

PROJECT MEMO



TO: Kim Mahoney
FROM: Nicole Stickney
Tacoma - (253) 383-2422
DATE: November 7, 2024
PROJECT NO.: 2230242.30
PROJECT NAME: Orting Comprehensive Plan Update
SUBJECT: Proposed Additional Changes to the draft Comprehensive Plan

INTRODUCTION

In this memo we document the small set of additional proposed changes to city's Comprehensive Plan document. These changes are shown in the Comprehensive Plan Update "final draft" document dated November 1, 2024 (typically with gray highlights for easy identification).

The proposed changes are the result of feedback received from agencies, staff, and members of the public per:

- A public hearing held on October 7, 2024 by the Planning Commission
- SEPA environmental review
- Review by the Puget Sound Regional Council (pre-certification)¹
- Comments from City Staff on the Transportation Element (received following preparation of the Planning Commission's packet)
- Comments included in the attached Comment Matrix (note: some edits were made to earlier drafts in response to comments; this was dependent on timing)
- Comments from Commerce.

PROPOSED CHANGES AND EDITS

Table 1: Proposed Changes and Edits to the Introduction, Land Use Element, Housing Element, Capital Facilities & Utilities Element and the Natural Environment Element

Proposed Change	Discussion
On Page I-2 we updated the graphic, adding the following to the description about the goals and policies in the Natural Environmental Element: "and information about environmentally Critical Areas"	Per DNR comments.
On Page I-12 we revised "natural hazard mitigation" to instead say "natural and geologic hazard mitigation."	Per DNR comments.
On page LU-2 we corrected the typo about employment figures (the wrong year was listed) and the 2044 population figure shown in Table LU-1 (the PSRC forecasted value was inadvertently listed); similarly we updated the graphic at LU-1.	PSRC commented "the city should ensure the final plan uses land use assumptions throughout that are substantially consistent with the adopted countywide growth targets. There are currently inconsistencies in the draft, including the employment

¹ State law requires PSRC to certify local comprehensive plans for consistency with VISION 2050, the Regional Transportation Plan, and transportation-related planning requirements. Jurisdictions must have a certified or conditionally-certified plan to be eligible to compete for regional transportation funds.



	growth target in the land use element (page LU-2)." Commerce noted inconsistencies.
At Figure LU-4 we put in a corrected version of the Land Use / Zoning map and listed "Adopted per Ordinance ____" since this is still in draft form.	
On page CFU-9 we corrected the name of the Pierce County Comprehensive Flood Hazard management Plan	Comment from Pierce County Public Works
On page CFU-10 and CFU-14 we updated the number of PSE customers for electrical, gas service. We also added the following description regarding electrical service: <i>"The City of Orting is mainly served from one 115/12kV distribution substation, namely Orting substation. This substation, with circuit ties to several adjacent substations included a well-connected transmission backbone system, is currently serving the city and surrounding population. The electrical system can be expanded as the area load develops. The timing of any future capacity additions is largely dependent on the development growth of the City, as well as any reliability-related improvement work that would be needed."</i> We also added the following description about natural gas service: <i>"supply mains range from 4"-20" to 2"-20". PSE currently operates one 2' high-pressure natural gas main within the City."</i>	Puget Sound Energy comments
On page CFU-12 we edited Table CFU-1 regarding capacity of the electrical system. (No Gray highlights are shown)	Puget Sound Energy comments
On page CFU-13 we corrected the project information about the new 12kV distribution circuit (project was completed)	Puget Sound Energy comments
On page NE-1 we added <i>"This element discusses natural features, environmentally critical areas, geologic hazard areas, critical aquifer recharge areas, fish and wildlife habitat conservation areas, flood hazard, topography and soils, climate, hazard mitigation planning, lahar preparedness, and wildfires."</i>	Staff comment (and relates to DNR comments).
We added an Appendix, "Appendix III: Housing Data and Supplemental Analysis" to assess potential Racially Disparate Impacts and Displacement Risk in Orting. Exclusion is also addressed. No changes were made to proposed new policy language addressing these themes, as these topics were already sufficiently covered.	PSRC commented: "Analysis of racially disparate impacts, exclusion, and displacement should be included in the draft plan or an accompanying housing analysis. Commerce provides guidance on how to approach analysis of racially disparate impacts. PSRC's Community



	Profiles include Racially Disparate Impacts measures that may be helpful.”
On page NE-21 we added language to policy NE 4.1: “including native vegetation and tree canopy.”	PSRC commented: “The plan includes a policy to encourage use of native vegetation. It should also include a policy to protect and restore tree canopy.” This relates to MPP-EN-9 and MPP-EN-13.

The PSRC also commented: “The city should clarify the capacity for housing to meet various income levels. In the draft plan, ADUs are included as providing capacity for housing under 80% AMI. Guidance from Commerce considers ADUs as moderate income (80->120% AMI) for higher-cost communities. All central Puget Sound cities are considered higher-cost communities. The plan must also demonstrate capacity for allocated emergency housing needs.”

We have not made any changes based on this comment. Instead, we supplemented the discussion in *Appendix I: Land Capacity Analysis* to provide a rationale for our approach in using Commerce’s guidance for “moderate-cost communities.”

