

# PSRC Plan Review and Comprehensive Plans

## Frequently Asked Questions

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This document compiles frequently asked questions on PSRC’s plan review process and local comprehensive planning. Questions were identified from surveys of jurisdictional staff and the kick-off event for the [Passport to 2044 workshop series](#). More information is available on the Plan Review website, or please feel free to reach out directly to PSRC staff at [planreview@psrc.org](mailto:planreview@psrc.org) with any additional questions. More questions may be added to this document over time. Washington State Department of Commerce has [their own FAQ on the periodic update](#).

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## Plan Review and Certification

### What are PSRC’s review standards and what planning resources are available?

PSRC reviews comprehensive plans for consistency with the multicounty planning policies (MPPs) in [VISION 2050](#), the transportation components of the Growth Management Act, and the [Regional Transportation Plan](#). PSRC’s [Plan Review Manual](#) provides information about the process, certification standards, and consistency tools for different types of plans. The process is also summarized in a June 2021 webinar—the [slides](#) and [recording](#) are available online.

PSRC has published many planning guides and data resources help complete the update. These are available on PSRC’s [Planning Resources page](#) and more will be added through early 2023. [Washington State Department of Commerce](#) and [MRSC](#) also provide many resources specific to the Washington Growth Management Act (GMA) context.

### What’s new in VISION and GMA since plans were last updated?

VISION 2050, the countywide planning policies, and countywide adopted growth targets have all been updated since the 2015/16 plans. PSRC has a [short overview](#) and [detailed matrix](#) of the policy changes in VISION 2050. Many of these policy changes are reflected in updated countywide planning policies and targets. PSRC’s [VISION 2050 Consistency Tools](#) include a “NEW” icon for new or expanded emphasis areas in VISION 2050.



The Growth Management Act has also been amended in several ways since the last plan updates, most notably changes to the Housing element (HB 1220) requirements. Commerce has a summary of [GMA amendments by year through 2020](#). MRSC also has summaries of GMA bills passed in [2021](#) and [2022](#), which included significant changes to the Housing element and plan deadlines, among other changes. The Commerce [periodic update checklist](#) highlights changes to state requirements since the last plan update cycle.

### **What is PSRC's review timeline?**

- **When would be a good time to meet with PSRC to review scope of work?**

While not required, PSRC encourages meeting and discussing plan scoping early in the update process and before you have a draft plan. The timing will depend on your plan update schedule, but generally, the earlier the better.

- **When would be a good time to send plan elements for review?**

We recommend submitting draft plans to PSRC during the planning commission's development of the draft, prior to your council's review. Drafts should be well-developed but should also be early enough in the process to provide sufficient time to address comments. The 60-day notification provided to the state before adoption provides limited opportunity to incorporate any recommended changes. Completing the consistency tool and providing early drafts to PSRC helps identify potential consistency issues before adoption.

### **How do I submit my materials to PSRC and other agencies?**

Materials can be submitted through the VISION 2050 Consistency Tool [Formsite](#) or via email to [planreview@psrc.org](mailto:planreview@psrc.org). Materials can be submitted to Commerce through the [PlanView](#) system. Plans can also be submitted to WSDOT for early coordination to the NW Region (King and Snohomish) or the Olympic Region (Kitsap and Pierce) by email ([more information](#)).

### **How does PSRC's certification relate to appeals through the Growth Management Hearings Board?**

PSRC's review and certification function is separate from challenges to the validity of policies or plans that may be brought before the Growth Management Hearings Board. PSRC's certification action is based on determining consistency with (1) the multicounty planning policies, which serve as the regional guidelines and principles, (2) the Regional Transportation Plan, and (3) Growth Management Act requirements for transportation planning. PSRC's certification process allows jurisdictions to be eligible for PSRC's federal transportation funding.

