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 Edmonds, adopted by the city on July 28, 2015. PSRC last certified the Edmonds comprehensive plan in 2004. 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 Edmonds 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 Edmonds 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 Edmonds 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 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 clear and concise documentation of land use assumptions used in forecasting future travel demand out to the plan horizon year of 2035, including consistency with land use targets used in the remainder of the plan.
- The transportation element includes comprehensive and prioritized project lists that include detailed evaluation criteria tailored for each mode, and supported by a robust financing plan with contingencies for potential revenue shortfalls. Table 3-11 describes overarching criteria and scoring principles for prioritizing implementation of projects on the list of planned improvements.
- Pedestrian and bicycle components of the plan provide detailed and highly accessible inventories of existing facilities along with criteria for identifying future investments needs.
- Transportation policies support ongoing coordination with Community Transit to expand service within the community, and envision opportunities to build on the implementation of Link light rail to Lynnwood with improvements to local transit service.
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 7):

☐ As a signatory to the Growing Transit Communities Compact, the city should consider further emphasizing transit-oriented development as a framework for future development in the city that complements the current activity centers. Bus rapid transit service along SR 99 and the proposed multimodal transit facility at Edmonds Crossing are ideal opportunities to address transit-oriented development through station area planning.

☐ 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 Transportation Policy 5.15 identifies 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. For more information, see the Department of Commerce’s Transportation Element Guidebook (pages 140-160) and PSRC’s list of concurrency resources.

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 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 as well as 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 contains a community sustainability element that provides an overarching environmental framework for the plan as a whole built around seven sustainability goals focusing on the themes of climate change, community health, and environmental quality.

☑ Environmental quality goals and policies address critical areas, shorelines, implementation through incentives and education, and monitoring of key environmental indicators.

☑ The land use element prioritizes open space protection to address quality of life, urban design, and conservation of environmental features as enumerated in Open Space Policy A.2.

☑ The plan includes a comprehensive set of goals and policies that address climate change. Climate Change Goal A directs the city to inventory and monitor municipal and community greenhouse gas emissions. Goal B commits the city to setting greenhouse gas emissions reduction targets based on targets adopted by the State of Washington. The plan also addresses adaptation to climate change through a proposed climate change risk assessment and impact analysis (Goal C) and mitigation strategies in the areas of land use, transportation, and energy efficiency (Goal D).

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:

☑ The land use element includes clear documentation of the relationship of the plan to adopted growth targets for housing and employment, including land use capacity and the Regional Growth Strategy.

☑ The plan focuses future growth in two primary activity centers. The Downtown/Waterfront center builds on the existing character, walkable urban form, mix of uses, and cultural activities in the downtown area and also seeks to leverage the transformative potential of the planned Edmonds Crossing project that will relocate ferry, rail, and bus service to a new multimodal facility. The plan identifies short- and long-term
actions to attract new development while preserving and enhancing amenities that currently attract residents, businesses, and visitors to the downtown.

☑️ The Medical/Highway 99 center and corridor is based on creating a series of activity nodes along SR 99 built around existing use clusters, institutions, planned developments, and transit access via Swift bus rapid transit. Implementation actions foster transit-oriented development through support for commercial, residential, and mixed-use development tailored to the characteristics of each node, with planned investments to improve circulation, especially for pedestrians and bicycles.

☑️ Urban design principles and strategies, including the Physical Design Guidelines in Transportation 2040, are well addressed in the community culture and urban design element. Particularly strong are policies that promote retention of architecture and landscapes that are historic or otherwise valuable to the community’s sense of place and history. Policies on public access and linkages to the local arts community are also notable.

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 establishes a goal that all land within the urban growth area will be annexed by cities or incorporated, and assumes this transition to be largely complete by 2040. The land use element in the Edmonds comprehensive plan includes a short section on annexation of the city’s urban growth area. The plan should be strengthened with a more detailed discussion of the city’s strategy for working with Snohomish County to encourage annexation of urban areas that are identified for future annexation into Edmonds and address gap areas adjacent to Edmonds that are currently not affiliated with any city for annexation. The city should consider adding policies advancing this goal, including, as called for in MPP-DP-19, support for establishing urban development standards, addressing service and infrastructure financing, and transferring permitting authority.

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 Goal F and implementing policies further opportunities for developing a more diverse housing stock in Edmonds, including innovative infill in existing neighborhoods that provide both overall housing supply and more affordable housing types.

☑️ Housing Goal G and implementing policies provide for and encourage housing within activity centers, including housing that is within walking distance of transit.
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:

☐ As a signatory to the Growing Transit Communities Regional Compact, the City of Edmonds has committed to take steps to attract growth near transit investments, provide housing choices affordable to a full range of incomes near transit, and increase equitable access to opportunity for new and existing residents of transit communities. In response to the breadth and depth of the housing needed to meet the needs of low- and moderate-income households and transit-dependent residents, and to support Sustainability Policy G.3, the city should consider additional tools to create more affordable units, such as incentive or inclusionary requirements for new development within activity centers.

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:

☑ Economic Development Goal B and implementing policies support the city’s business districts with business development strategies and capital facilities investments that align well with the plan’s land use goals in the areas of support for centers, streamlining regulatory processes, historic preservation, and transportation connectivity.

☑ Economic Development Goal D and implementing policies connects the city’s efforts to bolster the economy with steps to maintain and improve quality of life, particularly access to suitable affordable housing and cultural amenities.

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:

- Transportation Policies 3.1 and 3.2 promote clean transportation through minimizing environmental impacts, such as through mitigation of impervious surfaces with alternative paving materials. Policy 3.16 links the city’s efforts to shift travel away from single-occupancy automobile and toward alternative modes, such as transit, to mitigation of climate change impacts.

- Transportation Policy 5.1 calls for all new roadways to be designed as complete streets to accommodate auto, bicycle, pedestrian, and transit, where applicable and feasible.

- Transportation Goal 4 advances active transportation through a range of proposed actions to complete the city’s nonmotorized network and ensure that those facilities encourage safe use by the public.

**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).

**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:

- Community Sustainability Goal D and implementing policies address strategies for the city to achieve energy efficiency and general conservation of resources in developing and managing its capital facilities, such as through innovative approaches like life-cycle cost analysis and green infrastructure.

- Solid Waste goals and policies in the utilities element support recycling and conservation through a comprehensive set of strategies, including enhanced facilities and services, public education, and municipal operations.
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/. If the city has questions or needs additional information, please contact Michael Hubner at 206-971-3289 or mhubner@psrc.org.