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 Federal Way, adopted by the city on June 16, 2015. PSRC last certified the Federal Way comprehensive plan in 2012. PSRC staff reviewed the 2015 comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the City of Federal Way 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 Federal Way 2015 comprehensive plan conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

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1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
The remainder of this report contains a summary of the PSRC review of the City of Federal Way 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 city’s comprehensive plan effectively addresses the transportation planning requirements of the GMA and includes adequate air quality policies and provisions. Highlights include:

- The plan includes inventories of existing facilities, including infrastructure for roads, transit, and non-motorized transportation, that are complete and clearly communicated in text and graphics. The inventories illustrate gaps in existing networks that inform the prioritization and programming of investments.
- **Policy TP1.2** establishes level-of-service standards for autos, transit, pedestrians, and bicycles (described in more detail on page III-47), and the layered network, as a planning tool for identifying long-term investments and programs to meet the city’s goals for a transportation network that accommodates multiple travel modes. The plan further describes how multimodal level-of-service standards are used in the city’s concurrency management processes to identify multimodal improvements that serve new development. Level-of-service standards are also tailored to incentivize development in the City Center.
- **Policies under Goal 5** in the transportation element address a range of complementary demand management and system management strategies around transportation. These include commute trip
reduction programs, investing in and providing incentives for the use of alternative travel modes, and right-of-way improvements to support high-occupancy vehicle and transit mobility.

☑ The plan contains a complete financing plan that quantifies costs and revenues, identifies anticipated financing gaps, and provides a robust framework for pursuing a constrained transportation investment plan in the short term and alternatives for securing additional revenues to meet long-term needs.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

□ The Growth Management Act (see RCW 36.70A.115 and .130) requires that comprehensive plan accommodate growth for the succeeding 20 years through land use designations and transportation and other public investments. Land use assumptions must be consistent across plan elements. The Federal Way comprehensive plan commits to planning for 20 years of growth in policy LUP8 and addresses future growth assumptions in the transportation and land use elements in a manner that meets minimum requirements. However, the use of different time horizons and data sources creates uncertainty that should be cleared up through future plan amendments. The plan, which seeks to address a 2015 – 2035 planning period, addresses land use only to the year 2031 and transportation to the year 2040. The land use element should be amended with housing and employment growth targets that extend to the 2035 planning horizon, and should clearly document that the existing land use designations provide capacity for the additional growth. The transportation element should be amended to document more completely how the analysis of future transportation needs addresses growth anticipated through 2035, consistent with the growth pattern assumed in the land use element.

**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 Federal Way comprehensive plan effectively describes how the comprehensive plan addresses the Regional Growth Strategy and broad policy areas in VISION 2040 with a statement in the introduction to each plan element.

**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 comprehensive plan contains a natural environment element that addresses a range of environmental considerations through land use, transportation, and public actions to protect and enhance those features.
- ✔ The plan promotes several areas of activity for the city to acquire habitat and open space. Policy NEP75 supports continued habitat acquisition by the city. Policies NEP107 and NEP108 promote open space acquisition using a range of approaches, including innovative tools such as transfer of development rights and incentives.
- ✔ Policy NEP19 and NEP20 support the use of low-impact development techniques that utilize natural drainage and filtration, minimize impervious surfaces, and reduce harmful run-off.

**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 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 plan includes a city center element that addresses land use, transportation, and public realm investments necessary to achieve the city’s vision of creating a dense, mixed-use, pedestrian-friendly and economically vibrant center.
- ✔ Section 2.11 in the land use element promotes the use of incentives for new growth and development in the City Center, and the plan advances the continued use of existing tools such as tax exemptions for multifamily development and streamlined environmental review.
The plan addresses public health with a dedicated section in the land use element on healthy food access. The city also advances opportunities for active transportation through its bicycle and pedestrian plan. Indoor air quality is promoted through policies in the natural environment and land use elements.

**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. The plan incorporates a number of best housing practices that address identified housing needs. Highlights include:

- The housing element includes a comprehensive assessment of existing and future housing and affordable housing demand. Notable is the use of CHAS data to carry out a more detailed analysis that matches households by type and income level to housing in the community by cost level.
- Housing policies promote a wide range of housing types. For example, policy HP16 calls on the city to increase housing capacity and adopt innovative regulatory tools that could include inclusionary zoning, cluster housing, cottage housing, and attached housing types such as duplexes.
- The housing element supports efforts to identify state funding (see policy HP30) and potential local funding (see policy HP32) for affordable housing.

**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:

- VISION 2040 and the Growing Transit Communities Strategy call for increasing the supply of affordable housing near transit. Discussion text in the housing element refers to potential new housing tools, including requirements for affordable housing in new transit-oriented development. The city should consider adding one or more policies in the housing and/or city center elements that supports affordability requirements for new housing in close proximity to planned high-capacity transit investments.

**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 provisions of VISION 2040. Highlights include:

- The economic development element highlights a comprehensive toolbox of actions the city can take in the arenas of land use, land development, and infrastructure investments to grow the local economy.
- Goal EDG5 and implementing policies promote high quality education opportunities as an economic development tool for the community. This includes support for attracting a future university branch campus to the city center.
- Policy EDG8 addresses the intersection of land use and economic development focusing on potential for employment and business growth by industry type in specific land use planning areas.

**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 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, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- In addition to the transportation policy highlights noted on pages 2 and 3 of this report, the comprehensive plan also includes a number of policies that promote alternative modes of transportation. Policies TP3.1-TP3.7 promote coordination with transit providers and call for a range of city investments and programs to support the provision of both high-capacity transit and local transit service to the community. Policies TP 3.8-TP3.14 prioritize and give direction for investments in bike and pedestrian...
improvements, including TP3.10 on the one-mile grid for bike facilities and TP3.11 on promotion of bicycle and pedestrian improvements in the City Center through design guidelines.

**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, and/or functional plans:

- Transportation impacts on climate change and greenhouse gas emissions are addressed at a high level in a dedicated section in the natural environment element. These issues are not addressed in the transportation element. While the plan as a whole, and the transportation element in particular, advances programs and investments that reduce vehicle miles travelled and greenhouse gas emissions, the transportation element would be strengthened with more direct policy linkages to climate change mitigation and adaptation.

**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, reclaimation and reuse.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

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

- Policies NEP21 and NEP23 promote conservation of the supply and quality of water resources, including protection of water sources and demand management.

**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 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/](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.