



Memorandum

Date: October 12, 2010

To: Ryan Windish, Planning Manager
City of Sumner

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Subject: Response to Public Comments Received through October 8, 2010
Sumner 2010 Comprehensive Plan Update and EIS

This memorandum contains public comments provided during the comment period on the Draft Environmental Impact Statement (Draft EIS) for the City of Sumner (City) Comprehensive Plan Update and Amendments and responses to those comments. The State Environmental Policy Act (SEPA) requires a 60-day comment period for integrated Comprehensive Plans and EISs. The comment period extended from August 9, 2010, to October 8, 2010. This document summarizes comments received through October 8, 2010 and supersedes the memo prepared regarding comments received through September 15, 2010. These memos will be integrated into a chapter of the Final EIS.

The first section of this memo provides a list of public comments; the second section provides responses to comments followed by the comment letters. A summary of public meeting comments is also provided.

Public Comments

Twenty five comment letters were received during the public comment period from agencies, interest groups, and citizens. An additional three letters were received prior to the comment period, two from agencies, and one from a citizen. In addition, public comments from the Planning Commission hearing on August 30, 2010 are provided. Table 1 contains a list of the public comment letters received, and Table 2 contains a summary of public hearing comments received.

Table 1. Public Comment Letters Received

Letter Number	Date of Comment	Author: Resident, Property Owner, or Agency Name
1	August 26, 2010	Cathy Johnson
2	August 30, 2010	Investco, Michael Corliss
3	August 30, 2010	Robert and Shirley Lewis (Infinity Industrial Park)
4	September 18, 2010	Maxine Herbert-Hill
5	September 20, 2010	Robert M. Blackburn
6	September 29, 2010	Donna Hardtke
7	October 5, 2010	Katie Kindle
8	October 5, 2010	Puget Sound Regional Council, Jeff Storrar
9	October 7, 2010	Washington State Department of Commerce, Anne Fritzel
10	October 7, 2010	Washington State Department of Transportation, Ron Landon
11	October 8, 2010	City of Bonney Lake, John Vodopich
12	October 8, 2010	Washington State Department of Ecology (Ecology), Mike Drumright
13	October 8, 2010	Futurewise, Tim Trohimovich
14	October 8, 2010	Mike Herbert
15	October 8, 2010	Shannon Hochstatter
16	October 8, 2010	Investco, Brett Pudists
17	October 8, 2010	Heather Lewis
18	October 8, 2010	Muckleshoot Indian Tribe Fisheries Division, Karen Walter
19	October 8, 2010	Pierce County Planning and Land Services, Sean Gaffney
20	October 8, 2010	Pierce County Public Works Department, Gary N. Predoehl
21	October 8, 2010	Pierce Transit, Monica Adams
22	October 8, 2010	Katharine M. Rode
23	October 8, 2010	Scott E. Rode
24	October 8, 2010	Katharine M. Rode, DVD Transcript
25	October 8, 2010	Henry L. Seibert Jr.
Comment Letters Received Outside the Draft EIS Comment Period		
26	June 3, 2010	G. Richard Hill (McCullough Hill, PS)
27	June 29, 2010	Monica Adams (Pierce Transit)

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Letter Number	Date of Comment	Author: Resident, Property Owner, or Agency Name
28	June 30, 2010	Muckleshoot Indian Tribe Fisheries Division, Karen Walter

Table 2. Public Hearing Comments Received – August 30, 2010

Comment Number	Commenter	Comment Summary
PH 1-1	Barbara Bitetto 720 Thompson Street, Sumner	Ms. Bitetto indicated that she was the member of grass-roots organization to bring an art center to Sumner. Their group has partnered with the YMCA and believes they have the right philosophy. She supports the Orton Junction expansion as a way to bring the YMCA to the area.
PH 2-1	Bob Ecklund President and CEO of local YMCA	Mr. Ecklund stated that Sumner is the most enthusiastic community he has worked with in 36 years with the YMCA. The YMCA would meet Sumner's vision, and \$5 million has been dedicated to the effort to bring the YMCA to Sumner.
PH 3-1	Joe Grace 15229 46 th Street, Sumner	Mr. Grace voiced agreement with the staff's recommendation to deny the Manufacturing/Industrial Center (MIC) amendment application, stating that expansion of the MIC would be inappropriate next to the library.
PH 3-2		Mr. Grace stated that he agrees with the Orton Junction expansion in order to bring the YMCA to Sumner, but he believes reducing the UGA on the East Hill is a mistake. The City should maintain control of this area to prevent undesirable development from occurring.
PH 4-1	Michael Corliss Investco 1302 Puyallup Street, Sumner	Mr. Corliss agrees with staff recommendation on changes to the industrial area.
PH 4-2		Mr. Corliss assured the Planning Commission, the community, and the City Council that he is much vested in Sumner, and that he would do everything possible to make sure the Orton Junction area develops in a sensitive manner. He wants to listen to the comments of the people.
PH 5-1	Kyle Hardtke	Mr. Hardtke supports the UGA expansion. As a lifelong member of the community, he believes it is important to grow the economy responsibly and bring good retail space and well-paying jobs to the area. He also supports the YMCA.
PH 6-1	Donna Hardtke 711 Meeker Avenue, Sumner	Mrs. Hardtke is excited about the prospect of having a YMCA in Sumner and believes it will provide a valuable sense of community.
PH 7-1	Michelle LaRue 1614 South Mildred Street	Ms. LaRue is a community liaison for the YMCA. She believes the level of involvement in Sumner is outstanding and that the YMCA can provide valuable social gathering spaces and a place for kids to go.
PH 8-1	Rick Hansen 1307 Firley Dr., Puyallup	Mr. Hansen is a member of the Puyallup YMCA and serves on the board of advisors. He believes the YMCA provides great opportunity because it serves everyone, offers many scholarships, and helps the homeless.

