

# PSRC PLAN REVIEW REPORT & CERTIFICATION RECOMMENDATION

## CITY OF SEATTLE COMPREHENSIVE PLAN

August 31, 2017



### 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.<sup>1</sup> 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 update to the comprehensive plan for the City of Seattle, adopted by the city on October 17, 2016. PSRC last certified the City of Seattle's comprehensive plan in February 2016. The City of Seattle's 2015 update addressed minimum content requirements of a GMA plan update and refreshed inventories, targets, and the plan horizon. The city completed the full Seattle 2035 planning process later in 2016, and PSRC staff reviewed the 2016 comprehensive plan amendments and coordinated with city staff in the development of this report.

### CERTIFICATION RECOMMENDATION

Based on the review of the City of Seattle 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 Seattle 2035 comprehensive plan update conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.**

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<sup>1</sup> 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.

The remainder of this report contains a summary of the PSRC review of the City of Seattle 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 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 Seattle'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 support bicycle and pedestrian mobility, including an inventory of existing facilities and goals and policies that support a safe, convenient, and connected nonmotorized network.
- ☑ Policies support planning for people with special transportation needs, providing a wide range of affordable travel options, and making transit services affordable to low-income residents through programs that reduce household transportation costs.
- ☑ Goals and policies support intergovernmental coordination. These include actively engaging other agencies to assure consistency with city priorities, supporting regional pricing and parking strategies that manage transportation demand, coordinating with multiple agencies when planning and operating transportation facilities and services, and supporting completion of the freeway high-occupancy vehicle system throughout the central Puget Sound region (TG7, T7.1-7.9).

## 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 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 plan references a six-year Capital Improvement Program that identifies needs and cost estimates, and the city has also developed separate modal plans. While the comprehensive plan includes financing policies and a reassessment strategy, the city should add additional detail to the financing plan, including a summary of transportation needs and funding through the 2035 plan horizon. 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.
- The plan cites several modal plans as implementing the comprehensive plan and identifying system needs. Transportation need assessments and functional plans should be consistent with the comprehensive plan, including the adopted targets (RCW 36.70A.070(6)). The adopted Transit Master Plan appears to assume growth that is different than the comprehensive plan (see Transit Master Plan, Figure 1-1). The Transit Master Plan should be reviewed and amended as appropriate to ensure that it is based on growth assumptions that are consistent with the comprehensive plan.

## 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 Seattle 2035 introduction includes a detailed regional planning statement describing how the plan supports growth in centers, the Growing Transit Communities Strategy, and the Regional Growth Strategy.

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

- ☑ The plan includes a goal to reduce Seattle’s greenhouse gas emissions by 58 percent from 2008 levels by 2030 and become carbon neutral by 2050 (EN G3). The plan has supportive policies to address greenhouse gas emissions. These include increasing energy efficiency and low-carbon energy sources in buildings, planning for climate change adaptation, reducing waste, encouraging local food production, and addressing the impacts of climate change on marginalized populations and seniors (EN 3.1 – 4.4).
- ☑ Policy EN 1.2 calls for achieving no net loss of tree canopy coverage and striving to increase tree canopy coverage to 40 percent.
- ☑ Multiple policies address water quality, including striving to increase permeable surfaces and vegetative cover to control stormwater, reducing combined sewer overflows, and limiting the use of chemicals that have negative impacts on aquatic or human health (EN 2.1 – 2.7).

### 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 the 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 accommodates a significant share of regional growth, anticipating an additional 70,000 housing units and 115,000 employees in the planning period. The Growth Strategy element articulates the city’s vision to accommodate that growth primarily in urban centers and urban villages.
- ☑ The plan includes policies that support future growth within Seattle’s urban centers and manufacturing/industrial areas. The plan also directs capital facilities investments and services to support growth in centers (CF 3.1, T 3.2).
- ☑ Policies support the Transportation 2040 physical design guidelines through various policies addressing parking and pedestrian-oriented design (LU 6.1-6.15, LU 9.1-9.24).

