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 Mercer Island, adopted by the city on June 6, 2016. PSRC last certified the City of Mercer Island’s comprehensive plan in May 2012. PSRC staff reviewed the updated 2015 comprehensive plan and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Mercer Island 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 Mercer Island 2015 comprehensive plan update conform to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

The remainder of this report contains a summary of the PSRC review of the City of Mercer Island comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and

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.
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 on the part of the city is needed to more fully address VISION 2040, Transportation 2040, and Growth Management Act planning requirements. PSRC recognizes that the timing and mechanism for addressing each of the comments will vary based on the jurisdiction, its resources and plan update process, and the nature of the comment.

**Part I: Conformity with Growth Management Act Transportation Planning Requirements**

**Scope of Review**
The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

- **Land use assumptions and forecasts of travel demand** that are internally consistent and consistent with growth targets.
- **Service and facility needs**, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.
- **Financing and investments**, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.
- **Intergovernmental coordination** with neighboring cities, counties, and regional and state agencies.
- **Demand management**, including programs to implement the Commute Trip Reduction Act.
- **Pedestrian and bicycle planning**, including project funding and capital investments, education, and safety.
- **Land uses adjacent to airports**, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

**Discussion: Exemplary Plan Provisions**
The City of Mercer Island’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:

- Transportation goal 4 and policies 4.1-4.7 direct the city to provide transportation choices through a complete range of transportation facilities and services, including transit, walking, biking, and ridesharing. Policy 4.7 promotes multimodal mobility through implementing the city’s Pedestrian and Bicycle Facilities Plan.
- Transportation goal 12 and policies 12.1-12.3 promote the safety of the nonmotorized transportation system by calling for bicycle and pedestrian networks that safely access and link commercial areas, residential areas, schools, and parks within the city.
- The plan encourages intergovernmental coordination by directing the city to assist regional agencies in updates and implementation of Transportation 2040, the Highway System Plan, and the Washington Transportation Plan (Transportation policy 5.4).
DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for improvement of the plan to better align with Growth Management Act transportation planning requirements.

Part II: Consistency with Regional Plans and Policies

OVERVIEW
This section discusses consistency with the 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. A description of how the comprehensive plan addresses regional policies and provisions adopted in VISION 2020 and Transportation 2020 is contained in Appendix B. The city should update these sections and other references to reflect consistency with VISION 2040 and Transportation 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 Mercer Island comprehensive plan addresses the environmental policy topics in VISION 2040. Highlights include:

- Land use goal 18 emphasizes the protection of the natural environment as a priority for the city. This goal is promoted by policy 18.4 which directs the city to support the ecological functions of watercourses, wetlands, and habitat conservation areas through protection from the potential impacts of development. Further, land use policy 18.2 directs the city to improve the ecological health of watercourses and Lake Washington water quality through land use actions, storm water regulations and basin planning.
- These policies are also supported by land use policy 18.6 which encourages low impact development approaches for managing stormwater and protecting water quality and habitat.
- Land use policy 18.7 promotes city services and programs that encourage residents to minimize their own personal carbon footprint, especially with respect to energy consumption and waste reduction. In addition,
the collective impact of residents actions on local, county, and state greenhouse gas emissions reduction goals will be shared in outreach campaigns and educational initiatives (land use policy 18.9).

**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 many of the development patterns policies in VISION 2040. Highlights include:

- Land use goals 1 and 3 support the development of an attractive, mixed use, pedestrian scale and well-connected Town Center. These goals are supported by many policies, such as land use policy 3.1, which allows increased density if appropriate public amenities and enhanced design features are provided.
- Land use goal 12 and policies 12.1-12.3 encourage the development of inviting, accessible outdoor spaces with seating, greenery, water features, and art that offer settings for outdoor entertainment and special events as well as for quiet contemplation.
- Land use goal 13 states that Town Center buildings should meet a high standard of energy efficiency and sustainable construction practices as well as exhibiting other innovative green features, above and beyond what is required by the existing construction code.
- The land use element and other elements contain action plans to ensure implementation of comprehensive plan goals and policies.

**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 coming of Link light rail to Mercer Island will provide residents with access to jobs and destinations throughout the region, support planned residential and commercial growth in the Town Center area, and help the city meet its sustainability goals. As a signatory to the Growing Transit Communities regional compact, the city has made a commitment to work toward a vision for thriving and equitable transit communities throughout the region as furthered through implementation of goals and strategies contained in the Growing Transit Communities Strategy. The updated comprehensive plan does a good job of laying out the vision, goals and policies associated with the Town Center—the de facto station area for the...
Mercer Island Link station. Policies included in the Land Use, Housing, and Transportation elements address actions the city can take to attract mixed-use development to the station area, provide for housing options, and make improvements to multimodal transportation options. However, the planned station itself and its relationship to the future of the Town Center are only briefly mentioned outside of the transportation element. As Sound Transit moves forward with completing East Link light rail, Mercer Island should work to improve and expand implementation of the Growing Transit Communities Strategy by considering amendments to the comprehensive plan and/or adopting a subarea plan for the station area. These should include:

- Clearly identifying and addressing the role of the future Link light rail station, including in the maps and text in the land use, housing and transportation elements.
- Making clear the relationship between the light rail station area and the designated Town Center, as well as the opportunity that the station provides to support a Town Center development vision that includes mixed-use development at transit-supportive densities.
- Promoting equitable transit-oriented development and adopting specific strategies to preserve and expand the supply of housing in the station area that is affordable to low and moderate income households.
- Monitoring actual development and adjusting policies and regulations, as needed, to ensure that the city makes progress toward its goals in the station area.