We also received a comment from PSRC relating to capacity for Emergency Housing. In the forthcoming 20 year planning period Orting needs to be able to accommodate just 14 Emergency Housing beds. We added a footnote (footnote 7) to page H-14 in the Housing element to explicitly list out where these uses are allowed in the city; this information should satisfy this requirement.

Table 2: Proposed Changes and Edits to the Transportation Element

Proposed Change	Discussion
Page T-1: we added that Kansas St SW is also a significant arterial.	Correction from Staff
Page T-2: we added the length of roadways and description of the different road surface types in the City.	This is useful information found in the city’s Pavement Management System document, which we added for useful context.
Page T-3: added the name “Emergency Evacuation Bridge” and added a sentence about mitigation projections to SR 162 due to surrounding development (including at Tehaleh).	Staff Comments
Page T-8: we corrected the text to show that intersection P operates at LOS F (As shown in the figure)	Correction from Staff
Page T-15: we moved the reference to water/ sewer/ stormwater system	Staff comment / correction



improvements to the footnote. Removed "Calistoga Street" project (it is not in the TIP)	
Page T-16: we updated all project descriptions to match what is shown on the STIP. Additionally we added italicized statements such as "Both Orting and WSDOT are awaiting NEPA approval before continuing with the project" For the Whitehawk Blvd. Extension project. We updated details for the Orting Foothills Trail Realignment and Safety project.	Staff comment; we accessed STIP project descriptions from the WSDOT website at https://wsdot.wa.gov/business-wsdot/support-local-programs/delivering-your-project/statewide-transportation-improvement-program-stip
Page T-17: we corrected the completion date for the Emergency Evacuation Bridge System	Staff correction
Page T-22: minor edit about project lists	Staff correction
Page T-23: we added the phrase "... and would require WSDOT assistance on SR 162." For the Harman Way and Kansas Street discussion. We also added " <i>The district is also looking to construct an additional school buildings off of SR 162 across from the Whitehawk Blvd. intersection, which may result in the elementary school being relocated, which would reduce the pick-up/drop off traffic at the high school. This is awaiting the school district bond measure passing.</i> "	Staff comment
Page T-24: we added details about the city's crosswalk safety program and revised the statement about bicycle lanes to only include Calistoga Street W. We added a reference to the City's Main Park Master Plan regarding planned changes to the Foothills Trail.	Staff comments
Goal T.4: added a definition of Complete Streets Infrastructure (footnote) based on OMC 8-10-4	Staff comment.
Table T-7: added additional detail and information based on exiting city documents	PSRC commented "The city must identify projects and programs, including roadway projects, non-motorized projects, and system maintenance, necessary to meet transportation demands. The plan currently includes only roadway projects in the 2044 Improvement Program list. The plan must include a complete project list, including non-motorized and maintenance projects. Information on these requirements is provided in Commerce's Transportation Element Guidebook".



Under the heading “Funding the Transportation Vision” we added text: <i>“In addition, the city’s Pavement Management System (SCJ Alliance, 2024 or as amended) and the ADA Transition Plan (2024 or as amended) are incorporated into this Plan by Reference.”</i>	PSRC commented, “The Growth Management Act (RCW 36.70A.070(6)) requires that local comprehensive plans include a multiyear transportation financing plan for how the jurisdiction will meet the mobility needs identified for the planning period. The plan includes a list of transportation investments and estimated costs. It includes a list of funding sources but should also include estimated probable revenues available to the city and an analysis of the sufficiency of funding resources compared to estimated costs identified. Further guidance on how to address the financial analysis in the plan can be found in the Department of Commerce’s Transportation Element Guidebook, pages 202-212.”
Table T-7: added into sourced from the 2024 Pavement Management System (PMS) Plan by SCJ Alliance, 2024	PSRC commented, “The plan should include at least a conceptual plan for maintenance in the 20-year project list and financing plan. PSRC’s Transportation Element Guidance provides information for developing a project list.”
Modification to Policy T 1.1	City staff edit.
Modification to Policy T 1.30	PSRC commented, “The plan correctly states that SR 162 is a Highway of Regional Significance. It should clearly identify the level of service standard for SR 162 (LOS D). Policy T1.30 states that the standard for SR 162 is LOS E through part of Orting.”
Modification to Policy T 1.8	PSRC commented, “The plan should include a policy to prepare the transportation and other systems for emergencies.”

Table 3: Updates to the Land Capacity Analysis (Appendix I)

Changes	Discussion
We added language to specify that the assumed densities were based on the 2021 Buildable Lands Report (Pierce County); Adjusted Table 3 to note that there is sufficient capacity for accommodating the Emergency Housing targets and added information following Table 5 regarding our classification of Orting as a “moderate cost community.”	Per PSRC and Commerce Comments.

Anticipated future meetings and processing includes:

- **November 18, 2024:** Planning Commission will hold a special meeting to consider rendering a recommendation to the City Council to approve 2024 Comprehensive Plan & implementing code changes
- **November 20, 2024:** City Council will conduct a study session 2024 Comprehensive Plan Update project & implementing code changes and consider the Planning Commission’s recommendation to approve the plan and proposed changes to the Orting Municipal Code (OMC)



- **December 11, 2024:** City Council will hold a public hearing adopt the 2024 Comprehensive Plan Update and proposed changes to the Orting Municipal Code (OMC) at a regular meeting.

