City of Tukwila 2017 Comprehensive Plan Update

1) Certification report dated October 26, 2017 (see page 2). As of this Executive Board action taken at the December 7, 2017 meeting, the City of Tukwila 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 a certification condition for the city to address by December 2017.
BACKGROUND
PSRC conditionally certified the City of Tukwila’s 2015 periodic update of the city’s comprehensive plan on April 28, 2016. In October 2017, the city adopted amendments to the plan that address the condition, and resubmitted the plan for further review and full certification.

CERTIFICATION RECOMMENDATION
Based on the review of the 2017 City of Tukwila 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 Tukwila’s comprehensive plan, as amended in 2017, conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

2017 COMPREHENSIVE PLAN AMENDMENTS
The Growth Management Act requires local comprehensive plan elements to 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)).

The February 2016 certification report identified internal inconsistencies between population and employment targets in the different elements of the plan. Tukwila completed the periodic update through phases over the course of several years. The city used the employment targets and forecast products available in 2010 in the transportation background work and element, prior to adoption of new growth targets and release of updated forecast products. Employment forecasts in the transportation background report and transportation element assume 27,670 additional jobs from 2010–2030. This figure is higher than the growth assumed in both the current growth targets (i.e., 15,500 additional jobs by 2031). Assumptions used through the rest of the plan are consistent with the adopted targets.

In October 2017, the city adopted amendments to the plan that address the condition and resubmitted the plan for further review and full certification. Specifically, the transportation element was amended to incorporate the 2031 targets to be consistent with the other elements in the plan. The city’s travel demand model was re-run using the 2031 employment target and found that forecasted traffic volumes are not expected to grow as much within the city compared to the previous analysis using the 2030 target. The new forecast traffic volumes do not affect the proposed transportation capital improvement projects.

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 Tukwila 2015 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 Michael Hubner at 206-971-3289 or mhubner@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 Tukwila, adopted by the city on October 5, 2015. PSRC last certified the City of Tukwila’s comprehensive plan amendments in 2007. PSRC staff reviewed the 2015 comprehensive plan amendments and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION
Based on the review of the City of Tukwila 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 conditionally certifies that the transportation-related provisions in the City of Tukwila 2015 comprehensive plan update conform to the Growth Management Act and are consistent with multicounty planning policies and the regional transportation plan.

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1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
Conditional status is in place until the city updates the comprehensive plan to address employment assumptions used in the transportation element according to the following schedule:

1. Tukwila City Council adoption of a plan of work that addresses the condition identified in the certification report by May 31, 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.

The remainder of this report contains a summary of the PSRC review of the City of Tukwila 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 City of Tukwila’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:

- Provisions to support bicycle and pedestrian mobility, including an inventory of existing facilities, goals and policies that support a safe and convenient nonmotorized network, priority pedestrian and bicycle modal networks and planned investments. In addition, Tukwila’s Complete Streets policy requires all new city transportation improvement projects to provide appropriate accommodation for pedestrians, bicyclists, transit riders and persons of all abilities, while promoting safe operation for all others.

- The plan describes the city’s approach to transportation demand management strategies and the city’s support for Commute Trip Reduction, encouraging transit-oriented uses and pedestrian amenities in the vicinity of high-capacity transit stations, and establishing center-specific mode-split goals (Pages 13-20 and 13-21).

- The plan discusses coordination with jurisdictions and public entities such as the Port of Seattle, Metro and Sound Transit. The plan includes policies to coordinate with surrounding jurisdictions and regional and state agencies to finance and develop a multimodal transportation system that enhances regional mobility and reinforces the countywide vision for managing growth. The plan includes additional implementation strategies, such as adopting the Tukwila School District walk route maps as the basis for new requirements in the subdivision code (Policy 13.1.6).

- The plan details a tiered project list and funding strategies for the planned transportation network.

**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 Growth Management Act requires that plan elements use consistent land use assumptions. Specifically, travel demand forecasts and transportation need assessments should be based on land use assumptions that correspond with the most recently adopted growth targets (RCW 36.70A.070(6)). Using consistent land use assumptions ensures that a local jurisdiction is planning in a coordinated fashion for needed land uses, housing, and capital facilities.

