



City of Sultan Comprehensive Plan

Appendix K Summary of 2008 Supplemental Environmental Impact Statement

APPENDIX K

**CITY OF SULTAN'S URBAN AREA COMPREHENSIVE PLAN
Summary of 2008 Supplemental Environmental Impact Statement**

Note to Readers: The 2004 and the 2008 revision are "integrated SEPA/GMA documents". As discussed below, this means that the entire Plan and its appendices combine to form both a comprehensive plan and an assessment of environmental impacts. Appendix K is a summary of that analysis and supplements the adopted 2004 SEPA/GMA document.

Description of Proposal: In 2005 an appeal was filed with the Growth Management Hearing Board challenging certain elements of the City of Sultan's Comprehensive Plan (Plan). The Hearings Board ordered that the City make certain revisions to the Plan. The City proposes a revision of the City of Sultan's 2004 Comprehensive Plan as required by the Growth Management Act (GMA). The revision will address general policies on land use, housing, parks and recreation, transportation, capital facilities, utilities, critical areas protection, and economic development. The Plan also contains a Future Land Use map, an arterial street plan and revised mapping of other elements.

Requirements for a SEIS are governed by WAC 197-11-620:

A SEIS shall be prepared in the same way as a draft and final EIS (WAC 197-11-400 to 197-11-600), except that scoping is optional. The SEIS should not include analysis of actions, alternatives, or impacts that is in the previously prepared EIS.

The following document supplements the Final Environmental Impact Statement adopted as part of the 2004 Plan adoption.

Proponent: City of Sultan
P.O. Box 1199
319 Main Street
Sultan, WA 98294-1199
Phone: (360) 793-2231
Fax: (360) 793-3344

Location of Proposal: Sultan Urban Growth Area (UGA)

Lead Agency: City of Sultan

EIS Required: A Supplemental Environmental Impact Statement (SEIS) has been deemed necessary under RCW 43.21C.030(2)(c). The SEIS contains new information and analysis, but also builds on data and analysis contained in previous environmental

documents prepared as part of the 2004 Comprehensive Plan update.

The lead agency has identified the following elements of the environment for discussion in the Supplemental EIS:

- I. Natural Environment:** Topography, soils, erosion, air quality, surface and groundwater, public water supplies, plant and animal habitat, fisheries, energy and natural resources as those are affected by revisions to the adopted 2004 Plan.
- II. Built Environment:** Land and shoreline use, environmental health, housing, recreation, historic and cultural resources, transportation, public services, and utilities as those are affected by revisions to the adopted 2004 Plan.
- III. Alternatives** The 2004 Plan update considered four growth alternatives: Low, Moderate and High growth scenarios; and a “No Action” alternative, (see Plan Appendix “I”). For this 2008 revision, which is focused on issues raised by the Growth Hearings Board, no additional alternatives to the 2004 action were considered.

Alternatives could have been necessitated if, during the “Reassessment” phase of the 2008 revision process, it was determined that modifications to the capital facilities elements of the Plan – including phasing, financing or service coverage – prompted changes to land use, population, employment or UGA or other assumptions. Based on an analysis of revisions to the 2004 Plan, no reassessment has been deemed necessary.

SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

Integrating Environmental Impact Analysis with Growth Management Planning

The Washington State Environmental Policy Act (SEPA) requires all State and local agencies to use an interdisciplinary, integrated approach to build environmental factors into planning and the decision-making processes.

During the development of this Comprehensive Plan revision, the City of Sultan is required to consider the potential environmental impacts of plan policies and alternatives. Cities and counties planning under GMA may address environmental concerns during the growth planning process by combining the requirements of GMA with those of SEPA, as specified by 1995 amendments to Chapter 197-11 of the Washington Administrative Code (WAC), SEPA Rules.

Cities and counties planning under GMA have the option of combining analyses, documentation and public involvement required under environmental and growth management laws. This results in an “integrated document”, satisfying both GMA and SEPA requirements

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in one document, with the Environmental Summary serving as the Supplemental Environmental Impact Statement (SEIS) for this Plan.

A major benefit of this integrated approach is a more predictable process for development review. Evaluation of environmental choices during the planning process should facilitate analysis of potential environmental impacts as a result of development. This should result in more certainty and predictability for developers and landowners in association with future development proposals. The Comprehensive Plan and subsequent implementing regulations should therefore result in a timelier and more focused environmental review process.

Phased Review

It is the intent of this Comprehensive Plan to serve as the foundation for environmental review as required under SEPA. Project proposals that are consistent with the future land use designations and this Comprehensive Plan; and that incur no major system impacts to utilities such as wastewater treatment, stormwater drainage, domestic water and transportation facilities beyond those identified in this Comprehensive Plan and environmental review, should not be required to undergo further environmental review related to these systems. It is the intent of the City of Sultan to employ “phased review” of development in the community, where additional environmental analysis for specific projects on specific sites will be limited to project impacts that were not foreseen or were not otherwise documented in this integrated SEPA/GMA Comprehensive Plan. It is the policy of the City that where proposed developments conform to the policies of this Plan, they are considered to be consistent with the land use and planning vision of the community.

SEPA/GMA Integrated Document: Requirements

An integrated document will constitute the necessary SEPA document, as long as it contains the following as specified by WAC 197-11-235:

- I. Environmental Summary and Fact Sheet
- II. Comments and responses obtained during a 60-day review period ending on September 1, 2008.
- III. Appropriate technical and other materials either adopted by reference or included as appendices to this Plan.

I. Fact Sheet

Proposed Action:

Adoption of revisions to the City of Sultan’s 2004 Comprehensive Plan as required by the Growth Management Act (GMA) and the Growth Management Hearing Board. The revised Comprehensive Plan provides a land use plan and policies to address growth for a 20-year planning period through the year 2025 within the Sultan Planning Area. The Plan includes revisions to certain sections of the 2004 Plan. Development Regulations to implement the policies of the revised Plan are being adopted along with the Plan revisions. A revised Critical Areas Ordinance using Best Available Science was adopted by the City in 2006.

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Location of Proposal: The City of Sultan and its surrounding unincorporated urban growth area (UGA) in the Skykomish Valley.

Proponent: City of Sultan

Lead Agency: City of Sultan
P.O. Box 1199
319 Main Street
Sultan, WA 98294-1199
Phone: (360) 793-2231
Fax: (360) 793-3344

Responsible Official: Robert Martin, Community Development Director

Required Approvals: Planning Board recommendation
City of Sultan City Council – Adoption

EIS Authors: City of Sultan
Shockey/Brent, Inc.

