



Memorandum

Date:	October 14, 2010
To:	Ryan Windish, Planning Manager City of Sumner
From:	Lisa Grueter, Senior Planner, ICF International 206-801-2816
Subject:	Follow-up Responses to Comments

This memo supplements our October 12, 2010 memo titled “Response to Public Comments Received through October 8, 2010 Sumner 2010 Comprehensive Plan Update and EIS.” It provides some clarifications and includes some responses that were pending in the earlier memo.

Table 1. Responses to Comments – Clarifications and Supplements

Comment Number	Response
Letter 16: Investco, Brett Pudists	
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. Draft EIS Appendix C looks at the No Action capacity for the City limits only. Consideration will be given regarding whether further clarifications are needed in the Final EIS.
16-8	Response is pending Please see the revised Draft EIS Appendix A, which will be included in the Final EIS.

Comment Number	Response
Letter 19: Pierce County Planning and Land Services, Sean Gaffney	
19-9	<p>The results of the 2007 Buildable Lands Report are reflected in the No Action capacity analysis which shows surplus <u>UGA</u> capacity to meet 2022 growth allocations – this is stated in Chapter 2 (page 2-13) and in Section 3.10 (page 3.10-10). <u>However, there is a deficiency of capacity when looking at the City limits only (Draft EIS Appendix C).</u> The need for reasonable measures prior to UGA expansion is described on page 2-4 <u>and in Appendix C.</u> Also as noted on page 2-4, the City has implemented a series of plan <u>and code</u> amendments to make more efficient use of land. Section 3.9 of the Draft EIS suggests some monitoring of selected zones.</p> <p><u>Developments in the pipeline that are using code allowances for compact growth include cottages and mixed use developments shown on Draft EIS Figure 3.8-2 and on Table 3.8-2.</u></p> <p><u>There have also been mixed use and employment developments as well in Downtown (live-work, office), East Main (retail), and businesses in the industrial area to the north.</u></p> <p><u>Another approved preliminary plat not included on the table or map (will be added in the Final EIS) is a small lot single family development, Sumner Village plat in the LDR-4 zone. The Sumner Village plat was given preliminary approval in November 2006 and is still vested and pending final civil designs to move it forward.</u></p> <p><u>With its LDR-6 and later its LDR-4 zone, the City has promoted traditional neighborhood design that allow for smaller single family lots, and this has represented a large portion of lots created in the City over the last 15 years.</u></p>
19-12	<p><u>Please see the revised Draft EIS Appendix A, which will be included in the Final EIS. Response is pending.</u></p>
19-15	<p><u>Response is pending. Section 3.9 does address consistency with the Growth Management Act and Washington Administrative Code including all 13 goals and agricultural land classification criteria, which the Growth Management Hearings Board interprets.</u></p> <p><u>The Central Puget Sound Growth Management Hearings Board (CPSGMHB) case 10-3-003c was issued August 2, 2010 just in advance of the August 9, 2010 Draft EIS. It is the most relevant case as it involves Pierce County and issues relevant to the Orton Junction UGA Expansion Area, including: Pierce County Comprehensive Plan Text Amendment T-6 regarding agricultural lands that may be added to a UGA under some circumstances and Eatonville’s UGA Expansion Request U-5.</u></p> <p><u>T-6: The CPSGMHB indicated that agricultural land could be absorbed into a UGA provided there is a transfer or purchase of development rights and consistency with the appropriate</u></p>

