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. 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 Bothell, adopted by the city on July 7, 2015. PSRC last certified the Bothell comprehensive plan in March 2011. PSRC staff reviewed the comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the City of Bothell 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 Bothell comprehensive plan 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 Bothell 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

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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 city’s part 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’s comprehensive plan effectively addresses the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- The plan includes complete and comprehensive inventories of existing and planned facilities for auto, transit, bicycle, and pedestrian travel. The text and maps are highly readable. Projects in the regional transportation improvement program are clearly indicated.
- Context for and history of coordination with other agencies and jurisdictions on transportation described on pages TR-5 to TR-9 is thorough and provides a foundation for policy TR-P1 and actions TR-A1 through TR-A10.
- Policies TR-P25 to TR-P28 and implementing actions address various aspects of transportation demand management, including support for a strong Commute Trip Reduction program, land use patterns, and coordination with other agencies’ transportation demand management efforts.
- The plan includes a number of policies that promote bicycle and pedestrian travel through strategic investments and programs. These include prioritizing nonmotorized access to key destinations, including bicycle access to schools (TR-P32) and centers (TR-P30) and complete pedestrian networks serving transit stops and activity centers (TR-P44).
**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 (see comments addressing consistency with regional guidelines and principles on transportation and Transportation 2040 on page 8):

- While the Bothell comprehensive plan generally addresses the Growth Management Act and regional planning requirements to accommodate 20 years of population and employment growth consistent with local growth targets (RCW 36.70A.115 and .130; MPP-DP-3), the documentation of how the city will meet the 20-year targets should be clearer and more complete. The city should consider revisions to the plan to clearly indicate: (1) adopted targets for housing and employment growth in the city as a whole through to the plan horizon year, (2) citywide capacity for housing and employment, and (3) methodology for extending King County targets to 2035. PSRC staff is available to provide technical assistance.

- VISION 2040 calls for level-of-service standards to be focused on the movement of people and goods instead of only the movement of vehicles (MPP-DP-54), and for concurrency programs to address multimodal transportation options – both in assessment and mitigation (MPP-DP-55). The comprehensive plan includes methodologies for measuring levels of service for transit, bicycling, and pedestrian travel and calls for future work to integrate those concepts into the city’s concurrency program. The city should prioritize multimodal concurrency as an action and consider implementation steps, including tailoring concurrency to encourage development and multimodal improvements in the city’s activity centers. For more information, see the Department of Commerce’s Transportation Element Guidebook (pages 140-160) and PSRC’s list of concurrency resources.

- The Growth Management Act (see 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. While the comprehensive plan addresses this requirement, several revisions are recommended to make the strategy clearer and directive of future actions. First, summary data on estimated project costs and anticipated revenues in tables TR-13 and TR-14 show the same total dollar amounts, which do not match the broad conclusions in accompanying text. These important estimates should be corrected or clarified as appropriate. Second, the reassessment strategy (“funding analysis”) on page TR-49 should be clarified and expanded to address more specifically the steps the city could take to close the gap between costs and revenues. These steps could include demand management strategies to reduce the need for or estimated cost of improvements, pursuing new revenues, reducing the level-of-service standard, and changes to the land use element to reduce the need for improvements. Further guidance on how to address the financial analysis in the plan can be found in the Department of Commerce’s Transportation Element Guidebook. The guidebook discusses finance on pages 202-212.

