

PSRC PLAN REVIEW REPORT & CERTIFICATION RECOMMENDATION

CITY OF KENT COMPREHENSIVE PLAN

December 31, 2015



BACKGROUND

The Washington State Growth Management Act calls for coordination between local, regional, and state planning efforts. To advance this coordination, state law requires PSRC to certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies in VISION 2040 have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local comprehensive plans is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process ([Adopted Policy and Plan Review Process](#), Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans.¹ This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a [Plan Review Manual](#), provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with [VISION 2040](#), [Transportation 2040](#), and [Growth Management Act](#) requirements.

DISCUSSION

This report summarizes the findings and recommendations regarding the periodic update to the comprehensive plan for the City of Kent, adopted by the city on September 1, 2015. PSRC last certified the City of Kent's comprehensive plan in July 2012. PSRC staff reviewed the updated 2015 comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Kent comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council certifies that the transportation-related provisions in the City of Kent 2015 comprehensive plan update conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

The remainder of this report contains a summary of the PSRC review of the City of Kent comprehensive plan update. Under each heading, the scope of the certification review, as guided by the [Plan Review Manual](#) and Local Comprehensive Plan Checklist, is listed in high level bullets. Discussion in each topic area highlights

¹ The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC's Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council's Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.

exemplary provisions of the plan, as well as issues identified through the certification review where future work on the part of the city is needed to more fully address VISION 2040, Transportation 2040, and Growth Management Act planning requirements.

Part I: Conformity with Growth Management Act Transportation Planning Requirements

SCOPE OF REVIEW

The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

Land use assumptions and forecasts of travel demand that are internally consistent and consistent with growth targets.

Service and facility needs, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.

Financing and investments, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.

Intergovernmental coordination with neighboring cities, counties, and regional and state agencies.

Demand management, including programs to implement the Commute Trip Reduction Act.

Pedestrian and bicycle planning, including project funding and capital investments, education, and safety.

Land uses adjacent to airports, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The City of Kent's comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- ☑ Provisions to support multimodal transportation options and design for healthy communities, including an inventory of existing facilities and planned networks, multimodal investments identified in the city's comprehensive project list, and goals and policies that support a safe and functional nonmotorized network (for example, see T-4.1 – 4.3).
- ☑ Policies to support transportation demand management by allowing parking requirement reductions for businesses that have an approved commute trip reduction program, by working with major institutions and employers to promote alternatives to single occupant vehicles, and by encouraging transportation demand management strategies among employers who are not required to comply with commute trip reduction. (Policies T-6.1, T-6.2)
- ☑ Provisions that support intergovernmental coordination, such as Policy T-1.9, which calls for coordinating with King County and neighboring jurisdictions to implement concurrency strategies and mitigate shared traffic impacts through improvements or transportation demand management strategies.

DISCUSSION: AREAS FOR FURTHER WORK

The city should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- The city establishes a level of service for Pacific Highway (SR 509) at “F.” Because Pacific Highway is a highway of statewide significance, the city should reflect the level of service established by WSDOT as a level of service of “D” for this facility per RCW 36.70A.070(6)(a)(iii)(C).
- The Growth Management Act requires that local comprehensive plans include a multiyear transportation financing plan (see RCW 36.70A.070(6)) for how the jurisdiction will meet the mobility needs identified for the planning period. The city has identified system needs and cost estimates over the life of the plan, and the city intends to update its Transportation Master Plan with more detail about transportation planning. While the comprehensive plan includes a list of projects and estimates for the planning period, the city should provide additional detail in the transportation element, including:
 1. Provide a more detailed forecast of probable funding resources for transportation through the 2035 plan horizon.
 2. Provide an analysis of the sufficiency of funding resources compared to estimated costs of identified improvements, including maintenance.
 3. Revise and expand on the current reassessment strategy to address steps the city could take to close the gap between costs and revenues, as needed.

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.

Part II: Consistency with Regional Plans and Policies

OVERVIEW

This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the multicounty planning policies, VISION 2040 contains a regional growth strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

VISION 2040 Context Statement

VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The city effectively describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040.

Environment

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

Stewardship, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.

Earth and habitat, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.

Water quality, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.

Air quality and climate change, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The Kent comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- ☑ Policies for the city to be a model for environmentally friendly practices by promoting LEED certified construction and use of recycled or recyclable materials in public utility provision, public facilities, and capital improvements, as well as by developing and implementing an operations and maintenance program to prevent or reduce pollutant runoff from municipal operations (Policy U-9.3, U-11.4).
- ☑ Goals and policies that promote conservation of open space by defining a system of open space and greenway corridors, inventorying local and county designated Urban Separators, and by identifying and protecting significant recreational lands before they are lost to development (Policy P&OS-6.1, Policy LU 20.5, Goal P&OS-7).
- ☑ Provisions that support intergovernmental coordination on environmental issues by working with King County to produce critical area maps of the Potential Annexation Area, by coordinating wetland protection and enhancement plans with adjacent jurisdictions and the Muckleshoot Indian Tribe across jurisdictional boundaries, and by working cooperatively with tribal, federal, state and local jurisdictions to conserve and work towards recovery of threatened and endangered species (Policy LU-16.2, Policy LU-16.8, Policy U-9.2).

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the environment.

Development Patterns – Including Regional Growth Strategy

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:

Urban areas, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.

Centers, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.

Unincorporated urban areas, including policies that advance annexation and orderly transition of governance.

Resource lands, including identification of steps to limit development.

Regional design, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.