Comment Number	Response
	<p><u>community plan. In addition, the County UGA capacity surplus and agricultural land de-designation would need to be addressed. A net UGA expansion would be difficult to justify under case law. (page 39)</u></p> <p><u>The Draft EIS looks at a maximum alternative that results in a UGA expansion, but it also looks at the UGA Modification Alternative which results in a net UGA reduction that is within 2% of the 2022 growth allocations (within a 5% margin of error; if considering a typical vacancy rate there could be an even closer alignment). Draft EIS section 3.9 reviews agricultural de-designation criteria, and the Alderton-McMillin Community Plan policies, particularly policies regarding purchase and transfer of development rights. It is acknowledged in EIS Section 3.9 that de-designation criteria and community plan policies would need to be met.</u></p> <p><u>U-5: The CPSGMHB indicated that a net UGA expansion for employment uses was not appropriate where the 2007 Pierce County Buildable Lands Report indicated an oversupply of residential capacity in the County and in Eatonville, and where the City of Eatonville had an opportunity to remedy its residential capacity oversupply by reallocating the land to employment uses. The CPSGMHB indicated there could be no further UGA expansion without a new land capacity analysis or population allocation. Also, UGAs should be sized for the population allocation but consistent with RCW 36.70A.115 should provide for employment growth. (pages 43to 47)</u></p> <p><u>As noted above the City is considering an alternative that would result in a net UGA reduction and a lower population allocation than the draft 2030 allocation. Sumner also prepared a new land capacity analysis (see Draft EIS Appendix A). The City has a history of adopting reasonable measures for efficient use of land per Draft EIS Chapter 2.¹ The City limits show a deficit of capacity for population and employment (Draft EIS Appendix C). The area of potential UGA expansion would help provide regional retail not otherwise found in eastern Pierce County in proximity to residential uses in Sumner and Bonney Lake. See Draft EIS Appendix E.</u></p> <p><u>Also, as Pierce County completes its 2030 allocation process, the County UGA land capacity surplus found in the 2007 Buildable Lands Report could shrink by possibly 13,400 households.</u></p>

¹ Other potential mitigation measures for land efficiency are included in Draft EIS Section 3.9 (e.g. minimum density in HDR). The land capacity for action alternatives assumes the City makes efficient use of HDR land based on allowances for cottages, townhouses, and some other forms of attached dwellings. This would increase the population capacity of the City limits by 90 and reduce the current deficit.

Appendix A. City of Sumner Land Capacity Analysis for the 2010 Comprehensive Plan Amendments

REVISED

City of Sumner Land Capacity Analysis for the 2010 Comprehensive Plan Amendments

Growth Targets from Countywide Planning Policies

In accordance with the state Growth Management Act (GMA), Sumner is required to plan for growth in the succeeding 20-year planning period. The City's growth targets are the result of a multi-jurisdictional regional process of how each City is able to accommodate its fair share of future regional growth. The State Office of Financial management (OFM) population projections for Pierce County are divided among all Pierce County jurisdictions through an interactive process. The current adopted population allocation is for the planning horizon of 2022. Presently Pierce County is undergoing another collaborative process to approve 2030 population and employment allocations and to be consistent with VISION 2040 and the Regional Growth Strategy.

The City of Sumner is planning for a 2022 population in the city limits of 12,250 and a population of 2,100 in the Unincorporated UGA for total of 14,350 (see Table A-1). The latest process for 2030 has a proposed population allocation for of 13,770 in the city limits and 2,484 in the UGA for a total of 16,254.

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

Demographic	Base Year (2008)			Allocations (2008–Horizon Year)					
	City	UGA ¹	Total	2022			Proposed 2030		
				City	UGA ¹	Total	City ⁷	UGA ^{1,7}	Total
Population Gross	9,060	1,344	10,404	12,250 ⁵	2,100 ⁶	14,350	13,770	2,484	16,254
Population Net				3,190 ⁵	756 ⁶	3,946	4,710	1,140	5,850
Housing Units Gross ⁴	3,973	512	4,485	5,568	955	6,523	6,259	1,042	7,301
Housing Units Net				1,595	443	2,038	2,286	530	2,125
Employment ² Gross	9,345	418 ³	9,763	18,652 ⁵	491 ⁶	19,143	18,652	597	19,249
Employment ² Net				9,307 ⁵	73 ⁶	9,380	9,307	179	9,486

¹ Reflects official Pierce County UGA boundary for Sumner, which is slightly larger than the UGA included in the City Comprehensive Plan. The City intends to match the Pierce County UGA boundary in the No Action Alternative described later in this chapter.

² Employment excludes mobile and work at home jobs.

³ 2008 UGA employment calculated based on land use and 19.37 employees per acre.

⁴ Gross housing units are based on dividing the total population by a household size of 2.2.

⁵ Population is based on adopted 2022 allocation; Employment is based on 2030 proposed allocation, because there is no 2022 allocation. This scenario represents the "low" allocation.