**Part II: Consistency with Regional Plans and Policies**

**OVERVIEW**

This section discusses consistency with the adopted multicity 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 multicity 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 plan includes a comprehensive VISION
2040 statement in the land use element, and the transportation element describes the ways in which the comprehensive plan responds to Transportation 2040 and the Growing Transit Communities 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 city’s comprehensive plan effectively addresses the environmental policy topics in VISION 2040. Highlights include:

- The plan includes a natural environment element with a comprehensive set of policies addressing all major environmental topics. The plan also includes as an element the adopted shoreline master plan.
- The plan includes strong policies on water quality and habitat protection. NE-P14 promotes efforts to reduce pollution in major rivers and streams. NE-P25 encourages the adoption of low impact development approaches as a means to improve water quality and natural habitat, especially for protected fish species.
- The plan promotes the retention and expansion of protected open spaces. Action NE-A5 specifically calls for continuing collaboration with other agencies and non-governmental partners to acquire open space.
- The plan includes a comprehensive set of policies and actions that address climate change. Policies NE-P43 and NE-P44 call for a number of steps to curb greenhouse gas emissions, such as encouraging compact development, urban forests, green building practices, and adoption of energy efficient technologies in the building and transportation sectors. Policy NE-P53 calls for steps the city can take to adapt to climate change impacts, including improving resiliency of public infrastructure.

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for further work needed to better align the plan 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 the development patterns policies in VISION 2040. Highlights include:

- Multicounty planning policies, including DP-5, DP-11, and others, call for concentrating future growth within regionally and locally designated centers. The comprehensive plan includes policies that support this vision within Bothell’s several activity centers, most prominently downtown Bothell and Canyon Park, which is a designated regional growth center. Notable are policies in the economic development element, such as ED-P3 and ED-P25, supporting public and private investments and strategies to attract dense mixed-use development to the centers, and goal TR-G8, which prioritizes investing in transportation infrastructure that serves the city’s central places.

- LU-P22 directs the city to explore options for designating receiving areas for transfer of development rights credits from rural lands in unincorporated Snohomish County. This policy direction highlights the city’s commitment to cross-jurisdiction collaboration and environmental conservation.

- The plan includes an urban design element that addresses many of the topics and recommendations expressed in the Physical Design Guidelines in Transportation 2040 and the multicounty planning policies on regional design.

**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:

- **VISION 2040** calls for plans to promote the physical, social, and mental well-being and health of residents. The comprehensive plan addresses several aspects of public health, in particular policies LU-P19 through LU-P21 and components of the transportation element that aim to improve the city’s bicycle and pedestrian infrastructure. The city should consider furthering public health with additional policies and actions, such as access to healthy food, healthy housing, and coordination with public health agencies.

- Both Canyon Park and downtown Bothell have important roles to play in accommodating future growth through compact mixed-use and transit-oriented development. As noted above, the plan currently includes provisions that recognize and support this role. However, the city should strengthen its treatment of centers with additional text, mapping, policies, and actions. In particular, the city should ensure that the plan supports the role and success of the Canyon Park regional growth center, including addressing in the land use element and subarea plan section several of the planning expectations for centers called for in VISION 2040, including:
  - Clearly display the boundaries of the regional growth center on the future land use map.
  - MPP-DP-3 calls for jurisdictions with designated regional growth centers to establish housing and employment targets for these areas. PSRC recently produced additional guidance about setting center targets that the city may find helpful in this work.
  - As called for in VISION 2040 (DP-Action-18), the city should include mode split goals for the regional growth center. PSRC recently produced additional guidance about setting mode split goals that the city may find helpful in this work.
  - The Action ED-A33, which addresses the subarea planning needs for the regional 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 City of Bothell has included a plan element that addresses the Canyon Park Regional Growth Center, but the additional 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 policies in VISION 2040. Highlights include:

- Housing policies are presented in a plan element that combines housing and human services issues in a coordinated fashion. This is an innovative approach that is effective in highlighting and addressing a broader spectrum of linked community needs and services.
- The plan promotes housing diversity, including actions to encourage more affordable housing types in existing neighborhoods, such as small-lot single family homes (HH-A6) and innovative housing types (HH-A7).
- Policy HH-P15 prioritizes centers and other locations with high levels of transit service and multimodal accessibility for efforts to produce and preserve affordable housing.

