish an additional 10-foot heavily vegetated buffer strip immediately adjacent to the outer stream buffer</u>
<u>Toxic runoff</u>	<u>Route all new, untreated runoff away from stream while ensuring stream is not dewatered</u> <u>Establish covenants limiting use of pesticides within 150 feet of stream</u> <u>Apply integrated pest management</u>
<u>Stormwater runoff</u>	<u>Retrofit stormwater detention and treatment for roads and existing adjacent development</u> <u>Prevent channelized flow from lawns that directly enters the buffer</u> <u>Use low intensity development techniques (for more information refer to the drainage ordinance and manual)</u>
<u>Change in water regime</u>	<u>Infiltrate or treat, detain, and disperse into buffer new runoff from impervious surfaces and new lawns</u>
<u>Pets and human disturbance</u>	<u>Use privacy fencing or plant dense vegetation to delineate buffer edge and to discourage disturbance using vegetation appropriate for the ecoregion</u> <u>Place stream and its buffer in a separate tract or protect with a conservation easement</u>
<u>Dust</u>	<u>Use best management practices to control dust</u>

7. ~~8.~~ A best management practices plan addressing the proper design, layout, construction and use of the site is provided which is sufficient to mitigate impacts to wildlife and habitat areas; and

~~8.~~ 9. Monitoring of mitigation actions ~~is required~~ shall be implemented to verify long-term functional improvement of the enhanced buffer area per SMC 16.56.080(E) ~~(E)~~; and

10. The proposal includes a habitat management plan prepared by qualified professional biologist approved by the director that includes the submittal requirements in 16.56.080 Habitat Management Plans; and

11. The stream buffer shall be retained in an undisturbed or enhanced condition for the life of the project.

GH. Partial Exemptions. The following uses are allowed in fish and wildlife habitat buffers:

1. Activities directly related to the cultural, recreational, scientific and educational aspects of the stream...
2. Public utility corridors and large-scale public recreational facilities such as regional trails and parks may be allowed in buffer areas, through obtaining a RWHA permit, provided that the proposal is subject to review under the State Environmental Policy Act, and that the structure and function of impacted fish and wildlife habitat is replaced and restored and mitigated; and that appropriate federal and state agencies are notified of the project.

Section 27. Severability. If a section, subsection, paragraph, sentence, clause, or phrase of this ordinance is declared unconstitutional or invalid for any reason by any court of competent jurisdiction, such decision shall not affect the validity of the remaining portions of this ordinance. If the provisions of this ordinance are found to be inconsistent with other provisions of the Sumner Municipal Code, this ordinance is deemed to control.

Section 28. Effective date. This ordinance shall take effect five (5) days from the date of publication in the City's official newspaper.

Section 29. Corrections by City Clerk or Code Reviser. Upon approval of the city attorney, the city clerk and the code reviser are authorized to make necessary corrections to this ordinance, including the correction of clerical errors; ordinance, section, or subsection numbering; or references to other local, state, or federal laws, codes, rules, or regulations.

Passed by the City Council and approved by the Mayor of the City of Sumner, Washington, at a regular meeting thereof this _____ day of _____

Mayor Kathy Hayden

ATTEST:

APPROVED AS TO FORM:

City Clerk Michelle Converse, CMC

Andrea Marquez, City Attorney

First Reading:

Date Adopted:

Date of Publication:

Effective Date:



STAFF REPORT

DATE: December 2, 2024
TO: SUMNER CITY COUNCIL
FROM: Ryan Windish, Director of Economic and Community Development
RE: **Zoning Code Text Amendment – CRITICAL AREAS REGULATIONS**
File #: CTA-2024-0003

I. BACKGROUND

Purpose: The City Council is being asked to take action on Ordinance No. 2909 adopting the 2024 Comp Plan update on Critical Areas Regulations.

Why amendments are being proposed

The State Growth Management Act (GMA) requires cities to complete a “10-year periodic update” of their Comprehensive Plans. Sumner’s 10-year update will involve extensive revisions to the Comprehensive Plan (Comp Plan) and regulations to reflect new State laws and changes that have occurred over the last decade.

The GMA requires all cities and counties to adopt regulations that protect critical areas. Critical areas are lands with natural hazards and areas that support fragile or valuable resources. Sumner’s critical areas regulations were first adopted in the early 1990s. RCW 36.70A.030(5) defines five types of critical areas:

- Wetlands
- Aquifer recharge areas
- Frequently flooded areas
- Geologically hazardous areas
- Fish and wildlife habitat conservation areas.

Critical areas regulations help preserve the natural environment, maintain fish and wildlife habitat, protect drinking water and help reduce exposure to risks, such as landslides or flooding. All critical areas must be designated, and their functions and values protected using the best available scientific information (BAS). As defined by WAC 365-195-900 through 925, BAS is derived from a process that includes peer-reviewed literature, standard methods, logical conclusions and reasonable inferences, quantitative analysis, and documented references to produce reliable information. The last substantial review of Sumner’s regulations for BAS was in 2015. The 2024 updates to Sumner’s regulations are based on current Best Available Science.

The Planning Commission reviewed the proposed amendments, along with other 2024 Comprehensive Plan and regulations updates, in October 2023 and January 2024, and held a public hearing on the Plan and regulations on April 4, 2024. Study sessions with Council occurred in October 2024 and November 2024.

II. SUMMARY OF PROPOSAL

The proposed amendments to Sumner Municipal Code Title 16 Environment update regulations related to critical areas. A significant change proposed is to the width of stream buffers. See **Exhibit A, Exhibit B**. The proposed regulations are contained in **Exhibit C** Draft Critical Areas Regulations. Key changes are:

- A. Definitions and Formatting:** Updated definitions section and section titles to be consistent with current state code, and to better address critical areas requirements from the state, agency guidelines and best practices, such as:
 - Changing “Wildlife Habitat Area” to “Fish and Wildlife Habitat Conservation Area”
 - Best available science definition
 - Clarifying best management practices (BMPs)
 - Clarifying that fish and wildlife habitat does not include artificial features.
- B. Exemptions:**
 - Existing code exempts minor development and habitat restoration activities that do not need a permit.
 - Added a section for “partial exemptions” for activities that only require a minimal amount of City review. This should facilitate faster processing time for minor projects.
- C. Variance/reasonable use**
 - Existing code allows a variance process when regulations may cause extraordinary hardship or remove reasonable use of a property. Buffer reduction for most development is covered in other code sections.
 - This section is updated to clarify criteria for variance approval.
- D. Non-Conforming Uses:**
 - Existing code allows non-conforming uses that legally exist prior to code adoption.
 - This section to be updated to clarify when non-conforming uses can continue. Generally, non-conforming uses can continue and can expand outside of critical areas or their buffers, if there are no further impacts to the critical area or its buffer.
- E. Buffer adjustments**
 - Added sections for wetlands and streams to allow a project to exclude functionally disconnected buffers (e.g. bisected by a street). Previously, this was allowed in practice but explicit text was not in the existing code.
- F. Buffer reductions for streams**
 - **See Exhibit A** Streams and Wetlands Map.
 - Existing code allows buffer reductions for wetlands and streams, if the critical area is adequately protected.
 - Fish Bearing Streams (Type F): Existing code allows reduction of a buffer to no less than 75 feet (from 100 feet). No change is proposed.
 - Non-Fish Bearing Streams (Type N): Existing code allows a buffer reduction by approximately 50%, to between 20-25 feet. New code removes this reduction and treats all streams the same (see section below).
 - New code changes the approval process for stream buffer reduction; instead of a more onerous variance permit, a buffer reduction would be approved administratively.
 - Existing approval criteria are updated:
 - Reductions would be allowed on all properties, not just smaller ones (less than 200 feet deep).
 - Applicants still have to show there are no feasible alternatives that reduce impacts before being granted a reduction.
 - Applicants must also comply with site design and management measures to minimize impacts to streams/buffers, similar to what is required for wetlands.
 - New language no longer limits impervious surface area to 10% in the extracted buffer area.
 - Applicants are still required to enhance the existing buffer and follow measures to ensure enhancements are successful. This has been clarified by requiring a habitat management plan and oversight by a biologist, similar to wetlands requirements.
- G. Updated buffer widths for streams**
 - This section has new buffer recommendations based on discussion with Washington Department of Fish and Wildlife (WDFW) and the Best Available Science (BAS). Jurisdictions are required to include BAS in regulating critical areas. WDFW’s buffer recommendations are based on soil type, and tree

species, among other factors. For Sumner the range of buffers recommended is 100-231 feet. 100 feet is the minimum recommended buffer for all streams as it is the minimum distance needed to provide habitat functions (e.g. 95% or more removal of phosphorus, sediment and most pesticides and 80% removal for surface runoff containing excess nitrogen).