⁶ The UGA population allocation represents the adopted allocation for 2022; future employment matches capacity.

⁷ The City and UGA proposed allocation for 2030 is considered the "high" allocation.

The City must plan for these targets in its Comprehensive Plan, and demonstrate it has the capacity to accommodate it. See Chapter 2, “Project Description” for a summary of how the land capacity is accommodated by each of the three alternatives.

Land Capacity Estimate

Land use capacity is the measure that is used to determine the ability of the city to accommodate its adopted targets. The capacity analysis is the City’s best estimate of what parcels are likely to develop and the nature and intensity of the development at the time that the analysis is completed. The effort is very similar to the buildable lands analysis and report that is prepared every 5 years by Pierce County as required by GMA. The City has estimated the land capacity for vacant, underdeveloped, and redevelopable lands in the City and UGA. Consistent with regionally established methods that are tailored to reflect Sumner conditions, the total developable acres were discounted for critical areas such as wetlands, streams, steep slopes, rights-of-way and public purpose lands, and market/availability factors (e.g., not all property owners would want to sell or develop in the next 20 years).

Summary of Differing Assumptions between Alternatives

The following is a description of the methodology and steps conducted to establish the estimated land capacity for the 20 year planning horizon out to the year 2030. Three different capacity analyses were completed for the 2030 estimate:

No Action Alternative

The assumption for the City of Sumner is 2.2 persons per household (pph), which is an 8% reduction from the 2000 Census pph of 2.39. The 8% reduction represents trends countywide of a reduction in household size.

This alternative uses an employment floor area ratio (FAR) and employees per square foot of building area calculation to estimate industrial employment capacity. The calculation is 0.26 FAR and 1 employee per 1000 square foot of building area.

This alternative retains the 2022 population allocation of 12,250 for existing city limits and 2,100 for the UGA. There was no employment allocation available for 2022, and therefore the proposed 2030 employment allocation of 19,143 is utilized (total employment of city limits and UGA total).

UGA Expansion (Orton Junction) Alternative

This alternative utilizes all the basic assumptions described below, but uses 12 dwelling units per acre rather than 6.5 in High Density Residential (HDR) zones given that the 6.5 dwelling units per acre generally reflects a high percentage of single-family development in this zone and is not likely to continue into the future. Employment estimates are similar to those used in the No Action Alternative (19,249). The land capacity estimate utilized a proposed population allocation of 13,770 for the year 2030 and 2,484 in the UGA for a total population allocation of 16,254 and represents a maximum development option in the Draft EIS analysis. The employment allocation is high as well at 19,249 total employees.

UGA Modification Alternative

This alternative assumes that the population capacity being transferred from the East Hill area to the Orton Junction Area is based on current allowed densities under the Pierce County Medium Density Single-family (MSF) zoning at 5 dwelling units per acre and an assumption of 2.73 persons per household, and 8% reduction from the 2000 Census figure. This alternative also included the additional density in HDR as the UGA Expansion (Orton Junction) Alternative. This alternative assumes use of the 2022 population allocation and proposed 2030 employment allocation.

General Approach

The general approach to the land capacity analysis is to eliminate land that is undevelopable due to critical areas constraints or because the property is already developed to its maximum capacity for the next twenty year planning period. This includes subtracting from the total land area developed lands, and critical areas that are undevelopable such as floodways, wetlands, rivers, lakes, steep slopes, etc. The developed areas may include single-family homes on lots that can not be further subdivided or non-residential uses such as commercial/industrial, government buildings and facilities, schools and religious institutions. An estimate of future need for such facilities is also subtracted from the land supply.

Methodology

The methodology used to calculate the residential capacity is very similar to that used in the *2007 Buildable Lands Report* (BLR) as prepared by Pierce County. The discussion below presents the factors considered in the land capacity analysis followed by a description of the process.

Unbuildable Parcels—Minimum Area

For the purposes of this analysis, parcels less than 2,500 square feet or that are otherwise heavily encumbered by easements, shape, location, or other feature are not counted in the land capacity.