The City of Tukwila completed the periodic update through phases over the course of several years. The city used the employment targets and forecast products available in 2010 in the transportation background work and element, prior to adoption of new growth targets and release of updated forecast products. Employment forecasts in the transportation background report and transportation element assume 27,670 additional jobs from 2010–2030. This figure is higher than the growth assumed in the current growth targets (i.e., 15,500 additional jobs by 2031). Assumptions used through the rest of the plan are consistent with the adopted targets.

The plan identifies this issue and states that the city plans to revise the transportation element for consistency with other plan elements and adopted growth targets in 2016 (page 13-4). The city should complete this work and update the plan to document consistent land use assumptions across all elements. PSRC staff is available to provide relevant data and guidance on methodology.

**DISCUSSION: AREAS FOR FURTHER WORK**

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

- Provisions in the Growth Management Act (RCW 36.70A.510), Planning Enabling Act (RCW 36.70.547), and VISION 2040 (MPP-DP-51) require counties, cities, and towns to discourage the siting of incompatible uses adjacent to general aviation airports. Portions of King County International
Airport/Boeing Field are within the city, and Sea-Tac International Airport is within a mile of the city boundaries. The city has addressed height and incompatible uses in its development regulations. The city should review and use PSRC’s updated Airport Compatible Land Use Program to ensure the plan also addresses state requirements and regional policies that discourage siting incompatible uses adjacent to general aviation airports. Resources and information on PSRC’s Airport Compatible Land Use Program Update are available to assist the city. For additional information and guidance, the city can consult the Washington State Department of Transportation Aviation Division’s Land Use Compatibility Program.

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 references VISION 2040 and discusses consistency in the context of certain elements. The city should provide a context statement that describes in greater detail how the plan addresses VISION 2040, including the multicounty planning policies (MPPs) and the Regional Growth Strategy. 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 Tukwila comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- The plan includes detailed tree canopy goals, with the overall goal to increase citywide tree canopy to 29% by 2034. The plan includes tree canopy goals for various zones and the regional growth center, along with multiple policies about tree retention and the benefits of trees (Goal 4.13).
- Provisions for interjurisdictional collaboration and a systems approach to environmental stewardship, including coordinating with Kent on flood control projects that affect both jurisdictions (Policy 4.10.4).
and coordinating water quality improvement programs with adjoining jurisdictions whose surface waters flow into or through Tukwila (Policy 12.1.27).

☑️ The plan addresses water quality and water quality enhancement. For example, Policy 12.1.29 calls for encouraging the retention and planting of trees for their beneficial effects on surface water runoff, including flow attenuation, water quality enhancements and temperature reduction.

**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:

☑️ The plan accommodates an additional 4,800 housing units and 15,500 new jobs by 2031. The plan includes policies that support growth within Tukwila’s regional growth center, the International Boulevard transit station area and the North Tukwila manufacturing/industrial center.

☑️ The plan incorporates the Transportation 2040 physical design guidelines through various policies that address pedestrian-oriented design and vibrant public spaces (See Policies 1.6 – 1.8). For example, the plan includes policies requiring through-block pedestrian connections as major new development or redevelopment occurs and encouraging facilities and improvements that support transit use in new development, redevelopment, and street projects (Policies 1.6.3, 1.6.4).

☑️ Emphasis on health and social equity throughout the plan. For example, the plan includes a goal for Tukwila to be a healthy community where active living and access to affordable, culturally appropriate and nutritious food is available to all (Goal 1.9). Policies include exploring incentives or regulatory changes to encourage location of healthy food purveyors in underserved areas, encouraging locally based food production, distribution, and choice, supporting healthy food choices and active living programs, and promoting opportunities to grow food in the city (Policies 1.9.1 – 1.9.3, 6.6.1-6.6.9).

☑️ Various policies to support transit-oriented development in the Tukwila International Boulevard district, including Policy 8.10.4: “Consider using City funding and City-owned property to offset development costs of market rate housing in ‘pioneering’ residential or mixed-use projects.”
**DISCUSSION: AREAS FOR FURTHER WORK**

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

- MPP-DS-3 and the center plan checklist call for jurisdictions with designated regional centers to include housing and employment targets for growth in the centers planned for over the next 20 years. The plan should include targets for both the North Tukwila MIC and the regional growth center. PSRC recently produced additional guidance about setting center targets that the city may find helpful in this work.