After the City Council adopts the Comprehensive Plan update and changes to the Orting Municipal Code by Ordinance, the action is subject to an appeal period. Furthermore, the City will need to transmit the Plan to the Puget Sound Regional Council for Plan Certification and to Commerce per GMA statute.

NS/ns

c: Scott Larson – City of Orting
Wayne Carlson, Anisa Thaci - AHBL

Attachment

City of Orting Comprehensive Plan Update Project
Comments and Responses

#	Date Received	Name	Element or Topic	Version	Comments	Response
*Notes that comments were received were through an anonymous comment form provided on the City's Comprehensive Plan website. The purpose of the anonymous comment form was to encourage those who may otherwise not have wanted to provide a comment to feel comfortable doing so. Due to the responses being anonymous, we are unable to respond to those individual comments, but will instead provide our repsonses for public view on the City's Comprehensive Plan Update website.						
1	4/18/2024	*Anonymous	Transportation	N/A	Additional infrastructure to ease the commute in and out of Orting. Widen the roads or add additional routes if possible	Thank you for your comment. The Transportation Element is in the process of being updated and will identify existing deficiencies and will propose goals and policies for addressing the identified deficiencies.
2	4/18/2024	*Anonymous	Parks and Recreation/ Natural Environment	N/A	I would love to see a larger and improved off leash dog park / off leash dog area. Idaho has a large dog park with grass, plus “beach” area that goes down to the river. Steilacoom dog park is massive and such a great place with restrooms, playgrounds and trails. Hounds Hollow dog park in Bonney Lake has turf, an agility course and wooded trails. As his community continues to grow, I’d love for it to be more dog friendly and for the residence to have access to additional off leash dog park(s)/areas or a massive improvement to what we have and increase its size.	Thank you for your comment. The City recently completed an Updated Parks, Trails, and Open Space Plan in 2022, which provides goals and policies for existing and future parks and recreation needs.
3	4/19/2024	*Anonymous	Parks and Recreation	N/A	Add pickleball courts in the main park or any park in Orting for citizens to use.	Thank you for your comment. The Draft Orting Main Parks Master Plan includes the proposed addition of multiple pickleball courts adjacent to the proposed tennis courts. More information on the Main Parks Master Plan can be found here: https://www.cityoforting.org/government/project-updates/main-parks-master-plan
4	5/30/2023	Casey Twiggs - Tacoma-Pierce County Affordable Housing Consortium	General Update Process / Housing	Initial Draft	I represent the Tacoma-Pierce County Affordable Housing Consortium and I am tracking and mapping where each jurisdiction is in the process to update their Comprehensive Plan for 2024. I am trying to get a hold of someone who can answer a couple of simple questions regarding Orting's update progress. Can you or anyone in the Planning Commission answer these questions or forward me to someone who can? I have not been able to get in touch with the Planning Department. These are my questions: 1) What stage of the update process is Orting in currently? 2) Are there any amendments or proposed amendments related to affordable housing?	Thank you for your comment. Orting is currently in the process of drafting the Comprehensive Plan and conducting additional public engagement to receive feedback on proposed changes. The SEPA public comment period for the Comprehensive Plan Update is anticipated to be September 9-23. A public hearing for the Draft Comprehensive Plan will be held on October 7th. Proposed changes related to affordable housing include those required by the recent updates to the Growth Management Act (GMA) and Pierce County Countywide Planning Policies. Some of the proposed changes include a new policy (H4.1), stating, "Review and streamline development standards and regulations to advance their public benefit, provide flexibility, and minimize costs to housing."
5	3/1/2024	Genevieve Rigler (WSDOT)	General Comment	Initial Draft	WSDOT Olympic Region is proactively reviewing documents for the Comprehensive Plan Periodic Update and meeting with jurisdictions. We would appreciate if you could share when you anticipate releasing your DS/DNS, Transportation Chapter, Land Use Chapter, and Capital Facilities Plan documents for public comment. Knowing ahead of time will ensure that we can allocate adequate time to review your documents. We are finalizing a reference document for jurisdictions to use to understand WSDOT’s role and priorities throughout the update process and we will send this to you once it is finished. Lastly, if you have an email notification system for updates on your comprehensive plan, please add our team email (ORPlanview@wsdot.wa.gov).	Thank you for your comment. The SEPA public comment period for the Comprehensive Plan Update is anticipated to be September 9-23. A public hearing for the Draft Comprehensive Plan will be held on October 7th. Your team email (ORPlanview@wsdot.wa.gov) has been added to our Comprehensive Plan Update list.
6	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	On behalf of Puget Sound Energy (PSE), I am reaching out to convey our thoughts for your consideration as part of the periodic update to the comprehensive plan and development regulations under the Revised Code of Washington (RCW), specifically Chapters 36.70A and 43.21C. The attached spreadsheet contains suggested language as it relates to customer programs and our shared climate goals. In the attached, you will find 7 tabs grouped by category. At PSE, we recognize that climate change is one of the biggest existential threats facing our planet today. As one of the largest producers of renewable energy in the Pacific Northwest, PSE has been an early leader in addressing climate change and investing billions in renewable resources and energy efficiency for homes and businesses. Now, PSE is on the path to meet the current and future needs of its customers and to deliver on the requirements to decarbonize operations and serve its customers and communities equitably. This transition is unprecedented in terms of the magnitude of the change and the accelerated time frame in which it must be achieved. By working together, we can successfully drive towards our shared clean energy goals. PSE looks forward to providing input as the comprehensive plan items are discussed in more detail. Together, we can reduce emissions and keep energy safe, reliable, and affordable.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.