## 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 comprehensive plan anticipates an additional 35,000 housing units and 75,500 employees in the regional centers over the planning period. PSRC will be reviewing center subarea plans for certification, and the city should ensure that it has addressed the requirements of PSRC's [Center Plan Checklist](#) for the city's six regional growth centers and two manufacturing/industrial centers. More information on center planning can be found in PSRC's [Plan Review Manual](#), page 3-1.
- VISION 2040 (DP-Action-18) calls for local jurisdictions to adopt mode split goals for regional growth centers and manufacturing/industrial centers. The plan includes mode split goals for the regional growth centers but has not yet set targets for the manufacturing/industrial centers. PSRC has produced [guidance](#) about setting mode split goals that the city may find helpful in this work.

## 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:

- ☑ A detailed housing appendix that evaluates multiple dimensions of affordability and housing need.
- ☑ Policies that support housing for residents with special needs. Policies encourage housing opportunities for older adults and people with disabilities by promoting universal design features for new and renovated housing and designs that allow for independent living, various degrees of assisted living, and/or skilled nursing care (H-4.4, 3.2).
- ☑ Multiple policies address preserving affordable housing. For example, Policy H 5.8 states the city will strive for no net loss of rent/income-restricted housing citywide.

### 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 that supports industry clusters and partnerships and programs to support living-wage employment.
- ☑ Policies support economic development in areas with less economic opportunity and high concentrations of people living in economic hardship. These include reducing barriers to start-up and entrepreneurship for marginalized populations, increasing job training and placement to achieve greater inclusion in the workforce, and coordinating community development and place-based workforce-development opportunities in communities with high unemployment (ED 3.7, 4.2, 4.4, and 5.5).
- ☑ A thorough container port element that supports the ongoing vitality of the Port of Seattle and Duwamish regional manufacturing/industrial center.

#### **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 economy.

## **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 Seattle 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:

- ☑ The plan addresses environmental considerations in transportation planning and includes policies to promote green infrastructure, reduce drive-alone trips and vehicle dependence, and promote the use of alternative fuels (TG 4, T 4.1-4.6).

- ☑ Goals and policies focus on equitable access to multiple transportation options, including improving options in centers, considering demographic characteristics when designing transportation systems, and making transit services affordable to low-income residents through programs that reduce household transportation costs (TG 3, T 3.1 – 3.22).
- ☑ The plan incorporates a new approach to multimodal level of service standards through measuring the share of all trips made by driving alone. The city also commits to provide a menu of demand management tools to meet non-drive-alone mode share targets (TG 9, T 9.1 – 9.4). The plan also emphasizes investments to advance the city’s mode-share goals and reduce dependence on personal automobiles, particularly in centers (T 1.5).

**DISCUSSION: AREAS FOR FURTHER WORK**

The city should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans (please also see comments addressing Growth Management Act transportation planning requirements on page 3 of this report):

- ☐ The multicounty planning policies call for protecting the transportation system against disaster and developing prevention and recovery strategies for disasters. If such work has been completed by the city, such as an emergency management plan, these efforts should be incorporated in the transportation element (MPP-T-8).

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

- ☑ Goals and policies support operating city utilities consistent with regional growth plans. They also encourage working with other jurisdictions in King, Snohomish, and Pierce counties to explore regional funding strategies for capital facilities, particularly for those that serve or benefit residents throughout the region. (CF 5.4).
- ☑ Multiple policies promote conservation, demand management, and efficient use of public services. For example, Policy U 3.4 calls for building facilities that are models of environmental stewardship and high levels of energy, water, and material efficiency, effectively managing stormwater on-site, prioritizing local and environmentally preferable products, and limiting waste.
- ☑ Policy U 2.5: “Pursue the long-term goal of diverting most of the city’s solid waste away from landfills by increasing recycling, composting, and promoting products that are made to be reused, repaired, or recycled back into nature or the marketplace.”

**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 <https://www.psrc.org/data-and-resources/planning-services>. If the city has questions or needs additional information, please contact Liz Underwood-Bultmann at 206-464-6174 or [LUnderwood-Bultmann@psrc.org](mailto:LUnderwood-Bultmann@psrc.org).