Comment Number	Commenter	Comment Summary
PH 9-1	Roger Knutsen 16624 78 th Street East, Sumner	Mr. Knutsen was born and raised in Sumner and owns property in the Orton Junction area. He supports the staff recommendation because it will help him continue to farm by bringing more of his property into a right-to-farm jurisdiction.
PH 9-2		Mr. Knutsen is pleased with everything he has heard about the YMCA proposal and believes it would be good for the city.
PH 10-1	Gil Hulsmann 923 Shaw Road	Mr. Hulsmann is an attorney for Mr. Knutsen. He supports the staff recommendation and wants to remind everyone that the City has planned for this expansion for many years, and Sumner is one of the few jurisdictions in the area with a right-to-farm ordinance.
PH 11-1	Melony Kirkish 16020 65 th Ct. East, Sumner	Ms. Kirkish is a member of the Sumner Design Commission and has a background in architecture and urban studies. She advocates a city that is sustainable, pedestrian-friendly, and diverse. The YMCA can provide many social connections for the city.
PH 11-2		Ms. Kirkish asked the Planning Commission not to limit housing options in the Orton Junction area.
PH 12-1	Troy Serad	Mr. Serad was initially skeptical of the proposal to expand the UGA, believing it would divert focus from downtown. After speaking with the players involved, he now believes it is very logical and sensible and this can be a catalyst to reinvigorate Sumner. Citizens need to be very involved in this to influence the development that will occur in the Orton Junction area.
PH 13-1	Danielle Pansevicius 16316 86 th St. East, Sumner	Ms. Pansevicius presented some information on the recent rise in crime her neighborhood has experienced. Her residence is outside the expansion area, but she hopes that expansion of the UGA will increase police service to the area and curb the amount of crime in the neighborhood.
PH 13-2		Ms. Pansevicius supports bringing the YMCA to Sumner, but she is concerned about increased traffic and the possibility of a further increase in crime.
PH 14-1	Lana Hoover 506 Alder Avenue, Sumner	Ms. Hoover supports the YMCA proposal and believes it would be great to have a safe place for her family to go for health, fitness, and wellness.
PH 15-1	John MacDonald 3302 West Tapps Drive, Lake Tapps	Mr. MacDonald voiced his support for the YMCA.
PH 15-2		Mr. MacDonald expressed concern about reducing the UGA on the East Hill. Business owners in the area have been looking forward to becoming part of Sumner, and he would like staff to reconsider removing this area from the UGA.

Responses to Comments

This section provides our initial responses to the comments received followed by copies of the comment letters (Attachment A). Table 3 contains responses to comments; the numbering of the comments corresponds to the numbering added to the actual comment letters following the table.

Comments that state an opinion or preference are acknowledged with a response that indicates that the comment is noted and forwarded to the appropriate decision makers. Comments that ask questions, request clarifications or corrections, or are related to the Draft EIS are provided a response that explains the approach, offers corrections, or provides other appropriate information.

Table 3. Responses to Comments

Comment Number	Response
Letter 1: Cathy Johnson	
1-1	Comment has been noted and is being considered by City decision makers.
Letter 2: Michael Corliss, Investco	
2-1	Comment has been noted and is being considered by City decision makers.
2-2	Comment has been noted and is being considered by City decision makers.
Letter 3: Bob and Shirley Lewis, Infinity Industrial Park	
3-1	Comment has been noted and is being considered by City decision makers.
Letter 4: Maxine Herbert-Hill	
4-1	The comment regarding preferences for Orton Junction is noted and is being considered by City decision makers. The decision-making process is open to the public. The decision-making process includes development of city staff recommendations (Draft EIS Appendix D), Planning Commission consideration and ultimately a recommendation (hearing on August 30, 2010 and subsequent public meetings in September and October, 2010), and City Council consideration (scheduled for November and December 2010). The City Council will consider staff and Planning Commission recommendations as well as citizen and agency comments.
4-2	Surface water management is addressed in Section 3.20 of the Draft EIS. The section identifies potential impacts and mitigation measures including compliance with the City's stormwater regulations which are consistent with Ecology's 2005 stormwater manual. The City's stormwater regulations require use of low impact development methods.

Comment Number	Response
4-3	The use of the PM peak hour as the study period is based on the City's adopted level of service standard. The use of the PM peak hour as the study period is common in Pierce County and other Puget Sound jurisdictions as it tends to be the most congested period of the day. The City could require site-specific development to also review other periods of the day depending on their characteristics. The ability for phased environmental review is discussed in Section 2.3.3 of the EIS.
4-4	Expansions of the UGA would be required to follow the policies of the <i>Alderton-McMillin Community Plan</i> . The required acres for purchase and transfer of development rights are to be commensurate with the extent of UGA expansion as addressed in Sections 2.4 and 3.9 of the Draft EIS. The most expansive alternative – the UGA Expansion Alternative requires 131 acres of rural land to be re-designated to agricultural lands and protected by a conservation easement. The current property owner has indicated the difficulties in leasing the land for farming at market rates since 2007 (see page 3.9-38 of the Draft EIS).
Letter 5: Robert M. Blackburn	
5-1	Riverside Drive is considered a collector in the City of Sumner Transportation Plan. Section 3.9 of the Draft EIS considers current and future volumes in this area. With the Sumner Transportation Plan implementation, LOS is expected to be B at Riverside Drive and 78 th Street E. See Draft EIS page 3.13-22. The City has a concurrency program which requires that new development demonstrate compliance with City LOS standards. Until some improvements are completed on state routes, the City has adopted lower interim LOS standards (see Response to Comment 10-5 below.)
Letter 6: Donna Hardtke	
6-1	Comment has been noted and is being considered by City decision makers.
Letter 7: Katie Kindle	
7-1	The comment regarding preferences for Orton Junction is noted and is being considered by City decision makers. The City provided a 60-day comment period on the Draft EIS. The Planning Commission held a public hearing on August 30, 2010 and has held additional public meetings as they deliberate. The City Council is expected to hold an additional hearing and deliberation. These opportunities are much more than the minimum required by State law and are consistent with the public participation plan the City developed early in 2010 (available at the Community Development Department).
Letter 8: Puget Sound Regional Council (PSRC), Jeff Storrar	
8-1	Comment has been noted and is being considered by City decision makers.

Comment Number	Response
8-2	<p>The Multi-County Planning Policies (Vision 2040) are addressed in Section 3.9 of the Draft EIS. As described on page 3.9-19 the Multi-County Planning Policies address similar topics as the GMA goals; thus more unique policies were addressed and summarized on pages 3.9-19 to 3.9-23. Growth Management Act goals are addressed in the same section on prior pages.</p>
8-3	<p>The analysis in Section 3.9 addresses multi-county policies regarding land use development patterns, centers and compact urban communities, rural lands, health and human services, affordable housing, and environment/climate changes. The Draft EIS addresses an alternative that would expand the UGA as well as an alternative that would result in a net reduction of UGA territory by reducing the eastern UGA and expanding to the south.</p>
8-4	<p>Comment has been noted and is being considered by City decision makers.</p>
8-5	<p>Comment has been noted and is being considered by City decision makers.</p> <p>The East Hill Reduction Area has lots larger than an urban pattern and are rural and semi-rural (see page 3.9-31 – average lot sizes of 1.14 acres and a density of 0.88 du/ac). It is an area that is more difficult to serve. Local roads tend to be private and many are unpaved. The area is not as practical or economical to serve with sewer. It is located outside of the City of Sumner water service area.</p> <p>The Orton Junction area contains 46 parcels with 52% under one acre in size and another 30% under 5 acres in size. The remaining 12% of parcels are larger.</p> <p>See Section 3.9 for analysis of both the East Hill and Orton Junction areas in terms of lot sizes, services, and other features, particularly Table 3.9-1 and page 3.9-36 to 39.</p>
8-6	<p>Comment has been noted and is being considered by City decision makers.</p> <p>City actions to make efficient use of its land prior to considering UGA expansion are described on page 2-4 of the Draft EIS and include the LDR-4 zone, the Town Center plan, and the Manufacturing/Industrial Center (MIC).</p> <p>The City has accomplished its planning for the current plan area (city limits and UGA) with essentially the same boundaries since 1994. With a new 20-year planning horizon and proposed growth allocations, the City is once again considering logical growth patterns and boundaries. The Draft EIS studies alternative patterns and boundaries.</p>