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7	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Energy Equity: <i>"Partner with PSE to promote financial assistance and discounted billing programs for income qualified residents in order to ensure that the most vulnerable are not disproportionately impacted by the State's clean energy transition."</i> PSE's financial assistance and discounted billing programs include the following: PSE's Bill Discount Rate (BDR): Our BDR program provides income qualified customers with ongoing help on their monthly energy bill. Depending on household income and size, customers can save 5% to 45% a month on your bill. PSE Home Energy Lifeline Program (HELP): PSE provides qualified customers with bill-payment assistance beyond the Washington state LIHEAP program. Customers do not need to owe a balance on their PSE bill to apply. LIHEAP Program: This government program provides financial assistance so eligible households can maintain affordable, dependable utility services and avoid disconnection. PSE can assist with eligibility requirements and applications. The Salvation Army Warm Home Fund: Administered by the SA and funded by voluntary contributions from PSE customers, employees, and investors. The Warm Home Fund provides short-term, emergency bill payment assistance to PSE customers facing financial difficulties. Payment Arrangements: PSE will work with customers to produce a manageable payment schedule with a realistic timeline for up to 18 months. Budget Payment Plan: PSE provides customers with a predictable average monthly payment to reduce bill fluctuation and avoid unplanned high bills during winter heating months. Home Weatherization Assistance: This program provides free upgrades for single-family homes, manufactured homes or eligible apartment buildings. Upgrades can include insulation, duct sealing and much more. Energy Efficiency Boost Rebates: PSE offers higher rebates on energy-efficient upgrades to income-qualified customers. Low-Income Eligible Community Solar: This no cost program enables bill savings of up to \$40 per month for income eligible customers.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
8	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Electric Vehicles: <i>"Support EV charging infrastructure throughout the community in order to support the decarbonization of our transportation sector."</i> PSE's Up & Go EV Charging programs include the following: PSE Up & Go Electric for Public: PSE helps organizations easily and affordably install public charging for all EV drivers. PSE Up & Go Electric for Fleet: PSE empowers businesses, municipalities and more with electrifying their fleets. PSE Up & Go Electric for Multifamily: PSE brings pole charging to multifamily properties to attract new residents and keep existing ones. PSE Up & Go Electric for Workplace: PSE brings charging to workplaces so employees can electrify their commutes. PSE Home Charging: PSE provides rebates and incentives for the installation of home EV charging stations.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
9	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Energy Efficiency: <i>"Partner with PSE to promote energy efficiency programs and initiatives" and "Expedite permitting processes related to energy efficiency upgrades."</i> PSE's Energy Efficiency Charging programs include the following: Home Energy Assessment: PSE offers a quick and convenient 3-step process to help customers understand and control their home's energy usage.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.

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					Energy Efficiency Rebates: • Appliance program • Electric hybrid heat pump water heaters • Smart thermostats program • Weatherization program • Windows, water heat and space heat programs • Home weatherization assistance • Insulation Other PSE Energy Rebates: • EV chargers • New construction Clean Buildings Accelerator: PSE assists customers with complying with Washington’s Clean Buildings Law (HB 1257, 2019).	
10	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Green Options: "<i>Partner with PSE to promote local investments and customer enrollment in clean energy projects and programs in order to achieve clean energy goals.</i>" PSE's programs related to Green Options include the following: Green Power: PSE customers can voluntarily contribute to PSE investments in renewable energy projects in the Pacific Northwest. Solar Choice: PSE customers can voluntarily purchase solar energy from independent sources through PSE. Carbon Balance: PSE customers can voluntarily purchase carbon offsets from local forestry projects through PSE. Community Solar: PSE customers can voluntarily contribute to solar projects of their choice installed on such facilities as local school and community centers. Renewable Natural Gas: PSE customers can voluntarily purchase blocks of RNG to lower than carbon usage and support the development of locally produced RNG. Green Direct: This program is offered to local municipalities and corporations seeking to reduce their carbon footprint by investing in large scale renewable energy projects. This program is currently full.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
11	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Demand Response - Energy Management: "<i>Partner with PSE to promote and support programs designed to decrease load on the grid during times of peak use.</i>" PSE's programs related to Demand Response - Energy Management include the following: Time of Use (TOU) Program: PSE's current pilot program uses variable 24 hour pricing to incentivize customers to use less power during times of peak demand. Flex Rewards: This program encourages and financially incentivizes voluntary reduction in energy use during peak demand. Flex Smart: This program financially rewards customers for allowing PSE to make remote minor adjustments to thermostats during periods of high peak load and demand. Flex EV: This program incentivizes EV charging during off-peak hours.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
12	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Grid Modernization & Infrastructure: "<i>Partner with PSE to effectively meet rapidly increasing electrical demand as the City and region work to achieve a Clean Energy Transition by adopting codes that support siting existing and new technologies.</i>" PSE's New Carbon Free Electrical Generation & Energy Storage Systems include the following: Wind and Hybrid Wind (co-located wind and battery): A variable source of power representing approximately 30% of PSE's future electric resource need by 2030.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.