☐ The city should evaluate its parking requirements (transportation policy 11.2) for single family housing in the context of regional policies that call for jurisdictions to review and streamline development regulations to provide flexibility and minimize additional costs to housing (MPP-H-7), foster a transportation system that is less polluting and that minimizes negative impacts to human health and the environment (MPP-T-5-T-7).

**Housing**

**SCOPE OF REVIEW**

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

- **Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.
- **Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- **Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

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

☑ The plan directs the city to consider using regulatory and financial incentives such as density bonuses, fee waivers, and property tax reductions to encourage affordable housing development in the Town Center (housing policy 3.9).

☑ Housing policy 3.11 calls for a housing demonstration project to examine the feasibility and desirability of additional innovative housing options such as compact courtyard housing, attached single family housing or smaller lot housing.
Housing policies 3.20-3.24 support the development of special needs housing through strategies such as providing supportive zoning, seeking federal, state and private resources, and working with service providers.

**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:

- RCW 36.70A.070(2)(d) and MPP-H-2 call for jurisdictions to plan for a sufficient supply of housing to meet the needs of households of all incomes by enacting policies that promote affordable housing preservation and development. Further, King County CPPs H-1 and H-2 require local jurisdictions to address a share of the countywide need for housing that is affordable to moderate, low, and very low income households. The housing needs analysis in the comprehensive plan update provides data that indicate a significant gap between the existing housing supply in Mercer Island and the need for suitable housing that is affordable to existing and potential future residents and the local workforce. Housing policy 4.1 commits the city to adopting a package of specific housing strategies every 5 years. Given the urgent housing needs documented in the plan, the city should adopt a housing strategy early within that five-year period. Adopted strategies and actions, especially incentives for affordable units in the Town Center and other areas with good access to transit, should be evaluated for the degree to which they may effectively and sufficiently address quantified local and countywide housing goals. PSRC’s Housing Element Guide can provide additional guidance in this work. For more tools and strategies to consider, see the PSRC Housing Innovations Program.

**Economy**

**SCOPE OF REVIEW**

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

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

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

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

- The plan supports public and private investment in existing properties, infrastructure, and marketing to help maintain longstanding businesses and attract new businesses (land use policy 14.5).
- Land use goal 14 and policy 14.6 promote the economic vitality of the Town Center through planning for economic development activities and encouraging businesses to serve the needs of Mercer Island residents, as well as draw upon broader retail and commercial market areas.

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

Transportation

**SCOPE OF REVIEW**

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

- **Maintenance, management, and safety**, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.
- **Support for the regional growth strategy**, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.
- **Improved transportation options and mobility**, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.
- **Linking land use and transportation**, including integrating Transportation 2040 physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The Mercer Island comprehensive plan addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety. It supports the regional growth strategy and provides greater options and mobility. Highlights include:

- ✔ Transportation policy 1.1 supports measures to reduce vehicular trips using transportation demand management strategies such as preferential parking for carpool/vanpool, alternative work hours, bicycle parking, and distribution of information and promotion of non-motorized travel, transit and ridesharing options.
- ✔ The plan directs the city to prioritize transportation investments in the Town Center that promote mixed-use and compact development and provide multi-modal access to regional transit facilities (transportation policy 2.6).
- ✔ Transportation policy 7.7 encourages coordination with local and regional emergency services to develop priority transportation corridors and develop coordinated strategies to protect and recover from disaster.

**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 requires level of service standards for all locally owned arterials and transit routes, and the MPP-DP-54-56 call for other modes, such as biking and walking, to be addressed through concurrency. One partial approach the city should consider is to tailor its concurrency program to encourage development in the Town Center area where it can be supported by transit, non-motorized infrastructure, and mixed land uses. A more comprehensive approach is to develop multimodal level of service standards for concurrency. While there are many challenges involved in implementing multimodal concurrency, making progress in this area would strengthen and reinforce the plan’s many policies that are supportive of walking, biking and transit. 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) and 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 Mercer Island comprehensive plan update contains policies that address many of the public services provisions of VISION 2040. Highlights include:

- Utilities policy 3.1 directs the city to require that all new development be connected to the sewer system.
- The plan promotes recycling, composting and waste reduction in single-family, multi-family and commercial developments (utilities policy 5.2). Further, policy 5.3 directs the city to provide convenient opportunities for residents to recycle appliances, tires, bulky yard debris and other hard-to-recycle materials whenever practical.

**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:

- MPP-PS-19 states: Reduce the per capita rate of water consumption through conservation, efficiency, reclamation, and reuse. The utilities element contains policies on water conservation. Please add water reclamation and reuse to this policy or another policy to strengthen the water resources policies.
- The city should consider strengthening its renewable energy provisions by elevating the discussion on alternative energy initiatives in the capital facilities to a policy (see MPP-PS-12).

**Conclusion**
PSRC staff thanks the city for working through the plan review and certification process. PSRC is available to provide assistance for future plan updates. Additional planning resources can also be found at [http://www.psrc.org/growth/planreview/resources/](http://www.psrc.org/growth/planreview/resources/). If the city has questions or needs additional information, please contact Erika Harris at 206-464-6360 or eharris@psrc.org.