The Hearings Board has more of a quasi-judicial mandate when it is petitioned to review a set of policies or a plan. While there can be overlap with issues that are reviewed by the Hearings Board and PSRC, the Hearings Board process is set up to consider a much broader range of provisions from the entire body of requirements in the Growth Management Act and, unlike PSRC, can invalidate plans or regulations.

While appeals to the Growth Management Hearings Board are a separate process, appeals may address certification-related issues or require additional amendments. In some instances, PSRC may choose to delay certification until a Hearings Board appeal is complete.



### **What is PSRC's availability to answer questions or present to planning commissions or city councils?**

PSRC staff are happy to respond to questions and can provide presentations as needed. Please contact [planreview@psrc.org](mailto:planreview@psrc.org) to get in touch with staff. There are also a variety of materials on PSRC's [Plan Review web pages](#) that can be used to support council presentations if you want to incorporate content on regional plans or the plan review process into your own presentation and materials.

### **Does PSRC have data to support plan updates?**

Yes, PSRC has a variety of data resources that can help inform your plan. PSRC's [Community Profiles](#) make it easy to see Census data at the jurisdictional level, and the [Transportation System Conditions Tool](#) could be helpful for updating Transportation elements. PSRC has a new [Data Portal](#), which allows users to access, explore and build maps using regional datasets, including employment data, Displacement Risk Mapping, Opportunity Mapping, and the Regional Open Space Network. PSRC also expects to release an updated forecast product in fall 2022 that will represent the adopted growth targets and the VISION 2050 Regional Growth Strategy.

### **In terms of certification, what are best practices from past comprehensive plan updates?**

- **Use the consistency tool throughout the process.** This will help identify early on any topics that you should be sure to address in your plan.
- **Provide drafts to PSRC with sufficient time in advance of adoption.** A 60-day notice before adoption is required for Commerce, but we strongly advise providing additional time for us to review the plan and address any comments.
- **Consult your previous certification report.** Certification reports from the 2015/16 updates are available on [PSRC's website](#), and nearly all reports include comments for work that should be addressed in future plan updates.
- **Ask questions!** If you have questions or concerns, please reach out to [planreview@psrc.org](mailto:planreview@psrc.org). While PSRC's boards make the final certification decisions, PSRC staff are available to help all jurisdictions have a successful plan update process.

### **Are planning grants available to local governments?**

Grants to support the periodic update are available from the Washington State Department of Commerce on a formula basis, and Commerce has other planning grants available as well. Please visit the [Commerce website](#) for more information on planning grants. PSRC provides guidance and technical assistance but does not provide planning grants for jurisdictions.

### **What was changed when the Plan Review Manual was updated in September 2022? [new]**

The [VISION 2050 Consistency Tools for Local Comprehensive Plans](#) (starting on pg. 32 of the [manual](#)) was updated with the direction of PSRC's Growth Management Policy Board to integrate the GMA requirements of HB 1220 and countywide housing needs. These updates put additional emphasis on increasing housing options, addressing racially disparate impacts and exclusion in housing, and better aligning housing choices with community needs.



### **Can I use PSRC's SEPA work on VISION 2050 for our environmental review?**

The VISION 2050 Supplemental Environmental Impact Statement (SEIS) was prepared with the recognition that countywide planning groups, local jurisdictions, and other agencies developing plan amendments and updates could reference the regional environmental analysis (see WAC 17-11-655 Incorporation by Reference). Plans and plan amendments demonstrating consistency with VISION 2050 could use the VISION 2050 SEIS as a supporting document to address anticipated impacts within the range analyzed by the SEIS. To make this assessment of consistency, an independent SEPA review and document should be completed.

### **Does the comprehensive plan need to be consistent with both the CPPs and the MPPs?**

In the central Puget Sound, plans must be consistent with both. PSRC has been actively involved with the updates to the countywide planning policies (CPPs), and the CPPs are largely consistent with the multicounty planning policies (MPPs). However, some counties have unique policies, topics, and requirements that extend beyond what is required in the MPPs. Please consult the CPPs to ensure consistency. While PSRC certifies both countywide planning policies and local comprehensive plans, PSRC does not review local comprehensive plans for consistency with countywide planning policies. However, plans could be appealed by interested parties to the Growth Management Hearings Board for inconsistencies with the CPPs.