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					Solar and Hybrid Solar (co-located solar and battery): A variable source of power representing approximately 16% of PSE's future electric resource need by 2030. Utility-Scale Battery Energy Storage Systems (BESS): A technology that will allow energy to be stored for future use representing about 22% of PSE's future electric resource need by 2030. Types of energy storage technology include: • Chemical (e.g., Lithium-Ion Iron-Air) • Thermal (e.g., carbon, molten salt) • Gravity (e.g., water pumping, mechanical) Variable generation sources (wind & solar) require large scale Battery Energy Storage Systems (BESS) to be fully utilized since the sun goes down when demand increases and wind often fades when most needed; such as during extremely cold weather. Batteries maximize electrical production from variable generation sources, help meet periods of peak demand, and provide greater reliability for the grid.		
13	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Grid Modernization & Infrastructure: "<i>Expedite the local permitting and approval process in order to maintain grid capacity and reliability.</i>" PSE's New and Upgraded Transmission Lines, Substations, and Distribution Lines include the following: New regional transmission lines are needed to serve new utility scale clean energy resources, such as wind and solar. New local transmission lines are needed to meet increasing local demand due to growth, EV's, and electrification of the heating sector (e.g., Sammamish to Juanita line in Kirkland). Transmission upgrades are needed to meet increasing local demand (e.g., Energize Eastside line in Redmond, Bellevue, Newcastle, and Renton upgraded from 115kv to 230kv) due to growth, EVs, and electrification of the heating sector. In order to assure continued capacity and reliability, new and larger substations will be needed to meet growing energy needs due to growth, EVs and electrification of the heating sector. electrification of the heating sector. PSE proposes the following language related to Grid Modernization & Infrastructure: "Promote and support the growth of customer owned distributed energy resources." Behind the Meter - Distributed Energy Resources (DER) Customer Connected Solar: PSE assists customers with information and resources for installing residential solar projects and how to apply for interconnection and net metering with PSE. Battery Walls: PSE offers installation guidelines and a process whereby customers can report battery installations. Host An Energy Project: Community partners can get paid to lease space to PSE to develop distributed solar and/or battery storage projects. Distributed Renewables: PSE supports the development of commercial customer-owned renewable energy projects that generate between 100 kilowatts and 5 megawatts to interconnect to the PSE electrical distribution grid.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.	
16	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Grid Modernization & Infrastructure: "<i>Support ongoing vegetation management in order to maintain system reliability.</i>" PSE's Vegetation Management strategies include: Many cities are pursuing aggressive urban forestry programs in order to beautify their community, reduce heat islands, and to provide carbon offsets. Such policies should be balanced with the need to protect electrical system reliability around overhead lines.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.	

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17	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Grid Modernization & Infrastructure: "Pursue public-private partnership to seek funding sources to accelerate clean energy projects. " PSE's Public Funding strategies include: Recent state and federal legislation, including the IIJA and IRA, have unlocked public funding for climate and environmental benefit. PSE is aggressively pursuing all applicable funding opportunities to support lower customer bills, reduced power costs, and investments in the grid and clean energy. PSE is also supporting municipalities, tribes, and non-profits in their applications for public funding.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
18	4/23/2024	David Parker Brown (PSE)	Future Climate Element		PSE proposes the following language related to Wildfire Preparedness: "Support PSE’s wildfire mitigation efforts including electric system upgrades, year-round vegetation management, and fire weather operational procedures. Work closely with utilities and local fire departments to lessen the risk and impact of wildfires. " PSE's Wildlife Mitigation strategies include the following: Situational Awareness: PSE evaluates the condition of the electric system, as well as the environment around it, using real-time weather data, wildfire risk modeling and pre-wildfire season inspections. Strengthening the electric system: PSE regularly maintains and updates the electric system to provide safe and reliable power to our customers. In areas of high wildfire risk, we identify maintenance and improvement activities that will further reduce the risk of wildfire, including vegetation management, equipment upgrades, and in some cases, moving power lines underground. Operational Procedures: During wildfire season, PSE may change some device settings or implement operational procedures to reduce the risk of wildfire. In the future, PSE may proactively turn off power during high wildfire risk conditions to help prevent wildfires. This is called a Public Safety Power Shutoff (PSPS) . Emergency Response: During an emergency, including an active wildfire, PSE will coordinate with local emergency officials and may implement emergency response procedures. This may include turning off power at the request of emergency officials for public and first responder safety.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
19	4/23/2024	David Parker Brown (PSE)	Future Climate Element	N/A	PSE proposes the following language related to Gas Conservation & Decarbonization: "Evaluate the potential for renewable, recoverable natural gas in existing systems. " PSE's Renewable Natural Gas Production strategies include the following: Utilizing wastewater facility, landfill, or similar system.	Thank you for your comment. This comment may be further addressed in a future Climate Element (required by 2029), which is outside the scope of this update. The 2024 Comprehensive Plan Update will not include a Climate Element but will have goals and policies incorporated throughout the Plan in other elements.
20	8/9/2024	*Anonymous	Transportation	N/A	Orting needs more public transportation. Note: This comment is not a direct quote. This is a summary of general discussions had with attendees/general comments received at the 8/9/2024 Comprehensive Plan Open House.	Thank you for your comment. The Comprehensive Plan Update includes updates to the Transportation Element including the following related to encouraging multiple forms of transportation options: <i>"Goal T 8: Ensure preparedness and flexibility in the transportation network for changes in transportation technologies and mobility patterns."</i> <i>"Policy T 1.8: Maintain and improve the network of highways, streets, and roads that moves people, goods, and services safely and efficiently; minimizes social and environmental impacts; and supports various modes of travel."</i> The existing Transportation Element includes the following goal, proposed to remain: <i>"Goal T1: Maintain a transportation system that accommodates the separation of through and local traffic, provides adequate internal circulation, and interconnects effectively to the regional highway, non-motorized, and public transportation systems is responsive to the mobility needs of City businesses and neighborhoods, and guides future developments."</i>