- **Fish Bearing Streams:** All Sumner fish bearing streams (Type F) currently have a 100-foot buffer. Most of Sumner's Type F streams are on the valley floor and have a recommended buffer of 100 to 105 feet with a few areas of 225 feet. As the existing buffer is similar to WDFW's recommendation, no change is proposed.
- **Non-Fish Bearing Streams:** Based on BAS and WDFW recommendations, staff is proposing that non-fish bearing streams (Type N) also have a 100-foot buffer. This is an increase from the current 25-50-foot buffers.
 - **See Exhibit B** Non-Fish Bearing Stream Characteristics. Most of Sumner's Type N streams are located on the eastern and western forested slopes in landslide hazard areas, often within ravines, where steep slopes have development restrictions. Some have adjacent wetlands, which also are restricted. In these areas WDFW recommends 194 to 231-foot buffers. As current buffers for Type F streams are 100 feet, an increase to 100-foot buffer for Type N is recommended. This is much less than the 194 to 231 feet recommended by WDFW but is the minimum width for a viable buffer.
 - Characteristics of Type N streams: Type N streams in Sumner are primarily extensions of a Type F; they are the upper reaches of the same stream. All of these stream segments are tributaries to Sumner's major salmonid habitats, such as Salmon Creek and the White River. As tributaries, these streams are critical to the entire stream system, having an important role in protecting water quality (reducing high water temperatures and pollutants). BAS indicates that tributaries to Type F need the same protective buffers as Type F.
 - Given that Type N are extensions or tributaries to Type F that have a 100-foot buffer, having a consistent treatment in the code is recommended. Also, there is virtually no distinction on the ground between the water flowing from a Type N and where that water meets a Type F. Having a consistent buffer makes site design and permitting more straightforward.
 - Sumner's stream buffers have not been updated since 1992. As cities are required by the State to update their 2024 Comprehensive Plans for BAS, the proposed code will bring Sumner more in line with new BAS recommendations.
- **Effects on development:**
 - The proposed code maintains the 100-foot buffer for Type F.
 - Type N buffers are not proposed at the highest 231-foot recommended by WDFW, but will be held at a 100-foot width, consistent with other streams.
 - Buffer increases to Type N will occur primarily in areas of landslide and erosion hazard areas and wetlands that have restricted development already.
 - Type F and Type N will have a consistent treatment in the code in terms of buffer requirements and buffer reduction.
 - Buffer reduction provisions will allow for reasonable development, and for a streamlined administrative permit.

III. ANALYSIS

The regulations in SMC Title 16 Environment are considered development regulations that apply to property development and site management, similar to Zoning Code Title 18 regulations. Staff has reviewed the proposed regulations relative to the comprehensive plan, and evaluated how the proposed amendments implement the comprehensive plan. Relevant sections and policies related to the proposed amendments are presented below.

ENVIRONMENT ELEMENT

Goal 1. Practice environmental stewardship by protecting, enhancing and promoting the natural environment in and around the City of Sumner.

- 1.4 Protect surface water quality and quantity from significant degradation as required by state and federal law.

- 1.4.1 Implement development regulations and a surface water quality management plan to protect water quality.
- 1.4.3 Work with other agencies to educate the general public and developers on the potential surface water quality degradation resulting from development and human activity and how to reduce impacts.
- 1.4.4 Maintain consistency with local, regional and federal water quality protection plans and permits.
- 1.4.9 Work with residential and commercial developers to incorporate low impact development that preserves a site's natural hydrologic functions and practices that protect native vegetation and soils, facilitate reuse of resources, such as reclaimed water, and reduce impervious surface.
- 1.7 Incorporate the use of "best available science" as required by the Growth Management Act when implementing critical areas regulations.

Goal 2. Protect life and property in areas of natural hazards.

- 2.2 Minimize the potential for loss of life and damage to public and private investments resulting from flooding along the White (Stuck) and Puyallup Rivers.
- 2.2.4 Continue to implement wetland protection and stormwater management regulations to help mitigate flooding impacts to the community.
- 2.5 Take measures to protect hillsides and hillside development from landslide failures and the impacts associated with building on steep slopes.
- 2.6 Take measures to reduce erosion in all areas, particularly in areas with high risk of erosion, and the associated impacts.
- 2.7 Implement land use and environmental regulations with flexibility to assist in protecting hazardous areas.

Goal 3. Protect and enhance unique, valuable, and critical plant and wildlife habitat and promote bio-diversity.

- 3.1 Implement regulations and programs to protect unique, valuable and critical plant and wildlife areas, including flexible design standards.
- 3.2 Protect shorelines and wetlands through appropriate regulations, acquisition, and non-regulatory policies related to education, stewardship, density credits, restoration, etc.
- 3.4 Take measures to protect hillside areas from the impacts of development.
- 3.8 Give special consideration to conservation and protection measures necessary to preserve and enhance anadromous fisheries and listed or threatened endangered species.
- 3.11 Allow for the clustering of development at higher densities on a portion of a property when preserving fish and wildlife habitat or wetland areas on site.

COMMUNITY CHARACTER

Goal 5. Provide for open space and recreation and protect sensitive areas from degradation.

- 5.1 In reviewing plans and development proposals, consider both long and short term environmental impacts and encourage design which complements the area's natural and cultural features. Natural and significant cultural features should be integrated into the design of the community.

PARKS AND OPEN SPACE

Goal 2. Preserve, protect and enhance significant open space.

- 2.1 Control development and activity on hillside areas in order to preserve their aesthetic qualities, reduce impacts on the valley, protect habitat, and protect sensitive areas from degradation.
- 2.14 Through implementation of the State Shoreline Management Act and City environmental regulations, protect wetlands, riparian corridors, streams and wildlife areas.

CONCLUSION: The amendments would bring Sumner's regulations into compliance with Department of Ecology and Department of Fish and Wildlife recommendations, and would incorporate best available science (BAS) as required by the GMA. The amendments, overall, are consistent with the goals and policies related to the environment and other policies of the Comprehensive Plan, including the policies discussed above. Additional analysis is contained in the Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II), issued March 1, 2024.

IV. PUBLIC & AGENCY COMMENTS

The public notice for the Draft Comp Plan and Draft EIS was issued March 1, 2024, with a public comment period from March 1 to April 30, 2024. An additional 15-day notice of the Planning Commission public hearing was published on March 12. In addition, the notice of the Planning Commission public hearing was mailed to owners of parcels with a mapped non-fish-bearing stream (approx. 45 parcels with 20 owners). The postcard noted the increased stream buffer and that it would affect their property. Comments received were forwarded to the Planning Commission prior to its final recommendations.

V. SEPA ENVIRONMENTAL REVIEW

The State Environmental Policy Act (SEPA) establishes a process for SEPA review of Comprehensive Plan and regulations updates. In compliance with State SEPA environmental regulations, the 2024 Draft Comprehensive Plan (Volume I) and Draft Environmental Impact Statement for the 2024 Comprehensive Plan (Volume II) were issued March 1, 2024 for public review through April 30, 2024. The EIS consists of an evaluation of the potential impacts of proposed policy and regulation changes, and is available for review on the City's website at:

<https://connects.sumnerwa.gov/planning-sumners-future>.

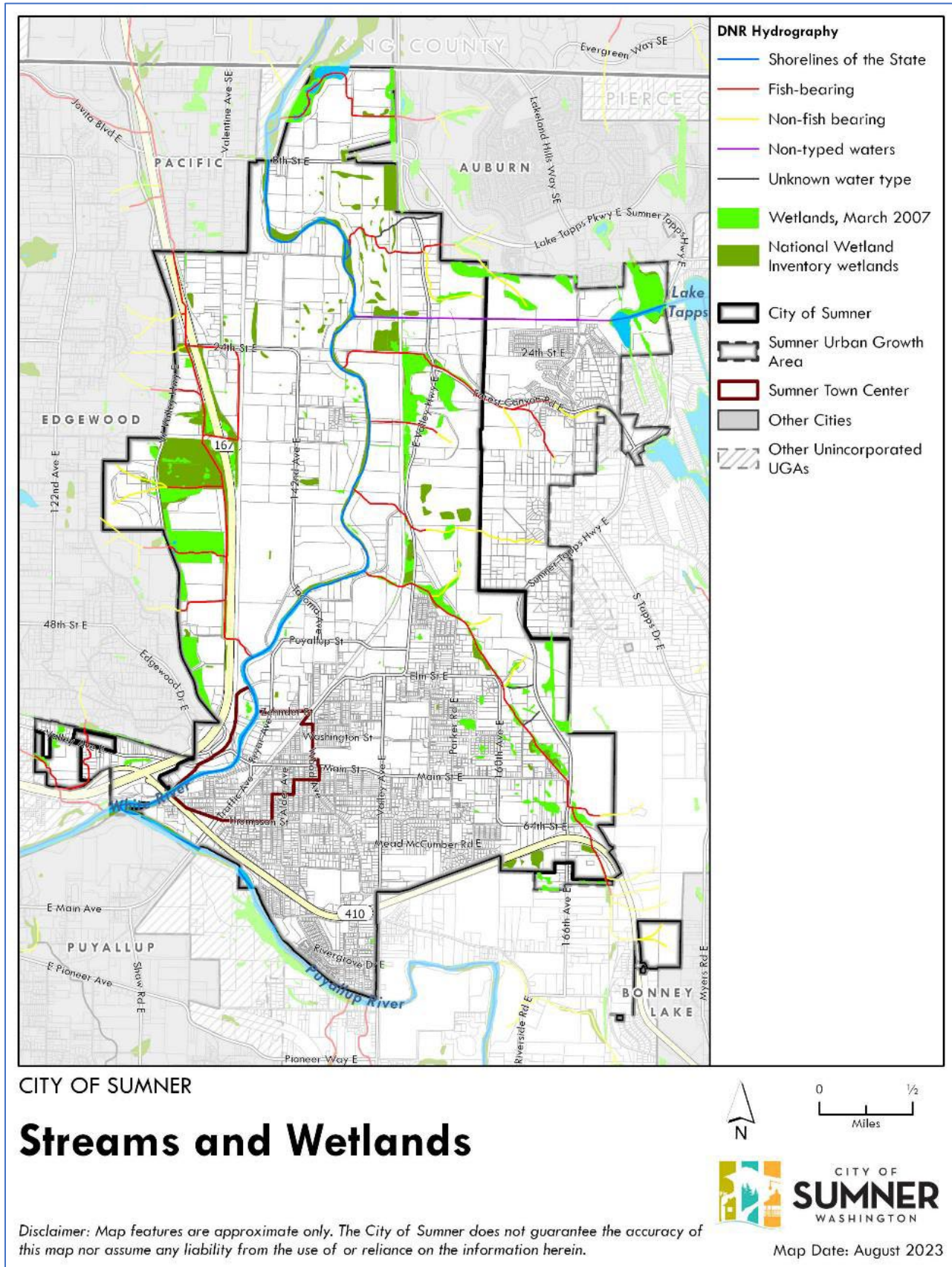
VI. PLANNING COMMISSION RECOMMENDATION

The Planning Commission voted unanimously to recommend that the City Council "Move to approve of Ordinance No. 2909 for the 2024 Comprehensive Plan Critical Areas Regulations dated September 10, 2024."