### **What are the consequences if a city/county does not update a plan in compliance with PSRC and/or state requirements?**

There are several possible repercussions for either not adopting a plan or adopting a plan that isn't consistent with requirements.

- If a plan or required development regulations are not adopted, jurisdictions can lose eligibility for state grants. The Washington State Department of Commerce emphasizes that it is important to clearly document when the jurisdiction is taking final action on plan adoption. Commerce tracks plan adoptions on their [website](#).
- If PSRC does not certify the plan, jurisdictions can lose eligibility for PSRC-managed federal transportation funds and for adding projects to the Regional Transportation Improvement Program (TIP). Jurisdictions with conditionally certified plans are eligible to compete for funds. Jurisdictions that have not adopted a plan in a timely manner or followed conditions are not eligible for funding or adding projects to the TIP.
- Plans could be appealed to the [Growth Management Hearings Board](#) by interested parties for failure to act or inconsistencies with the Growth Management Act, the multicounty planning policies, or countywide planning policies.



## Conditional Certification

### What is conditional certification?

Plans that are conditionally certified meet a majority of planning requirements for consistency with the multicounty planning policies, the Regional Transportation Plan, and the Growth Management Act. They require limited additional work in order to be in full conformity with criteria for certification. PSRC staff will reach out to jurisdictional staff on certification issues prior to board review.

Jurisdictions that are conditionally certified are eligible to apply for regional funding and may proceed with projects submitted into the Regional Transportation Improvement Program, provided that they follow the required conditions of approval.

### Why were plans conditionally certified in the past? Any lessons learned?

There were a few reoccurring certification issues in the 2015/16 updates. Here are the main issues identified in conditional certification and tips for addressing them:

- **Growth targets.** Local plans are expected to use land use assumptions that are substantially consistent with the targets adopted by the county or countywide planning organization. Jurisdictions were conditionally certified for planning for growth in their comprehensive plan that was substantially out of alignment with growth targets, not for actual growth out of alignment with the plan. Land use capacity may exceed targets. [VISION 2050](#) includes additional guidance (see p. 42) on aligning local plans with the Regional Growth Strategy and targets.
- **Capacity.** A fundamental expectation of the Growth Management Act is providing enough capacity for growth. RCW 36.70a requires that plans provide sufficient capacity for planned growth. If the most recent Buildable Lands report or other land capacity analysis shows a shortfall, the plan must document how growth can be accommodated. Housing need at various income bands may require different types of capacity, even if the total housing capacity in a jurisdiction is sufficient. Zoned development capacity should at least meet if not exceed growth allocations for both housing capacity and employment capacity.
- **Nonmotorized transportation.** The Growth Management Act requires planning for bicycle and pedestrian facilities, and PSRC reviews to ensure plans address nonmotorized transportation. WA Department of Commerce's [Guide to your Transportation Element](#) provides an overview of the planning requirements.
- **Internal inconsistencies.** The comprehensive plan must use the same growth assumptions throughout. This is sometimes a simple drafting error and sometimes a much more complex problem, but the plan should clearly state one set of assumptions for future population, housing, and jobs across all plan elements. The Transportation element includes travel forecasting based on those land use assumptions. If you are working with a consultant on travel modeling, please ensure that they are working with assumptions that are consistent with other elements of the plan.



- **Projects in the Regional Transportation Plan.** Most communities are served by state routes. Travel modeling and other planning assumptions should assume transportation investments only on state routes that have been formally identified in the Regional Transportation Plan. Your plan can identify community desires for investments or changes on state facilities, but travel forecasts or project lists shouldn't be predicated on unplanned investments from other agencies.