Comment Number	Response
8-7	<p>Comment has been noted and is being considered by City decision makers.</p> <p>See also the response to Comment 8-2. We will be reviewing the PSRC checklist, and determining if any clarifications should be included in the Final EIS.</p>
Letter 9: Washington State Department of Commerce	
9-1	<p>Comment has been noted and is being considered by City decision makers.</p>
9-2	<p>Section 3.9 of the Draft EIS evaluates designation criteria in the Washington Administrative Code, the Pierce County Comprehensive Plan and the <i>Alderton-McMillin Community Plan</i>. In particular, see pages 3.9-26 to 3.9-41.</p>
9-3	<p>The ability of the UGA Expansion Alternative to meet 2022 and 2030 allocations is provided in Chapter 2. The ability of the UGA Modification Alternative to meet 2022 allocations is the focus in Chapter 2 as the alternative's intent was to generally be consistent with 2022 allocations rather than require a major change in allocations in 2030. However, in Chapter 3.10, Table 3.1-1¹ on page 3.10-9 all alternatives, including the UGA Modification Alternative, are compared to both adopted 2022 and 2030 proposed allocations. In the Final EIS, this same comparison information on Table 3.1-can be added into Chapter 2.</p> <p>The staff recommendations are to deny the MIC expansion in order to maintain the Town Center Plan approach. The Planning Commission and City Council will be considering the MIC request.</p>
9-4	<p>Comment has been noted and is being considered by City decision makers. The County's role in determining growth allocations and UGA boundaries is addressed in Chapter 3-9 of the EIS. The request to label the UGA expansion as pending County approval is taken under advisement; it can be made part of the Preferred Alternative.</p>

¹ Table numbering should read 3.10-1; this will be corrected in the Final EIS

Comment Number	Response
Letter 10: State of Washington Department of Transportation	
10-1	<p>The comment is noted. The City’s improvement standards address non-motorized travel. The need to address transit is also indicated in Chapter 3-13. The citation of the Vision 2040 Complete Streets discussion will be added in the Final EIS in Sections 3.9 and 3.13. For reference, the Vision 2040 discussion states:</p> <p style="padding-left: 40px;">Complete Streets (Vision 2040 page 82)</p> <p style="padding-left: 40px;">Federal policy guidance for street design, also known as “routine accommodation.” Complete streets are designed and operated to enable safe and convenient access for all road users, while accommodating the movement of freight and goods. Pedestrians, bicyclists, motorists, and transit riders of all ages and abilities can safely move along and across a complete street. By designing and operating streets to be complete, transportation agencies increase capacity, avoid expensive retrofits, encourage physical activity, and help create walkable communities.</p>
10-2	<p>The Sumner Transportation Plan assumptions in relation to WSDOT System Plan assumptions are addressed on pages 3.13-14 to 15.</p>
10-3	<p>Response is pending.</p>
10-4	<p>The Sumner Transportation Plan assumptions in relation to WSDOT System Plan assumptions are addressed on Draft pages 3.13-14 to 15.</p>
10-5	<p>The Draft EIS notes in Section 3.13 the outcome if projects on state routes are not implemented:</p> <p style="padding-left: 40px;">“Without the development of these transportation improvements, traffic forecasts would likely be lower and the projected traffic operations along the improvement corridors would likely be worse than reported; therefore, may not meet the current Concurrency requirements. This would affect the City’s ability to implement its current Comprehensive Plan and any of the Alternatives since every proposed development in the city is required to go through a permitting and approval process. This process requires proposed developments to comply with all adopted policies and standards, including Concurrency. The City’s Transportation Plan identifies a range of funding strategies for the city and other agencies to pursue to implement projects concurrent with development. If improvements cannot be funded concurrent with development, the city would need to reassess its funding strategy, LOS standards, land use plan, as required under GMA.” Page 3.13-28.</p> <p>Also, the Draft EIS indicates that the City’s concurrency program has exceptions for LOS at the interchanges on SR 410 and intersections along SR 162 recognizing the regional traffic flows and the uncertainty of the time at which improvements would be made:</p> <p style="padding-left: 40px;">“The City’s transportation concurrency program is a requirement of the GMA. It is set forth in Policy 3.3 of the Transportation Element of</p>

Comment Number	Response
	<p>the City’s Comprehensive Plan. The city has identified exceptions to concurrency on SR 167, SR 410, SR 162, the three SR 410 interchanges serving the city, and other city roadways and intersections until the previously described transportation improvements are funded and constructed. These locations are impacted by significant levels of regional traffic, which the City of Sumner cannot control. The city is continuing to work with other agencies to define regional funding strategies for these improvements. The Transportation Element does; however, the city will coordinate with WSDOT to identify appropriate mitigation of development traffic impacts on SR 162 and at the three SR 410 interchanges.” Page 3.13-29.</p> <p>The City has already identified LOS conditions without improvements (quoted above). The City is considering if any additional information is appropriate.</p>
Letter 11: City of Bonney Lake, John P. Vodopich	
11-1	<p>The City of Sumner intends to comply with the agricultural resource lands policies of Pierce County expressed in the County Comprehensive Plan and <i>Alderton-McMillin Community Plan</i>. See Draft EIS Chapter 3.9 for an analysis.</p>
11-2	<p>Chapter 3.9 addresses consistency with adjacent jurisdiction plans. The focus on Chapter 3.9 is on abutting land use, transportation, and services. Except near City-owned springs, the city limits of Sumner and Bonney Lake do not abut. With the availability of the Sounder station, traffic from Bonney Lake affects Sumner. Some services are coordinated between the two cities (e.g. sewer treatment plant).</p> <p>Pierce County in consultation with cities determines the regional growth allocations. The City’s Draft EIS studies a range of alternatives that review the adopted and the proposed growth allocations. In addition, the City prepared an economic analysis finding that there is a lack of regional retail and commercial use types in eastern Pierce County. See Draft EIS Appendix E, Orton Junction Market Study.</p> <p>The City of Sumner has requested Bonney Lake’s 2006 economic study, and in the meantime has reviewed the Downtown Plan Element of Bonney Lake’s Comprehensive Plan. The City’s vision is for a downtown that serves Bonney Lake citizens as a central community-serving place:</p> <p style="padding-left: 40px;">“Bonney Lake needs a Downtown where its residents can meet, bring out-of-town guests, and gather for celebrations. Downtown will be full of restaurants, shops, offices, and streets that are pleasant for walking. It will contain a Main Street and a Civic Center. Its Central Plaza will be Bonney Lake’s most public place. The retail core will be ringed with commercial, residential, office, and mixed-use buildings, some containing multiple floors.”</p> <p>The City of Bonney Lake’s 2006 analysis studied:</p> <ol style="list-style-type: none"> 1. Free-standing one-story retail.

