City of Puyallup 2018 Comprehensive Plan Update

1) Certification report dated January 31, 2019 (see page 2). As of this Executive Board action taken at the February 28, 2019 meeting, the City of Puyallup comprehensive plan is now fully certified for consistency with the transportation-related provisions of the Growth Management Act, VISION 2040, and Transportation 2040.

2) Certification report dated February 25, 2016 (see page 4). This report summarizes complete review of the 2015 comprehensive plan update and two certification conditions for the city to address by December 31, 2017. Note: the city was granted a one-year deadline extension in February 2018.
BACKGROUND
PSRC conditionally certified the City of Puyallup’s 2015 periodic update of the city’s comprehensive plan on April 28, 2016. In November 2018, the city adopted amendments to the plan that address the conditions and resubmitted the plan for further review and full certification.

CERTIFICATION RECOMMENDATION
Based on the review of the 2018 City of Puyallup comprehensive plan amendments, 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 Puyallup’s comprehensive plan, as amended in 2018, conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

2018 COMPREHENSIVE PLAN AMENDMENTS
The Growth Management Act requires local comprehensive plans to be updated to accommodate the growth that is anticipated for the succeeding 20-year planning period (see RCW 36.70A.070, .115, and .130). The Act also requires that plan elements use consistent land use assumptions in order that a local jurisdiction is coordinating planning for land uses, housing, and capital facilities (RCW 36.70A.070(6)). VISION 2040 (MPP-DP-3) calls for countywide adoption of housing and employment growth targets that promote the Regional Growth Strategy. MPP-T-9 calls for coordination of state, regional, and local transportation planning in support of that strategy.

The February 2016 certification report identified inconsistencies between population and employment targets in the different elements of the city’s plan. The land use element referred to adopted 2030 growth targets and to projections of future growth out to the year 2035. In contrast, analysis of future needs in the transportation element referred to a plan horizon year of 2035 but used growth assumptions for that year that more closely aligned with the 2030 targets. The certification condition directed the city to rectify the inconsistency by using a consistent planning horizon year in both plan elements, noting that PSRC could provide technical guidance on extending the 2030 targets based on the Regional Growth Strategy.

The report also identified an inconsistency between the anticipated growth and required capacity included in the plan and the housing and employment growth targets adopted by Pierce County. The growth targets adopted by Pierce County show that Puyallup is expected to plan for an additional 6,885 housing units and 11,648 jobs by 2030. If extended to a plan horizon year of 2035, the targets would be higher. The plan recognized that the 2014 Pierce County Buildable Lands report found that the city had a capacity shortfall of at least 1,400 housing units and 1,889 jobs and had discussion that suggested the gap may be filled through amendments to the allowed uses and densities in the South Hill Regional Growth Center. To meet certification requirements and rectify the capacity shortfall, the condition required a plan amendment to reflect future land use plan changes that would result in sufficient capacity to accommodate the 20-year land use assumptions and growth targets.
Following a one-year extension to complete additional planning, the city adopted amendments to the plan that address the conditions in November 2018 and resubmitted the plan for further review and full certification. Specifically, the land use element was amended to incorporate the 2035 targets to be consistent with the other elements in the plan. Growth capacity was demonstrated through the adoption of the South Hill Regional Growth Center Neighborhood Plan and associated zoning changes to allow higher densities, completion of a Planned Action Environmental Impact Statement for the Downtown Regional Growth Center, and adoption of code amendments related to affordable and infill housing allowances.

**CONCLUSION**
PSRC staff worked closely with the city as they drafted the plan amendments that address the conditions for certification. If the Executive Board acts as recommended, the plan will no longer have conditions on its certification. PSRC looks forward to working with the city on future planning efforts and will continue to provide guidance and technical assistance on any further amendments to the plan, subarea plans, or functional plans developed in response to additional issues identified through the PSRC certification review.