**Date of Supplemental
EIS Issue:** July 1, 2008

Date Comments Due: August 31, 2008

Date of Final Action: September, 2008

Location of Prior Environmental Documents and Background Information:
City of Sultan
319 Main Street
Sultan, WA 98294-1199

Public Open House and Comment Meeting:
August 19, 2008, 4:00 – 7:00PM at City Hall

Cost of Document: Printed copies are available at City Hall at the address above. Copies are also available on CD. The document is also available to view on the City's website at: [www.http://www.ci.sultan.wa.us](http://www.ci.sultan.wa.us). CD's are free. Printed copies cost \$75.00.

SEPA Distribution List

Federal Agencies

Bonneville Power Administration (BPA)
Bureau of Indian Affairs
Federal Aviation Administration
Federal Emergency Management Agency (FEMA)
National Marine Fisheries Service
Natural Resource Conservation Service
NOAA Fisheries

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NOAA Northwest Regional Office
U.S. Army Corps of Engineers
U.S.D.A. Forest Service
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service

State Agencies

Department of Agriculture
Department of Archeology and Historic Preservation
Department of Community Trade and Economic Development
Department of Corrections
Department of Ecology
Department of Fish and Wildlife
Department of Health
Department of Natural Resources
Department of Social and Health Services
Department of Transportation
Interagency Commission on Outdoor Recreation
Parks and Recreation Commission
Washington State Attorney General's Office
Washington State Emergency Management Division
Washington State Energy Office
Washington State Patrol
Washington State Utilities and Transportation Commission (UTC)

Regional Agencies

Puget Sound Clean Air Agency
Puget Sound Regional Council
Puget Sound Water Quality Action Team
Snohomish County Planning and Development Services
Snohomish County Economic Development Council
Soil Conservation District
Sultan School District

Local Government, Tribes and Utilities

BNSF Railway Company
City of Everett Department of Public Works
City of Gold Bar
City of Monroe
Community Transit
Highland Water Association
Northwest Pipeline Company
Puget Sound Energy
Snohomish County Fire District 5
Snohomish County Public Utility District No. 1
Snohomish County Sherriff's Office
Snohomish Health District
Startup Water District
The Tualip Tribes
Verizon

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Organizations and Interest Groups

Fern Bluff Grange
FOE Sultan (Sky Valley) # 4149
Sky Valley Chamber of Commerce
Sultan Arts Council and Museum
VFW
Volunteers of America (VOA)
US 2 Safety Coalition

Media

The Herald
Monroe Monitor

Libraries

Sno-Isle Library District
Sultan Library

Purpose of the Proposal

The Proposed Action is revision of the City of Sultan 2004 Comprehensive Plan in accordance with requirements of the Growth Management Act (GMA). In general, the proposed revision is intended to revise and refine, correct, and extend the 2004 Comprehensive Plan policy direction, rather than markedly depart from the original Plan vision.

The City of Sultan adopted its updated Comprehensive Plan in 2004. The adoption was appealed to the Central Puget Sound Growth Hearings Board in 2005 (Fallgatter v. City of Sultan, Case No. 06303). On June 29, 2006 the Hearings Board ruled that several actions taken by the City were inconsistent with the requirements of the Washington GMA. These are summarized as follows:

1. The Transportation Improvement Plan (TIP) is inconsistent with the Transportation Element of the Comprehensive Plan.
 - a. The TIP does not assess the impact of growth on Highway 2 (US-2).
 - b. Improvements listed in the TIP are not reflected in the Finance Element of the Plan.
 - c. Improvements for the Industrial Master Plan are not included in TIP.
 - d. The Growth Hearings Board mandates that the TIP be made consistent with the City Comprehensive Plan Transportation Element.
2. Different population forecasts for Year 2025 were used in the Water Systems Plan, the General Sewer Plan and the Comprehensive Plan.

Source	Population Estimates 2025
City	11,119
Sewer Plan	7,200
Water Plan	6,750

3. Some implementing and amended regulations have not been adopted.
4. The City had indicated that these “functional” sewer and water plans would be updated after comprehensive plan adoption to make them consistent. The Hearings Board ruled

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that the original sewer and water plans should have been based on the comprehensive plan forecasts *before* they were adopted.

5. The boundaries of the Water Systems Plan are different than the UGA Boundary.
6. The Sewer Plan is not in conformity with the Land Use Plan.
7. The public participation process was inadequate. The Hearings Board found that:

If Sultan's Water and Sewer Plans had been properly based on GMA-adopted population targets and service areas, adoption of (the Sewer, Water and TIP) ordinance(s) using the regular City public notice and hearing process....would most likely be adequate to satisfy the public process procedures under the relevant statutes.

The Growth Hearings Board remanded the City's Comprehensive Plan to the City to make necessary revisions:

- Review and, if necessary, update development regulations;
- Adoption of revised TIP;
- Adoption of sewer and water plan revisions to comply with comprehensive plan; and
- Revisions to the Finance Element and Transportation Element of the Comprehensive Plan.

The proposed 2008 revisions to the Comprehensive Plan, for the most part, deal with capital facilities planning. Portions of the Plan dealing with this issue were adjusted as necessary to ensure up to date information and consistency between the Plan and supporting capital facility (e.g. roads, utilities) plans. This Supplemental EIS addresses changes to the 2004 EIS prompted by revisions supporting the Capital Facilities Plan. These are summarized as follows:

Population, Housing and Employment

The 2004 EIS provided a substantial listing of past trends and future demographic forecasts. The 2008 Plan effort reviewed and in some cases revised these figures. Changes were not significant, particularly as they affected the impact assessment resulting from revised capital facilities planning analyses. The exception involved the 2004 Plan's estimate of 1500 existing jobs in Sultan. This figure should have been 1010. The 2025 employment estimate of 2000 employees did not change.

Land Area

The 2004 Plan indicates that the corporate city limits contains 2,557.0 acres which is inaccurate. The total UGA area to be served by infrastructure by 2025 has been recalculated and in 2008 totals 2,304 acres. Total land area within the current city limits is approximately 1,966 acres.

Critical Areas and Buildable Lands

Sultan developed a detailed inventory of the GMA/CTED defined critical environmental and resource lands within the Sultan proposed urban growth area in 1994. For the 2008 revision, more precise analysis of the actual amount of buildable lands was conducted to confirm the ability of the UGA to accommodate 2025 growth.

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In 2004, the City had not revised its Critical Areas Ordinance to include “best available science” as part of its Growth Management Act responsibilities. The ordinance has since been adopted.

