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 major update to the comprehensive plan for the City of DuPont, adopted by the city on October 27, 2015. PSRC last certified the DuPont comprehensive plan in 2012. 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 DuPont 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 DuPont 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 DuPont 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 Chapter 36.70A.070, RCW. 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 recommended. 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’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 and inter-agency coordination in transportation planning (ED-4.1, Goal T-1, T-1.1, 1.3-1.4).
- Policy LU-8.2 promotes office developments to stagger work hours, encourage carpooling, and implement other transportation demand management measures.
- Many provisions that focus on improving accessibility and safety for pedestrians and bicyclists in DuPont’s transportation network (LU-3.2-3.3, 4.3, Goal T-3, T-3.1, 5.7). Especially notable is policy T-3.2, which prioritizes future pedestrian facility improvements that increase pedestrian safety, link to key destinations, promote multimodal trips, and improve conditions for the elderly and persons with disabilities.

**DISCUSSION: AREAS FOR FUTURE WORK**

The city should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:
The Growth Management Act requires that plan elements use consistent land use assumptions. Specifically, travel demand forecasts and transportation need assessments should be based on land use assumptions that correspond with the most recently adopted growth targets (RCW 36.70A.070(6)). The transportation element should include additional detail to demonstrate that the land use assumptions used for the traffic forecast are consistent with the 2035 land use assumptions used elsewhere in the plan. Additionally, more information on the forecasted travel conditions and future levels of service should be included in the plan.

RCW 36.70A.070(6) requires local plans to include a multiyear transportation financing plan for how each jurisdiction will meet the mobility needs identified for the 20-year planning period. While the plan provides important information, such as a 20-year transportation project list and estimated costs, the city should more fully address financing for identified needs, including:

1. Develop a more detailed estimate of expected revenue for transportation projects over the 20-year planning period.
2. A reassessment strategy to address steps the city could take to close any gaps between costs of needed improvements and revenues, such as additional demand management strategies, pursuing new revenues, reducing level-of-service standards, and land use changes.

Commerce’s Transportation Element Guidebook discusses finance on pages 202 through 212.

Per RCW 36.70A.070(6)(a)(iii)(A), in addition to the maps of roads (Figure T) and current and proposed trails throughout DuPont (Figure V), the plan should contain a pedestrian facility inventory and a complete roadway inventory. See the Washington State Department of Commerce’s Transportation Element Guidebook, pages 122-127, for information on developing inventories of transportation facilities (http://www.commerce.wa.gov/Documents/GMS-Transportation-2012.pdf).

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 city describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040.

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 addresses many of the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- Policies that call for protection and preservation of DuPont’s natural features and environmentally sensitive areas (ED-5.4, NE-1.1, 2.1-2.2, CF-6.3).

- Provisions that address water quality by maintaining and, where possible, restoring and enhancing ecological functions of the Sequatchie Creek Watershed, lakes, marshes, wetlands, steams, and bluffs, and requiring new developments to incorporate appropriate on-site stormwater facilities or connect to regional facilities to prevent pollution, flooding, and other surface water degradation (NE-5.1, CF-1.9).

- Policy NE 4.1 calls for ensuring that all development meets or exceeds applicable federal, state, regional, and local air quality standards. Policies T-2.5 and T-2.6 promote transportation strategies to reduce greenhouse gas emissions, such as encouraging high occupancy vehicles, programs that encourage residents to drive less, and other demand management techniques.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

**Development Patterns – including 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 addresses the development patterns policies in VISION 2040 with a particular emphasis on planning for the city’s downtown area. Highlights include:

- Policies that promote opportunities for multimodal transportation, including directing development within villages to be based on a grid system and development standards to encourage on-street parking and parking at the rear of commercial structures (LU-1.2, 4.4, 5.1-5.2).

- Many policies that focus on and plan for historic and cultural preservation within DuPont (ED-5.1, CR-1.1-1.3, 1.5).
The plan includes goals and policies to maintain and enhance DuPont Station as the city’s primary urban center with a mix of land uses and an identifiable pedestrian downtown (Goal LU-6, LU-6.1-6.2).

**DISCUSSION: AREAS FOR FURTHER WORK**

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

- The Growth Management Act (see RCW 36.70A.115) requires local plans to provide sufficient capacity to accommodate growth anticipated for the 20-year planning period. Pierce County, in consultation with its cities and towns, adopted housing and employment growth targets for each jurisdiction. DuPont is expected to plan to accommodate an additional 2,097 housing units by 2030, a housing target that the city extended to 2,540 units by 2035. The 2014 Pierce County Buildable Lands report found that the city did not have sufficient capacity to accommodate the 2030 housing growth target and would have a deficit of 811 housing units in 2030, which translates to a deficit of 1,324 housing units by 2035.

  The plan identifies measures to address capacity deficiencies, including a reassessment of residential capacity on a key site that was not considered buildable previously. The Sequalitchew Village site, currently an active gravel mine with a zoning designation of Residential Reserve (RR), is now expected to provide capacity for 1,863 additional housing units within but toward the end of the 2015-2035 planning period.

  Given the importance of ensuring that the city can meet anticipated housing demand, the city should consider amending the plan to:

  - Clarify the timing and feasibility of development of the Sequalitchew Village site relative to the planned growth targets, including any needed rezones, developer agreements, or public facility and service needs to serve the approximately 1,800 units expected at buildout, and/or
  - Identify and enact opportunities to increase the capacity for housing on this or other sites in the form of residential or mixed use development that may occur earlier in the planning period.