VII. EXHIBITS & REFERENCES

- A. Ordinance No. 2909: Critical Areas Regulations dated September 10, 2024
- B. Streams & Wetlands Map – based on Department of Natural Resources (DNR)
- C. Non-Fish Bearing Stream Characteristics (List)

EXHIBIT A Streams and Wetlands Map



Source: Parametrix November 2023

EXHIBIT B

NON-FISH BEARING STREAMS (TYPE N) LOCATION & CHARACTERISTICS – DRAFT

Source: Sumner GIS layers, Google Earth, Dept. of Natural Resources Stream Types – January 2024

EAST HILLSIDE - Non-Fish Bearing Streams						
Segment Location	Description	Landslide Hazard Area*	Wetlands	Development in City limits	Ownership	UGA (County = 35-115')
Tributaries to Salmon Creek						
1. East of Sumner-Tapps Hwy	Above gravel processing plant	yes	?	Industrial, quarry site	Private	Forested quarry
2. East of Van Tassel Rd	Within City watershed	yes	yes	Forested watershed	City-owned	x
3. East of Stuck Valley Ave	Within City watershed	yes	?	Forested watershed	City-owned	x
4. East of E Valley Hwy	Within Puyallup watershed	Yes	yes	Conservation tracts	City & Pierce County	x
Tributaries to White River						
5. East of E Valley Hwy at 150 th	Forested watershed	Yes	yes	Forested Cava quarry property, watershed	Private, City of Puyallup	10 SF dwellings
6. East of E Valley Hwy & South of 29 th	Forested area below Cava quarry	Yes	yes	SF dwelling	Private	x
7. Along Forest Canyon Rd	Forested hillside	Yes	?	N/A	N/A	Forested Cava quarry property, 7 SF dwellings
8. E Valley Hwy above Dieringer	Forested hillside	Yes	Yes	Industrial watershed	Private, Cascade Water Alliance	x
9. E Valley at base of hill	Ditch or seeps running N-S betw road & slopes	Yes	?	8 SF dwellings	Private	Forested PSE. Water Alliance, PSE

WEST HILLSIDE - Non-Fish Bearing Streams						
Segment Location	Description	Landslide Hazard Area*	Wetlands	Development in City limits	Ownership	UGA
Tributaries to Sotain Creek						
1. 37XX W Valley Hwy	Ridgetop industrial development	Yes	No	Warehouses fully developed	Private	x
2. W Valley Hwy	Yusen Logistics wetland	No	Yes	Undeveloped wetland	Private	x
3. W Valley Hwy at 24 th St	Neff/Stowe	No	Yes	Grade/fill	Private	x

4. From hillside, crossing W Valley	Industrial site-Cascade Devel	No	No	Industrial/commercial already developed	Private	x
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**Landslide hazard areas generally include slopes greater than 15% with fault planes, water seepage, or historic land failures. Geotechnical studies are required for development.*

Type I = 25% or greater = Type I Type II = 15-25%

Type I and II: Development limited to 40% of lot area, or 50% for a residential subdivision.

SUBJECT: Ordinance No. 2915 - Sumner Library Development Agreement

CATEGORY: Ordinance

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

1. Ordinance No. 2915 - Sumner Library Development Agreement
-

STAFF CONTACT: Andrea Marquez, City Attorney

SUMMARY BACKGROUND:

After the Pierce County Rural Library District purchased a 3-parcel site on Main Street from the City for the new library facility, Sumner voters approved a bond measure for a new public library. The parcels total approximately 1.7 acres and will be consolidated into one lot for the new Sumner Public Library building. The building will be approximately 17,500 SF with additional associated site development. To begin constructing the library, the District applied to the City for a conditional use permit as the site is zoned General Commercial. The City and the District also drafted a development agreement to supplement the permitting process due to the mutual advantages that a development agreement might provide for the public entities. This development agreement vests various city development codes to the current version of the codes and sets other development guidelines. This vesting lasts for 3-5 years, depending on the District's progress toward completing construction of the library, but the agreement preserves the City's authority to address serious threats to public safety at any time. Similarly, transportation and park impact fees are vested at the 2024 rates. The agreement specifically addresses the street parking permitted on Main Street for the new building and defines the public access route from Main Street to the library's parking area, which will be located behind the building. The agreement also requires the District to construct an 8-foot fence where fencing is required between the library site and residential lots. In addition to these development guidelines, the agreement requires the Library to either create a space on the property or provide rotating exhibits that communicate historical information about Sumner to the public. This second, connected agreement, has a 50-year term. As required by City code, the City held a public hearing regarding the development agreement in front of the Sumner Hearing Examiner. At the same hearing, the Examiner also considered the District's application for a conditional use permit. The examiner recommended that the City Council approve the Development Agreement. The City Council held a public hearing on December 9, 2024. The Examiner will rule on the District's conditional use permit application after the City Council takes action on the development agreement.

COUNCIL COMMITTEE/STUDY SESSION:

MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION:

STAFF RECOMMENDATIONS/MOTION:

Approve Ordinance No. 2915 authorizing a Development Agreement between the City and the Pierce County Library System.

ORDINANCE NO. 2915
CITY OF SUMNER, WASHINGTON

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, AUTHORIZING THE MAYOR TO ENTER INTO A DEVELOPMENT AGREEMENT WITH PIERCE COUNTY RURAL LIBRARY DISTRICT RELATED TO THE DEVELOPMENT OF A NEW SUMNER PUBLIC LIBRARY.

WHEREAS, in the Aug. 1, 2023, primary election, voters in the City of Sumner approved a Library Capital Facility Area (LCFA) and bonds to build a new Sumner Library; and

WHEREAS, the Pierce County Rural Library District purchased adjacent parcels at 15126, 152008, and 15216 Main Street in Sumner for the new public library and has applied for a conditional use permit from the City for building the library at that location; and

WHEREAS, the District is seeking to enter into a development agreement with the City to vest certain zoning and development rules and regulations, including impact fees; and

WHEREAS, the proposed development agreement requires the District to later execute an agreement to provide space at the public library site for a permanent or rotating display exhibiting Sumner's history; and

WHEREAS, development agreements are specifically authorized by RCW 36.70B.170-210 and SMC 18.20 as a proper exercise of a City's police power; and

WHEREAS, a duly noticed public hearing on the development agreement was conducted by the Sumner Hearing Examiner on November 20, 2024; and

WHEREAS, following the public hearing by the Sumner Examiner, the City Council held a duly noticed public hearing regarding the development agreement on December 2, 2024. and

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SUMNER, WASHINGTON, DO ORDAIN AS FOLLOWS:

Section 1. In accordance with its authority pursuant to SMC 18.20.010, the City Council authorizes the Mayor to execute, on behalf of the City of Sumner, a development agreement with

the Pierce County Rural Library District, which agreement shall substantially conform to Exhibit A, and to execute any and all other related documents necessary to effectuate the agreement.

Section 2. The City Council authorizes the Mayor to execute, on behalf of the City of Sumner, an agreement with the Pierce County Rural Library District requiring the District to exhibit information regarding Sumner’s history at the new Sumner public library, which agreement shall substantially conform to Exhibit E of the development agreement.

Section 3. All sections in this ordinance are hereby deemed severable. Any section found invalid or unconstitutional by a court of law with jurisdiction shall not be deemed to invalidate or find unconstitutional other sections in this ordinance.

Section 4. Corrections. The City Clerk or City Attorney are authorized to make necessary corrections to this ordinance including, but not limited to, the correction of scrivener’s/clerical errors, references, ordinance numbering, section/subsection numbers and any references thereto.

Section 5. Effective Date. This ordinance shall become effective five days after publication in the official newspaper of the City of Sumner.

Passed and approved by City Council of the City of Sumner at regularly scheduled open public meeting on the _____ day of _____ 2025.

