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 Snohomish County comprehensive plan, adopted on June 10, 2015. PSRC last certified Snohomish County’s comprehensive plan in February 2003. PSRC staff reviewed the updated 2015 comprehensive plan and coordinated with county staff in the development of this report.

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

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

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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.
checklist for local comprehensive plans, 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, and 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 county 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:

- **Multiple objectives and policies promote transportation demand management techniques to support an efficient transportation system**, including employer-based commute trip reduction programs, support for transit, pedestrian, and bicycle transportation, and parking strategies (objectives 5.B, 5.C)
- **The county’s transportation concurrency system is tailored to provide an efficient transportation system**, support land use objectives, and address multiple modes (policies TR 5.A.1-5.A.9). Strategies include designating certain arterials as one of several designations (ultimate capacity, transit emphasis, multimodal corridor) that affect the level of service standards and call for additional transportation demand management programs and transit, pedestrian, and bicycle treatments.
- **The transportation element includes notable goals and policies that call for a coordinated and equitable system of development impact mitigation that recognizes the contribution of transportation demand management strategies to a reduced need for roadway capacity expansion expenditures. The county should consider also amending policies associated with objective TR 7.B to allow transit, pedestrian, and bicycle improvements as mitigation for development impacts.**
DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for improvement with GMA transportation requirements (see comments addressing consistency with regional guidelines and principles on transportation and Transportation 2040 on page 7).

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 descriptions of and references to VISION 2040 in several places within the plan. The county is encouraged to continue to expand on these references in future updates to 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 county’s comprehensive plan addresses many of the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- Objective NE 2.A and associated policies call for the county to coordinate with other jurisdictions and agencies, tribes, and non-governmental organizations to protect, restore, and enhance ecological functions, including fish and wildlife habitat, watersheds, shellfish beds, and salmon recovery.
- The natural environment element includes strong policies addressing protection of critical areas through strategies including best available science, interjurisdictional coordination on fish and wildlife habitat issues, and protection and restoration of stream banks, vegetated areas, and overall ecological functions (policies 1.C.2, 3.A.1, 3.B.1).
- The plan calls for the use of low impact development techniques wherever feasible when development activity disturbs land or affects drainage patterns (policy 3.H.2).
Goals, policies and strategies in the natural environment, transportation, and land use elements support efforts to reduce the county’s contribution to climate change. Strategies include developing a system of compact mixed-use centers, encouraging an efficient and lower-impact transportation system, adopting development regulations that foster energy conservation, and encouraging a renewable energy resources and a clean energy economy.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

**Development Patterns – including Regional Growth Strategy**

**SCOPE OF REVIEW**

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

- **Urban areas**, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.
- **Centers**, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.
- **Unincorporated urban areas**, including policies that advance annexation and orderly transition of governance.
- **Resource lands**, including identification of steps to limit development.
- **Regional design**, addressing local provisions that apply the Transportation 2040 Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.
- **Health and active living**, addressing healthy environment, physical activity and well-being, and safety.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The county’s comprehensive plan addresses many of the development patterns policies in VISION 2040. Highlights include:

- Policies and future land use map designations establish a system of pedestrian- and transit-oriented mixed-use centers. The plan calls for plans for urban centers to meet street connectivity standards, ensure streets are designed for all users, establish minimum development densities, reduce land consumption for parking, and encourage no net loss of affordable housing.
- Policies in the land use element ensure urban densities are achieved within the urban growth area, including guarantees that land that is annexed into cities achieves minimum residential density levels.
- Policy PE 1.B.2 limits the current and future population growth allocation to the county’s rural area to a maximum of 8.5% of countywide growth. This policy reflects and advances VISION 2040’s focus on permanently sustaining the ecological functions, resource value, lifestyle, and character of rural lands for future generations.
- The plan supports farming and farmland preservation throughout the county through strategies such as restrictions on incompatible uses on adjacent lands, public awareness and education programs, policies calling for the county to initiate studies that could improve conservation of farmland, and programs that promote and market locally grown and processed products.
- A dedicated cultural resources section aims to identify, preserve, and enhance archaeological, historic, and arts resources throughout unincorporated Snohomish County.
**Discussion: Areas for Further Work**

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

- The Paine Field manufacturing/industrial center plays an important role in accommodating future economic growth in the region. VISION 2040 includes an action for jurisdictions with regional centers to develop subarea plans (DP-Action-17), and PSRC will be certifying center plans for consistency with regional policies and procedures. Subarea planning will help the county and the City of Everett achieve the vision for the area as well as address regional center expectations in the center plan checklist. The comprehensive plan includes goals and policies that call for maximizing the potential of the center as an aviation and industrial commercial facility and discourage incompatible retail and office uses. The county has worked with the City of Everett on subarea planning in the past and has also adopted a master plan for the airport portion of the center. The county should continue to work with the City of Everett to address a full range of planning expectations for the Paine Field manufacturing/industrial center.

- VISION 2040 calls for all unincorporated lands within the urban growth area to transition into cities and assumes this transition to be largely complete by 2040. Snohomish County, in collaboration with the cities, has made notable progress in affiliating nearly all of the urban growth area with cities, although some gaps remain to be addressed. To further support the transformation of governance called for by the Growth Management Act and VISION 2040, the county should work with the cities through the countywide planning process and strengthen policies in its comprehensive plan to encourage joint planning agreements, establish compatible development standards, and coordinate review of development permits with affiliated cities within the urban growth area.