While conditional certification provides additional time to address specific issues, full certification after adoption is the preferred outcome for jurisdictions and PSRC. Please reach out to PSRC staff or consult the [Plan Review Manual](#) if you have any questions on requirements.

## Targets, Capacity, and Housing

### **Does our plan need to be consistent with countywide growth targets? Are targets a minimum or a maximum? What is the rationale?**

For PSRC certification, VISION 2050 states that plans need to demonstrate substantial consistency between the land use assumptions used throughout the plan and the adopted countywide growth targets. See p. 42 of [VISION 2050](#) and the VISION 2050 Consistency Tool for Comprehensive Plans for more information. A growth target is the amount of growth for the 20-year planning period that each jurisdiction has agreed to through the countywide process. A jurisdiction must provide sufficient capacity to accommodate the growth targets. Capacity for growth can exceed growth targets, which may be particularly important in planning for growth under new affordability requirements in HB 1220 (see questions below). Each county should have a process if growth targets need to be amended.

VISION 2050 emphasizes that where growth happens is important. Coordination and consistency among jurisdictions is critical in planning for transportation, achieving climate goals, understanding actual forecasted growth, and jobs-housing balance, among other reasons. Planning for growth targets that have been developed through the countywide process ensures coordinated growth throughout the region.

### **Do employment growth targets factor in the increase of working at home? What does COVID mean for growth targets?**

While work at home increased during the pandemic, most employees work outside of the home, and most jobs continue to have a physical location.

Over the long-term, PSRC's forecasts have been [reliable](#), even factoring in the ups and downs of employment cycles. Employment targets are focused on providing space for sufficient employment-related uses. While there is always uncertainty in planning for the future, it continues to be important to provide enough capacity and planning for employment uses. For the purpose of PSRC review, jurisdictions may consider work at home as a portion of their capacity for employment growth, provided that work at home can only accommodate a limited and justifiable amount of the workforce.



### **What's the process to update targets based on revised OFM forecasts or housing need estimates from Commerce this fall?**

When the Office of Financial Management (OFM) releases updated population forecasts in late 2022, counties should ensure the county control total used to develop population targets remains within the OFM range. Regardless of whether the 2022 projection changes, the totals identified in the adopted growth targets are very likely to remain within the low-to-high projection range.

If the 2022 projections suggest adjusting the county control totals, any changes should be coordinated through all four counties working together at PSRC. Consideration of changes due to the 2022 OFM projections should occur through countywide planning forums before making adjustments to targets for individual communities.

### **Suppose planning to meet the housing requirements of HB 1220 results in a community having surplus residential capacity?**

Capacity and targets are related but different. Growth targets represent total growth expected during the 20-year planning period and are determined through the countywide process to allocate projected growth. VISION 2050 and the comprehensive plan review checklist state that capacity for growth can exceed targets. PSRC recognizes that additional capacity will help achieve adopted growth targets based on the type, location, and timing of development. Many jurisdictions may lack sufficient capacity to accommodate growth at lower income bands. That may mean revisiting capacity but doesn't necessarily mean the total amount of growth should change. The counties should have a process in place to adjust the targets if necessary. One caveat is that VISION 2050 includes a policy discouraging adding capacity in regional geographies that do not have high-capacity transit. When a community substantially increases capacity beyond its adopted target it should document how the additional capacity is necessary to support regional policies.

Commerce will be releasing guidance on land capacity to accommodate housing need in late 2022. See Commerce's project page for more information on resources to [implement HB 1220 and update GMA Housing Elements](#).

### **Buildable lands says we have adequate housing capacity. Reality says we don't. How does the GMA resolve this incongruity?**

Buildable Lands uses a number of reasonable assumptions to estimate capacity, but the timing, location, and type of capacity documented in Buildable Lands may not be sufficient for the growth your jurisdiction is planning for or experiencing. Like the question above, jurisdictions should evaluate capacity across several factors and may need to provide additional capacity to ensure the growth targets in the plan can be achieved during the planning period.