Shoreline Management

In 2004, the City stated its intent in the Comprehensive Plan to revise its Shoreline Master Program (SMP). The City is in the final stages of adopting a new Shoreline Master Program. In 2008, the Plan is undergoing final review by the Department of Ecology.

Transportation

The revised 2008 Plan included an extensive re-write of the City’s Transportation Element. A revised Arterial Street Map was developed, design standards for arterials were modified and the City’s Level of Service was changed. In 2008 the Transportation Element of the Comprehensive Plan is better integrated with other capital facilities plans, including the programming of over \$155 million in transportation improvements through 2025.

The 2004 Plan anticipated improvements to US 2, but in early 2008 a more specific Route Development Plan has been adopted as the result of work by the US-2 Safety Coalition and other stakeholders. The first phase of safety improvements is now underway.

Police Level of Service (2.6 officers per 1000 residents) is discussed in the 2004 Plan, but is proposed for elimination as a code requirement in 2008. The City will strive to provide a high level of quality public safety service, but must balance police expenditures with other needs in the community.

Public Utilities

The 2008 revision was prepared to meet certain mandates of the Growth Management Hearing Board which found that there had been inadequate planning for capital facilities based on long term growth projections for the Sultan community. As a result, the future project information outlined in the 2004 Plan and EIS has changed, as have the capital cost estimates. These changes are discussed in each of the Plan sections and are summarized in Section 2.10 (Capital Facilities Plan). Adoption of the Plan and CFP in late 2008 will not only meet the mandates of the Hearings Board, but will also ensure that the impacts of growth as projected in 2004 will be properly mitigated by a well-planned infrastructure system.

Code revisions are being proposed to clarify when and how property owners will be expected to pay fair-share costs for extension of the planned sewer and water systems. Property owners with functioning septic systems may be allowed to pay a hook-up fee for utilities extended past their properties without having to connect. These owners may be required to sign annexation or non-protest ULID agreements; and may be required to abandon their septic systems when new construction occurs on their property.

As part of Plan adoption and code revisions, the Council will consider allowing new septic service in a few situations where a new single family dwelling is proposed a long distance from the existing sewer system and where future connection to sewer within the planning period is assured. The City believes this is an equitable solution for isolated cases. The City may require that these owners site structures in such a way that future development, at urban densities, is not precluded.

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Design criteria have been revised to better reflect the standards to be used by the City in designing water and sewer improvements. For the water utility, the water distribution system will be designed to deliver a fire flow of 1,000 gallons per minute (GPM) at fire hydrants in residential areas, and 1,500 GPM in non-residential areas.

For the sewer system, the sewerage piping system will be designed to contain all flow projected to enter the sewer system during a 10-year, 24-hour storm event.

Stormwater Management

In addition to the improvements to the overall capital facilities planning effort, the City is in the process of creating a stormwater utility to provide revenue for stormwater improvements and maintenance.

Parks and Recreation

Significant changes have been made to the Parks and Recreation Element of the Comprehensive Plan. The inventory of existing parks has been realigned to more accurately reflect what facilities are available. City facilities were separated from school district and other ownerships to better integrate capital costs with other City needs. Mini-parks (one acre or smaller) are to be dealt with outside of the City budget; for example, by requiring small recreation spaces as part of new development. The number and types of new parks have been reduced from the 2004 Plan. The main goal of the next six-year capital facilities plan will be to acquire property for a new community park.

Capital Finance Strategy

The 2008 Plan revisions include a comprehensive financial strategy that outlines a viable approach to funding the facilities necessary to support development as well as providing funding for other important community facilities to the year 2025. This strategy is based on an analysis of the City's financial capacity, the potential for grant assistance and the opportunity for developer financing of projects need for new development. The strategy includes identifying ways that key facilities need to provide a system of improvement to serve the entire City and UGA by 2025.

Impact Fees

Development impact fees have undergone a complete review as part of the 2008 revision to assure a significant revenue source related to needs created by new growth. Transportation fees will increase substantially; park fees will remain essentially the same, although the number of new parks may be reduced.

Impact fees proposed for adoption in 2008 are as follows:

Transportation:	\$5,272 per peak hour trip
Parks:	\$3,175 per dwelling unit

Development Codes

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The 2004 Plan noted that a Planned Unit Development ordinance was being considered. This is now in place.

Additional code changes being considered as part of the 2008 revision are as follows:

- 16.16.045 (New section) New septic system reasonable use exception – future sewer connection required.
- 16.28.230 Subdivision Regulations -- Revisions to septic system regulations
- 16.72 Recreational and Open Space Standards relating to facilities to be provided by new developments
- 16.92 Stormwater management permits. Revising design standards
- 16.108 Concurrency Management System Eliminating concurrency test for police services
- 16.112 Development Impact Fees
- 16.112.015 (New Section) Definitions defining terms related to the Transportation Plan
- 16.112.020 applying impact fees to certain permits
- 16.112.030. Clarifying and updating the formula for recreation facility impact fees
- 16.112.040 Clarifying and updating the formula for traffic impact fee formula.
- 16.112.050 Establishing procedures for providing alternative traffic analysis
- 16.112.080 Limiting Impact fee credits for other than traffic impact fees.
- 16.112.085 (New section) Establishing traffic impact fee credits
- 16.112.090 Clarifying impact fee appeal procedures
- 16.150 Definitions Adjusting definitions for “family day care homes”

Purpose of the Supplemental EIS

The purpose of this Supplemental EIS is to assist the public and agency decision-makers in considering future decisions on land use patterns and Comprehensive Plan goals, policies, and development regulations for the City of Sultan as part of the Comprehensive Plan revision. These broad decisions will provide direction and support for more specific actions by the City, such as capital improvements and implementing regulations.

The SEPA review of the Plan is a “planning level” analysis as opposed to a “project level” analysis. The latter is done for specific projects on specific sites and is much more detailed. A planning-level analysis is more general in nature. SEPA requires that analysis be as specific as the information available. Because the Comprehensive Plan is more general in its discussion of topics, the SEPA analysis will be more general than what might be found in a project-level SEPA review. It is assumed that as specific projects or decisions are made in the future, more detailed information will be provided, and that the policies of this Plan will be considered in decision-making. This is referred to as “Phased Review” and will be a part of future decision-making using the 2008 updated Plan.

The 2004 Plan was adopted after conclusion of the environmental review process. The technical background supporting the mitigation measures can be found in the documents adopted by reference as part of the 2008 Plan.

