BACKGROUND
A major emphasis of the Washington State Growth Management Act (GMA) is the need to coordinate local, regional, and state planning efforts. To advance this coordination, the Puget Sound Regional Council (PSRC) is required to formally 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 (MPPs) have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local plans and policies 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 Town of Carbonado, adopted by the town on June 15, 2015. PSRC last certified the Carbonado comprehensive plan in December 2008. PSRC staff reviewed the 2015 comprehensive plan and coordinated with town staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the Town of Carbonado 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 Town of Carbonado 2015 comprehensive plan conforms to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

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.
The remainder of this report contains a summary of the PSRC review of the Town of Carbonado 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 is needed to more fully address VISION 2040, Transportation 2040, or GMA 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 town'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:

- Emphasis on intergovernmental coordination in transportation planning (Land Use Goal 4, Policies 4.1-4.3). Transportation Policy 1.4 also demonstrates Carbonado’s consideration of how its LOS standards would impact planning for roadway facilities in neighboring jurisdictions.
- Consideration of various transportation demand management strategies to accommodate changing conditions in the community and surrounding region over the planning horizon (p. 116-117). The town is encouraged to identify specific strategies to implement these considerations over the life of the plan.
- Promotion of new development, neighborhood parks, and amenities to be oriented towards pedestrians and bicyclists. Of particular note are provisions that direct parking to be located to the rear or side of buildings, new development and redevelopment to be designed at the pedestrian scale, and bicycle parking guidelines to be established for different types of development (Land Use Policies 3.5-3.7, 4.7, 8.3, Transportation Policy 3.2).
**DISCUSSION: AREAS FOR FURTHER WORK**

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

- In its “Inventory of Facilities and Services” section of the transportation element on pages 117-119, the comprehensive plan lists principal and minor arterial streets and collector streets, as well as discussing other forms of motorized transportation available in or near Carbonado. Per WAC 365-196-430(2)(C)(iii), the comprehensive plan should include a more complete roadway inventory that also addresses local streets. The town should include a map inventorying all types of streets within Carbonado town limits as well as current and proposed pedestrian and bike facilities. See the Washington State Department of Commerce’s Transportation Element Guidebook, pages 122-127, for information about inventories of existing facilities and conditions.

- Page 120 in the transportation element discusses projected residential trip generation and nonmotorized facility demand. Per RCW 36.70A.070(6)(a)(ii), the plan should include forecasted impacts on state-owned facilities (SR 165). More information on these requirements is outlined in Department of Commerce’s Transportation Guidebook, page 73.

- 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. The financing plan should include a list of investments to meet transportation needs over the planning period, estimated costs for those investments, estimated probable revenues available to the local jurisdiction, and a reassessment strategy in the event revenues fall short of costs. The plan addresses many of these requirements, including guiding policies, a 6-year Capital Improvement Program, and a description of local revenue sources. However the town should more fully address financing for identified needs, including:
  1. Provide cost estimates for roadway, pedestrian, and bicycle improvements identified through the 2035 plan horizon.
  2. Develop a more detailed forecast of probable funding resources for transportation through the 2035 plan horizon.
  3. Provide an analysis of the sufficiency of funding resources compared to estimated costs of identified improvements, including maintenance.
  4. Revise and expand on the current reassessment strategy to address steps the town could take to close the gap between costs and revenues, such as 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, pages 202-212.

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

**OVERVIEW**

This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040, and Transportation 2040, the region’s long-range transportation plan. In addition to the MPPs, 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 town includes a general description of VISION 2040 in the plan. The town should more explicitly describe how the plan addresses VISION 2040 when the town next amends the comprehensive plan. Examples of context statements are provided in PSRC’s Plan Review Manual, page 2-1.