Comment Number	Response
	<p>2. Mixed use retail/office. 3. Retail and housing. 4. Retail and housing with parking offset. 5. Single-use rentals, condos, and offices.</p> <p>The uses studied in Sumner’s Orton Junction Market Study include a subset of <i>regional</i> retail uses such as household furnishings, apparel, personal care, and sports/recreation. The Orton Junction area is not identified as an area that would be a center for office or government uses. Proposed Sumner PMUD regulations would limit multifamily uses to 10%.</p> <p>Regarding Eastown, we understand that district is further removed from the Sumner community.</p> <p>Last, although economic studies may be helpful for policy discussions, it should be noted, however, that economic analysis is not required in an EIS. (See WAC 197-11-448, -450, and -726.)</p>
11-3	See response to Comment 11-1.
Letter 12: Washington State Department of Ecology, Waste 2 Resources, Mike Drumright	
12-1	The comment is noted. Phased environmental review is discussed in Section 2.3.3 of the EIS.
Letter 13: Futurewise, Tim Trohimovich	
13-1	Comment has been noted and is being considered by City decision makers.
13-2	<p>In numerous places in the Draft EIS, the draft or proposed nature of the growth allocations are mentioned:</p> <p>Chapter 2 notes the draft nature of the allocations for 2030. See pages 2-2 and 2-3 – as noted: “Currently, the City Comprehensive Plan is based on a horizon year of and growth allocation to 2022; however, a current process, under the Pierce County Regional Council, will result in proposed allocations for year 2030. While some agencies wait to analyze the effects of growth allocations after the numbers are adopted, this EIS allows the City and other decision makers to compare the environmental effects of adopting new growth allocations versus maintaining current allocations. Thus, the EIS will serve as an informational tool in the decision-making process.”</p> <p>Further Section 3.10 states on page 3.10-2: “Until the 2030 population allocation of 13,770 persons is adopted at the local and regional level, the 2022 allocation of 12,250 will remain in effect within city limits.”</p> <p>Page 3.10-8 indicates: “The City’s allocations for population, dwelling units, and jobs are being updated through a multi-jurisdictional, regional process, under the Pierce County Regional Council, that will result in allocations for year 2030. Table 2-1 shows proposed allocations for the current plan area, including a population of 16,254 by 2030 (increase of 5,850 over 2008 base year). In</p>

Comment Number	Response
	<p>addition, the City would need to amend plans to accommodate 7,301 housing units (increase of 2,125 housing units over 2008 base year) and 19,249 employees (increase of 9,486 employees over 2008 base year) by 2030. Although the City falls short of meeting its 2030 housing allocations under all alternatives, it comes closest under the UGA Expansion Alternative.”</p> <p>Section 3.11 notes the proposed nature of the allocations in numerous places, such as on page 3.11-12: “Applying a similar methodology for the proposed 2030 city allocation (13,770), the advisory fair-share housing allocation would equal around 740 units ...The 25% goal ... applied to the 2030 proposed allocation would mean 531 affordable dwelling units.” The proposed nature of 2030 allocations is also described in the impact analysis starting on page 3.11-13.</p>
13-3	<p>The draft UGA allocations are based on “Preliminary 2030 Population and Housing Unit Targets (2/25/10) Unincorporated Urban Pierce County by City/Town Urban Service Area” prepared by Pierce County for a Growth Management Coordinating Council meeting.</p>
13-4	<p>As noted in Chapter 3.9, the City will need to seek de-designation of agricultural resource lands pursuant to the <i>Alderton-McMillan Community Plan</i>. If de-designated, they will not be considered lands of long-term commercial significance for agriculture.</p>
13-5	<p>It should be noted that the Vision 2040 allocations are to counties and to categories of cities. It is up to Pierce County in consultation with cities to distribute the growth allocations.</p> <p>The UGA Modification Alternative would be within 2% of the year 2022 population allocations. If this or a similar alternative were selected, then the City could request a smaller allocation closer to the adopted 2022 allocation rather than the full draft 2030 allocation.</p>
13-6	<p>See Response to Comment 13-2.</p>
13-7	<p>See Responses to Comments 13-2 to 13-5.</p>
13-8	<p>The Sumner community is a valley city predominantly. The suggested language on lahars give a range of options including leaving areas undeveloped or to incorporate engineering measures among others. The City has addressed volcanic hazards in its adopted critical areas ordinance. The City prohibits the siting of critical facilities in some volcanic hazard areas as noted in the suggested mitigation measure, limits the occupancy size of land uses, and also requires a title notice and an evacuation plans.</p>