Kathy Hayden
Mayor, City of Sumner

Approved as to form:

Attest:

Andrea Marquez
City Attorney

Michelle Converse
City Clerk

**DEVELOPMENT AGREEMENT
for the
DEVELOPMENT OF THE PIERCE COUNTY SUMNER LIBRARY**

Parties: Pierce County Library and the City of Sumner Tax
Parcel Account Nos: 0520197014, 0520197015 and 0520193060
Date: XXXXX, 2025

This Development Agreement (“*Development Agreement*” or “*Agreement*”) regarding development of a new Pierce County Public Library in Sumner, is made by and between the **CITY OF SUMNER**, a Washington municipal corporation (“*City*”) and the **PIERCE COUNTY RURAL LIBRARY DISTRICT**, a Washington county library established pursuant to title 27.12 RCW (“*Library*”). The City and the Library shall be referred to as a “party” or collectively as the “parties” to this Agreement. The “Effective Date” of this Agreement shall be the later date of the parties’ execution of this Agreement.

I. RECITALS

A. RCW 36.70B.170 through .210 authorizes a governmental entity to enter into, as a proper exercise of its police power, a development agreement with an individual or entity having ownership or control of real property within its jurisdiction. The City has codified this police power authority in Sumner Municipal Code (“*SMC*” or “*City Code*”) 18.20.010 through .050.

B. The Library is the owner of approximately 1.67 acres of property in Sumner that is zoned General Commercial under the Sumner Municipal Code. The Property consists of parcel numbers 0520197014, 0520197015 and 0520193060 and is legally described on ***Exhibit A*** and depicted on ***Exhibit B*** (“*Library Site*”). The Library intends to develop the Property for use as a public library and the City hearing examiner may permit development of the Property in that zone for that use. The Library seeks confirmation of the development standards that will apply to development of the new public library.

C. The City issued a final Mitigated Determination of Non-Significance (MDNS), pursuant to the State Environmental Policy Act (SEPA) RCW 43.21C, on November 26, 2024.

D. On November 26, 2024, following a public hearing and completion of the State Environmental Policy Act (“SEPA”) review process, the City’s Hearing Examiner approved this Agreement and granted a Conditional Use Permit (CUP 2024-0007) for the use of the Library Site as a new public library.

E. The approval of this Agreement constitutes a land use decision under RCW Ch. 36.70C.

ACCORDINGLY, THE PARTIES AGREE AS FOLLOWS:

AGREEMENT

1. **Development.** Subject to subsection (2)(g), the Library may develop the Property after the Effective Date of this Agreement with new buildings, outdoor storage, parking, and other site improvements all for the purpose of providing library services to the residents of Sumner and Pierce County ("*Library Development Project*"). The future Development will require the issuance of building and other construction permits pursuant to the Sumner Municipal Code and the provisions of this Agreement. A conceptional plan for the Library Development Project is attached as Exhibit C.

2. **Development Standards.** Except as otherwise provided in this Agreement, the Library Development Project occurring subsequent to the Effective Date shall be governed by this section as well as those City Code provisions identified in subsection (g) that are in effect on the Effective Date.

(a) **Use.** The authorized uses on the property shall be limited to use as a public library and those principal and conditional uses permitted in the General Commercial zone, as identified in the Vested City Code.

(b) **Access.** (i) The requirements of SMC 18.43.100 are modified to relieve the Library from the obligation to grant and record an access corridor easement to permit ingress and egress from parcel 0520197013 and the Library may prevent vehicular ingress and egress from that parcel. The Library shall otherwise comply with the provisions of Chapter 18.43 SMC in effect at the time of the Effective Date.

(ii) If access by the public to the Library Site is provided over parcels 0520193076 and 7001640060 pursuant to recorded access easements, the Library agrees to maintain, restore, reconstruct, and generally keep the Easement Areas, described and depicted in Exhibits A & B, in good condition and repair so that the Easement Areas are safe for pedestrian and vehicular travel (including emergency vehicular travel). The Library shall cut, trim, remove and dispose of any vegetation on the Library Site that interferes with pedestrian and vehicular travel. Maintenance, restoration, and repair work shall be conducted in a good and work-manlike manner and expeditiously prosecuted to completion as not to unreasonably interfere with or hinder use of the Easement Areas. When the Library performs maintenance, repair, restoration, or clearing in the Easement Areas or on its servient property, it will make all reasonable accommodations to minimize interruption of travel over and use of the Areas, including performing, if necessary, the work in stages to insure that at all times a 12-foot drive-aisle is passable. The City assumes no responsibility for the maintenance, repair or restoration of the Easement Areas.

(iii) If access by the public to the Library Site is not granted by recorded easement over parcels 0520193076 and 7001640060, the requirements of 18.43 SMC are modified to allow public access to the Library Site from Main Street and to allow the Library to construct a driveway abutting the Main Street right-of-way. The driveway shall be constructed according to the requirements of the applicable provisions of the SMC and the Sumner Development Specifications and Standard Details. The Library shall

otherwise comply with the provisions of Chapter 18.43.SMC in effect at the time of the Effective Date.

(c) **Parking.** Based on the need for library patrons to quickly deposit borrowed books inside the Library building or in an exterior depository, on-street parking may be installed along the frontage of the Library Site. The on-street parking areas shall conform to the Sumner Development Specifications and Standard Details and the city's SEPA determinations.

(d) **Fence Height.** The City acknowledges and recognizes that SMC 18.12.080J(8) provides an exemption for fence heights associated with public facilities, including libraries. Such facilities are allowed fence heights necessary and appropriate for such facilities. The City, therefore, approves and consents to, and the Library agrees to install, 8-foot fences wherever SMC provisions require the installation of fencing for the Library Development Project. The fencing shall be installed according to the relevant SMC provisions and the Building Code.

(e) **Impact Fees.** The Library shall pay and City shall collect impact fees under Title 12 of the City Code as a condition of Development approvals, subject to the provisions of this Section. The fees (i.e. Park and Transportation) shall be calculated according to the City's current schedule of impact fees in effect on the Effective Date and for a 12-month period thereafter. Impact fees for building permits issued to the Library for the Library site after 12 months following the Effective Date shall be imposed and paid by Library per the then-current schedule of impact fees as it may be amended from time to time.

(g) **Vesting.** The Library Development Project shall vest to the Effective Date of this Development Agreement (the "*Vesting Date*"), as described more particularly below under Section 5. Such vesting shall extend for 5 years from the Effective Date, subject to the reservation of the authority of the City set forth under Section (g)(iii) below.

i. ***Vested City Code.*** Except as otherwise expressly set forth under this Development Agreement, the Vested Codes ("*Vested City Code*") shall consist of the codes, rules, regulations, officially adopted policies, standards and specifications applicable to the Library Development in effect on the Effective Date. The following SMC chapters and titles shall be the Vested City Codes under this Agreement: SMC Ch. 12.02 and the City of Sumner Development Specifications and Standard Details,, Ch. 12.24, Ch. 12.36, Ch 12.38, Ch. 12.42, Ch. 13.28, Ch. 13.30, Ch. 13.36, Ch. 13.48 Ch.15.34, Ch.15.52; Title 16, Ch. 18.02, C.18.04, Ch.18.16 Ch 18.30, Ch. 18.32, Ch.18.41. Ch.18.42, Ch. 18.43, Ch. 18.44, Ch. 18.48, Ch. 18.50, Ch. 18.54, Ch. 18.56, and the City of Sumner Comprehensive Plan, including the Comprehensive Plan Land Use Designation of Public-Private Utilities and Facilities on the School Site.

In addition to the above laws, the Library Development shall be subject and vested to the versions of the International Building Code, International Fire Code, and other building construction codes, such as the Seismic Code, including any fees associated thereunder, in effect in the City at the time of the Library's submittal of a complete building permit application.

A complete copy of the Vested City Code is included as Exhibit D, which shall not be included in the recorded copy of this Agreement but shall be available on file at the Auburn Department of Community Development.

Notwithstanding the foregoing, Developer acknowledges that the Library Development contemplated by this Agreement shall be subject to all other city, state, and federal rules, regulations, and code provisions, including any amendments thereto, that are not identified in this section.

ii. **Project Approval.** Without limiting the foregoing, the Library shall have the right to develop the Library Development Project according to the terms and conditions of the following:

- (a) the terms and conditions of this Development Agreement;
- (b) the Mitigated Determination of Non-Significance under SEPA, RCW Ch. 43.21C, for the Library Development Project issued by the City on November 26, 2024; and
- (c) the terms and conditions of approval of the CUP 2024-0007 issued by the City Hearing Examiner by decision dated XXXXXXXXXX, 2024, and which approval and CUP shall be deemed extended concurrent with the Term of this Agreement.

iii. **Exemptions.** Amendments, additions, increases or other changes to the following plans, policies, laws, ordinances, regulations, fees and monetary charges adopted by the City following the Effective Date are exempt from the vesting provided in this Agreement:

- (a) Permit application, permit review, and inspection fees applicable to any application for development;
- (b) Water, sewer and stormwater connection charges, general facility charges, and monthly service charges, as the Council may from time to time adopt and/or amend; and
- (c) Impact fees imposed under Title 3 of the SMC, except as otherwise specifically provided in this Agreement;
- (d) The City's authority to require additional SEPA review and/or mitigation under Ch. 43.21C and Ch. 197-11 WAC in connection with applications for development approvals; provided however that the Library Development Project shall be vested to the City's substantive SEPA policies and regulations in effect on the Effective Date;
- (e) Any law, ordinance, rule, regulation or policy adopted by the City pursuant to RCW 36.70B.170(4), following written notice to the Library and an opportunity

to be heard, that the City deems necessary to address a serious threat to public health and safety;