Vacant Land

Vacant

Vacant land in the capacity analysis is made up of lands that have no improvement value, are designated vacant in any category used by the Pierce County Assessor-Treasurer and applies to both residential and commercial lands. This represents vacant land, and not unoccupied structures.

Vacant (single-unit)

The Vacant (single-unit) acreage represents existing vacant single-family properties that will not be further subdivided in the next twenty years such as individual building lots. Lot size for Vacant (single-unit) properties will vary based on the minimum lot area of the underlying zoning. In no case shall the Vacant (single-unit) lot exceed 2.5 times the minimum lot area for the underlying zone. When the lot exceeds 2.5 times the minimum lot area for the underlying zone, it is assumed that this property can be further subdivided into at least one additional lot and will be calculated as Underdeveloped. (See below.)

Redevelopable

Redevelopable parcels are those developed multi-family, commercial and industrial properties that, due to low improvement value or no improvements, have a high potential for being demolished and a new building constructed on the site. Typically, when the land value exceeds the improvement (building) value the area is considered available for redevelopment. Likewise, when a single-family residential structure is in a commercial or industrial zone, it is anticipated that this non-conforming use would be redeveloped into a more intense use consistent with the surrounding zoning.

Underdeveloped

Underdeveloped parcels are residential parcels that have potential for being further subdivided or potential for more dwelling units. In the land use capacity calculation this is generally lands with an existing single-family residential house with a lot size equal to or greater than 2.5 times the minimum lot size in the respective zone. The assumption is that this property could be subdivided further into at least one other lot. While it is impractical to analyze every lot in detail to ascertain the potential for subdividing, a cursory review of properties was completed in order to eliminate those that seem very unlikely to further subdivide given lot widths, value of the property, location, history of the property, etc. Multi-family may be underdeveloped if less than 20% of the allowed density has been utilized and could occur with a single-family home on a large lot or an existing apartment that has room for more units on site.

Displaced Units

The land capacity analysis incorporates a category that includes displaced existing residential homes. In the analysis existing housing units located on underdeveloped parcels and redevelopable multi-family parcels are identified as displaced units. These displaced units are then added into the housing units needs side of the equation. In this approach all underdeveloped and redevelopable multi-family land is calculated as vacant land.

Market Availability

While properties may meet the criteria for vacant, underdeveloped, and redevelopable lands, property owners may not want to sell or further develop the land in the next twenty years. There are various reasons for this to occur, including personal use, economic investment, and sentimental relationship with their surrounding environment. To account for the market availability, a specific percent of the net acreage is deducted from the inventory. A higher percentage is deducted for properties categorized as either underdeveloped or redevelopable because of the greater uncertainty and increased level of difficulty to develop.

Critical Areas

Critical areas and buffers were removed from the overall land capacity as follows:

Wetlands: Use Wetland Inventory maps and a 75 foot buffer as an average of all buffer widths assuming that the majority of wetlands will be Type II or III.

Streams: Use Fish and Wildlife Habitat maps and buffers for Type 3, 4 and 5 streams. (100', 50', and 25')

Steep Slopes: Subtract slopes greater than 25% per the Landslide Hazard Area maps.

Floodways: Subtract floodway areas using Preliminary FEMA Maps.

River Buffers: Subtract according to Shoreline Master Program for Environmental Designation (200', 100', and 50')

Residential Land Capacity

The residential land capacity was generated through acreage deductions to account for factors identified above and the application of an average residential density (dwelling units per acre).

Basic steps for calculating the residential land capacity for LDR, MDR, and HDR are as follows:

1. Pierce County Assessor-Treasurer parcel data was utilized and only residentially zoned parcels were included (LDR, MDR, and HDR).
2. LDR, HDR and MDR were separated into different spreadsheets.
3. In all LDR zones parcels were sorted by lot size and all lots less than 2,500 square feet were removed. Lots less than 6,000 square feet were removed in HDR and MDR zones as this would be the minimum for developing a duplex and meeting parking requirements and setbacks.
4. Lots were sorted by the Land Use Code and non-residential uses were removed. Parcels removed included public facilities (e.g., government buildings, fire stations, parks, utility stations, roads, stormwater ponds) and civic uses (e.g., schools, religious institutions, daycares).
5. LDR zones were sorted by zone and then underdeveloped/vacant/vacant single-unit parcels were determined by dividing the lot size by 2.5 times the minimum lot size for the respective zone. Results were evaluated as follows:
 - a. If results were less than 1 and parcel was single-family residential then delete
 - b. If results were less than 1 and parcel was vacant, then Vacant Single-Unit
 - c. If results were greater than or equal to 1 and parcel was vacant, then Vacant
 - d. If results were greater than or equal to 1 and parcel was single-family residential, then Underdeveloped
6. HDR and MDR Underdeveloped parcels contain development that is less than or equal to 20% of the allowed density for the zone. The assumption being that these parcels have potential for redevelopment or further development given the greater potential for density. Existing development density was calculated by dividing the gross lot area (acres) by the number of dwelling units. The result was then divided by 20% of the allowed density. If the results were less than or equal to 1, the parcel was retained in the analysis and determined to be Underdeveloped. This is different approach than the BLR that only considers Redevelopable potential and not Underdeveloped.
7. Critical Areas were subtracted from the Gross Lot Area to establish a Net Developable Area.
8. Net Developable Area was reduced by:
 - a. Subtracting 22% of the area assumed for roads, stormwater facilities other public facilities

- b. Subtracting Non-residential Uses such as churches, daycares, schools, etc. calculated as 2% of the Net Developable Area
 - c. Adjusted Net Developable Area equals Net Developable Area minus Non-residential Uses
 - d. Land Unavailable for Development equals 10% of Vacant land and 20% of Underdeveloped land
 - e. Final Adjusted Net Developable Area equals the Adjusted Net Developable Area minus the Land Unavailable for Development and converted to acres.
9. Dwelling Units Per Net Acre equals the Final Adjusted Net Developable Area multiplied by dwelling units per acre based on BLR for all the LDR zones. HDR used a factor of 12 dwelling units per acre given that the 6.5 dwelling units per acre reflected a large amount of single-family residential zoning that is not anticipated in the future. In the UGA where there is no city zoning, an average lot size was estimated and utilized based on average densities for the LDR-1 and LDR-2 comprehensive plan designations. The Private Public Facilities and Utilities (PPUF) designation was split with smaller lot sizes assumed at LDR-12 or LDR-6 densities depending on the development pattern of the existing plats:

Table A-2. Zoning and Density Table

Zoning	Densities (du/acre)
LDR-4	5.4
LDR-6	5.41
LDR-7.2	4.97
LDR-8.5	5.13
LDR-12	3.63
MDR	12
HDR	6.5 (No Action Alt.) 12 (Action Alts)
CBD	25
MUD	40 (BLR=30)
NC	25
LDR-1	4.24
LDR-2	5.54
PPUF	5.41-3.63
MSF	5

10. Dwelling Units were then multiplied by persons per household to estimate the population capacity.

Mixed Use Zoning Land Capacity

Mixed use zoning permits residential and commercial activity on the same parcel or on separate parcels within the same zoning classification. To account for this mixture or activity in both the residential and commercial/industrial capacity analyses, a ratio is incorporated to reflect future residential/commercial land consumption. As a consequence, the gross acreage identified under each mixed use zoning classification (General Commercial (GC), Central Business District (CBD), Neighborhood Commercial (NC) and Mixed Use District (MUD)) represents the acreage assumed as either residential or commercial, not the total gross acreage categorized as vacant, vacant (single-unit), underdeveloped, or redevelopable. Where vertical mixed use is anticipated, 100 percent of the land area is assumed to be both residential and commercial in recognition of buildings where the first floor is commercial and additional stories are residential.

The basic steps for calculating residential capacity in the mixed use zones is as follows:

1. Pierce County Assessor-Treasurer parcel data was utilized and zones that allow for mixed use development: GC, CBD, NC and MUD, and analyzed in separate spreadsheets. See description below under Commercial/Industrial for methodology for calculating net Buildable Area.
2. Residential capacity was determined by multiplying the net Buildable Area by 10 percent. This is a conservative ratio assuming 90 percent of the area would develop as commercial and 10 percent would be retained for residential. This is based on the historic development pattern in the City. MUD was estimated at a higher ratio given that minimum densities and mixed use are required. See Table A-2 above regarding estimated densities, most of which are consistent the BLR.