Programmatic Analysis

This Supplemental EIS provides qualitative and quantitative analysis of environmental impacts appropriate to the general nature of the Comprehensive Plan revisions. The adoption of comprehensive plans or other long-range planning activities are classified by SEPA as a non-project (i.e. programmatic) action. A non-project action is defined as an action that is broader than a single site-specific project and involves decisions on policies, plans or programs. An

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EIS for a non-project proposal does not require site-specific analysis; instead the EIS discusses impacts and alternatives appropriate to the scope of the non-project proposal and to the level of planning for the proposal (WAC 197-11-442).

Phased Review

SEPA encourages the use of phased environmental review to focus on issues that are ready for decision, and to exclude from consideration issues already decided or not yet ready for decision-making [WAC 197-11-060 (5)]. Phased review is appropriate where the sequence of a proposal is from a programmatic document, such as an EIS addressing a comprehensive plan, to other documents that are narrower in scope, such as for a site-specific, project-level analysis. The City of Sultan is using phased review, as authorized by SEPA, in its environmental review of growth management planning actions. The analysis in this Supplemental EIS will be used to review the environmental impacts of the proposed Comprehensive Plan revisions and other related actions, including implementing regulations.

Public Comment

The following public participation opportunities were held to gain public input:

07/11/06	Sultan Planning Board Meeting (SPBM)-Comprehensive Plan (Plan) Overview
08/01/06	SPBM- Plan Task & Schedule Amendments
08/15/06	SPBM- Prioritization of Tasks for Plan Updates/Amendments
09/05/06	SPBM- Plan Amendment, Tasks & Schedule
10/03/06	SPBM- Discussion of Plan Amendments, Tasks & Schedule Presentation
10/17/06	SPBM- Reid Shockey Draft Capital Facility Plan Presentation
11/14/06	SPBM- Reid Shockey Draft Capital Facility Plan Presentation
11/28/06	SPBM- Approval of Capital Facilities Plan
12/05/06	SPBM- Review of Capital Facilities Plan revisions
02/20/07	SPBM- Review of Parks, Capital Facilities Plan, and Land Use Element
02/20/07	SPBM- Traffic Information Plan revisions & Project Overview Presentation
03/13/07	Open House
03/20/07	SPBM
03/28/07	Public Meeting in Sultan
05/15/07	Planning Board Meeting
05/15/07	Public Meeting and Open House in Sultan
05/24/07	City Council Meeting
06/26/07	Planning Board Meeting
07/31/07	Planning Board Meeting
07/31/07	Public Meeting in Sultan
09/05/07	News Release for Open House on 09/18/07
09/05/07	CPSGMHB Hearing
09/11/07	Planning Commission Meeting
10/02/07	Planning Commission Meeting
10/03/07	CPSGMHB Hearing
10/08/07	New Release Joint Planning Commission and City Council Meeting 10/25/07
10/25/07	Council and Planning Meeting
11/08/07	City Council Meeting
11/13/07	Planning Commission Meeting
11/15/07	City Council Meeting
11/27/07	Planning Commission Meeting

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01/08/08	Planning Commission Meeting
01/10/08	CPSGMHB Hearing
01/10/08	City Council Meeting
01/16/08	GMA Compliance Team Meeting
01/22/08	Planning Commission Meeting
01/24/08	City Council Meeting
02/05/08	Planning Commission Meeting
02/07/08	CPSGMHB Hearing
02/12/08	New Release Public Hearing on Comp. Plan Amendments
02/13/08	CPSGMHB Hearing
02/14/08	City Council Meeting
02/19/08	Planning Commission Public Hearing
02/19/08	Planning Commission Meeting
02/21/08	CPSGMHB Hearing
02/28/08	City Council Meeting
02/28/08	CPSGMHB Hearing
03/05/08	Council and Planning Joint Meeting
03/14/08	CPSGMHB Hearing
03/17/08	News Release Open House 03/25/08
03/19/08	Council and Planning Joint Workshop
03/25/08	Open House
03/27/08	City Council Meeting
04/01/08	Council and Planning Meeting
04/15/08	Council and Planning Meeting
04/17/08	New Release Open House 04/22/08
04/22/08	Open House
04/24/08	City Council Meeting
05/08/08	City Council Meeting
05/13/08	Council and Planning Meeting
05/27/08	Public Meeting/Open House
06/03/08	Council Planning Meeting
06/17/08	Planning Board recommends circulation of Draft Plan and SEIS
06/24/08	Public Open House on Draft Plan and SEIS
06/26/08	City Council authorized release of Plan/SEIS for public comment
07/01/08	Draft Plan/SEIS circulated for public comment

In addition, a public open house and comment meeting on the SEIS will be held August 19, 2008 from 4-7 PM. Subsequent meetings will be held by the Planning Board and City Council as part of the Plan adoption process.

II. Analysis of Alternatives

Proposed Action

The Proposed Action is adoption of the City of Sultan 2008 Revised Comprehensive Plan. The 2008 Revised Plan and Supplemental Environmental Impact Statement (SEIS) provide a revised land use plan and policies to address growth for a 20-year planning period through the year 2025 within the Sultan Planning Area. The Plan includes updates to certain sections of the 2004 Plan and internal and external consistencies with Sewer, Water and Transportation Plans. A revised Critical Areas Ordinance using Best Available Science was adopted in 2006.

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The Proposed Action consists of updates to the following components:

- Land Use
- Economic Development
- Housing
- Transportation
- Parks and Recreation
- Capital Facilities
- A need to modify some development regulations. The development regulation updating process is proceeding concurrently with Plan review and adoption.
- Housekeeping and minor revisions to the City's current Comprehensive Plan elements, which refine but retain current policy intents.

This Plan revises certain chapters from the 2004 Plan related to the above topics. The Critical Areas Protection element was added in 2006 to address "Best Available Science" requirements of GMA.

If the City Council takes no action to adopt comprehensive plan revisions, the existing City of Sultan Comprehensive Plan adopted in 2004 will remain in effect. However, the portions of those elements noted above that were ruled inconsistent by the Growth Hearings Board would not be valid. Review of development proposals that are impacted by the Growth Hearings Board ruling may be compromised, denied or put on hold pending resolution of these issues.

Objectives of the Proposal

Sultan would want to plan its future in any event. However, under the Washington GMA, it is required to do so. In 1991, the Legislature enacted the GMA to guide and coordinate local planning. The Act recognizes the diversity of growth management challenges facing Washington's large, small, urban and rural cities/counties and establishes distinct planning requirements for all cities/counties that vary depending upon population and growth rates.