(f) Procedural ordinances or regulations of the City which are not substantive, relating to hearing bodies, notices, applications, findings, records, hearings, reports, recommendations and appeals and any other matter of procedure;

(g) Any plans, policies, ordinances, regulations or Vested City Code that the City must change, or the City reasonably determines to be necessary to change, to comply with, the requirements of any state or federal law or the directive of any state or federal agency or court in order to avoid being in violation of state or federal law or to preserve the City's eligibility to receive shared revenues, grants, or other funding, but only to the extent necessary to comply with such state or federal law, directive, or order. To the extent that the City can comply with such state or federal law, order, or directive by adopting changes to plans, policies, ordinances or regulations that apply prospectively, this exemption shall not apply to permit retroactive changes to the terms, conditions or Vested City Code provisions to which the Library Development Project is vested under this Agreement;

(h) Taxes of any nature of general applicability throughout the City.

iv. ***Subsequent Code Amendments.*** If mutually agreed by the Library and City, the Library may develop the Property in accordance with one or more amendments to the Vested City Code adopted after the Effective Date, without the obligation to comply with other subsequently adopted City Code provisions. The City's decision whether to agree to application of such amendments to the Vested City Code may be made administratively by the City's City Manager. Any such agreement must apply the entirety of an amended City Code section or chapter, as applicable, which shall apply to all future Development from the time of such Code amendment through the Term of this Agreement.

3. **Historic Space.** In consideration for the mutual promises of and certainty provided by this Agreement, the Library agrees to execute a services agreement for the creation and maintenance of "historic space(s)" within the Library for exhibiting Sumner community information and city history. A proposed Historic Space Service Agreement is attached to this agreement as Exhibit E and is incorporated herein.

4. **Term.** This Agreement shall remain in effect for 5 years from the Effective Date ("Term") provided it is not earlier terminated pursuant to this section. The Agreement shall earlier terminate if the Library has not performed the following two conditions within three years from the Effective Date:

(a) Submit to the City a full and complete building permit application for the Library Development Project, as identified in CUP 2024-007; and

(b) Publish a request for bids for the Library Development Project, as identified in CUP 2024-0007.

Any request for an extension of the Term under this Development Agreement shall be subject to submittal of a Type VI Land Use Application under SMC Ch. 18.56, as of the Effective Date of this Development Agreement, and shall be processed for review and determination before the City Council, at a public hearing in accordance with SMC Ch. 18.20, as of the Effective Date of this Development Agreement. In no event shall an extension of the Term be for a period of greater than five (5) years.

5. **Effective Date.** The “Effective Date” of this Agreement shall be the later date of the parties’ execution of this Agreement. Provided, however, in the event of any judicial appeal by a third party of this Agreement in accordance with the Sumner Municipal Code, the Effective Date shall be extended to the date that any such appeal is concluded by mandate to Superior Court upon conclusion of all appellate review. The Library agrees to be solely responsible for, and liable for all risk associated with, and to defend, hold harmless and indemnify the City from and against any and all liability, damages, costs or expenses, including attorney's fees, in the event the Library undertakes any construction activities during any such appeal.

6. **Conforming structures, improvements and uses.** Amendments to the City Code during the Term of this Agreement shall not be deemed to create nonconforming structures, improvements, or uses. Structures, improvements and uses that are consistent with this Agreement shall be considered conforming, and such uses may continue and such structures and improvements may be maintained, repaired, remodeled and replaced, consistent with the standards in Section 2 and the Vested Code, for the Term of this Agreement.

7. **Amendments.** The Library may apply for amendments to this Agreement. “Minor Amendments” are those that do not increase the gross floor area of potential Development by more than 10% or do not significantly increase the environmental impacts of development on the Property, unless those impacts are mitigated to a level that is less than significant. Minor Amendments may include, but are not limited to,

- Deviations from development standards in addition to those provided in Section 2.
- An alteration of the alignment or configuration of a building or facility that does not decrease any setback or materially increase any off-site impacts;
- Any change that does not increase the impervious surface area nor create any significant increase in any off-site impacts or detrimentally impact the surrounding community;
- Any change that does not increase impacts on the transportation network;
- Any change that would allow issuance of an Addendum to the MDNS under the SEPA rules and regulations (RCW ch. 43.21C and WAC ch. 197-11).

Minor Amendments relating to zoning and land use shall be approved administratively by the City Manager and Minor Amendments related to engineering standards by the City’s Public Works Director. The City shall render a decision on such request for a Minor Amendment not more than twenty (20) days after delivery of said Minor Amendment application to the City.

All other amendments are Major Amendments and shall require submittal of a written application by the Library, as a Type VI Application, and shall require review, a public hearing, and recommendation by the Hearing Examiner, and review, public hearing, and approval by the City Council by Ordinance, to the extent required under SMC 18.20 as of the Effective Date of this Development Agreement.

8. **Default and Remedies.**

(a) **Default.** Subject to the notice and opportunity to cure provided in this section, any failure by a Party to perform any material action required under this Agreement shall constitute a default, unless such failure is compelled by order of a court.

(b) **Dispute Resolution.** In the event of any dispute under and prior to any claim of default under this Agreement, the parties, upon the written request of the other party, shall first meet not more than seven (7) business days from the date of such request to seek, in good faith, to resolve such dispute. The City shall direct the appropriate department director or staff member with information relating to such dispute and the Library shall direct the project manager, consultant, and/or an appropriate staff member with adequate technical information or expertise related to such dispute to attend such meeting.

(c) **Notice and Opportunity to Cure.** Except as expressly provided otherwise in this Agreement, no party shall be in default under this Agreement unless it has failed to perform as required under this Agreement for a period of thirty (30) days after written notice of default from the other Party. Each notice of default shall specify the nature of the alleged default and the manner in which the default may be cured satisfactorily. If the nature of the alleged default is such that it cannot be reasonably cured within the thirty (30) day period, then commencement of the cure within thirty days and diligent prosecution to completion of the cure shall be deemed a cure.

(d) **Rights of Non-Defaulting Party.** Except as set forth herein, a party not in default under this Agreement shall have all rights and remedies provided by law or equity, including without limitation damages, specific performance, or writs to compel performance or require action consistent with this Agreement.

(e) **Attorneys' Fees.** In any action to enforce or determine a party's rights under, this Agreement, the prevailing party shall be entitled to attorney's fees and costs and other professional fees and all other fees and expenses actually incurred and reasonably necessary in connection therewith.

9. **Notices.** All notices required to be given under this Agreement shall be given in writing and shall be deemed delivered on the date of hand delivery of the notice or the date that is three days after mailing of the notice by certified or registered mail, return receipt, postage prepaid, to the parties at the addresses set forth below:

If to Owner: Gretchen Caserotti
Executive Director

3005 112th St E Tacoma, WA 98446

If to City: Jason Wilson
City Administrator
1104 Maple Street
Sumner, WA 98390
jasonw@sumnerwa.gov

The Parties, by notice given, may designate any further or different address to which subsequent notices are to be sent.

10. **Specific Performance.** The parties acknowledge that money damages and remedies at law generally are inadequate and specific performance and other non-monetary relief are particularly appropriate remedies for the enforcement of this Agreement and should be available to all parties.

11. **Third Party Beneficiaries.** There are no third-party beneficiaries of this Agreement and no party other than the Owner and the City shall be entitled to enforce this Agreement.

12. **Mutual Drafting.** Both the City and Owner have participated fully in the drafting of this Agreement, and the rule of construction of ambiguities against the drafter shall not apply to either Party.

13. **Covenant Running with the Land.** All of the provisions of this Agreement shall be enforceable as equitable servitudes and constitute covenants running with the land pursuant to applicable law. Each covenant to do or refrain from doing some act on the Property hereunder, (a) is for the benefit of such properties and is a burden upon the Property, (b) runs with the Property, and (c) is binding upon each successive owner during its ownership of Property or any portion thereof, and each person having any interest therein derived in any manner through any owner of the property or any portion thereof, and shall benefit such party and the Property hereunder, and each other person succeeding to an interest in such Property.

14. **Recording.** This Agreement shall be recorded with the Office of the Pierce County Recorder.

15. **Entire Agreement.** This Agreement represents the entire agreement of the Parties with respect to the subject matter of this Agreement. There are no other agreements, oral or written, except as expressly set forth in this Agreement. This Agreement supersedes all previous agreements, oral or written, except as expressly set forth in this Agreement. This Agreement may be modified only by a written instrument duly executed by the Parties following the amendment process described in Paragraph 7 of this Agreement.

16. **Authority.** The obligations to dedicate property, implement mitigation measures, make impact fee or other payments, or to fund or to provide services, infrastructure, or other facilities agreed to by Library in this Agreement are made pursuant to, authorized by and/or are consistent with applicable law, including without limitation RCW 43.21C.060, WAC 197-11-

350, RCW 36.70B.170(4), RCW 82.02.020 and the Washington State and United States Constitutions. Each Party represents and warrants that it has the power and authority, and is duly authorized, to enter into this Agreement on the terms and conditions herein stated, and to deliver and perform its obligations under this Agreement.