Special Considerations

There were some unique situations regarding residential land capacity as described below:

1. A local mining and gravel company located on the East Valley Highway and mining the east hill, City Transfer, Inc. (CTI) owns approximately 221 acres (181 acres in city limits and 40 acres in UGA) of residentially zoned land. In 2004 this area was assumed to have residential land capacity and development within the next 20 years. However, the owners have indicated that they intend to mine the property for the foreseeable future and plan to mine for over the next 20 years. Therefore, this area has been removed from the capacity analysis, totaling approximately 616 dwelling units or a population of about 1,357 persons.
2. Puget Sound Energy (now Cascade Water Alliance) properties were removed from the analysis given the uncertainty in how the owners may proceed with these properties over the next 20 years. It seems unlikely that the area would develop as residential given CWA long-term plans to develop a water treatment plant and distribute water to eastern King County cities.
3. The Agricultural and Residential Protection zones were not included in the capacity calculations. The Agricultural zone has a very low development density (1 dwelling unit per 20 acres), is currently owned by the City and being leased for farming and is located almost entirely within

the floodway or floodplain. The Residential Protection zone is located on land that is presently permitted for mining and was recently logged.

4. Parcels with a land use description of "OLDER BUSINESS DISTRICT" were deleted from the analysis given the City's recently adopted Historic Preservation Ordinance and less incentive to redevelop these properties.

Commercial and Industrial Employment Capacity

The land capacity for commercial and industrially zoned land included analyzing the employment potential for the Light Manufacturing (M-1) and Heavy Manufacturing (M-2) and the commercial zones (Interchange Commercial (IC), GC, NC, MUD, and CBD). The basic steps for calculating the employment capacity for commercial and industrial zones is as follows:

1. Pierce County Assessor-Treasurer parcel data was utilized and only commercial and industrial parcels were included (CBD, GC, NC, IC, MUD, M-1 and M-2) to determine employment capacity. The residential capacity, where mixed use is allowed, is calculated above.
2. Each respective zone was separated into a separate worksheet.
3. Redevelopable properties were calculated by dividing the land value by the improvement value and when the result was greater than 1, the parcel was considered Redevelopable and retained in the spreadsheet. If the properties had no improvement value and the land use code was Vacant, then retained as Vacant. Developed parcels were removed from the data.
4. The Buildable Area was determined by subtracting Critical Areas from the Gross Area as contained in the Pierce County Tax Assessor Records.
5. A percentage of the Buildable Area was determined to be Unavailable for Development within the 20 year planning horizon. For Vacant land it was assumed 10% of land would not develop and for Redevelopable land 50% was assumed to remain undeveloped. Redevelopable land has a higher degree of uncertainty and may have a viable use (e.g., single family residential, truck yard, parking lot) and not be as likely to redevelop as vacant land. These percentages were subtracted from the Buildable Area.
6. Employment estimate was then calculated by :
 - a. Multiplying the net Buildable Area by an average 19.37 employees per acre to estimate employment for commercial lands. This is identical to the BLR.
 - b. Utilizing a floor area ratio (FAR) and employees per square foot of building area calculation to estimate employment capacity. This method was based on the estimate used in the Manufacturing/Industrial Center report prepared by AHBL (AHBL, 2009, page 111-112). The net Buildable Area was multiplied by 0.26 FAR, converted to square feet, and then a 1 employee per 1000 square foot of building area ratio was applied. This resulted in an estimate for industrially zoned land.

Special Considerations

There were some unique situations regarding commercial land capacity as described below:

1. Some of the lands that would be Vacant were not included in the analysis because they are currently used for outdoor storage for established businesses that are not likely to change operations in the next 20 years or separate these properties.

Differences Between 2010 LCA and 2007 Buildable Lands Report

The 2010 Land Capacity Analysis (LCA) differs in various ways from the assumptions and methodology in the BLR, and therefore results in different conclusions and a reduction in overall capacity. The 2007 Buildable Lands Report shows that there is capacity within the 2008 city limits for the 2022 population allocation of 12,250 with excess capacity for 723 housing units or a population of 1,634 (using 2.26 persons per household). The BLR also shows that there is employment capacity within the 2008 city limits for the additional employment need of 3,205 with an excess capacity for 9,012 employees.