This Comprehensive Plan was developed in accordance with the GMA¹ to address growth issues in the City of Sultan and the adjacent UGA. It represents the community's policy plan for growth over the next 20 years. It will assist the management of the City by providing policies to guide decision-making for growth, development and public services. Cities are required to update their plans every ten years. The original Sultan GMA Plan was adopted in 1994 and planned through the year 2015. The City adopted an updated Comprehensive Plan in 2004 designed to carry the community forward through 2025. This revision is intended to correct inconsistencies in the 2004 Plan identified by the Growth Hearings Board. Specifically, the revised Plan will:

- Revise the 2004 Sultan Comprehensive Plan elements, goals, policies and implementation plans to correct inconsistencies identified by the Growth Hearings Board.
- Accommodate population and employment forecasts to meet GMA requirements and the City vision.
- Include revisions that may be needed because of GMA changes and other related State law.

¹ RCW 36.70A.070

Significant Impacts

This SEIS considers the environmental consequences of the 2008 revisions and development regulations by supplementing information previously provided in the Final Environmental Impact Statement for the 2004 City of Sultan Comprehensive Plan. Particular attention is paid to the most recent environmental information available.

The revised Comprehensive Plan would direct land use, services and capital resources for the next 20-year period, but the Plan alone would not have direct impacts on the environment. The Comprehensive Plan would have indirect impacts by establishing the mix of land uses and overall land use patterns, levels of public services, and focus of future public capital improvements.

Future development or public capital improvement projects allowed by the Comprehensive Plan could directly or indirectly affect the elements of the environment addressed in the EIS:

1. Revisions to the 2004 Plan will allow resolution of remaining issues with the Growth Management Hearings Board and finalize adoption of the Plan.
2. Development proposals coming forward to the City will be allowed subject to compliance with City codes as revised; and in accordance with adopted policies in the Comprehensive Plan.
3. Development will add impervious surfaces, re-grade slopes, remove vegetation, and increase stormwater runoff quantities. The extent of these impacts will be affected by regulations and planning policies designed to reduce effects on water quality, flooding, erosion.
4. Development proposals will also affect the “built environment”, adding new homes, subdivisions, commercial and industrial structures according to the adopted Land Use Map. Development will be subject to development regulations affecting setbacks from critical areas, landscaped buffers, utility services, stormwater detention systems, etc. to assist in mitigating environmental impacts. The “cityscape” however will inevitably change to a more intense urban environment.

Impacts related to the changes proposed in the 2008 Plan, and therefore not previously addressed, are addressed in the following Matrix of Impacts and Mitigation Measures. It can be assumed that the balance of the Plan is consistent with the 2004 version and the 2004 EIS.

The City will review each of these future actions as they arise to determine: 1) their consistency with the policies of this Plan; and 2) their direct impacts upon the environment.

Proposed Mitigation Measures

Implementation of Comprehensive Plan policies and existing or proposed development regulations that implement the Comprehensive Plan will serve as mitigation measures. As an integrated SEPA/GMA document, it is a fundamental purpose of this Plan to ensure that future growth and development occurs in a manner that is compatible with the many, diverse elements of the community. The policies themselves are intended to mitigate the impacts of growth and the regulatory changes that will occur upon adoption of this Plan will add further substance to those policies.

Programmatic mitigation measures described under each element of the environment being addressed in this SEIS are identified in the Matrix of Impacts and Mitigation Measures below.

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Significant Unavoidable Impacts

The facts presented in the 2008 revised Plan describe what has happened in the past and what will likely happen in the future as growth occurs through 2025. It is a fact that the community will grow, that the population will increase and that development will occur in areas that are currently more rural in character. The UGA has finite boundaries within which this growth will occur. The areas outside the UGA will remain rural.

Comparison to 2004 Environmental Review

The following table shows where elements of the environment, including existing conditions, impacts and mitigation, were discussed in the adopted 2004 Plan; and where discussion occurs in the 2008 Plan.

<u>Environmental Element</u>	<u>2004 Plan</u>	<u>2008 Revisions</u>
<u>Physical Environment</u>		
Earth	37, 40, 43-44 Appendix J: 1-8, 112-114	
Air	43 Appendix J: 8-13	
Water	36-37, 43-44, 55, 66, 160-161 Appendix J: 14-28	17, 19, 70, 148-160, 194-195
Plants	41, 44 Appendix J: 28	
Animals	41, 44, 66 Appendix J: 30, 32-39	
<u>Built Environment</u>		
Energy & Natural Resources	216-218 Appendix J: 120-125	
Environmental Health	42-43, 54, 61, 75, 210, 214 Appendix J: 98-103	17, 20
Land Use	21-22, 29, 30-32, 40-44, 60-62, 71-72, 226-228 Appendix J: 31-32, 39-46, 141-142	15, 22, 35, 56-60
Shoreline Use	37, 40, 44, 56, 66-68, 169, 221 Appendix J: 28	16
Population & Economics	29-31 Appendix J: 48-53, 58-62, 64-67, 69-77	15, 24-29, 57-59
Housing	52-54 Appendix J: 47, 54-57, 64-68	15, 23, 50-52, 57-58
Aesthetics	43-44, 67, 52-53, 61, 220-222 Appendix J: 137, 139-140, 142-143	
Light & Glare	42, 217 Appendix J:	
Recreation	66-67, 72, 122, 168-174, 214, 216,	17, 20, 70, 78, 162-

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<u>Environmental Element</u>	<u>2004 Plan</u>	<u>2008 Revisions</u>
	221 Appendix J: 128-135	167, 169, 171-172, 188-189, 215

Environmental Summary

The following Matrix of Impacts and Mitigation Measures is intended to provide a comparison of impacts by key subject area, a review of mitigation measures, and potential significant unavoidable adverse impacts for each. Specific locations of the discussion are identified on the table above.