17. **Counterparts.** This Agreement may be executed in counterparts, with each Party sending a .pdf of its signature to the other Party by electronic mail transmission. This Agreement, when fully executed and signature pages exchanged as provided herein shall be effective as the original document.

18. **Exhibits.** This Agreement includes the following Exhibits, which are incorporated by reference:

- a. Exhibit A: Legal description of Property.
- b. Exhibit B: Depiction of Property.
- c. Exhibit C: Sumner Library Plans
- d. Exhibit D: Vested Codes
- e. Exhibit E: Historic Space Service Agreement

19. **Indemnification.** Library releases and agrees to defend, indemnify and hold harmless the City and all of its elected and appointed officials and its employees from all liability, claims, causes of action, fees (including reasonable attorneys' and expert fees), penalties, appeals and costs, including but not limited to the costs of defense of any claim or appeal brought by a third party, arising in connection with the approval of or otherwise relating to this Agreement or any Development under this Agreement, except to the extent resulting from the sole negligence of the City or its officers, agents or employees in performance of this Agreement, and except in connection with any action by either Party to enforce this Agreement or in connection with any other matter in which the Library and City are adverse.

20. **Interpretation.** The parties intend this Agreement to be interpreted to the full extent authorized by law as an exercise of the City's authority to enter into development agreements pursuant to RCW 36.70B.170 – .210, except that this Agreement shall be construed to exclude from the scope of this Agreement actions taken by the City through its police power authority, as defined by the Washington State constitution and general law, and other actions that are prohibited by law from being subject to a mutual agreement with consideration.

21. **Non-Enforcement Not Waiver.** Failure by any one of the parties to enforce this entire Agreement or any provision of it with regard to any provision contained herein shall not be construed as a waiver by that party of any right to do so.

22. **City Council Authority.** This Agreement shall be subject to approval by no less than a majority vote of the City Council of the City of Sumner. Absent such approval, this Agreement shall be void and of no further force or effect.

IN WITNESS WHEREOF, the parties have executed this Agreement on the date and year set forth hereinbelow.

**PIERCE COUNTY RURAL LIBRARY
DISTRICT**, a county library municipal
corporation

CITY OF SUMNER, a Washington
municipal corporation

By: _____

By: _____
Kathy Hayden

Its:

Its: Mayor

Date: _____

Date: _____

ATTEST:

Michelle Converse, City Clerk

Approved as to form:

Approved as to form:

Andrea Marquez, City Attorney

STATE OF WASHINGTON)
) ss.
County of Pierce)

On this _____ day of _____, 2024, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Kathy Hayden to me known to be the Mayor of the City of Sumner, the municipal corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said municipal; corporation, for the uses and purposes therein mentioned, and on oath stated that he/she is authorized to execute the said instrument and that the seal affixed (if any) is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first above written.

Notary Public in and for the State of Washington,
residing _____ at

Name (printed or typed):

My appointment expires:_____

EXHIBT A

Section 19 Township 20 Range 05 Quarter 33 BEG AT A PT ON S LI OF W E DANIEL CO
RD 726 FT E & 30 FT S OF NW COR LOT 4 IN SEC TH E 132 FT TH S 389 FT TH W 132
FT TH N 389 FT TO BEG (DC2135HW5-14-86)

Section 19 Township 20 Range 05 Quarter 33 : L 2 OF SHORT PLAT 81-06-30-0321 OUT OF
3-098

SEG R-0553 DL EMS

Section 19 Township 20 Range 05 Quarter 33 : L 3 OF SHORT PLAT 81-06-30-0321 OUT OF
3-098

SEG R-0553 DL EMS

EXHIBIT B

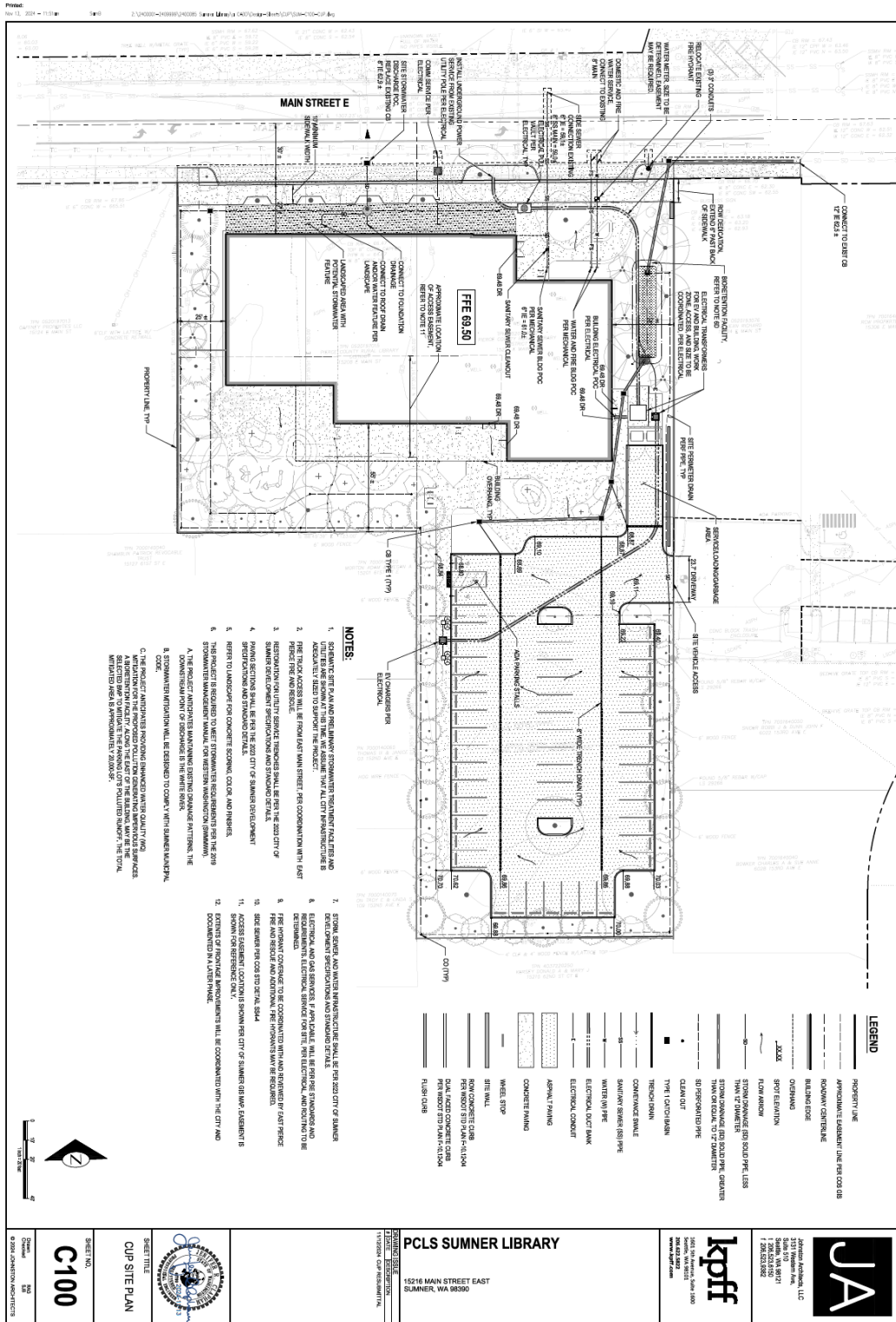
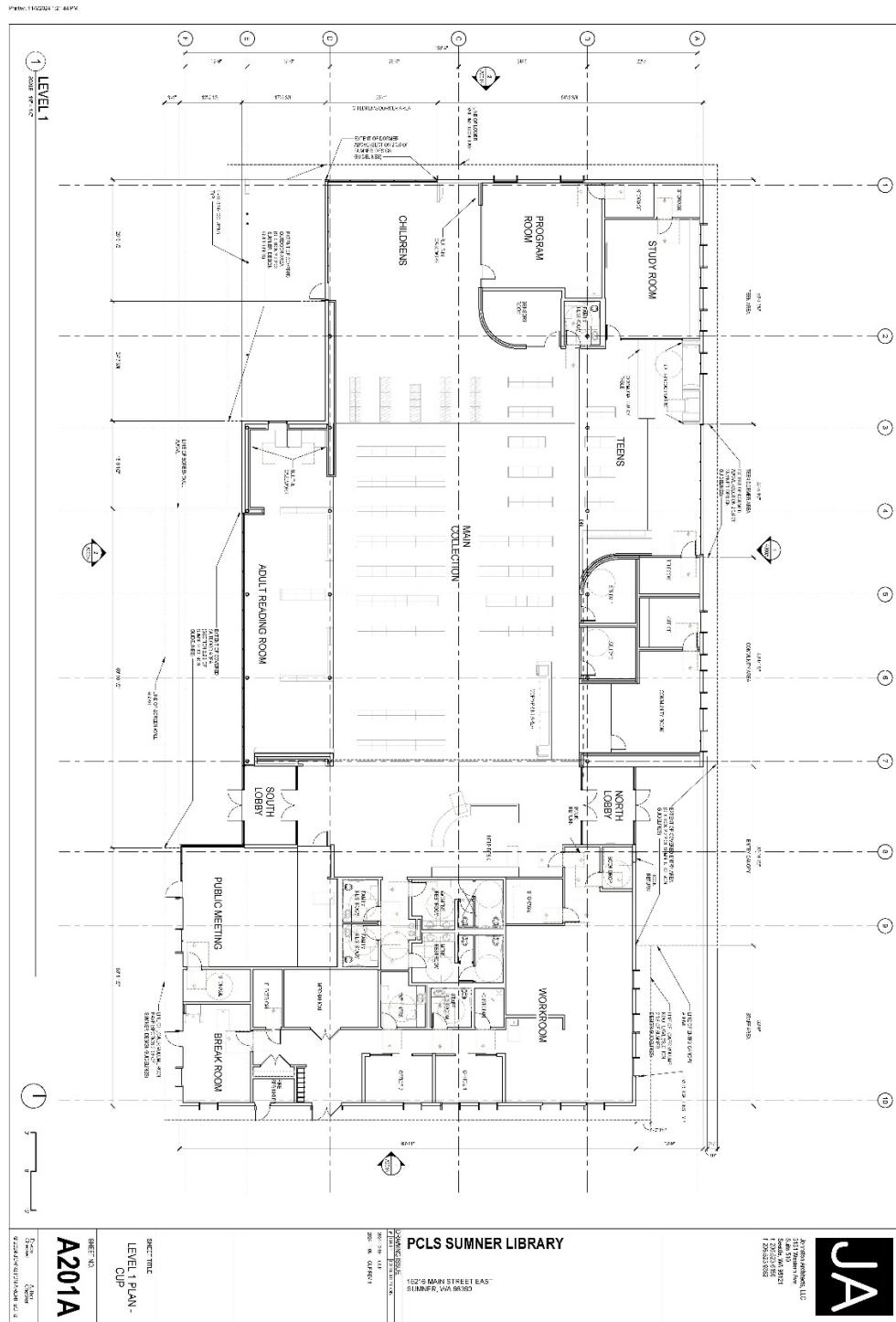
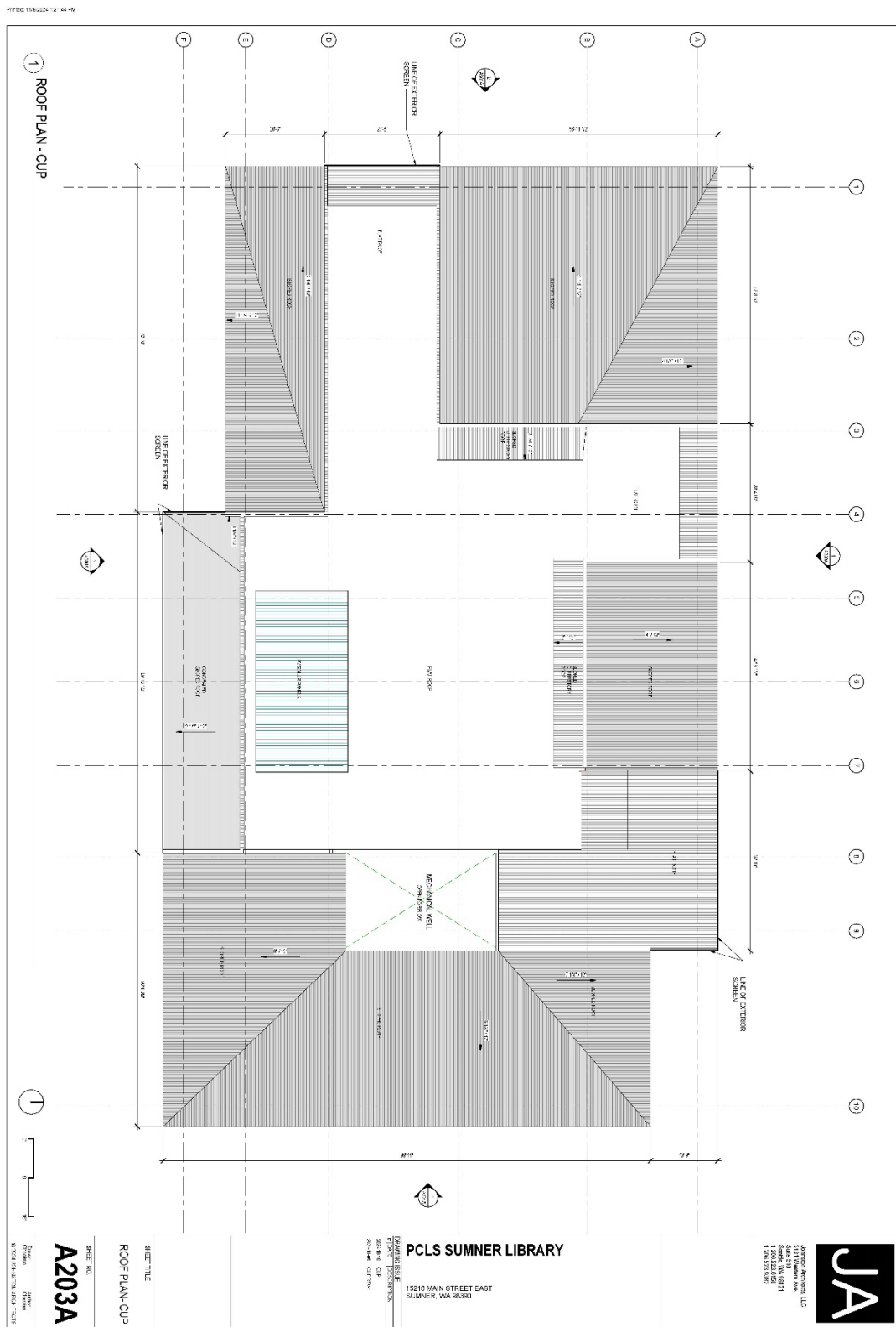
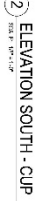