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21	8/9/2024	*Anonymous	General Comment	N/A	No more growth within the City. Note: This comment is not a direct quote. This is a summary of general discussions had with attendees/general comments received at the 8/9/2024 Comprehensive Plan Open House.	Thank you for your comment. Per the Puget Sound Regional Council (PSRC) projections, the population of Orting is anticipated to increase, with an estimated population of 9,550 persons by 2044. Due to the growth targets for cities across Washington state (including Orting), the City must properly plan for projected growth. The Comprehensive Plan Update provides goals and policies for sustainable growth that align with the City's character and vision, including (but not limited to): <i>"Goal LU 1: Be true to the vision for Orting by encouraging the expansion of its economic base while retaining elements of its agricultural heritage"</i> <i>"Policy LU 1.9: Review proposed commercial and public developments (including new construction or major renovation and alteration) according to the Architectural Design Review process to ensure consistency with the adopted Orting theme of "Turn of the Century Western and Victorian," a style of building, architecture, and exterior lighting used in Orting and the area from statehood in 1889 through World War I. Evaluation of a project will be based on the quality of its design and its relationship to the natural setting of the valley and mountain settings."</i>
22	8/9/2024	*Anonymous	General Comment	N/A	Growth is inevitable and is something that people need to adapt to. Note: This comment is not a direct quote. This is a summary of general discussions had with attendees/general comments received at the 8/9/2024 Comprehensive Plan Open House.	Thank you for your comment.
23	8/9/2024	*Anonymous	General Comment	N/A	No more growth within the City. Note: This comment is not a direct quote. This is a summary of general discussions had with attendees/general comments received at the 8/9/2024 Comprehensive Plan Open House.	Thank you for your comment. Per the Puget Sound Regional Council (PSRC) projections, the population of Orting is anticipated to increase, with an estimated population of 9,550 persons by 2044. Due to the growth targets for cities across Washington state (including Orting), the City must properly plan for projected growth. The Comprehensive Plan Update provides goals and policies for sustainable growth that align with the City's character and vision, including (but not limited to): <i>"Goal LU 1: Be true to the vision for Orting by encouraging the expansion of its economic base while retaining elements of its agricultural heritage"</i> <i>"Policy LU 1.9: Review proposed commercial and public developments (including new construction or major renovation and alteration) according to the Architectural Design Review process to ensure consistency with the adopted Orting theme of "Turn of the Century Western and Victorian," a style of building, architecture, and exterior lighting used in Orting and the area from statehood in 1889 through World War I. Evaluation of a project will be based on the quality of its design and its relationship to the natural setting of the valley and mountain settings."</i>
24	8/9/2024	*Anonymous	Parks and Recreation/ Natural Environment	N/A	Desire for more nature/recreational opportunities within the City Note: This comment is not a direct quote. This is a summary of general discussions had with attendees/general comments received at the 8/9/2024 Comprehensive Plan Open House.	Thank you for your comment. The City recently completed an Updated Parks, Trails, and Open Space Plan in 2022. Additionally, a Natural Environment Element was added to the Comprehensive Plan, which focuses on protection of existing critical areas within the City. Additionally, the City is in the process of developing the Main Parks Master Plan, which proposes additional amenities including pickle ball courts, a splash pad, playgrounds, relocating foothill trails, and additional amenities. More information on the Main Parks Master Plan can be found here: https://www.cityoforting.org/government/project-updates/main-parks-master-plan
25	8/10/2024	*Anonymous	Maintenance/ Parks and Recreation	N/A	I noticed a new restroom that is being built on the Orting Trail. However, my concern is safety and why the existing bathroom at the park is updated, or at least thoroughly cleaned, and repaired with soap and toilet paper stocked. I'm there almost everyday and the bathroom is disgusting and whomever cleans it is doing a terrible job.	Thank you for your comment. The comment has been noted and sent to the Public Works Department.
26	9/17/2024	*Anonymous	Transportation	Draft for SEPA Environmental Review and Public Comment	Why are we taxed for public transportation when we have no public transportation? Why do we allow so much housing being built without addressing infrastructure particularly 162, I've lived here 22+ years and it has gotten worse and there's been nothing done with the main road in and out. Explain to me why that hasn't been taken care of before we let more people build. Also. Why don't we do like some counties and cities in the Northeast they do not allow anything over 12 feet to be on the roads during rush hour i.e. logging trucks gravel trucks tractor trailers. Why don't we implement something like that.	Thank you for your comment. The Puget Sound Regional Council (PSRC) has developed a regional growth strategy, which has allocated growth targets among various jurisdictions. As for taxing, the local comprehensive plan does not address public transportation taxes.