Matrix of Impacts and Mitigation Measures

Land Use Impacts
<p>2008 Revision</p> <ul style="list-style-type: none"> • Land Use distribution based on a current population projection of 11,119 for UGA in 2025. • Adjustments made based on updated trends to ensure currency of information. • Two expansion areas added to the UGA since 2004. • Better relationship of land use policies to Capital Facilities Plan. • Buildable lands recalculated based on more current critical areas information • Revised housing analysis to confirm future land demand • Corrected employment information to confirm future land demand • UGA boundaries confirmed as proper size to accommodate future population and employment • Land use distribution reviewed to comport with utilities and transportation demand analysis.
<p>Background Information Figures and Tables</p> <p>Figure LU-1 Land Use Map Figure 2 Population and Employment Growth by TAZ Figure 2 Population and Employment Growth by TAZ Figure 3 Future Commercial Areas</p> <p>Table 1 Planning Assumptions Table 2 Employment by Category City of Sultan Table 3 Job Location in Sultan Table 4 Buildable and Vacant Acreage in Sultan UGA Table 5 Sultan Housing Unit Inventory</p>
<p>Mitigation Measures:</p> <p>As with the 2004 Plan the goals, policies and action plans emphasize the protection of potentially incompatible land uses through appropriate location of land use zones, emphasis on protection of neighborhoods and residential uses and performance standards for development. The 2008 revisions more closely align future land use patterns with the phasing of infrastructure to better assure that services will be available to existing and future residents.</p> <p>Residential, commercial, industrial and institutional uses are respected in the Plan for their value in the Sultan UGA. There is recognition that the relationship of these uses to each other must be properly controlled so that incompatibilities are minimized. Some modification to existing development regulations will occur to strengthen the City’s approach to impact mitigation.</p>
<p>Significant Unavoidable Adverse Impacts:</p>

Both the 2004 Plan and 2008 revisions result in new construction to accommodate population and employment growth. New construction will result in changes of use and the characteristics of parcels of land, including potential demolition and displacement. The extent of change is the same under each Plan version.

Transportation Impacts

2008 Revision

- Transportation Element meets mandatory requirements of Growth Management under RCW 36.70A.070 and provides transportation project recommendations to the City's Capital Facilities Plan.
- Revised Arterial Street Map developed.
- Design standards for arterials modified.
- The revised Transportation Element recommends adoption of a revised transportation level-of-service (LOS) standard and the adoption of a revised traffic impact fee based on the review findings.
- The intent of the transportation element is to establish a vision for the City of Sultan's transportation system for the year 2025 and guide development of that system by both the City and other responsible stakeholders.
- Clarification of concurrency policy.
- Clearer explanation of relationship of the Plan to Capital Facilities Program.
- Revised facility plans integrated into the Plan. Consistent with population and land use forecasts.
- 2008 Transportation Element of the Comprehensive Plan better integrated with other capital facilities plans.
- Programming of over \$155 million in transportation improvements through 2025.
- A possible impact fee increase to \$5,272 per peak hour trip is proposed.

Non-motorized

Recent completion of the High Street off-road trail and the bike lanes on Sultan Basin Road provide a measure of safety and choice for safe cycling within the City.

Transit

No change. Existing transit coverage is good within the historic area of the City. Many other areas within the City and the larger Sultan Planning Area, including area's north of High Street and north of US-2 in the plateau area, lack adequate access to public transit service.

System Preservation

The Plan identifies a number of transportation projects that will correct existing deficiencies in surface conditions or improvements, but not add street capacity. These include lack of sidewalks, deteriorated pavement conditions, lack of or inadequate storm water facilities or safety needs.

Impacts of Proposed Capital Improvements

To accommodate growth under all alternatives, numerous projects are proposed to improve road, transit, and non-motorized transportation. Although the improvements address the impacts of traffic congestion, the projects themselves could result in impacts to the natural and built

environment.

Construction impacts would include increased noise and dust, as well as impede the normal flow of traffic. Roadway expansion projects will additionally result in increases in impervious surface area, which in turn can potentially affect water quality, vegetation, wildlife, and other elements described elsewhere in this SEIS.

Detailed planning and design analyses will be required to carry any of the proposed transportation improvement projects through to pre-design, design and ultimately construction. At this later stage, more analysis of projects would include detailed evaluation of topographic considerations, impacts to residents and businesses, environmental impacts, construction impacts, and project costs. Mitigation measures would be identified at that time.

Background Information Figures and Tables:

- Figure T-1 Recommended Arterial Functional Classifications
- Figure T-2 Average Traffic Volumes
- Figure T-3 2007 Transportation Level of Service
- Figure T-6 2025 “No Build” Traffic Volumes
- Figure T-7 2025 “Preferred” Traffic Volumes
- Figure T-8 2025 “No Action” Arterial Scenario LOS
- Figure T-9 Sultan 2025 “Preferred” Arterial Scenario LOS
- Figure T-10 Recommended Arterial Improvements
- Figure T-11 Three-Lane Arterial with Bike Lanes
- Figure T-12 Three-Lane Arterial with Multi Purpose Trail
- Figure T-13 Sultan 2025 Recommended Transit Streets
- Figure T-14 Future Bike Lanes and Trails
- Figure T-15 US 2 RDP Recommended Safety Improvements
- Figure T-16 US 2 RDP Recommended Capacity Improvements

- Table T-1 US-2 2006 Intersection LOS
- Table T-2 US-2 2025 Intersection LOS
- Table T-3 Recommended Existing Street Deficiency Projects
- Table T-4 Recommended Arterial System Capacity Projects
- Table T-5 Recommended Arterial System Circulation Projects
- Table T-6 Transportation Projects Beyond 2025
- Table T-7 Recommended Nonmotorized Improvements within the Sultan Planning Area
- Table T-8 Planning Level Cost Estimates for Recommended Transportation Improvements
- Table VIII-6 Unconstrained Transportation Needs List
- Table VIII-7 Funding Strategy for Transportation

Significant Unavoidable Adverse Impacts:

Even with LOS adjustment from “B” to “D”, significant investment in future transportation improvements will be necessary to accommodate the 2025 population and employment estimates. Some future road alignments and construction will traverse neighborhoods that currently have much smaller traffic volumes on their streets. New development may have to absorb a greater cost for extending streets with upgraded standards, which may have an effect on housing cost.

Utilities Impacts

2008 Revision

Water

- Capital Facilities and Public Service— Water Section based on 2005 Water Plan.
- Increases in future water demand by increases in population, and the addition of customers who currently use private wells.
- Existing supply of 25 mgd, expandable to 60 mgd. Groundwater system available for emergency uses.
- Storage capacity equals 32 million gallons per day in five wells.
- Water distribution system will be designed to deliver a fire flow of 1,000 gallons per minute (GPM) at fire hydrants in residential areas and 1,500 GPM in non-residential areas.

Sewers

- Capital Facilities and Public Service— Sewer Section based on 2006 General Sewer Plan, adopted consistent with the 2008 Comprehensive Plan.
- 18 miles of collection system improvements will be required to keep pace with growth.
- Plan developed for all areas in UGA, including currently unsewered portion of City.
- Three-phase expansion plan to wastewater treatment plant to accommodate growth through 2029.
- Sewer system piping will be designed to contain all flow projected to enter the sewer system during a 10-year, 24-hour storm event; and peak hour flow will be contained within the pipes as flowing full without surcharging flow up to manholes.