Comment Number	Response
13-9	<p>Based on a review of the statute, and guidance from Ecology, the statutory GHG emission requirements listed in RCW 70.235.020 apply only to the State, and do not enact any binding GHG emission control standards on municipalities or private sources at this time. See Attachment B for a copy of the statute. Ecology’s draft guidance on how municipalities can enact their own GHG emission reduction standards under SEPA is described in Ecology’s web site “Guidance on Addressing Greenhouse Gas Emissions (www.ecy.wa.gov/climatechange/sepa.htm). Ecology’s guidance document makes no statement that the RCW 70.235.020 emission reduction goals apply to any municipality. To the contrary, Ecology’s guidance makes it clear that each municipality is free to enact its own GHG reduction policies.</p>
13-10	<p>Futurewise commented that the RCW 70.235.020 emission reduction goals should be used as SEPA significance thresholds. However, based on the information in Ecology’s guidance document (cited above in Response to 13-9), the numerical GHG reduction goals described in RCW 70.235.020 are not relevant as explicit tools for the City to set its own SEPA significance thresholds for GHG emissions from new development within the City. Ecology’s GHG guidance document references the State’s emission reduction goals in RCW 70.235.020, but does not indicate that municipalities or private industries are required to achieve those same numerical reduction goals. To the contrary, Ecology’s guidance makes it clear that each municipality is free to enact its own GHG reduction requirements and set its own SEPA significance thresholds related to GHG emissions.</p> <p>It would be difficult for a suburban community with a robustly growing population and economy to achieve State goals by itself. As described in Ecology’s guidance document, the aggressive reduction goals might be achievable by the State because it has the authority to enact state-wide GHG control regulations for the largest GHG source categories: state-wide cap-and-trade, state-wide fuel economy standards; state-wide low-carbon fuel standards; and state-wide emission limits for electricity generation. None of those strategies can be enacted by a local municipality. However, the City recognizes it has local land use authority and there are proposed mitigation measures in Draft EIS Chapter 3.2 that identify land use, transportation, energy efficiency, and other measures that can reduce greenhouse gases.</p> <p>Ecology’s draft guidance document suggests several options for how municipalities could set SEPA significance thresholds. One of those recommended options is the February, 2010 Council on Environmental Quality (CEQ) “Draft NEPA Guidance on Consideration of the Effects of Climate Change and GHG Emissions.” Upon consideration of the recommended options, the consultant team elected to use the CEQ Guidance to evaluate the SEPA significance for the DEIS as it relates to NEPA, a federal law similar to Washington’s SEPA.</p>

Comment Number	Response
13-11	<p>Some of the City limits and UGA already extend south of SR-410. The Draft EIS discusses compatibility with agriculture in Section 3.9. Page 3.9-38 indicates: “The interchange area immediately north of the proposed UGA expansion includes two car dealerships, gas station, a 93,000 square foot grocery outlet, and several other businesses. None of these uses is traditionally supportive of agricultural activity. Dust and noise from the agricultural activities is likely to conflict with the auto dealership and retail uses, and movement of agricultural equipment may interfere with traffic from those urban retail uses. In addition, the existing housing density along 166th Street East and between 74th Street and 151st Avenue East includes multiple parcels with lot sizes as low as 0.2 acre.”</p> <p>Further, the section indicates on the same page: “The area is adjacent to the current Sumner UGA or City boundary to the north, northeast, and west. Approximately 21 properties totaling 118.8 acres are within 1,000 feet of the Sumner UGA or City boundary. The combined area south of SR 410 that is currently in either the City or its existing UGA is approximately 40 acres. These areas are immediately adjacent to the area proposed for UGA expansion.”</p> <p>The land use section 3.8 provides analysis of land use conversions and compatibility and includes the following mitigation measure: “The City should work with Pierce County in a joint planning agreement to address potential incompatibility between the commercial use in the Orton Junction expansion area and the surrounding agricultural and low density residential uses to the west, south, and east.”</p> <p>The County cumulatively considered agriculture in its <i>Alderton-McMillin Community Plan</i> and associated EIS and identified a process for de-designation and UGA expansion in limited circumstances near the Sumner UGA. Expansions of the UGA would be required to follow the policies of the <i>Alderton-McMillin Community Plan</i>. The required acres for purchase and transfer of development rights and conservation easements are to be commensurate with the extent of UGA expansion as addressed in Sections 2.4 and 3.9 of the Draft EIS.</p> <p>The existing land use map (Figure 3.8-1) is based on Pierce County Assessor data and shows most of the Orton Junction study area as in agricultural uses. We will review the map and update it in the Final EIS if appropriate.</p>
13-12	<p>The EIS studies the No Action Alternative, which has as a principle feature no UGA expansion.</p> <p>Should the City select an action alternative that would expand the UGA, de-designation and purchase of development rights would be needed; see Response to Comments 13-4 and 13-11. Additionally, the City currently has a right-to-farm ordinance.</p>
13-13	See Response to Comment 13-5.

Comment Number	Response
13-14	Chapter 3.9 includes cross references to Section 3.2 regarding air quality. The need for mitigation measures is noted on page 3.9-23; additional cross-referencing can be added in the Final EIS.
13-15	See the discussion of “Development Patterns” which addresses compact urban areas and protection of rural and agricultural lands on page 3.9-19 to 21.
13-16	<p>The word “pending” means that the allocations are awaiting review and adoption. Also see Response to Comment 13-2. Chapter 3.9 also indicates that most of the Orton Junction Area is designated as agricultural resource lands – see page 3.9-35 – and would require de-designation and compliance with policies on purchase of development rights and conservation easements.</p> <p>Page 3.9-30 indicates that County policies indicate the lowest priority for UGA inclusion are agricultural and resource lands. However, it is also noted that it may be allowed where the community plan allows such inclusion: The Alderton-McMillin community plan allows for UGA expansion subject to policies. A cross-reference to section 3-1 Earth related to lahars can be added in the Final EIS; however, the Alderton-McMillin community plan does not restrict UGA expansion into volcanic hazard areas. See also Response to Comment 13-8.</p> <p>The commenter does not identify the other “problems that should be corrected,” and thus no response can be made.</p>
13-17	See Responses to Comments 13-8 and 13-16. The cited study on Pierce County agriculture is countywide. The information in the Draft EIS regarding market use of the property is based on local property owner information.
13-18	<p>Section 3.8 of the Draft EIS identifies the conversion of agricultural land inside and outside the city limits, whether considered lands of long-term commercial significance or not. This chapter addresses physical changes in land use.</p> <p>Chapter 3.9 addresses policy consistency. In order to allow for UGA expansion, de-designation must be accomplished. If completed, then the land would no longer be considered lands of long-term commercial significance for agriculture. Thus, at a policy level if de-designation is accomplished, policy consistency can be achieved.</p>
13-19	See Responses to Comment 9-3 and 13-5.