Additional background and resources can be found in the City of Puyallup 2016 PSRC Plan Review and Certification Report and on the PSRC website at https://www.psrc.org/our-work/plan-review. Questions should be directed to Andrea Harris-Long at 206-464-6179 or AHarris-Long@psrc.org or Liz Underwood-Bultmann at 206-464-6174 or LUnderwood-Bultmann@psrc.org.
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 Puyallup, which was adopted by the city on November 10, 2015. PSRC last certified the Puyallup comprehensive plan in 2011. All elements, which collectively comprise the 2015 periodic GMA plan update, are reviewed here for certification. 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 comprehensive plan for the City of Puyallup, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in the comprehensive plan update for the City of Puyallup conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

Conditional status is in place until the city amends the comprehensive plan to:

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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.
- Resolve inconsistencies between plan elements in planning period and growth assumptions, and
- Provide sufficient capacity in planned future land uses to accommodate anticipated population, housing, and employment growth.

This work will occur according to the following schedule:

1. Council adoption of a work plan to address the condition identified in the certification report by May 30, 2016.

2. Submission of a draft amended comprehensive plan and supporting documents that address the condition to PSRC for review and comment in advance of adoption.

3. Once the condition is adequately addressed, submission of the adopted amended comprehensive plan and supporting documents by December 31, 2017, for review and certification by PSRC.

The city acknowledges and understands these conditions, which are described in more detail on page 6 of this report.

This report contains a summary of the PSRC review of the City of Puyallup 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 on the part of the city 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 Puyallup 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:

- The transportation element includes inventories of existing facilities, including infrastructure for roads, transit, and nonmotorized 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.

- The transportation financing plan is thorough and clear, showing the costs of planned projects for the 20-year period along with expected and potential revenues. The plan identifies anticipated financing gaps, and provides a framework for pursuing a constrained transportation investment plan in the short term and alternatives for securing additional revenues to meet long-term needs.

- Policy T-3.2 establishes level-of-service standards for multiple transportation modes, including vehicular, pedestrian, bicycle, and transit. The transportation plan further uses a “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.

Discussion: Areas for Further Work
The certification review did not identify any major areas for improvement of the plan to better align with GMA transportation requirements.
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. Each element of the Puyallup comprehensive plan includes a brief description of high level policy direction in the multicounty planning policies in VISION 2040. The city should consider describing in greater detail how the comprehensive plan addresses VISION 2040, including the Multicounty Planning Policies and the Regional Growth Strategy, when the city next amends the plan. Examples of context statements are provided in PSRC’s Plan Review Manual, page 2-1.

Environment

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.

- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.

- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.

- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The Puyallup comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- Goal NE-3 provides overall direction for critical areas protection to “protect, integrate, and restore” the natural functions of critical areas, implemented through policies that address a watershed approach to mitigation, open space acquisition, site design, monitoring, and other strategies.

- The natural environment element includes a robust set of policies that address the interface of land use and development with critical areas and natural hazards, including flood and geologic/volcanic hazard areas.

- Goal NE-8 commits the city to “improve and enhance the quality of all aquatic resources.” Implementing policies promote retention of natural vegetation, land use buffers, public education, strong mitigation requirements, multi-agency watershed management, and other tools.

- The plan includes a number of policies and actions that implement state and regional goals to mitigate greenhouse gas emissions. These include policies to reduce vehicle miles traveled through commute trip reduction strategies (NE-11.4), capital projects that promote multimodal travel (NE-11.8), and inclusion
of climate change impacts when doing environmental review under the State Environmental Protection Act.

✅ The natural environment element includes an implementation schedule that identifies specific actions, time frame, and potential partners for carrying them out. The implementation schedule is also a notable feature of several other elements in the plan.

**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**

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<th>SCOPE OF REVIEW</th>
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<td>VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:</td>
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- **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:

✅ The plan focuses a large share of its future residential and employment growth in two designated regional growth centers.

✅ A complete subarea plan for the Puyallup Downtown regional growth centers is adopted as part of the comprehensive plan. Design guidelines and incentives promote dense transit-oriented development around the Sounder commuter rail station and a strong pedestrian orientation in the core of the downtown. Planned urban form, design, and public realm enhancements contribute toward place making. Adoption of a planned action EIS is considered to provide further incentive to new development in the downtown.