Surface Water Management

- Surface Water Management Plan developed for the City of Sultan in 2002 with adoption in 2006.
- The Surface Water Utility is under development.

Background Information Tables and Figures;

Sewer

- Figure S-1 Existing Sewer System
- Figure S-2 Sewer System Improvements
- Figure TF-1 Projected Wastewater Flows and Plant Capacity

- Table S-1 Sewer Interceptor System
- Table S-2 Sewer Improvements Included with Transportation Improvements
- Table S-3 New Sewer Extensions
- Table S-4 New Sewer Pump Stations and Force Mains
- Table S-5 Sewer Main Replacements
- Table S-6 Needed Sewer Facilities by 2025
- Table TR-1 Projected Population, ERUs, and Wastewater Flows form 2010 to 2029
- Table VIII-12Unconstrained Sewerage Needs List
- Table VIII-13Sewer System Funding Strategy

Water

Figure W-1 Existing Water Distribution System

Figure W-2 Water System Improvements

Table W-1 Inventory of Water System Piping (2005)

Table W-2 Booster Pump Station Equipment

Table W-3 Water Improvements Included with Transportation Improvements

Table W-4 Water Main Replacements

Table W-5 New Water Main Extensions

Table W-6 Needed Water Facilities by 2025

Table VIII-11 Water System Funding Strategy

Storm Water

Figure SW-1 City of Sultan Stormwater Basin Map

Figure SW-2 City of Sultan Stormwater Inventory Map

Figure SW-3 City of Sultan Stormwater Needs – Location Map

Table SW-1 City Owned Stormwater Facilities 2008

Table SW-2 Level of Service for Conveyance Comparison

Table SW-3 Storm Conveyance Level of Service City of Sultan

Table SW-4 City of Sultan Needs List for Stormwater

Table VIII-13 Unconstrained Storm Water Needs List

Table VIII-14 Stormwater Management

Capital Facilities Funding

Figure CFP-1 Capital Facility Financing Relationships

Figure VIII-1 Strategic Financing Approach

Table CFP-1 2009-2014 CIP Revenues/Expenditure

Table CFP-2 Revenues and Expenditures – All Projects

Table VIII-1 Forecasted Revenues

Table VIII-15 Unconstrained Needs for General Government

Table VIII-16 Recommended Funding Strategy for General Government

Table VIII-4 Unconstrained Public Facility Needs

Table VIII-5 Unconstrained Need By Type

Mitigation Measures:

- The 2005 Water Plan identifies a program of conservation methods as a primary method of increasing supply through reducing per capita and per connection usage rates.
- The 2006 General Sewer Plan evaluated the collection system identifying several locations where system deficiencies exist and improvements are required to meet the needs of future development. The report also recommends continuation of the City's program to reduce infiltration and inflow into the system.
- Use of a reassessment strategy to periodically monitor levels-of-service and take action to ensure needed infrastructure is in place or funded to accommodate growth.

Significant Unavoidable Adverse Impacts:

Under each alternative, future population growth and development will continue to increase the need and demand for public utilities and services such as water supply, sewers, libraries and schools. Coordination with service providers and regular review of capital plans by service providers will help avoid impacts.

Lack of timely infrastructure funding or the inability of individual development sponsors to extend infrastructure over longer distances to serve new projects could delay achievement of population targets.

Parks and Recreation Impacts

2008 Revision

- Parks classified to match CFP and concurrency discussions.
- Park inventory update excludes mini-parks as a publicly funded capital facilities need. Will be provided as part of future subdivision development. 2025 population would require 14 additional acres of mini parks.
- LOS standards calculated based on local and national standard. Foundation Level of Service (FLOS) eliminated.
- LOS for City owned park facilities will range from 1.5 acres per thousand residents for neighborhood parks, to 2.0 acres per thousand residents. Formerly overall FLOS standard for community (including school and private facilities) was 42.6 acres per thousand residents.
- The number and types of new parks have been reduced from the 2004 Plan. Key 2008 Plan priority is acquisition of land for one additional Community Park.
- \$8.9 million in acquisition and improvements are planned through 2025.

Background Information Figures and Tables;

- Table P-1 City Owned Park Facilities – 2004 and 2008
- Table P-2 Non-City Facilities
- Table P-3 Park Level of Service
- Table P-4 Park Improvements 2008-2025
- Table VIII-8 Parks Unconstrained Needs List
- Table VIII-9 Park Financial Strategy
- Table VIII-10 Unconstrained Sewerage Needs List

Mitigation Measures:

- The City would collect a \$3,175 per dwelling unit park impact fee from new development.
- The City could pursue more aggressive grant and bond financing for parks and trails projects.
 - The City intends to enter into partnerships with other providers to implement open space initiatives.

Significant Unavoidable Adverse Impacts:

Increased residential and employment growth will increase the demands on parks and recreational facilities. With implementation of mitigation measures, the City could provide parks and recreation services at locally adopted levels-of-service to meet the demand, avoiding adverse impacts.

Development of “mini-parks” in the City will rely heavily on provision of such facilities as part of new subdivision development and approval.

Natural Environment Impacts

2008 Revision

Critical Areas

- Development in critical area buffers and on geologic hazard areas would affect water quality, critical habitats and public safety. Such development is restricted under the policies of the revised Plan.
- The City adopted new critical areas regulations to implement the Plan policies in December 2006. This includes “best available science”.
- When reviewing development proposals the City will work to achieve a “no net loss” standard for critical areas and habitats.

• **Shoreline Management**

The City is in the final stages of adopting a new Shoreline Master Program (SMP). It is currently under final review by the Department of Ecology.

Background Information Tables and Figures

- Figure 4 Future Land Use and Critical Areas, Sultan UGA
- Figure 5 Rivers and Streams (2004 Plan)
- Figure 6 Aquifer Recharge – 1994 Plan
- Figure 7 Flood Hazards

Mitigation Measures:

- Revised Critical Areas Ordinance has recently been adopted.
- “Best Available Science” policies and methods added to regulations and project reviews.
- Code revisions are being proposed to clarify when and how property owners will be expected to pay fair-share costs for extension for the planned sewer and water systems.
- Surface water management regulations will reduce impacts from developments on surface water quality and quantity.
- State and federal regulations are acknowledged in the Plan for their preeminent roles in guiding development. These include the Clean Water Act, Endangered Species Act, and Clean Air Act; and the Washington State Growth Management Act (GMA), Shoreline Management Act, and Water Pollution Control Act.
- City will work with Snohomish County and other local jurisdictions to coordinate environmental regulations on a countywide basis.