Health and active living, addressing healthy environment, physical activity and well-being, and safety.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The city's comprehensive plan effectively addresses many of the development patterns policies in VISION 2040. Highlights include:

- ☑ The plan is based on adopted residential and employment targets that align with VISION 2040, accommodating growth through strategies such as ensuring residential development achieves a substantial portion of the allowable maximum density and promoting infill development through regulatory and investment incentives (Policies LU-7.1, LU-9.1 and 9.2).

- ☑ Policies promoting downtown revitalization by encouraging medium- and high-density residential development that support high-capacity transit and by monitoring trends to maintain vitality in centers. The plan also prioritizes capital facility projects and services to support growth in centers (Policies LU-3.2, LU-3.5, LU-3.6, Goal LU-4).
- ☑ Policies supporting the Transportation 2040 Physical Design Guidelines through managing parking, incorporating transit supportive and pedestrian-oriented design features, and supporting health and well-being. For example, Policy LU-5.1 focuses on adopting and maintaining policies, codes, and land use patterns that promote walking, biking, public transportation, and social interaction to increase public health and sense of place.

DISCUSSION: AREAS FOR FURTHER WORK

The city should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- ☐ Both downtown Kent and the Kent manufacturing/industrial center have important roles to play in accommodating future growth in the region. The city has developed a Downtown Action Plan and has included Policy LU-12.4 to create a comprehensive subarea plan for the Kent manufacturing/industrial center. The city should ensure that it addresses several centers planning expectations, including:
 - As called for in VISION 2040 (DP-Action-18), the city should adopt mode split goals for the regional centers. PSRC recently produced [additional guidance](#) about setting mode split goals that the city may find helpful in this work.
 - Policy LU-12.4, which addresses the subarea planning needs for the regional manufacturing/industrial center, should be implemented in the near term. VISION 2040 includes an action for jurisdictions with regional centers to develop subarea plans (DP-Action-17), and PSRC will be certifying center plans for consistency with regional policies and procedures. The subarea planning proposed will help the city both achieve its vision for the area as well as address regional center expectations in the [center plan checklist](#).

Housing

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

Increased housing production opportunities, including diverse types and styles for all income levels and demographic groups.

Affordable housing needs, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.

Regional housing objectives in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The city's comprehensive plan effectively addresses the housing provisions contained in VISION 2040. Highlights include:

- ☑ Multiple policies that promote preservation of existing housing, including Policy H-1.5 to pursue comprehensive neighborhood preservation strategies for portions of the community that need reinvestment.
- ☑ Policy LU-7.4 and Goal LU-8 allow a diversity of single-family housing forms and strategies in all residential districts and encourage more flexible and innovative building design, street standards and site design for single-family and multifamily development.

- ☑ Policies to address the spectrum of housing affordability needs by providing rental and homeownership assistance, by utilizing density bonuses, fee reductions, or other regulatory incentives for affordable housing, and by exploring collaborations with other South King County jurisdictions to assess housing needs, coordinate funding, increase capacity, and find cost efficiencies. (Policies H-3.2, H-4.3, and H-4.5)

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on housing.

Economy

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

Include an **economic development element** that addresses: business, people, and places.

Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.

Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.

Adequate housing growth in centers through collaboration with the private sector and provision of infrastructure.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The city's comprehensive plan effectively addresses many of the economic provisions of VISION 2040.

Highlights include:

- ☑ An economic development element with goals and implementation strategies, including focusing on city image and branding, place-making, business climate, industrial cluster growth and retention, and workforce development.
- ☑ Provisions to foster inclusiveness, showcase community diversity, and promote access to jobs and services, especially for lower-income individuals, when planning local and regional transportation systems and economic development activities (Policy HS-2.32, Goal E-4).

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on economic development.

Transportation

SCOPE OF REVIEW

VISION 2040 and Transportation 2040 call for local comprehensive plans to address the following transportation policy topics:

Maintenance, management, and safety, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.

Support for the regional growth strategy, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.

Improved transportation options and mobility, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.

Linking land use and transportation, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The Kent comprehensive plan addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- ☑ Goals and policies support transit use through coordination with transit agencies, implementing Kent’s Transit System Plan, fostering transit-oriented development opportunities, providing transit stop amenities, and other actions to create a transit-supportive environment (Policies T-5.1 – 5.5).
- ☑ Level-of-service standards for vehicle, transit, pedestrian, and bicycle travel, as well as a policy to consider incorporating multiple modes into the city’s concurrency program during the next update of the Transportation Master Plan (T-1.10). The plan also includes tailoring transportation levels-of-service to facilitate medium- to high-density development in the regional growth center and designated Activity Centers.
- ☑ Policy T-2.3 to prepare for, respond to, mitigate and recover from disasters as provided for in the City of Kent Comprehensive Emergency Management Plan.

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on transportation (see comments addressing Growth Management Act transportation planning requirements on page 3 of this report).

Public Services

SCOPE OF REVIEW

VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

Promote more efficient use of existing services, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.

Promote renewable energy and alternative energy sources.

Plan for long-term water needs, including conservation, reclamation and reuse.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The Kent comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- ☑ Policies promoting water conservation through use of native and drought-resistant plants, documenting water use on customer bills to encourage conservation, implementing a water structure that promotes efficient use of water, promoting rainwater collection, and plan monitoring (Policies U-6.1, U-6.4, U-6.5, U-6.6, U-12.3)
- ☑ Policies U-15.1 and 15.2 call for waste diversion and promoting stewardship through recycling, composting, and purchase of environmentally preferable products.

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on public services.

Conclusion

PSRC staff thanks the city for working through the plan review and certification process. PSRC is available to provide assistance for future plan updates. Additional planning resources can also be found at <http://www.psrc.org/growth/planreview/resources/>. If the city has questions or needs additional information, please contact Liz Underwood-Bultmann at 206-464-6174 or LUnderwood-Bultmann@psrc.org.