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 town’s comprehensive plan effectively addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- Goals and policies that encourage consideration of short- and long-term environmental impacts when making decisions about capital facilities and services (Capital Facilities Goal 2, Policies 2.1-2.2, 4.7). Of particular note is Policy 4.7, which provides for funding programs to mitigate cumulative adverse environmental impacts of proposed facility plans, projects, operating procedures, and maintenance procedures.
- Policies that encourage expansion of open space areas within Carbonado and protection and promotion of native vegetation (Parks, Recreation and Open Space Policies 1.1-1.4, 1.8; Land Use Policies 6.5-6.6).
- Goals and policies that encourage ecologically responsible water management, including stormwater runoff quality improvements, water pollutant minimization, water conservation, and protective measures to ensure an uncontaminated water supply (Land Use Goal 7, Policies 7.1-7.2, 7.5-7.8).
- Support for public education programs that work to reduce air-polluting activities, especially with regard to transportation (Transportation Policy 4.3).

DISCUSSION: AREAS FOR FURTHER WORK
The town should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- The MPPs in VISION 2040 and the strategies in Transportation 2040 call for reducing greenhouse gas emissions and adapting 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). Policy 4.4 in the transportation element of Carbonado’s comprehensive plan promotes reduction of criteria pollutants for mobile sources. However, the town is encouraged to consider strategies to mitigate GHG emissions in municipal operations and identify more specific actions, such as increasing the number of trees in the town (MPP-En-24) and more transportation demand management strategies. Helpful information on
identifying emissions-reducing strategies can be found in the Washington State Climate Change Resources, Washington State Integrated Climate Change Response Strategy, and PSRC Climate Change Information.

- While the plan includes policies that call for minimizing impacts on wetlands, Critical Areas Policy 1.2 refers to the natural ability of wetlands to improve stormwater runoff quality by holding and gradually releasing stormwater. The town is encouraged to revise this policy and identify ways to address stormwater runoff before it reaches wetlands, such as through low-impact development practices.

Guidance on stormwater and low-impact development can be found in the Puget Sound Partnership Stormwater Resources.

### 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 town’s comprehensive plan effectively addresses the development patterns policies in VISION 2040. Highlights include:

- Clear guidelines for Carbonado’s street network extension to form a grid pattern with relatively short block lengths, frequent intersections, and alleys to provide more alternatives for pedestrian and vehicle traffic and to enhance public safety (Land Use Policy 8.10).
- Policies that encourage shared parking facilities and maximum automobile parking standards for various types of development (Land Use Policy 3.12, Transportation Policy 3.1).
- Promotion of development in the downtown area that will encourage pedestrian and bicycle mobility, enhance the sense of community, and reduce the number and length of motorized shopping trips (Economic Development Policy 4.3).
- Policies to identify and preserve historical and cultural resources that preserve the character of Carbonado and its past (Land Use Policy Goal 8, Policies 3.3, 8.1-8.2, 8.11-8.13).

#### DISCUSSION: AREAS FOR FURTHER WORK

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

- Per RCW 36.70A.115, providing sufficient capacity to accommodate growth targets is an important component of the periodic update. According to the Pierce County 2014 Buildable Lands report, Carbonado should plan to accommodate an additional 14 jobs by 2030. The analysis found that the town has capacity for six new jobs, but Carbonado still may not need to implement reasonable measures. The town is encouraged to identify approaches to address this nominal shortfall of capacity to ensure it can
accommodate new economic activity. More information on these requirements can be found in the WA Department of Commerce: Urban Growth Area Guidebook.

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 town’s comprehensive plan effectively addresses the housing provisions in VISION 2040. Highlights include:

- ✅ Goals and policies that promote a wide range of housing types and densities throughout Carbonado to accommodate the needs of residents at various life stages and with various income levels (Land Use Goal 2, Policies 2.1-2.2, 2.4, 3.10; Housing Goal 1, Policy 2.1; Economic Development Goal 7).
- ✅ The plan includes numerous policies that promote the preservation, production, and availability of affordable housing. The plan advances innovative tools and strategies, such as clustering, density transfers and bonuses, accessory dwelling units, home rehabilitation programs, cottage housing, inclusionary zoning measures, consideration of opportunities to reduce land costs for non-profit and for-profit developers to build affordable housing, and exploration of federal, state, and local programs for financing affordable housing (Land Use Policy 6.2, Housing Goal 1, Policies 1.1-1.4, 1.6-1.16, 3.1, 4.7; Economic Development Goal 7, Policy 7.1).
- ✅ Policies that support opportunities to provide special needs housing (Housing Policies 1.5, 3.2-3.3).