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

- The housing element calls for the county to encourage private sector production of new housing units that are affordable to, and occupied by, low income households. Implementation strategies include development standards that reduce housing production costs, development incentives and future consideration of reduced minimum lot sizes for housing (policy 1.C.3).

- The housing element addresses development, preservation, and rehabilitation of affordable units including mobile homes and manufactured homes through support for the Housing Authority of Snohomish County, participation in the Alliance for Housing Affordability, and implementation of an affordable housing trust fund (policies 1.B.3, 1.C.4-7).
The land use and housing elements call for the county to provide opportunities for and encourage a variety of housing types and densities in residential neighborhoods, including the use of innovative urban design techniques to foster broad community acceptance (policies LU 2.A.4-5, HO 2.B.1-4).

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

**Economy**

**SCOPE OF REVIEW**
VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:
- Include an economic development element that addresses: business, people, and places.
- **Retention and recruitment efforts** that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- **Equitable benefits and impacts**, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- **Adequate housing growth in centers** through collaboration with the private sector and provision of infrastructure.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**
The county’s comprehensive plan update contains a thorough and detailed economic development element that effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- ✔ The plan includes an economic development element that supports industry clusters, focuses on creating shared prosperity and family wage jobs, and balances economic and environmental concerns.
- ✔ The transportation element supports job access for disadvantaged populations by working with transit agencies, social service agencies, and other partners to ensure mobility for people with special transportation needs.
- ✔ Policies call for the county to ensure a sufficient supply of land to accommodate employment targets and support economic growth, including support for the intensification and reuse of existing industrial and other employment areas.
- ✔ Objectives and policies in the land use and economic development elements recognize the economic importance of the county’s working farmlands and associated businesses and support sustainable timber production and mining in designated resource lands.

**DISCUSSION: AREAS FOR FURTHER WORK**

- ☐ VISION 2040 calls for economic development efforts within the region to include programs and provisions for distressed areas and areas with disadvantaged populations (MPP-Ec-11,12,13). The plan does not explicitly address distressed areas or disadvantaged populations. The county should work to develop and add to the plan supportive policies, programs, and strategies that address MPP-Ec-11, 12, and 13.
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 county’s comprehensive plan addresses the major transportation emphases in VISION 2040 and Transportation 2040, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- ✔ The plan supports the Regional Growth Strategy with a strong policy emphasis on supporting transit- and pedestrian-oriented land uses within centers and connecting them with an efficient multimodal transportation system (policies 2.A.2, 2.A.5, 2.B.1-2).

- ✔ The plan calls for transit to be integrated with land development review and with the design and maintenance of public roads, and extended throughout the urban area at an appropriate level of service (policies 1.A.1, 1.A.2).

- ✔ The plan establishes a system designation, developed in coordination with Community Transit, for transit emphasis corridors that serves as a framework for transportation-efficient land use designations and transit-supportive infrastructure investments.

**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 (see comments addressing Growth Management Act transportation planning requirements on page 2 of this report):

- □ VISION 2040 calls for the region to emphasize transportation investments that provide and encourage alternatives to single-occupant vehicle travel and increase travel options and increase the proportion of trips made by transportation modes that are alternatives to driving alone (MPP-T-23,24). While the comprehensive plan reflects a focus on a multimodal transportation planning, development standards, and mitigation programs, it is unclear what level of funding is identified for pedestrian, bicycle, and transit projects in the financing plan and improvement lists. For example only about 5% of the expenditures in the improvement portion of the plan’s financial strategy (table 14) appear to be identified for standalone pedestrian projects and none for standalone bicycle or transit projects. The plan, however, also indicates that the non-capacity portion of the financing plan addresses nonmotorized pedestrian facilities, sidewalks, transit & HOV improvements (table 17).
In order to more effectively and completely address the need to plan for and implement a multimodal transportation system, the county is encouraged to build on the notable goals and policies in the plan by more clearly identifying projects and funding that support the transit, pedestrian, and bicycle components of the transportation system. Doing so will support the region’s goal of offering greater options, mobility, and access in support of the Regional Growth Strategy. See PSRC’s Transit Supportive Planning Toolkit and Active Transportation Plan for more information and examples.

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 county’s comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- The natural environment and utilities elements include goals and policies that support efforts to reduce energy consumption and promote renewable energy production, including strategies such as energy-efficient site planning, market support for clean energy production, and transportation strategies to reduce fossil fuel consumption (policies En 10.B.3-4, 10.B.6, 9.B.2).
- The natural environment element includes policies that promote the conservation and efficient use of water (policies En 9.A.1, 9.A.3, 11.B.4).

**Discussion: Areas for Further Work**
The county should address the following comments at the earliest opportunity through future amendments to the comprehensive plan, subarea plans, or functional plans:

- **VISION 2040 calls for new development within the urban growth area to be served with sanitary sewer systems or fit with dry sewers in anticipation of connection to the sewer system (MPP-PS-9). The plan includes policies that partially address this policy, including policies 3.A.1 and 3.A.2. The county should review the plan and consider amendments if necessary to ensure consistency with regional policy in this area.**

**Conclusion**
PSRC staff thanks the county for working through the plan review process. PSRC is available to provide assistance for future plan updates and additional planning resources can also be found at http://www.psrc.org/growth/planreview/resources/. If the county has questions or needs additional information, please contact Yorik Stevens-Wajda at 206-464-6179 or ystevens-wajda@psrc.org.