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27	9/18/2024	*Anonymous	Land Use/ Natural Environment	Draft for SEPA Environment al Review and Public Comment	I am concerned to preserve the farmland around Orting. Since farmland is practically irreplaceable, I think the development of the city should seriously consider the impact of development on the surrounding farms. If we could facilitate economic growth through farm related services and agritourism as well as other businesses, we might have the most sustainable plan. Also we should discourage housing options that tend towards the development of slums, such as the use of tiny houses.	The Economic Development Element of the Comprehensive Plan includes a goal (Goal ED 6) that states <i>"Promote regional tourism focused on eco-tourism and agritourism."</i> Additionally, the Land Use Element of the Comprehensive Plan provides goals and policies for sustainable growth that align with the City's character and vision, such as: <i>"Goal LU 1: Be true to the vision for Orting by encouraging the expansion of its economic base while retaining elements of its agricultural heritage"</i> There is one small community of tiny homes that has been developed in Orting for homeless veterans. No changes are being proposed at this time for tiny homes, but tiny homes can serve multiple purposes and are not exclusively used to address homelessness.
28	9/25/2024	*Anonymous	Transportation / Housing	Draft for SEPA Environment al Review and Public Comment	As highlighted in the survey results, it's clear why so many people love living in Orting: the small-town charm, strong sense of community, and close-knit relationships are what make this place special. However, the very things that draw people to Orting are being jeopardized by unchecked growth and increasing traffic concerns. These issues are also the main reasons many feel compelled to leave. It's essential that we pause the continuation of allowing large organizations to build multi-unit complexes and townhomes that don't serve the long-term interests of our community. Instead, we should promote homebuilding that supports our current and future residents, fostering growth that aligns with Orting's values and unique character. Take, for example, the commute from Orting to Sumner—what should be a 9-mile drive can often take up to an hour due to traffic congestion. This alone highlights the strain our infrastructure is under. The number one priority for our community should be improving our roads and addressing traffic issues. If we don't focus on fixing these problems, the very reasons people love Orting will be eroded by unsustainable growth and lack of infrastructure development. Orting cannot solve the world's problems, but we do have the responsibility to solve our own. With the current rate of growth and lack of proper infrastructure, such as adequate roads, we need to prioritize what Orting needs, not what politicians in Olympia dictate. This is about protecting the future of our town and ensuring it remains a place that reflects the values and desires of its residents, not outside interests. Let's focus on thoughtful growth that preserves Orting's character and addresses the real needs of our community.	Thank you for your comment. Please see responses above regarding growth targets. In order to prepare for this anticipated growth, new 2023 Washington State legislation require cities to provide for missing middle housing and includes new regulations for Accessory Dwelling Units (ADU's) and allowing for higher densities.
29	9/30/2024	Elizabeth Weldin (Pierce County - Planning and Public Works)	Natural Environment	Draft for SEPA Environment al Review and Public Comment	We would like to become a Party of Record for the 2024 Comprehensive Plan Periodic Update. Pierce County appreciates the opportunity to review and comment on Orting's 2024 Comprehensive Plan update. Pierce County recommends that the City of Orting review and reference the Pierce County's 2023 Comprehensive Flood Hazard Management Plan (CFHMP). We look forward to continued coordination with City staff to address flood-related concerns of the Carbon and Puyallup Rivers surrounding the City. On page 9 of Packet 3, the highlighted new section describes Pierce County's planning efforts. The Pierce County flood plan should be titled "Pierce County Comprehensive Flood Hazard Management Plan". The paragraph also lists several proposed projects on the Carbon and Puyallup Rivers near the City of Orting. Pierce County has identified projects for the Puyallup and Carbon Rivers to improve the resilience of the flood risk reduction infrastructure. These projects are in the preliminary planning stages and still require multiple elements and funding before they are ready for implementation, and their benefit can be realized. Please refer to the CFHMP for more information about the County's Carbon and Puyallup River projects. The County recommends coordination between the proposed County and City projects for concurrency in the design and construction. Figure NE-3 on page 48 of Packet 3 does not show the best available data of the potential risk. Please refer to "PC_NHC Verified DFF Floodway" layer on Pierce County's PublicGIS - snapshot below. Based on the County's CFHMP and County staff observations, Figure NE-3 appears to understate the potential hazard and does not include all the available data. We encourage the City of Orting to explore zoning solutions that accommodate the Growth Management Act and regional population growth and housing requirements and avoid the mapped flood hazard and areas of flood risk.	Kim sent a response via email on 10/1: "Confirming receipt, and responding to some of your email's content. We can certainly make an edit in our Natural Environment Element that refers to the County's 2023 Comprehensive Floor Hazard Management Plan as a source of local flood information – we can also edit the reference on page 9 of the third packet to refer to the County's plan as the "Pierce County Comprehensive Flood Hazard Management Plan" and will propose substituting Figure NE-3 with the more updated layer you've provided to our Planning Commission. Given your note about our agencies' continued coordination on flood-related concerns, I've cc'd JC Hungerford and Ryan McBee to this email so they're apprised of this communication. Particular to your note regarding our zoning solution considerations to accommodate growth projections, we have completed a Land Capacity Analysis as a component of our Comprehensive Plan Update and have found sufficient capacity for our assigned growth targets, much of which would occur outside the flood hazard areas. The LCA is appended to our draft Comprehensive Plan if you wish to review it, and it's also been sent to PSRC and Commerce for their review. Finally, I'd like to accept your offer to transmit a copy of the Corps' Draft Feasibility Evaluation study from June 2024 to me; Ryan McBee and JC Hungerford could be included in that email, too. We will regard the County as a party of record to this project and will provide your comments to our Planning Commission and City Council to consider as they continue moving through the adoption process of our Comprehensive Plan."