✅ The plan provides broad support for innovative development techniques to create vibrant centers and preserve the environment. Policy LU-9.1 encourages green building practices. Policies LU-9.2 and 9.3 promote transfer of development rights and other incentives to protect agricultural and sensitive lands.

✅ Goals LU-16 and 17 promote mixed-use development in the city, with implementing policies that call for development regulations that allow or require higher densities or intensity of new building, with residential and commercial uses, integrated through multimodal transportation networks.

✅ Goal LU-7 calls for the community to be “planned and designed to promote physical, social and mental well-being.” The goal is furthered with policies that include LU-7.1 on location of community facilities in central locations and near transit, LU-7.2 on investments to improve walkability, and LU-7.4 promoting enhanced access to healthy food.

✅ Goals LU-14 and 19 advance the concept of including small-scale commercial and mixed uses in residential neighborhoods as a way to promote walkability and access to goods and services.
**DISCUSSION: CONDITIONS FOR CERTIFICATION**

The city must address the following provisions of the Growth Management Act and VISION 2040 in order to maintain certified status:

- The state Growth Management Act (see RCW 36.70A.130) requires local jurisdictions to review, update, and revise their comprehensive plans “to accommodate the urban growth projected to occur in the county for the succeeding twenty-year period.” Elements of the Puyallup plan reference planning horizons and growth assumptions that appear to be inconsistent with each other. Most notably, the land use element refers to the adopted 2030 growth targets and also to projections of future growth out to the year 2035. In contrast, analysis of future facility needs in the transportation element refers to a plan horizon year of 2035, but uses growth assumptions for that year that are more closely aligned with the 2030 targets.

  The city should amend the plan to ensure consistency across all plan elements in planning for future growth. With a plan adoption year of 2015, it is recommended that the plan elements use a planning horizon year of 2035, extending the 2030 targets and providing for a full 20-year planning period. PSRC can provide technical guidance on extending the targets in a manner that ensures consistency with the Regional Growth Strategy.

- The state Growth Management Act also requires local comprehensive plans to provide sufficient capacity to accommodate growth that is anticipated during the 20-year planning period. The growth targets adopted by Pierce County show that Puyallup is expected to plan for an additional 6,885 housing units and 11,648 jobs by 2030. If extended to a plan horizon year of 2035, the targets would be higher. As summarized on page 3.7 of the plan, the 2014 Pierce County Buildable Lands report found that the city currently only has capacity to accommodate 5,495 additional housing units and 9,759 jobs, leaving a capacity shortfall of at least 1,400 housing units and 1,889 jobs. Discussion text on page 3.8 of the plan suggests that the gap may be filled through amendments to the allowed uses and densities in the South Hill subarea.

  The city must amend the plan to reflect any future land use plan changes that may result from adoption of the South Hill subarea plan or other changes, such as providing additional capacity elsewhere in the city, including in the Puyallup Downtown regional growth center, and document that those changes have resulted in sufficient capacity to accommodate the 20-year land use assumptions and growth targets.

**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:

- Policy LU-6.1 directs the city to actively support annexations within the existing Puyallup Urban Growth Area (UGA), where conditions favor proposed annexation to the city. Policy LU-8.1 furthers interjurisdictional collaboration to “coordinate the boundaries of the Puyallup urban growth area.”

  VISION 2040 calls for all unincorporated lands within the UGA to transition into cities and assumes this transition to be largely complete by 2040. With large areas of unaffiliated UGA abutting the Puyallup UGA, the city should strengthen these provisions to more actively pursue affiliation of additional unincorporated Pierce County area that may be feasibly annexed to the city in the future.