Significant Unavoidable Adverse Impacts:

Both the 2004 Plan and 2008 revision will increase urbanization in the Sultan UGA, thereby increasing potential for erosion and sedimentation, and reducing infiltration which may affect water resources if not properly controlled; and reduction of wildlife habitat.

Comparison of Key Elements of the Adopted Plans

On June 29, 2006 the Central Puget Sound Growth Hearings Board ruled that several actions taken by the City were inconsistent with the requirements of the Washington Growth Management Act (GMA). The Transportation Improvement Plan (TIP) was ruled inconsistent with the Transportation Element of the Comprehensive Plan. Different population forecasts for Year 2025 were used in the Water Systems Plan, the General Sewer Plan and the Comprehensive Plan. The City had indicated that these “functional” sewer and water plans would be revised after comprehensive plan adoption to make them consistent. The Hearings Board ruled that the original sewer and water plans should have been based on the comprehensive plan forecasts *before* they were adopted. The boundaries of the Water Systems Plan are different than the Urban Growth Area (UGA) Boundary. The Sewer Plan is not in conformity with the Land Use Plan.

This section compares key elements of each of the adopting plans for Transportation, Water and Sewer to the Comprehensive Plan and the Capital Facility Plan to ensure consistency among these documents.

Transportation

The Growth Management Act (GMA) requires cities and counties to provide travel forecasts for at least ten years based on the jurisdiction’s adopted future land use plan. In Sultan, this was accomplished through development of a traffic forecasting model that provided future traffic growth forecasts to the year 2025 based on the City’s adopted year 2025 Future Land Use Plan. A description of the traffic forecasting model development and its resulting forecasts is provided in the Transportation Plan. Forecasts were based on two alternative assumptions:

- A 2025 No Action Scenario that assumed no change or improvement to the City’s existing street system. US-2 was assumed to be four lanes with two additional traffic signals installed at Main Street and at Rice Road intersections.
- A 2025 Preferred Arterial Scenario that assumed a series of City arterial street improvements including arterial extensions across the plateau and construction of a connecting Minor Arterial grid system. US-2 was assumed to be four lanes with two additional traffic signals installed at Main Street and Rice Road Intersections. A new right-turn only intersection at 1st Street and US-2 was assumed.

Existing and future (2025) population and land uses were used in the traffic forecast.

At the heart of the transportation planning requirements of the Growth Management Act (GMA) is the requirement of local governments planning under the Act to determine their transportation needs, including local and state transportation system improvements as well as projects and strategies necessary to meet established level of service standards.

The overall goal of the City’s Transportation Element is to promote a balanced, affordable, reliable and efficient transportation system that supports the City’s 2025 Future Land Use Plan. In order to meet the goal, a series of transportation improvements are recommended for arterials, State highways, transit facilities and

City of Sultan Comprehensive Plan

services, non-motorized facilities, and freight transport facilities. Revisions include an extensive re-write of the City's transportation element. A Revised Street Map was developed, design standards for arterials were modified and the City's Level of Service was changed from "B" to LOS "D".

The 2004 Plan anticipated improvements to US 2, but early in 2008 a more specific Route Development Plan has been adopted as the result of work by the US 2 Safety Coalition and other stake holders. The first phase of safety improvement is now underway. Following is a summary of the Transportation Plan recommendations.

Arterial System Improvements

A series of transportation improvements are recommended to develop the arterial street system within the Sultan Planning Area. Four types of system improvements are recommended:

1. Existing street deficiency improvements necessary to address existing deficiencies on both local access and arterial streets,
2. Future arterial system capacity improvements necessary to meet the City's traffic level of service (LOS) standard "D",
3. Future arterial system enhancements necessary to meet City street design standards and to provide enhanced arterial system connectivity to help reduce traffic congestion at key system choke points, and
4. Two transportation projects that look out beyond the year 2025 to present long-term City project concepts to begin dialogue with regional leaders and potential partner agencies.

Utilities

As a result of the Growth Management Hearings Board decision, the water and sewer plans for the City were each compared against the 2004 Comprehensive Plan to determine where inconsistencies occurred. Such inconsistencies were the result of the three plans being developed at different times and based on differing data or assumptions.

For the 2008 revision, the land use plan was confirmed as accommodating a 2025 population of 11,119 and employment of 2000 workers. Population and employment was distributed throughout the community based on a methodology used by Pertee Inc. for the transportation study. The feasibility of this distribution was confirmed through an analysis of available buildable land areas within the 2025 Urban Growth Area for each land use designation on the City's Future Land Use map.

Based on the population and employment distribution, the water and sewer plans were reviewed to confirm when and where utility systems would be required.

- General Sewer Plan

Population Served: The three plans all assume a 2025 population of 11,119. In December 2005, Snohomish County adopted new population targets for the County and the constituent cities. The 2025 target population for the City of Sultan was

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10,840 people; however this target has since been revised to be 11,119 people in 2025. (City of Sultan General Sewer Plan Amendment No. 1, April 20, 2006.)

Area Served: The sewer plan assumed the current UGA boundaries and did not make its own recommendations on UGA boundaries. The population was distributed as part of the transportation plan and is consistent with the new boundaries.

- Water System Plan

Population Served: The three plans all assume a 2025 population of 11,119.

Area Served: The Comprehensive Plan reflects two recent expansions of the UGA on the northern edge of the City near the Water Treatment Plant. The population was distributed as part of the transportation plan and is consistent with the new boundaries. The water plan assumed the then current UGA boundaries and did not make its own recommendations on UGA boundaries.

Major Projects: The 2005 Water System Plan identified 26 improvement projects. The 2008 CFP shows that two of those has been completed (W-1 and W-22), 7 have been deleted (W-4, W-5, W-7, W-10, W-21, W-25 and W-26). Of the remaining projects in the Water System Plan, the 2008 CFP reflects minor inconsistencies in nine of those projects regarding name or length or size of pipe to be upgraded. The 2008 CFP includes revised cost estimates and 14 newly proposed projects.

Piping: The size of the CFP utilities are those assumed in the 2006 Plan and this sizing will suffice for the current UGA boundaries.

As a result of this review, the utility plans are found to be consistent with the Comprehensive Plan revision.

The cost of the public portion of the utility and transportation improvements (private development will pay for some extensions to serve new projects) were then confirmed. These estimates were put in the capital facilities element of the Plan. Cost and revenue estimates for transportation are included in the 6-year Transportation Improvement Program.