Comment Number	Response
13-20	<p>The City of Sumner along with Pierce County, federal agencies, and the Sumner School District have developed emergency evacuation plans.</p> <p>Pierce County has a map of lahar travel times, has Mount Rainier volcano evacuation signs, and a siren system. Sumner is located in Time Zone C which shows a 1.5 hour travel distance from the lahar event (see Appendix C). Two sirens are located in Sumner per an agreement with Pierce County. Another siren is located south of Sumner. Sumner also has an evacuation route map (see also Appendix C).</p> <p>Vehicular evacuation is not the only method of evacuation. For example, the Sumner School District evacuates students in the valley via pedestrian routes to schools on the East Hill. See: http://www.sumner.wednet.edu/studentfamilyservices/ERPreparedness/Pages/LaharPlan.html.</p>
13-21	<p>Table A-1 in Appendix A notes that 2030 allocations are “proposed”. See also Response to Comment 13-2.</p>
13-22	<p>The potential human safety impacts of geologic hazards are addressed in Section 3.2 of the Draft EIS.</p> <p>The need for non-motorized linkages in the UGA expansion area is included in Section 3.13 of the Draft EIS.</p> <p>The purpose of including an alternative that results in a net reduction in UGA territory was in part to address a compact urban area. See Draft EIS Chapter 2.</p> <p>The study regarding leisure and transportation can be cited in the Final EIS when discussing a preferred alternative and Growth Management Act goals for urban areas.</p>
13-23	<p>Comment has been noted and is being considered by City decision makers. The City will provide notice of future hearings to agencies, interest groups, and citizens that have commented.</p>
<p>Letter 14: Mike Herbert</p>	
14-1	<p>Comment has been noted and is being considered by City decision makers.</p>
14-2	<p>Section 3.13 of the Draft EIS addresses the full planning area as the City is considering growth allocations for the whole planning area. However, most of the analysis is devoted to the ramifications of UGA expansion in the Orton Junction area. Regarding PM peak hour analysis, see response to comment 4-3 above.</p> <p>While some traffic data is older for portions of the City, the Draft EIS did compare the Transportation Plan predictions for traffic conditions to more recent data and found the original results to still be accurate. See page 3.13-3. The data for the Orton Junction area is all recently collected.</p>
14-3	<p>See responses to comments in Letter 10, particularly response 10-5.</p>
14-4	<p>Response is pending.</p>

Comment Number	Response
14-5	<p>The City of Sumner’s EIS is programmatic and non-project as described in Chapter 2. It is focused on the proposed legislative actions under consideration by the City. The EIS alternatives are studied on the basis of a land capacity analysis (see Appendix A) which is a planning tool appropriate to a Comprehensive Plan Update. The EIS is not intended to study site specific proposals or actions. Future development proposals would be subject to project-level SEPA review, and the City’s policies and regulations that would determine what level of development is allowable. In addition, project-level SEPA review may also result in mitigation measures that respond to specific proposals, and these mitigation measures may address impacts beyond the level of impacts addressed in the current EIS.</p>
14-6	<p>Comment has been noted and is being considered by City decision makers. The City decision-makers may consider any alternative in the range of the Draft EIS alternatives.</p>
14-7	<p>Comment has been noted and is being considered by City decision makers. Regarding the proposed employment uses, they are more regional in character and are not intended to replicate the community-serving downtown uses. See Response to Comment 11-2.</p>
14-8	<p>New development is responsible for the demand in services and infrastructure it creates. City regulations include transportation concurrency which requires improvements in place at the time of or within six years of development. Water, sewer, stormwater facilities must be in place at the time of development, consistent with city regulations.</p>
14-9	<p>The potential effects and mitigation measures regarding emergency services are addressed in Section 3.16 of the Draft EIS. Emergency service providers were contacted and reviewed information and analysis prior to the publication of the Draft EIS to ensure that their topic areas were adequately addressed.</p>
14-10	<p>The State Environmental Policy Act (SEPA) is focused on environmental impacts and does not require a market analysis or feasibility study (See WAC 197-11-448, -450, and -726). The market study included in the Draft EIS is provided as an aid to the policy discussion regarding the Sumner Comprehensive Plan Update, and shows the potential demand for commercial uses in the Orton Junction area.</p> <p>The City may plan for economic growth that is less than that projected by the study if it desires, and ultimately will need to plan for employment growth allocations. It should be noted that presently there are no employment growth allocations for the year 2022; the Draft EIS studies draft allocations for the year 2030 which have not yet been adopted.</p>
14-11	<p>Comment has been noted and is being considered by City decision makers.</p>
14-12	<p>The comment is noted and is being considered by City decision makers. See Response to Comment 8-5.</p>

Comment Number	Response
14-13	<p>Regarding East Hill, Draft EIS Table 3.9-1 indicates: “The reduced boundary eliminates areas of large lot development characterized by rural development with average lot sizes of 1.14 acres and development density at 0.88 dwelling units per acre. The proposed UGA boundary would retain rural residential development adjacent to the City of Sumner and City of Puyallup watersheds. The area proposed for removal under this alternative would have difficulty achieving the planned urban densities for the urban zoning district assumed for this area, due to topography, existing development patterns, and the costs and difficulty of providing urban services to this area.”</p> <p>The Orton Junction area contains 46 parcels with 52% under one acre in size and another 30% under 5 acres in size.</p> <p>See Section 3.9 for analysis of both the East Hill and Orton Junction areas in terms of lot sizes, services, and other features, particularly Table 3.9-1 and page 3.9-36 to 39.</p>
14-14	See Response to Comment 4-2.
14-15	Comment has been noted and is being considered by City decision makers.
Letter 15: Shannon Hochstatter	
15-1	Comment has been noted and is being considered by City decision makers.
Letter 16: Investco, Brett Pudists	
16-1	Comment has been noted and is being considered by City decision makers.
16-2	Comment has been noted and is being considered by City decision makers.
16-3	<p>The Draft EIS Section 3.9 includes discussion about the difficulty of providing services in the East Hill and the ability to serve the Orton Junction Area. In addition, whole chapters are devoted to each public service and utility and address the two locations. More cross-referencing or clarification could be added in the Final EIS.</p> <p>Regarding the primary emphasis on ability to serve, we note the following Central Puget Sound Growth Management Hearings Board case:</p> <p style="padding-left: 40px;">“As the Board held in Bremerton regarding the third exception, just because unincorporated lands today contain urban growth on them does not necessarily mean that they should be included within a UGA. Instead, counties must examine how a UGA designation of lands falling within the third exception will achieve the transformation of local governance within the UGA such that cities are, in general, the primary providers of urban governmental services, and will achieve compact urban development.” [Vashon-Maury, 95-3-0008, FDO, at 21]</p>

