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 Brier, adopted by the city on February 28, 2017. PSRC last certified the City of Brier’s comprehensive plan amendments in 2011. PSRC staff reviewed the 2015 comprehensive plan amendments and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Brier 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 Brier 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 Brier 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. PSRC recognizes that the timing and mechanism for addressing each of the comments will vary based on the jurisdiction, its resources and plan update process, and the nature of the comment.

**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 Brier’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:

- The plan includes provisions to support bicycle and pedestrian mobility, including an inventory of existing facilities, goals and policies that support a safe and convenient environment for walking and bicycling, and bicycle modal networks and planned investments. The plan also calls for requiring new development and redevelopment to incorporate pedestrian supportive measures, such as providing secure and attractive pedestrian spaces, and providing adequate sidewalks, bikeways, and pathways and crosswalks (Policies TR 6.1 – TR 6.7).

- Multiple policies emphasize interjurisdictional cooperation on transportation facilities and services, such as coordinating with Community Transit, Sound Transit and other transit service providers to promote and enhance transit use in Brier, and working with state, regional and local agencies to develop land use strategies that will support public transportation and discourage increased traffic congestion (Policy TR 2.5, Policies SC 1.10 - SC 1.11).
✓ Policy TR1.6 supports transportation demand management programs, specifically information sharing and other techniques including ridesharing, promoting transit use, and increasing the use of non-motorized transportation.

**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:

- Snohomish County recently completed its target reconciliation process with the adoption of Ordinance No. 16-0178. The ordinance maintains the city’s overall population and housing unit growth targets, but shifts 39 population and 14 housing units from the City of Brier to the Brier unincorporated MUGA. The plan should be updated to reflect these changes.

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**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 plan does not include a VISION 2040 context statement.

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

- The plan includes policies to protect and enhance existing natural resources and environmentally sensitive areas and includes an inventory of mapped environmentally sensitive areas (Pol. Land Use G-9; Figures 3, 4, 5).
The plan includes policies to protect and preserve water quality, natural drainage, and fish and wildlife habitat (Pol. Land Use W-1 through W-14).

The plan includes policies to preserve lands for park, open space, and greenbelt purposes, and to provide open space benefits and environmental services (Pol. Land Use OS-1 through OS-6).

The plan includes policies to utilize native vegetation and landscaping to buffer land uses, minimize noise and visual pollution, and provide ecosystem benefits. (Pol. Land Use V-1 through V-8).

The parks and recreation element includes a revised parks level of service standard, with an emphasis on siting parks and recreation facilities accessible within one-half mile on foot or bicycle from residential areas. (Pol. PR 1.4).

**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** and Transportation 2040 call for reducing greenhouse gas emissions and adapting to impacts related to climate change. The plan includes policies to reduce car trips and promotes more sustainable modes of transportation. The plan should include policies that directly address reducing greenhouse gas emissions and adaptation to impacts related to climate change. See page 42 of VISION 2040 for an overview of climate change and related policies and page 34 in Transportation 2040 for information on the four-part greenhouse gas reduction strategy (land use, user fees, choices, and technology).

**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 supports efficient use of urban land by encouraging redevelopment and development of underutilized and vacant land compatible with the envisioned character, scale and design of surrounding development (Pol. Land Use RD-1 through RD-7).

- The plan identified the Neighborhood Business area as a site for future compact commercial growth to provide goods and services for the everyday needs of the immediate neighborhoods. (Pol. Land Use C-1 through C-5).
The plan supports annexation of the city’s affiliated urban growth area and provides guidance for compatible design standards, and addressing service needs and infrastructure financing. (Pol. Land Use A-1 through A-3).

The plan supports the Transportation 2040 physical design guidelines through various policies that address complementary land uses and pedestrian-oriented design. Policies focus on buffering residential areas from commercial uses and transportation corridors, and support maintenance and expansion of pedestrian and other nonmotorized facilities (Pol. Land Use G-6, Pol. Land Use G-13, Pol. Land Use RD-7, Pol. Land Use C-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 development patterns.

**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:

- The plan includes multiple strategies to address affordable housing, including preservation of existing housing, allowing cottage housing and “mother-in-law units,” and securing funding and resources from public and private partners (Policies H 4.1 through H 4.4).
- The plan includes multiple policies supporting fair housing and development and preservation of housing for residents with special needs, including developing zoning regulations consistent with the Federal Fair Housing Act (Policy H 5.2).

**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:

- RCW 36.70A.070(2)) requires comprehensive plans to include an inventory and analysis of existing and projected housing needs and adequate provisions for existing and projected needs of all economic segments of the community. The city’s housing element includes a limited needs assessment. It should be expanded to include additional information on special needs housing, housing affordability/cost burden, and projected future housing needs for a variety of income levels. Future work should be done to identify a full range of housing needs as a basis for potential future plan amendments. PSRC’s Housing Element Guide can provide additional guidance in this work. For more tools and strategies to consider, see the PSRC Housing Innovations Program. PSRC staff is also available to provide assistance.
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:

- The plan supports home businesses and occupations that are compatible with single-family zoning and recognizes that home businesses and occupations contribute to the livelihood of many residents. (Pol. Land Use SF-3).
- Commercial and mixed-use development is centralized in the neighborhood business zone to discourage traffic, efficiently use resources for site improvements and utilities, and minimize incompatible land uses. (pol. Land Use C-6, C-8).

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 should provide more information about economic sectors and the city’s actions to support economic development in either a new economic development element or existing plan elements.

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 Brier 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 includes policies to promote safe motorized and nonmotorized networks and to identify unsafe transportation elements in an effort to reduce vehicle accidents (Pol. TR 2.1, TR 2.2).
- Policy TR 3.2 calls for coordinating land use development plans with transportation and mobility needs for the community.

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 (please also see comments addressing Growth Management Act transportation planning requirements on page 3 of this report):

- The Growth Management Act requires level-of-service standards for all locally owned arterials and transit routes, and the MPPs call for other modes, such as walking and biking, to be addressed through this approach. While the transportation and other plan elements have many policies supportive of walking, biking and transit, the level-of-service analysis does not include modes other than automobiles. Inclusion of level-of-service standards that address multiple modes of transportation will help with the evaluation of needs when comparing the inventories to the standards, as well as respond to the MPPs on multimodal concurrency. The Washington State Department of Commerce’s Transportation Element Guidebook has information on how to set level-of-service standards and identify system needs (pages 143-150 and 183-189) (http://www.commerce.wa.gov/Documents/GMS-Transportation-2012.pdf).

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

- The plan includes policies to plan for long-term water needs. For example, the city will coordinate with the Alderwood Water District to provide an efficient and adequate water supply to residents and businesses (Pol. UT 2.1).
- The plan includes policies to ensure coordination with service providers and neighboring jurisdictions to ensure the efficient and equitable siting of capital facilities (Pol. CF 1.4).

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 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 Laura Benjamin at 206-464-7134 or LBenjamin@psrc.org.