- The comprehensive plan update includes South Hill Neighborhood Plan Policies, a preliminary update of the subarea plan for the regional growth center, that sets broad direction for more specific amendments that are forthcoming in 2016. The policy framework moves the city’s plans for the center toward a vision of higher density, mixed-use, and pedestrian oriented development that is more consistent with the goals and criteria for regional designation. The city should complete the subarea plan and amend its provisions to the comprehensive plan, including adding detail on planned uses and densities and infrastructure improvements, as appropriate.
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:

- Goal H-3 provides for greater housing diversity to meet community needs with policies that promote infill development in single-family areas (H-3.3), jobs-housing balance (H-3.6), and incentives for innovative housing (LU-10.2 and 10.3).
- Policies H-9.1, 9.2, and 9.3 support the development of affordable projects by governmental and non-profit entities through coordination on financing, land acquisition, and entitlements.
- Goal H-6 addresses housing for persons with special needs with policies that promote a spectrum of housing types from emergency to permanent (H-6.1), senior housing (H-6.3), and coordination of services for special needs populations and the homeless.
- Implementation actions include near-term commitment to development of an affordable housing strategy and consideration of a broad spectrum of regulations and incentives to promote housing diversity and affordability.

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 housing goals of GMA, VISION 2040 (especially MPP-H-5 and H-6), and the Growing Transit Communities Strategy support the provision of affordable housing in locations that best meet the needs of low-income and special needs households, particularly access to transit and services. Policy H-4 gives high level direction to provide affordable housing choices in the regional growth centers. Future development of subarea plans for these areas should consider a more complete range of regulatory tools, incentives, and programs to preserve and expand the stock of affordable housing within walking distance of frequent transit service and especially within the designated regional growth 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 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 economic development element includes policies that recognize and support the economic health and growth in the city’s two regional growth centers (see ED-4.1 and 4.2).
- Goal ED-2 reinforces the multiple linkages between land use, infrastructure, and the economic health of the community. Policies address allowed land uses (ED-2.2) and infrastructure investments made through the city’s capital planning, and specifically LIFT grants.
- Policy ED-3.1 emphasizes the importance of housing choice as an economic asset.

**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 Puyallup 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:

- The transportation element supports continuing and enhanced transit service. For example, policy T-1.1 promotes a broad range of actions that advance coordination among multiple agencies in planning for and implementing transportation projects, especially transit. Policy T-4.1 addresses improvements to corridors served by transit, including strategies such as signal prioritization, queue jumps, and transit-only lanes, as well as improved connections to transit for pedestrians and bicyclists. Policy T-4.2 identifies actions to support and enhance Sound Transit investments.
- The plan identifies existing facilities for multiple modes, including pedestrian and bicycle facilities, and identifies needed improvements to those networks. Further, Policy T-4.3 commits the city to develop a comprehensive active transportation circulation plan and implementation program that builds on the
concept of interconnected networks and prioritizes future capital projects. Policy T-6.5 commits the city to addressing long-term funding needs for nonmotorized improvements.

✔ The plan addresses a range of parking management strategies for the downtown Puyallup regional growth center. These include monitoring parking utilization, shared parking, code requirements that promote parking structures that are compatible with urban design goals, and consideration of access management through on-street parking fees and residential parking permits.

✔ The plan sets mode split goals for each of the regional growth centers as a framework for encouraging a much higher share of trips by transit, bicycle, and foot.

**DISCUSSION: AREAS FOR FURTHER WORK**
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on transportation.

**Public Services**

**SCOPE OF REVIEW**
VISION 2040 calls for local comprehensive plans to address the following public services policy topics:

- **Promote more efficient use of existing services**, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.
- **Promote renewable energy and alternative energy sources**.
- **Plan for long-term water needs**, including conservation, reclamation and reuse.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**
The Puyallup comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

✔ The capital facilities element identifies the LIFT grant as an opportunity to make targeted improvements in the Puyallup Downtown and South Hill regional growth centers.

✔ The plan promotes environmental stewardship (policy U-11) and conservation and energy efficiency (policy U-12) in utilities provision.

✔ Policy U-2.5 addresses the need to explore cooperative strategies to address long-term regional water supply, including meeting the needs of the city as it grows.

**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.

☐ MPPPS-7 and PS-12 promote renewable energy and alternative energy sources to extend the life of existing facilities and infrastructure and reduce greenhouse gas emissions. The city should consider amending the capital facilities and utilities elements to address more explicitly policies and actions that implement VISION 2040 in these areas.

**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 Michael Hubner at 206-971-3289 or mhubner@psrc.org.