**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 through the provision of infrastructure.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The town’s comprehensive plan effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- Policies that encourage commercial businesses, especially locally owned and operated businesses, that will cater to the needs of local residents, Foothills Trail users, and Mt. Rainier tourists (Land Use Policies 3.1-3.2).
- Economic Development Goal 2 and Policy 4.1 promote the creation of family-wage jobs, as well as economic sectors that will bring new capital into Carbonado’s economy, diversify the economic base, pay higher-than-average wages, and maintain sound environmental practices.
- Economic Development Policy 2.1 promotes coordination efforts with employers and social service providers to coordinate employment and training opportunities for disadvantaged persons, especially in providing support for transportation, dependent daycare, language, and access to housing.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

Transportation

**SCOPE OF REVIEW**

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

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and maintain sound 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 town’s comprehensive plan effectively 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:

☑ Transportation Policy 1.17 provides for protection of the transportation system against disaster, development of prevention and recovery strategies, and planning for coordinated responses through use of transportation-related preparedness, prevention, mitigation, response, and recovery strategies and procedures.

☑ Policies that address environmental impacts of transportation capital improvements and facilities (Transportation Policies 1.12, 2.8).

☑ Policies that promote safe routes for pedestrians and bicyclists to various locations across Carbonado (Transportation Policy 2.1). Furthermore, Land Use Policy 3.7 stresses commercial and mixed use development to include facilities for pedestrians, bicyclists, and disabled persons. It also promotes site designs to accommodate potential future users of public transit in Carbonado, as well as incorporation of sidewalks and internal pathways to enhance pedestrian circulation.

☑ Policies that address safety issues to ensure the safety of motorists, pedestrians, and bicyclists, including the promotion of street lights and traffic calming devices where appropriate (Transportation Policies 2.6-2.7).

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 transportation.

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 town’s comprehensive plan effectively addresses the public services provisions of VISION 2040. Highlights include:

☑ Policies that promote more efficient use of public services, including utility demand management programs and strategies, education of utility consumers, and water conservation through water rate restructuring (Land Use Policies 6.9, 7.7; Utilities Policy 1.2; Capital Facilities Policy 2.3).

☑ Land Use Policy 7.4 pushes for all new development and redevelopment to be required to use the sanitary sewer system. The town’s authorization of a General Sewer Plan in 2013 to eventually connect all development in the Carbon River Drainage Basin to a sewer system goes a long way to improve Carbonado’s sanitation services.

☑ The town’s plan addresses equity concerns for how service fees disproportionately impact low-income households in the community. By encouraging research on utility bill assistance programs, Carbonado aims to relieve lower income residents who spend higher shares of their incomes on utilities (Utilities Policy 1.5).
Encouraging energy efficiency in new and existing housing development, including policies that promote weatherization programs, green building techniques, energy and water conservation code provisions, and adding solar energy elements in residential structures (Housing Goal 5, Housing Policies 5.1-5.2, Economic Development Policy 6.1).

**Discussion: Areas for Further Work**

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

- In the “Future Demand and Adequacy” section of the Utilities element, the comprehensive plan asserts that water supply will suffice for 251 equivalent residential units (ERUs) after capital improvements scheduled for 2014-2015 are completed. Storage will also be considered adequate once the 2014-2015 construction of a reservoir is finished, based on current consumption levels. However, this section should discuss meeting water demand based on 2030 growth projections, or the anticipated 317 households in Carbonado plus 16 households outside of the town limits (MPP-PS-2). For more information on planning for capital facilities, see the WA Department of Commerce Capital Facilities Planning Guidebook.

**Conclusion**

PSRC staff thank the jurisdiction for working through the plan review process. 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/. If the town has questions or needs additional information, please contact Yorik Stevens-Wajda at 206-464-6179 or ystevens-wajda@psrc.org.