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 Sumner, adopted by the city on July 27, 2015. PSRC last certified the city of Sumner’s comprehensive plan in September 2006. 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 Sumner 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 Sumner 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 City of Sumner comprehensive plan update. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high level bullets. Discussion in each topic area highlights

1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
exemplary provisions of the plan, as well as issues identified through the certification review where future work on the part of the city is recommended.

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 Sumner’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:

- The plan supports active transportation by developing a highly interconnected network of streets, sidewalks, bicycle lanes, and trails and improving nonmotorized connections to regional transit facilities (Transportation 3.6, 4.1-4.5, and 5.4).
- Transportation policy 5.8 promotes strategies and programs that reduce the demands on the transportation system such as transit, carpools, vanpools, and flexible work schedules and locations.
- Transportation policies 8.1-8.3 support the manufacturing industrial center by calling for improvements for freight access and circulation to and within the center.

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with transportation-related provisions of the Growth Management Act (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 city describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 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 Sumner comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:
- Transportation policies 6.7 and 6.8 support the reduction of greenhouse gas emissions by calling for the city to reduce the rate of energy use per capita, both in building use and in transportation activities.
- Transportation policy 6.5 states that low impact development should be the preferred alternative for new transportation projects and calls for the city to provide incentives for the use of low impact development techniques that will reduce impervious surfaces, provide for stormwater infiltration, and protect the natural environment and systems.
- Both the transportation and environment elements contain policies to improve air quality in the city through strategies such as reducing reliance on the automobile, conducting greenhouse gas emissions analysis on plan alternatives, encouraging alternative fuels and electric vehicles, and monitoring air quality (Transportation 6.3 and Environment 1.1).

DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for improvement of the plan to better align with regional environmental guidelines and principles.
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 city’s comprehensive plan effectively addresses many of the development patterns policies in VISION 2040. Highlights include:

- Many elements of the plan promote the development of a compact, vibrant, pedestrian-oriented town center (land use 1.15, housing 4.3, and community character 3.1-3.24).
- The plan supports the preservation and growth of the manufacturing industrial center by encouraging the concentration of manufacturing and industrial uses, working with funding partners to provide critical infrastructure, and restricting incompatible land uses (land use 1.11-1.14).
- Land use policy 1.2 supports efficient use of urban land and infrastructure by encouraging infill development on vacant properties with existing public services and public utilities, and new development in areas with existing or planned public facilities.

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 Environmental Impact Statement (Volume II) provides detailed information on growth targets, development capacity, and other assumptions for the city. The 2035 growth targets and development capacity information documented in the Environmental Impact Statement should be summarized in the land use element and/or other elements in the body of the plan to clearly convey growth assumptions and consistency between all plan elements.
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 housing needs assessment in the Draft EIS does an outstanding job of characterizing the gap in affordability for Sumner residents. By numerically characterizing the need, the city can accurately plan for and monitor outcomes for households at all income levels.
- Housing policies 4.1-4.4 promote the development of a variety of housing types and densities in the town center near the commuter rail station.

**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 Growth Management Act requires jurisdictions to make adequate provisions for existing and projected housing needs of all economic segments of the community. The policies in the housing element go a long way to meeting Growth Management Act requirements and advancing VISION 2040’s housing goals, including the city’s commitment to developing a housing strategy to implement fair share objectives by December 2017. In response to the housing needs identified in the plan, the city should prioritize development of the tools identified in Policy 2.3.3. These tools would be particularly effective in furthering affordability in the town center and access to regional transit.

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:
☑ Economic development policies 2.1 and 2.2 call for the city to partner with other organizations to provide education and training opportunities.

☑ Economic development policy 2.12 encourages coordinated and effective policies, regulations, and economic development efforts to foster continued growth of a viable regional manufacturing and industrial center, consistent with Pierce County and Puget Sound Regional Council requirements.

☑ Policies 5.1-5.18 contain strategies that promote the development of the town center as a high-quality place for employment, recreational, residential, and a variety of commercial activities.

**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 Sumner 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:

☑ Many policies and provisions in the plan encourage a multimodal transportation network and promote alternatives to driving alone (Transportation 2.4, 3.6 and 4.1-4.5).

☑ Policies such as transportation policy 5.6 and economic development policy 5.2 address Transportation 2040’s physical design guidelines, including directing the city to monitor the needs for downtown parking and developing methods for providing attractive, safe, accessible, effective and well-utilized parking within the town center. In town centers in particular, managing parking can have many benefits. The parking management information in PSRC’s Planning for Whole Communities Toolkit may be helpful in planning for parking. The right size parking project provides additional information on parking supply and management.

☑ Transportation policy 3.11 promotes maintenance of the transportation system through an ongoing pavement management system and traffic operations program.
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:

- PSRC commends the city for including many policies and provisions in the plan supportive of active transportation and tailoring its concurrency program to encourage development in the town center area where it can be supported by transit, nonmotorized infrastructure, and mixed land uses. The Growth Management Act requires level of service standards for all locally owned arterials and transit routes, and the MPPs call for other modes, such as biking and walking, to be addressed as well (MPP-PS-54-56). The city should continue to work to develop policies, standards, and regulatory approaches that incorporate multiple travel modes. While there are many challenges involved in implementing multimodal level-of-service standards and 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 Sumner comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- The plan contains provisions for efficient and innovative stormwater facilities such as regional facilities that support infill development. These strategies can help reduce the need for individual on-site ponds and facilities, provide development incentives, encourage efficient use of land, and reduce overall facility maintenance costs (capital facilities and public services 1.7.7).
- Capital facilities and public services policy 2.1 calls for the city to meet a LEED® Silver certification for new construction or major renovations of city facilities when economic benefits, including the reduction of operating costs, enhanced asset value, optimized building performance, and a healthier workplace for its employees, may be realized.
- Capital facilities and public services policy 1.6 promotes an efficient water system through strategies such as protecting groundwater resources and implementing a water conservation program for residential, commercial, and industrial users.

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 plan recognizes the importance of serving new development with sanitary sewer systems in policy 1.8.2, as does VISION 2040. To be more consistent with MPP-PS-9, consider adding language addressing standards and maintenance plans for alternative technologies. MPP-PS-9: Serve new development within the urban growth area with sanitary sewer systems or fit it with dry sewers in anticipation of connection to the sewer system. Alternative technology to sewers should only be considered when it can be shown to
produce treatment at standards that are equal to or better than the sewer system and where a long-term maintenance plan is in place.

COMMENTS AND GUIDANCE

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/. If the city has questions or needs additional information, please contact Erika Harris at 206-464-6360 or eharris@psrc.org.