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In June, the U.S. Army Corps of Engineers delivered the Final Draft Jones Levee Feasibility Study to Pierce County. The study looked at four alternatives, with the preferred option being a setback levee. The modeling identified possible flooding impacts on the river’s left bank -- the opposite side of the Puyallup River from the Jones Setback Levee. The possible impacts resulted in the estimated project cost of \$45 million or more. Pierce County is reassessing its strategy to address the funding gap and how to deliver the Jones Setback Levee project successfully. Unfortunately, the study is not publicly available at this time. The County would be glad to provide the Draft Feasibility Evaluation study (dated June 2024), upon the City’s specific request.

Finally, here are some recent sediment studies of the Puyallup River Basin that may provide some information and insight for future infrastructure planning:

- Channel Change and Sediment Transport in the Puyallup River Watershed | U.S. Geological Survey (usgs.gov)
- Mount Rainier Fluvial Geomorphology and River Sedimentation | U.S. Geological Survey (usgs.gov)

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10/24/2024

Tricia R. Sears-
Washington
Geological Survey
(WGS)
Washington DNR

Natural
Environment

For this proposal submitted via Planview, I looked at the proposal and focused on areas related to WGS work. Of note, but not limited to, I look for language around the geologically hazardous areas, mineral resource lands, mining, climate change, and natural hazards mitigation plans.

Specifically in this proposal, I reviewed the three documents 20240916 Packet CPU 1, 2, and 3.

CPU Packet 1, on page 1-2, suggest adding a reference to critical areas in the Natural Environment category of the diagram of Elements.

On page 1-12, the Natural Environment Element has new language proposed and old language with strikethrough. Why is that language being struck?

Critical areas are mentioned multiple times in this packet, but geologic hazards are not mentioned. Perhaps add a statement that notes additional information is found in the Natural Environment Element.

CPU Packet 2, has no mention of critical areas or geologic hazards.

CPU Packet 3, contains the Natural Environment Element. There are two paragraphs to describe the geologic hazard areas. There is no map. Suggest adding a map.

Climate and Climate Change is a section on page NE-9 and Hazard Mitigation Planning is a section on page NE -11. There are multiple climate change and hazard related sections included. Nice job on including hazards, hazard mitigation planning, and climate resilience in your comp plan .Suggest putting a description early in the Natural Environment Element that clearly states/summarizes all the hazards identified in the hazard mitigation plan and critical areas identified for Orting. Then notes they will be described in subsequent paragraphs. It could be helpful for the reader.

Recognizing the limitations of the current proposals, I want to mention that it would be great for you to consider these in current or future work, be it in your comprehensive plan, development code, and SMP updates, and in your work in general:

- Consider adding a reference to WAC 365-190-120 geologically hazardous areas for definitions in other areas besides the CAO. In addition, consider adding a reference to WAC 365-196-480 for natural resource lands.
- Consider adding a reference to the WGS Geologic Information Portal in other areas besides the CAO. If you have not checked our interactive database, the WGS Geologic Information Portal, lately, you may wish to do so. Geologic Information Portal | WA - DNR
- If you have not checked out our Geologic Planning page, you may wish to do so. Geologic Planning | WA - DNR

Kim replied to Tricia on October 23, 2024. Response is summarized below:

Thank you for your comment. Previous to this Comprehensive Plan update, Orting’s Comprehensive Plan did not have a Natural Environment element; that element is an entirely new piece of work this year. The struck through language was previously associated with the discussion under the Land Use element. In place of that language, the Land Use element was discussed more succinctly and language was added as appropriate to describe the Natural Environment element. These comments will also be considered during our Critical Areas Ordinance update process that will be taking place next year. Additionally, no mentions of critical areas or geologic hazards are included in CPU Packet 2, as the packet only included the Land Use and Housing Elements. The discussion of critical areas and geologic hazards has been limited to the Natural Environment element.

We will make the following changes in the Natural Environment Element:

- Incorporate critical areas into the diagram.
- Expand the discussion on I-12 to include mention of geologic hazards.
- Add a statment in the introduction that summarizes all the hazards identified in the hazard mitigation plan and critical areas identified for Orting