Table A-3 below shows the differences in the methodologies and the general effect on outcomes followed by more detailed discussion in the text.

Table A-3. BLR and Land Capacity Analysis Comparison

2007 Buildable Lands Report	2010 Land Capacity Analysis	Outcomes
<u>Residential</u>		
<u>Persons Per Household: 2.26</u>	<u>Persons Per Household: 2.2 and 2.73 (East Hill UGA) decreased based on general trend of reduced household sizes from 2000-2030</u>	<u>Increases overall number of dwelling units to serve given population thereby decreasing land capacity related to need.</u>
<u>Parcels less than 2,500 sq. ft. included in the analysis</u>	<u>Parcels less than 2,500 sq. ft. excluded</u>	<u>Slightly decreases land capacity</u>
<u>Redevelopable commercial/multi-family land value exceeds improvement value</u>	<u>Redevelopable parcels calculated same as BLR for commercial. See Underdeveloped below for multi-family</u>	
<u>Underdeveloped multi-family capacity is not calculated but an improvement to land value was used to determine if property is redevelopable.</u>	<u>Calculates underdeveloped multi-family capacity based on potential for greater density/number of units</u>	<u>Undeterminable change in capacity</u>
<u>Underdeveloped single-family at 2.5 times minimum lot size</u>	<u>Same as BLR</u>	<u>No difference</u>
<u>Displaced units included back into calculation</u>	<u>Same as BLR</u>	<u>No difference</u>
<u>Market Availability assumes that 10% vacant and 50% redevelopable unavailable for development</u>	<u>Same as BLR</u>	<u>No difference</u>
<u>Critical Areas Calculations used old FEMA maps</u>	<u>Use new Preliminary FEMA maps for floodway which is larger than old maps</u>	<u>Decreased land capacity</u>
<u>Roads/Stormwater ponds area not subtracted from overall area</u>	<u>Roads and stormwater ponds subtracted at a rate of 22% of gross area</u>	<u>No difference</u>
<u>Density assumptions based on net acres</u>	<u>Same as BLR except for MUD calculated at 40 du/acre rather than 30 du/acre; HDR is assumed at 12 du/acre rather than 6.5 du/acre in Action Alternatives</u>	<u>Increased land capacity</u>
<u>Assumed redevelopment of some historic downtown properties</u>	<u>Assumes "Older Business District" building will not redevelop due to the historic preservation ordinance</u>	<u>Decreased land capacity</u>
<u>Employment</u>		
<u>Calculations based on land use (commercial or industrial) and employees per gross acre</u>	<u>Calculations based on a floor area ratio (FAR) and estimate of employees per square foot of building area based on MIC study.</u>	<u>Increased employment capacity</u>
<u>Additional Key Differences¹</u>		

¹ See "Special Considerations" on page A-7, 1 and 2.

Included CTI property and assumed capacity. See above regarding the long term use of this property.	Does not include CTI lands	Decreased capacity
Portions of PSE/Cascade Water Alliance lands in the analysis on the East Hill	Doe not assume development on CWA lands as they have no plans to develop into housing	Decreased capacity

Persons Per Household

[To determine the number of housing units necessary for the projected population and to calculate capacity a 2.2 persons per household \(pphh\) was used. This is similar to the 2.26 pphh number used in the BLR, however, it has been further reduced to reflect the changing demographic and trend toward smaller household sizes into the future. The overall reduction was 8% based on a memo prepared by Pierce County and presented to a GMCC meeting on May 2009. \(May 2009: Pierce County, Housing Unit Conversion Factors—Persons Per Household\) The persons per household was calculated as 2.73 on the East Hill because the 2000 Census shows the Census Tracts 703.03 Block Groups 1 has 3.04 pphh and Group 2 has 2.97 pphh, therefore, conservatively and an 8% reduction of the lower number, 2.97 equals 2.73 pphh for the LCA.](#)