Comment Number	Response
	The fact that some of the East Hill area contains some level of development (in a sprawl pattern) doesn't mean that it has to be served in the future or further developed as urban due to the difficulty to provide urban level of services,
16-4	See Response to Comment 9-3 regarding 2030 allocations. The Final EIS can study a "hybrid" alternative in the range of the Draft EIS Alternatives. The Planning Commission is due to provide a recommendation of a Preferred Alternative in October 2010.
16-5	Draft EIS Table 2 1. Growth Allocations for Current Plan Area (City Limits and UGA) shows the breakout of the allocations for the City limits and UGA. Each alternative's capacity is a sum of the City and current or proposed UGA capacity combined compared to the total 2022 or 2030 allocation. Consideration will be given regarding whether further clarifications are needed in the Final EIS.
16-6	The Draft EIS evaluates consistency of employment capacity compared to proposed employment allocations. The City has provided comments to Pierce County regarding the MIC study and the need for employment allocations that reflect that study. Section 3.10 includes the following potential mitigation measure among others: "Request a higher employment allocation, for example, to recognize demand for other employment types such as commercial and service uses serving eastern Pierce County, in order to reach a corresponding level of jobs as the employment forecast."
16-7	The City has conducted an employment capacity analysis and has provided Draft EIS Appendix E for additional retail market information. Section 3.3 recognizes the change in flood hazard boundaries and addresses the potential difference in land capacity by adjusting floor area ratios still consistent with the MIC study. Section 3.10 also includes the following mitigation measure: "Amend its land capacity analysis to recognize the effect of forthcoming changes to 100-year floodplain regulations, which would limit impervious surfaces in many circumstances. This would reduce the land capacity for employment, particularly industrial employment. See Section 3.3, "Flooding," for additional information."
16-8	Response is pending
16-9	The comment is noted. Chapter 2 includes the following description of the 1993 EIS: "The <i>Final Environmental Impact Statement—Sumner Comprehensive Plan Update</i> (for the first update to the original comprehensive plan) was issued on December 22, 1993, to address the Sumner Planning Area including a range of UGA alternatives south of State Route (SR) 410. The EIS was prepared as part of an integrated process with the GMA comprehensive plan." An expanded discussion [or cross-reference] can be added to the Final EIS.

Comment Number	Response
16-10	Comment has been noted and is being considered by City decision makers.
Letter 17: Heather Lewis	
17-1	Comment has been noted and is being considered by City decision makers.
Letter 18: Muckleshoot Indian Tribe Fisheries Division, Karen Walter	
18-1	The property is zoned for manufacturing uses, whether the property is included in the MIC or not. The MIC would facilitate manufacturing uses, but the Town Center plan could also facilitate mixed uses which may in part include light manufacturing uses. In either case future development would be subject to City flood hazard regulations. The Draft EIS for the Comprehensive Plan amendments is non-project in nature. The implications of a chemical plant in particular are the subject of a separate site-specific land use request and associated SEPA EIS.
18-2	The Draft EIS includes sections 3.4 and 3.5 which describe current riparian buffers, which along fish-bearing waters are a minimum of 150 feet. The potential impacts of each alternative including the potential effect on riparian habitat are included. For example, section 3.4.2 indicates “Removal of vegetation and creation of impervious surfaces would reduce groundwater recharge rates and increase the quantity and rate of surface water runoff delivered to local streams.” The Draft EIS includes mitigation measures including application of low impact development techniques which are adopted in City stormwater regulations.
Letter 19: Pierce County Planning and Land Services, Sean Gaffney	
19-1	Comment has been noted and is being considered by City decision makers.
19-2	<p>The comment is noted. This description can be added in the Final EIS in Chapter 1, similar to the following:</p> <p style="padding-left: 40px;">For the purpose of this analysis, the No Action Alternative represents the continuation of the City’s current Comprehensive Plan and retention of the 2022 planning horizon and growth allocations. The No Action Alternative would not include any amendments to the City Comprehensive Plan Land Use Map, Comprehensive Plan policies, or development regulation, or consideration of any location-specific amendment requests to the City Comprehensive Plan or zoning. <u>It would not amend City plans to update growth targets consistent with targets that may be adopted by the Pierce County Council. The No Action alternative is required to be studied under SEPA.</u></p>

Comment Number	Response
19-3	<p>Draft EIS Table 3.2-4 includes calculations of “Soil Carbon” Emissions from Agriculture/ Mineral Land Conversion. Removal of large acreages of vegetation or farmland to develop urban areas can increase regional GHG emission by two mechanisms. First, removal of farmland terminates the process of natural carbon sequestration, when living plants remove CO2 from the atmosphere and convert it to plant matter by photosynthesis. Second, clearing the upper few feet of soil and above-ground vegetation removes organic material from the soil that otherwise would have decomposed into carbon-based soil nutrients, and instead forces that organic material to decay into CO2 emissions. The sum of these two mechanisms is often referred to as “soil carbon emissions”. The magnitude of the soil carbon emissions on a per-acre basis depends on the type of vegetation that is removed. Removal of row-crop farmland that is typically found in the Sumner area generates relatively low soil carbon emissions, compared to clearing of deciduous or coniferous forest (BuildCarbonNeutral, 2010). It is also important to note that the magnitude of soil carbon emissions generated by clearing of a given acreage of forest or farmland is generally much lower than the magnitude of the annual GHG emissions from tailpipes and space heating generated by the urban land use that replaces the previous farmland.</p>
19-4	<p>Page 3.3-4 indicates that “No 100-year flood hazards are mapped in this [Orton Junction Expansion] area.” This is accurately stated. Indicating that there is an adjacent floodplain south of River Road can be added to the Final EIS. We are considering if other clarifications are needed.</p>
19-5	<p>Pages 3.9-31 to 32 indicate the density of the reduction area and the status of vested permits:</p> <p>The reduced boundary eliminates areas of large lot development characterized by rural development with average lot sizes of 1.14 acres and development density at 0.88 dwelling units per acre. The proposed UGA boundary would retain rural residential development adjacent to the City of Sumner and City of Puyallup watersheds. The area proposed for removal under this alternative would have difficulty achieving the planned urban densities for the urban zoning district assumed for this area, due to topography, existing development patterns, and the costs and difficulty of providing urban services to this area.</p> <p>The proposed UGA Modification Alternative includes one existing single-family subdivision in the “pipeline,” Burrill Hollow is a proposed 15 lot subdivision located at 15821 40th Street E (APN: 0520181046). This development is in the reduction area and is vested to urban standards. It would result in an urban development surrounded by larger lot development that would be subject to rural density patterns if the East Hill reduction area is removed.</p>
19-6	<p>See Response to Comment 13-11.</p>
19-7	<p>See Response to Comment 8-6.</p>