EXHIBIT C







15218 MAIN STREET EAST
SUMNER, WA 99390



3131 Western Ave.
Suite 513
Seattle, WA 98121
t 206.523.6150
f 206.523.0362

SHEET TITLE
EXTERIOR
ELEVATIONS - CUP

SHEET NO
A300A



NORTH ENTRY RENDERING



NORTHWEST CORNER RENDERING



SOUTHWEST CORNER RENDERING



SOUTH ENTRY RENDERING



J.A. Architects, LLC
15210 Main Street East
Sumner, WA 98390
Phone: 206.833.3800
Fax: 206.833.3802

PCLS SUMNER LIBRARY

15210 MAIN STREET EAST
SUMNER, WA 98390

DESIGNED BY
J.A. Architects, LLC
15210 Main Street East
Sumner, WA 98390
Phone: 206.833.3800
Fax: 206.833.3802

SHEET TITLE
EXTERIOR VIEWS -
CUP

SHEET NO.
A990A

DESIGNED BY
J.A. Architects, LLC
15210 Main Street East
Sumner, WA 98390
Phone: 206.833.3800
Fax: 206.833.3802

EXHIBIT D

Vested Codes

EXHIBIT E

This exhibit is a draft agreement that is under discussion by the Parties. The substance of the final agreement shall be by mutual agreement of the Parties.

LIBRARY HISTORIC SPACE SERVICES AGREEMENT

THIS SERVICES AGREEMENT (the “*Agreement*”), regarding historic displays at the future Pierce County Public Library in Sumner, is entered into as of _____, 2024 (the “*Effective Date*”) by and between the **CITY OF SUMNER**, a Washington municipal corporation (“*City*”) and the **PIERCE COUNTY RURAL LIBRARY DISTRICT**, a Washington county library established pursuant to title 27.12 RCW (“*Library*”). The City and the Library shall be referred to as a “party” or collectively as the “parties” to this Agreement.

I. RECITALS

II. TERMS AND CONDITIONS

1. **Historic Space.** In consideration for the mutual promises of and certainty provided by the Development Agreement for the development of the Pierce County Sumner Library, the Library agrees to create and maintain a “historic space(s)” at the Sumner Library property for exhibiting Sumner city history information. As the City lacks a public history museum, the purpose of the space is to provide historic information about the city and/or its residents similar to the information provided by the White River Valley Museum except focused on Sumner and its resident or the inhabitants of the vicinity prior to Sumner’s incorporation. The Library’s performance of its obligation is subject to the following terms and conditions.
 - a) The Library shall identify the location of the space. The location may be a single location or several locations and may be either inside or outside the Library building, at the Library’s discretion.
 - b) The locations and content of the exhibits may be fixed, or may change or rotate over time, no less frequently than once a year if the exhibit is not permanent. If the content of the exhibit(s) is fixed for more than a year, the City shall approve the content.
 - c) Library property may not lack a historic display or exhibit for more than two months cumulatively per calendar year.
 - d) If a location consists of a wall, the exhibit space shall be no smaller than 48” x 48”. If the historic space includes a cabinet, it shall be no smaller than 48” x 18”

x 36". If the historic space is an outside display, it shall be no smaller than 100 square feet.