Undersized Parcels

[Parcels less than 2,500 square feet were considered undevelopable for any type of housing and were removed from the overall land capacity. This is a relatively small percentage of the overall land area, but nonetheless was removed as it is unlikely that these lots, even if legally nonconforming and variances were granted, that they would be developed.](#)

Underdeveloped Multi-family

[The BLR analyzed multi-family based on redevelopment potential and this was based on the land value to improvement value similar to the calculation for commercial structures. The LCA took a different approach that was expected to capture those parcels that may not have taken full advantage of the dwelling unit and density potential. For instance, a duplex on a large lot zoned multi-family may meet the redevelopment criteria as the land value might exceed the improvement value, but it may be likely that additional units would be constructed if unused housing density was available. This method was intended to be more accurate in determining the potential for additional multi-family units as it brings the development potential in terms of units into the analysis.](#)

Critical Areas and Floodplain/Floodways

[The Federal Emergency Management Agency \(FEMA\) in cooperation with the National Flood Insurance Program \(NFIP\) has been working on updates to the FEMA floodplain and floodway maps. These preliminary maps have been out for review for the last year and will become official maps in](#)

the near future. The floodway, where development is essentially prohibited, has increased substantially in the northern area of the City near the White River and also near the Puyallup River. This increase in floodway has reduced overall capacity. These maps were not in affect during the BLR.

Roads/Stormwater Ponds and Public Facility Reduction

For platted lands, the BLR did not remove area for roads/stormwater ponds and public facilities and parks because the density calculations and platting data that was provided by the City of Sumner was based on minimum lot sizes and net densities. The BLR density assumptions were based on densities from previous 5 years of development with some assumptions for higher density based on an expectation of increased efficiencies more typical of development from 1995-2000.

The LCA uses a 22 percent reduction in gross land area based on past developments and the percentage of gross acreage devoted to roads and other utilities to establish a net developable area. The net densities matching the BLR were applied to the net developable area. In two cases, LDR-4 and LDR-7.2, the applied densities (5.4 dwelling units per net acre and 4.97 dwelling units per acre, respectively), again based on past trends, resulted in slightly fewer dwelling units than would have been realized if applying the minimum lot size in the zones to the calculation. The net difference is slight, overall, and would add about 75 dwelling units to the overall capacity for the City. When considering the alternatives, this is less than 2% of the overall housing capacity.

Density Calculations

The density calculations for the Mixed Use Development (MUD) zone was set at 30 dwelling units per acre but was modified to 40 dwelling units per acre given the fact there is a minimum development density of 15 dwelling units per acre and the configurations of lots in this zone will likely facilitate maximum build out of the area. The High Density Residential (HDR) zone is calculated at 12 dwelling units per acre rather than 6.5 dwelling units per acre due to the fact that the 6.5 dwelling units per acre is based on a history of single-family small lot plats in the HDR zone and that is not a likely scenario in the future. More recent developments have pushed the densities closer to 12 dwelling units per acre and this is anticipated to continue.

Older Business District and Redevelopment

The City has a historic downtown area along Main Street between roughly the BNSF railroad tracks and Wood Avenue. This area of downtown has a large number of historic buildings that likely would be eligible under the historic preservation ordinance for certification and tax benefits if renovated. These benefits could discourage demolition and therefore buildings with an "Older Business District" description and designation by the tax assessor were removed from the land capacity.

Industrial Employment

In the BLR industrial employment was calculated based on gross acres and a density of 11.5 employees per acre. The BLR also acknowledges the inherent difficulties in estimating employment capacity and the fact that employment in a single building could double or triple based on how many shifts may be working there or what type of use (manufacturing having a higher density of employees than warehousing). The 11.5 employees per acre number was derived from estimates

and studies that Pierce County had conducted and is a broad assumption. The LCA method of estimating employment was based on the estimate used in the Manufacturing/Industrial Center report prepared by AHBL (AHBL, 2009, page 111-112). The net Buildable Area was multiplied by a floor area ratio of 0.26, converted to square feet, and then employment estimated at 1 employee per 1000 square foot of building area. The MIC study also utilized data on building demand, absorption, business types, etc. to estimate the level of building square footage demand.