Comment Number	Response
19-8	<p>Analysis of the policy to support locally grown food can be added in the Final EIS. Agricultural lands in the proposed Orton Junction Expansion Area have been historically used for farming bulbs and not for locally grown food. In addition, the purchase of development rights and conservation easements is intended to bring more land into a protective designation in the <i>Alderton-McMillin Community Plan</i> area. A UGA expansion would also require agricultural land de-designation, and would be a determination that the subject land does not have long-term commercial significance for farming. Farmland without the designation of long-term commercial significance would in any case be allowed to continue farming through the City’s right-to-farm ordinance, The City supports community gardens; there is one on public land near the cemetery and another on a private religious property. Through a joint-planning agreement the City and County could determine other measures to promote local farming.</p>
19-9	<p>The results of the 2007 Buildable Lands Report are reflected in the No Action capacity analysis which shows surplus capacity to meet 2022 growth allocations – this is stated in Chapter 2 (page 2-13) and in Section 3.10 (page 3.10-10). The need for reasonable measures prior to UGA expansion is described on page 2-4. Also as noted on page 2-4, the City has implemented a series of plan amendments to make more efficient use of land. Section 3.9 of the Draft EIS suggests some monitoring of selected zones.</p>
19-10	<p>The acquisition and protection of agricultural resource lands is intended to focus on the most important land to be retained in the valley and would be determined by a joint planning agreement. Mitigation measures recommend the City:</p> <p>“Acquire and protect commensurate ARL acreage to compensate for any acreage currently designated as ARL that would be added to the Summer UGA under either action alternative. Concentrate acquisition efforts on parcels with the greatest potential for long-term commercial significance and with potential to prevent additional UGA expansion further south in the future.”</p> <p>“Execute a joint planning agreement with Pierce County that specifies the development standards required by the <i>Alderton-McMillin Community Plan</i> and identifies the specific parcels to be acquired and protected with ARL conservation easements.”</p> <p>The specific locations of ARL lands proposed for conservation would be determined prior to the City’s application for UGA boundary changes to Pierce County.</p>

Comment Number	Response
19-11	<p>Future stormwater improvements would be consistent with the City's 2004 Stormwater Comprehensive Plan update, and with the City's regulations which are consistent with Ecology's 2005 manual. The need for a particular improvement would be determined with specific development proposals and would be subject to phased SEPA review as described in Section 2.3.3.</p> <p>The language regarding requiring LID through incentives will be modified to indicate it is plain "required". The City's stormwater regulations state:</p> <p style="padding-left: 40px;">13.48.020.D To meet the intent of the NPDES permit issued by the Washington State Department of Ecology of providing treated stormwater discharges to the river systems exempt from flow control and to meet the intent of other permit requirements, 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 Attachment "A" codified at the end of this chapter as herein referenced. The city engineer, or his designee, may waive LID strategies if he deems that this type of stormwater management is not applicable or feasible for a particular project</p>
19-12	Response is pending.
19-13	UGA draft allocations identified in Draft EIS Chapter 2 are based on a document prepared by Pierce County staff and provided to the Growth Management Coordinating Council: "Preliminary 2030 Population and Housing Unit Targets (2/25/10) Unincorporated Urban Pierce County by City/Town Urban Service Area."
19-14	See Responses to Comments 9-3, 13-2, 13-5, and 13-21.
19-15	Response is pending.
Letter 20: Pierce County Public Works Department, Gary N. Predoehl	
20-1	Response is pending.
20-2	See Response to Comment 10-5.
20-3	Response is pending.
20-4	Response is pending.
Letter 21: Pierce Transit, Monica Adams	
21-1	The comment is noted. Corrections to the paragraph will be made in the Final EIS.
21-2	Comment has been noted and is being considered by City decision makers. The suggested language can be included as part of a preferred alternative, subject to Planning Commission recommendation and City Council approval.

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Comment Number	Response
21-3	Comment has been noted and is being considered by City decision makers.
Letter 22: Katharine M. Rode	
22-1	Comment has been noted and is being considered by City decision makers.
22-2	Geologic hazards are addressed in Section 3.1, flooding hazards are addressed in Section 3.3, fisheries are considered in Sections 3.4 and 3.5, and roads are considered in Section 3.13 of the Draft EIS..
22-3	Comment has been noted and is being considered by City decision makers.
Letter 23: Scott E. Rode	
23-1	Comment has been noted and is being considered by City decision makers. See also Response to Comment 19-10.
23-2	Comment has been noted and is being considered by City decision makers. See also Response to Comment 10-5.
23-3	Comment has been noted and is being considered by City decision makers.
Letter 24: Rodes, DVD Transcript	
24-1	Comment has been noted and is being considered by City decision makers.
Letter 25: Henry L Seibert Jr.	
25-1	Response is pending.
25-2	Response is pending.
25-3	Future development will be required to meet City stormwater regulations and would be subject to site-specific SEPA review.
Letter 26: G. Richard Hill, McCullough Hill	
26-1	Comment has been noted and is being considered by City decision makers.
26-2	Comment has been noted and is being considered by City decision makers.
26-3	Comment has been noted and is being considered by City decision makers.
Letter 27: Monica Adams, Pierce Transit	
27-1	Comment has been noted and is being considered by City decision makers.

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Comment Number	Response
Letter 28: Karen Walter, Muckleshoot Indian Tribe Fisheries Department	
28-1	Comment noted. The comprehensive plan amendment is a non-project action. For detailed responses to comments regarding the Northstar Chemical Distribution Project, please refer to the Final EIS for that project.
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PH 1-1	Comment has been noted and is being considered by City decision makers.
PH 2-1	Comment has been noted and is being considered by City decision makers.
PH 3-1	Comment has been noted and is being considered by City decision makers.
PH 3-2	Comment has been noted and is being considered by City decision makers.
PH 4-1	Comment has been noted and is being considered by City decision makers.
PH 4-2	Comment has been noted and is being considered by City decision makers.
PH 5-1	Comment has been noted and is being considered by City decision makers.
PH 6-1	Comment has been noted and is being considered by City decision makers.
PH 7-1	Comment has been noted and is being considered by City decision makers.
PH 8-1	Comment has been noted and is being considered by City decision makers.
PH 9-1	Comment has been noted and is being considered by City decision makers.
PH 9-2	Comment has been noted and is being considered by City decision makers.
PH 10-1	Comment has been noted and is being considered by City decision makers.
PH 11-1	Comment has been noted and is being considered by City decision makers.
PH 11-2	Comment has been noted and is being considered by City decision makers.
PH 12-1	Comment has been noted and is being considered by City decision makers.

Comment Number	Response
PH 13-1	Comment has been noted and is being considered by City decision makers.
PH 13-2	Comment has been noted and is being considered by City decision makers.
PH 14-1	Comment has been noted and is being considered by City decision makers.
PH 15-1	Comment has been noted and is being considered by City decision makers.
PH 15-2	Comment has been noted and is being considered by City decision makers.