  The plan notes that the adopted targets may not be consistent with the city’s long-term vision and that the city looks forward to working with Pierce County to revise the targets. The city is encouraged to actively work with Pierce County when establishing growth targets to better align future growth anticipated in DuPont over the next 20 years and beyond with the city’s vision and known development constraints.

  More information on these requirements can be found in the WA Department of Commerce: Urban Growth Area Guidebook. PSRC staff is available to provide technical assistance as needed.

- VISION 2040 supports regional and local centers with policies that call for prioritization of regional and subregional infrastructure investments that serve these areas (MPP-DP-13). Implementation of a centers-based land use pattern in DuPont would be strengthened with explicit prioritization of local capital improvements—pedestrian and bicycle improvements, parks and open space, and other public facilities—to the city’s town center.

- The plan includes excellent information about the relationship of the city to adjacent Joint Base Lewis-McChord. The GMA requires and the multicounty planning policies call for cities to discourage incompatible land uses adjacent to military lands. The city should incorporate relevant policies to address this issue. See VISION 2040 (MPP-DP-52), page 61, and RCW 37.70A.530 for more information.

**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 addresses the housing provisions contained in VISION 2040. The plan incorporates a number of best housing practices that address identified housing needs. Highlights include:

- Goals and policies that promote a variety of housing types and densities throughout DuPont to accommodate the needs of residents of all economic segments (Goals H-1-2, H-1.1-1.2, 2.1-2.2).
- Policy H-2.4 encourages special needs housing for the elderly to integrate within residential villages so as to mix generations within the social fabric of the city.
- Strategies to promote increased supply of and access to affordable housing throughout the DuPont community, such as encouraging Multi-Family Tax Exemptions, cottage style housing, and accessory dwelling units, (H-2.3, 2.5-2.6).
- Provisions that focus on providing incentives for housing maintenance and rehabilitation (Goal H-3, H-3.1-3.2).

**DISCUSSION: AREAS FOR FURTHER WORK**

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

**Economy**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an economic development element that addresses: business, people, and places.
- Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- Adequate housing growth in centers through collaboration with the private sector and provision of infrastructure.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan update contains a thorough and detailed economic development element that effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- An economic development element that simultaneously supports DuPont’s small town identity and promotes economic growth through policies aimed to enhance tourism and local education opportunities by capitalizing on the city’s unique cultural and historical resources (LU-1.3, Goal LU-2, ED-2.4, 5.3, CF-1.6).
- Policy ED-1.3 calls for the review of zoning districts to ensure that a range of uses that provide professional level jobs are permitted.
- Policies that support local business development, such as promotion of special small business financing and management assistance programs, as well as provision of guidelines and standards for the siting of home-based businesses in residential neighborhoods (ED-3.1-3.3).
DISCUSSION: AREAS FOR FURTHER WORK
The city should address the following comment at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

☐ The city is commended for including an economic growth and development element that addresses people, business, and places. The city should consider adding policies and provisions to address multicounty planning policies on distressed areas and disadvantaged populations (MPP-Ec-11, 12).

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 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:

- ✅ Policy T-5.14 encourages the use of electric vehicles and a broad range of charging opportunities at public and private parking venues throughout DuPont, such as via minimum standards for new developments that provide parking facilities.
- ✅ Many provisions that promote coordination with regional partners to expand transit services in DuPont (Goal T-2, T-2.1-2.4, 4.1).
- ✅ Provisions that call for increased street connectivity to improve route options and access, spread traffic loads over a variety of appropriately developed roadways, minimize pedestrian/vehicular conflicts, and minimize reliance on the I-5 freeway for local circulation (T-1.2, 3.6, 5.1-5.3, 5.11, 5.15).

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

☐ The multicounty planning policies and Transportation 2040 emphasize providing a system for all users and increasing mobility and choice in transportation. The city has adopted provisions addressing various users of the system. Consideration should be given to adopting a “complete street” provision in the plan to further reinforce this. See VISION 2040, page 82.

☐ Consistent with MPP-DP-55, the plan includes a notable effort to establish facility-based levels-of-service for pedestrian and bicycle facilities. The city is encouraged to continue developing policies, standards,
and regulatory approaches that incorporate multiple travel modes. While there are challenges involved in implementing multimodal level-of-service standards, progress in this area would strengthen and reinforce the plan’s vision of supporting walking, biking and transit. The plan could also support transit, pedestrian, and bicycle projects as mitigation for development impacts. 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). PSRC has resources on multimodal concurrency.

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

- ✓ CF-3.1 promotes conservation of energy, water, and other natural resources in the location and design of public facilities.
- ✓ Policies that promote efficient use of public facilities through such techniques as conservation, demand management, and improved scheduling (CF-3.2, 7.1, 7.3).

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

- □ Several MPPs promote energy and water conservation, renewable energy, alternative energy sources, and water reclamation and reuse (MPP-PS-12-13; MPP-En-21-23; MPP-T-6). While the plan has policies to promote conservation of water and other natural resources, the plan would be strengthened by adding policies and provisions to promote renewable energy and alternative energy sources (see MPP-En-23, MPP-PS-12.13). More information on these alternatives can be found in the Washington State Department of Commerce Capital Facilities Planning Guidebook.

Conclusion
PSRC staff thanks 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 jurisdiction has questions or needs additional information, please contact Liz Underwood-Bultmann at 206-464-6174 or LUnderwood-Bultmann@psrc.org.