**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 (RCW 36.70A.070) requires local housing elements to include a comprehensive housing needs assessment. The housing element would be more effective and more transparent by including a summary of the findings of the housing needs assessment produced for the city by A Regional Coalition for Housing. The housing element should also clearly state the countywide planning framework for local housing elements, which includes the housing growth target and goals for equitably addressing affordable housing needs.

- The multicounty planning policies call for the use of innovative techniques and public-private partnerships to meet the housing needs of the region’s households at all income levels. Policy HH-P17 calls for the city to explore options for creating incentives for private developers to provide affordable housing in the community. Many jurisdictions in the region have adopted, or are considering, incentive or inclusionary zoning provisions and other related tools to increase the affordable housing supply. The city should consider advancing this policy with further work in the short- to medium-term, with amendments to the comprehensive plan as needed.

- Policy HH-P40 commits the city to adopting and periodically updating a housing strategy. Given the depth and breadth of identified needs in the community and region, the city is encouraged to update the most recent housing strategy as a short term priority. Further discussion would also be helpful in the plan on the relationship between the housing strategy and comprehensive plan goals and policies.
**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 through the provision of infrastructure.

**Discussion: Exemplary Plan Provisions**
The city’s comprehensive plan effectively addresses the economy policies in VISION 2040. Highlights include:

- The plan contains an economic development element that promotes private investment and opportunities in the community with policies and actions that are consistent with and reinforce the land use plan for Bothell. Notable is discussion on pages ED-3 to ED-5 which highlights opportunities for investment and economic activity within distinct subareas of the city.
- Policy ED-P3 promotes public and private initiatives and identifies project locations for potential catalyst development.
- Action ED-A33 addresses the subarea planning needs for the Canyon Park regional growth center, including infrastructure improvements, land use, and outreach and incentives geared toward potential private partners.

**Discussion: Areas for Further Work**
The certification review did not identify any major areas for further work needed to better align the plan 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 city’s comprehensive plan effectively addresses the major transportation emphases in VISION 2040 and Transportation 2040. Highlights include:

✔ MPP-T-5 through -7 call for local and regional efforts to promote “clean” transportation. The comprehensive plan promotes environmentally friendly transportation investments that include policies and actions to reduce greenhouse gas emissions associated with transportation. Policies on water quality seek to limit impacts from stormwater runoff from public and private sector uses, including roads.

✔ The transportation element clearly documents the data and assumptions used in modeling future demand for transportation infrastructure in the community. These assumptions are more than adequate to meet the requirements of the Growth Management Act and VISION 2040.

✔ Planned bicycle and pedestrian facilities are clearly described in both the transportation element and, where applicable, subarea plan elements of the comprehensive plan.

DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for further work needed to better align the plan 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 city’s comprehensive plan effectively addresses the public services provisions of VISION 2040. Highlights include:

✔ Plan elements covering capital facilities, utilities, and parks and recreation provide comprehensive background on the multi-agency coordination that supports provision of essential public services. The plan provides a sound basis for continued work within the city and with external partners to ensure that planned facilities meet projected future needs consistent with growth assumptions in the comprehensive plan.

✔ The multicounty planning policies call for steps to ensure improved efficiency and conservation of public resources, such as water, energy, and solid waste capacity. The comprehensive plan addresses these issues in NE-P47 through NE-P49 that direct the city to work with other agencies and the public to achieve greater conservation of resources through water use efficiencies, recycling and composting, and greater reliance on sustainable energy sources.

DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for further work needed to better align the plan with regional guidelines and principles on public services.
**Conclusion**

PSRC staff thanks the city for working through the plan review process. Staff review found that the city has completed the necessary requirements in the update for plan certification. PSRC is available to provide assistance for future plan updates, and additional planning resources can also be found at [http://www.psrc.org/growth/planreview/resources/](http://www.psrc.org/growth/planreview/resources/). If the city has questions or needs additional information, please contact Michael Hubner at 206-971-3289 or mhubner@psrc.org.