- e) Any exhibit may consist of different mediums, including audio. Any exhibit may be targeted to either adults or children.
 - f) With the Library's consent, which consent shall not be unreasonably withheld, and at least 30 days notice to the Library, the City may control the content and presentation of the historic space display. If the City provides the content of any display space, the City shall do so at its expense and risk. If the City's display is a temporary exhibit, it will comply with the Library's exhibit schedule to create and show the exhibit in the Historic Space. Unless the City selects the content of the exhibit space, the Library shall be responsible for selecting, assembling, installing, and displaying the historic space content at its sole expense and risk. For any display, the City shall in good faith make itself available to assist the Library with the content of displays in the Historic Space(s), including providing topic suggestions to the Library, providing sources of information, and providing design review and suggestions.
2. **Term.** The term of this Agreement shall commence on the Effective Date and shall expire on the fiftieth anniversary (the "*Term*"). The obligations contained in section X shall be effective six months after the City issues the Library a certificate of occupancy and shall remain effective for the Term.
3. **Force majeure.** In the event that a Party is prevented or delayed, directly or indirectly, from the performance of any of its respective obligations hereunder by a Force Majeure Event, then: (a) such Party shall be excused from the performance of such obligations for so long as, and to the extent that, the Force Majeure Event prevents or delays such performance; (b) such failure shall not be deemed to be a breach or default of this Agreement.
- (a) Definition "Force Majeure Event" means any event or circumstance (or combination thereof) and the continuing effects of any such event or circumstance (whether or not such event or circumstance was foreseeable or foreseen by the Parties) that temporarily delays or prevents performance by the Party of any of its respective obligations under this Agreement, but only to the extent that and for so long as: (a) the event or circumstance is beyond the reasonable control of the Party; (b) despite the exercise of reasonable diligence, the event or circumstance cannot be prevented, avoided or stopped by the Party; and (c) the Party has taken all reasonable measures to avoid the effect of the event or circumstance on the Party's ability to perform its obligations hereunder and to mitigate the consequences of the event or circumstance.
- (b) Scope. Force Majeure Events include the following, to the extent the requirements set forth in this section are satisfied: (a) acts of God of any and all kind, including volcanic eruption, landslide, earthquake, flood, lightning, tornado or other unusually severe storm or environmental conditions, perils of the sea, fire or any other acts of nature or natural disaster; (b) accidents, damage or loss of any and all kind, including explosions,

epidemics, pandemics, quarantine or criminal or terrorist acts; (c) strike or labor disturbances or difficulties of any and all kind, including labor or material shortage; (d) act of war (whether declared or undeclared), acts of public enemies, armed conflicts, act of foreign enemy, acts of terrorism (whether domestic or foreign, state-sponsored or otherwise), riot, civil commotion, blockade, insurrection, civil disturbance, revolution or sabotage.

(c) **Insufficient Funding.** Notwithstanding the foregoing, the insufficiency of funds, financial inability to perform or changes in a Party's cost of performing its obligations hereunder shall in no event be considered or constitute a Force Majeure Event.

(d) **Reservation of Rights.** Suspension of any obligation as a result of a Force Majeure Event shall not affect any rights or obligations which may have accrued prior to such suspension or, if the Force Majeure Event affects only some rights and obligations of the Affected Party, any other rights or obligations of the Party.

(d) **Force Majeure Procedures.** Following the occurrence of a Force Majeure Event, the Party shall provide prompt notice to the other Party of the Force Majeure Event, give an estimate of its expected duration and the probable impact on the performance by the Party of its obligations hereunder, exercise all reasonable efforts to continue to perform its obligations hereunder; expeditiously act to correct or cure the Force Majeure Event to the extent such action is within the power of the Party; exercise all reasonable efforts to mitigate or limit damages to the other Party to the extent such action will not adversely affect its own interests; and provide prompt notice to the other Party of the cessation of the Force Majeure Event and the resumption by the Affected Party of the performance of its obligations hereunder.

4. Default and Remedies.

(a) **Default.** Any failure by a Party to perform any material action required under this Agreement shall constitute a default, unless such failure is compelled by order of a court, subject to the notice and opportunity to cure provided in this section.

(b) **Dispute Resolution.** In the event of any dispute under and prior to any claim of default under this Agreement, the parties, upon the written request of the other party, shall first meet not more than seven (7) business days from the date of such request to seek, in good faith, to resolve such dispute. The City shall direct the appropriate department director or staff member with information relating to such dispute and the Library shall direct an appropriate staff member with adequate technical information or expertise related to such dispute to attend such meeting.

(c) **Notice and Opportunity to Cure.** Except as expressly provided otherwise in this Agreement, no party shall be in default under this Agreement unless it has failed to perform as required under this Agreement for a period of thirty (30) days after written notice of default from the other Party. Each notice of default shall specify the nature of the alleged default and the manner in which the default may be cured satisfactorily. If the nature of the alleged default is such that it cannot be reasonably cured within the thirty (30) day period, then

commencement of the cure within thirty days and diligent prosecution to completion of the cure shall be deemed a cure.

(d) **Rights of Non-Defaulting Party.** Except as set forth herein, a party not in default under this Agreement shall have all rights and remedies provided by law or equity, including without limitation damages, specific performance, or writs to compel performance or require action consistent with this Agreement.

(e) **Attorneys' Fees.** In any action to enforce or determine a party's rights under, this Agreement, the prevailing party shall be entitled to attorney's fees and costs and other professional fees and all other fees and expenses actually incurred and reasonably necessary in connection therewith.

5. **Indemnification.** The Library shall defend, indemnify and hold the City, its officers, officials, employees, agents and volunteers harmless from any and all claims, injuries, damages, losses or suits, including all legal costs and attorney fees, arising out of or in connection with the Library's performance of this Agreement, except as stated in other sections of this Agreement and for that portion of any injuries or damages caused by the City's sole negligence.

6. **Severability.** Any provision of this Agreement that is unenforceable shall be ineffective to the extent of such unenforceability without invalidating the remaining provisions of this Agreement, and any such prohibition or unenforceability in any jurisdiction shall not invalidate or render unenforceable such provision in any other jurisdiction. In the event any such provision of this Agreement is so held invalid, the Parties shall, within seven (7) Days of such holding, commence to renegotiate in good faith new provisions to restore this Agreement as nearly as possible to its original intent and effect.

7. **No Assignment.** No Party will assign or otherwise transfer this Agreement or its rights and obligations hereunder without the other Party's advanced written consent. Any attempt to do so is void.

8. **Amendment.** Except as provided herein, no amendment or variation of the provisions of this Agreement shall be binding upon the Parties hereto unless evidenced in a writing which indicates that such writing is intended to amend the terms of this Agreement and is signed by duly authorized officers or representatives of each Party.

9. **Third Party Beneficiaries.** There are no third-party beneficiaries of this Agreement and no party other than the Library and the City shall be entitled to enforce this Agreement.

10. **Mutual Drafting.** Both the City and Library have participated fully in the drafting of this Agreement, and the rule of construction of ambiguities against the drafter shall not apply to either Party.

11. **Entire Agreement.** This Agreement represents the entire agreement of the Parties with respect to the subject matter of this Agreement. There are no other agreements, oral or written, except as expressly set forth in this Agreement. This Agreement supersedes all previous agreements, oral or written, except as expressly set forth in this Agreement.

12. Non-Enforcement Not Waiver. Failure by any one of the parties to enforce this entire Agreement or any provision of it with regard to any provision contained herein shall not be construed as a waiver by that party of any right to do so.

IN WITNESS WHEREOF, the parties have executed this Agreement on the date and year set forth hereinbelow.

**PIERCE COUNTY RURAL LIBRARY
DISTRICT**, a county library municipal
corporation

By: _____

Its:

Date: _____

Approved as to form:

CITY OF SUMNER, a Washington
municipal corporation

By: _____
Kathy Hayden _____

Its: Mayor

Date: _____

ATTEST:

Michelle Converse, City Clerk

Approved as to form:

Andrea Marquez, City Attorney

SUBJECT: Election of Deputy Mayor

CATEGORY: Motion

BUDGET IMPACT:

Expenditure Required: None

Within Budget Allocation: N/A

ATTACHMENTS:

STAFF CONTACT: Jason Wilson, City Administrator

SUMMARY BACKGROUND: Pursuant to Council Rules Section 19 (listed below) council must elect a Deputy Mayor at the first Regular Council meeting in January of each year. For this action, the Mayor will accept nominations from the Council and those nominations will be voted upon.

Section 19. Deputy Mayor Selection Process and Duties

19.1 The Deputy Mayor shall be elected to a one (1) year term at the first Regular Council meeting in January of each year. The Mayor shall conduct the election for the Deputy Mayor as follows:

- a. The Mayor shall open the floor for nominations. Nominations do not require a second.
- b. At the conclusion of nominations, the Mayor shall ask a motion to close nominations. A majority vote of Council is required.
- c. The City Clerk shall conduct a roll call vote. Each Councilmember shall respond with the name of the nominee they wish to vote for. Any nominee receiving a majority vote of the Council shall be declared the winner of the election. In the event of a tie, the Mayor shall cast the tie-breaking vote.

19.2 The Mayor shall preside at all meetings of the Council, and in the absence of the Mayor, the Deputy Mayor will act in that capacity, following established procedures and directives provided in Section 10 of the Council Rules for the Mayor. If both the Mayor and Deputy Mayor are absent, the Councilmembers present shall elect one of its members to serve as Presiding Officer until the return of the Mayor or Deputy Mayor.

COUNCIL COMMITTEE/STUDY SESSION:
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MEETING/STUDY SESSION DATE:

COMMITTEE RECOMMENDATION:

STAFF RECOMMENDATIONS/MOTION:

Conduct nominations and elect a Deputy Mayor.