- The city used a unique approach addressing required components of the land use element within five subarea elements. The plan includes the required information and policy areas, but the city should consider inclusion of a land use element in future updates. In particular, discussion of the city’s targets and land use capacity is located in different elements and background reports. The plan also discusses various boundary issues that have resulted from incremental annexations over time. To provide additional clarity about these issues, the city should consider consolidated discussion of employment and housing capacity, targets, annexation, and boundary issues in a single element.

**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:

- A thorough housing needs assessment, which provides a multilayer analysis of the current and future housing needs for the city and evaluates the results from existing housing programs. Key findings from the needs assessment have been translated into priority issues in the housing element.

- The plan includes a goal for the city to support and collaborate with other jurisdictions and organizations to assess housing needs, coordinate funding, and preserve and create affordable housing opportunities (Goal 3.3). This goal is supported by policies to support the equitable distribution of regional funds for affordable housing, periodically review regional low-income housing goals to evaluate the city’s compliance with regional standards, and continue supporting very low-, low- and moderate-income housing to address the countywide need (Policies 3.3.1-3.3.3).

- The plan includes multiple policies that address affordable housing and preservation. Strategies include identifying specific publicly owned land for affordable housing development, exploring acquiring property to land bank for affordable housing, and partnering with non-profit organizations and for-profit developers to acquire, rehabilitate, construct, preserve and maintain permanent affordable housing and support services.

**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:

1. Include an economic development element that addresses: business, people, and places.
2. Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
3. Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
4. 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:

- An economic development background report that includes an overview of existing conditions, issues, and opportunities for the city.
- Provisions to support equitable economic development, including implementation strategies to engage with and understand the economic development needs and priorities of traditionally under-represented groups and to explore possible city actions to increase the median income of Tukwila’s residents, including support for entrepreneurship, small business startups, and vocational training, particularly among low income or low English proficiency communities.
- Emphasis on economic development within the city’s two designated centers, including actively promoting development in the regional growth center by supporting existing uses, proactively developing programs and incentives to attract new businesses, investing in infrastructure and public amenities, and encouraging business owners and developers to invest in the quality of both the built and natural environment (Policy 2.1.18).

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:

1. 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.
2. 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.
3. 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 Tukwila 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:

- ✓ A transportation background report that explores and analyzes level of service measures for a variety of transportation modes.
- ✓ Multiple goals and policies support transit use through coordination with King County Metro and Sound Transit. The city has developed a Transit Master Plan, designated transit priority corridors, and encourages transit-oriented uses, development patterns and pedestrian amenities in the vicinity of high-capacity transit stations and other strategies to support well-used and efficient transit (Policies 13.4.1-13.4.8, 13.5.3, 13.4.8). These provisions of the plan serve to advance the goals of the regional Growing Transit Communities Compact, of which Tukwila is a signatory.
- ✓ Policy 13.1.5 directs the city to design and operate transportation facilities in a manner that is compatible with and integrated into the natural and built environments in which they are located. Features such as natural drainage, native plantings and local design themes that facilitate integration and compatibility should be incorporated.

**DISCUSSION: AREAS FOR FURTHER WORK**

The city should address the following comments at the earliest opportunity as appropriate through future amendments to the comprehensive plan, subarea plans, or functional plans (please also see conditions and comments addressing Growth Management Act transportation planning requirements starting on page 3 of this report):

- □ Consistent with MPP-DP-55, the plan includes a notable effort to evaluate levels of service for pedestrian and bicycle facilities. The city is encouraged to continue developing policies, standards, and regulatory approaches that incorporate multiple travel modes. While there are challenges involved in implementing multimodal level-of-service standards, progress in this area would strengthen and reinforce the plan’s vision of supporting walking, biking and transit. The plan could also support transit, pedestrian, and bicycle projects as mitigation for development impacts. 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). PSRC has resources on multimodal concurrency.

- □ As called for in VISION 2040 (DP-Action-18), the plan includes mode split goals for the regional centers. However, mode split goals for the regional growth center cover only a six-year period, and the plan doesn’t include baseline information to measure progress towards achieving mode split goals in either the manufacturing/industrial center or regional growth center. The city is encouraged to refine mode split goals for the centers in order to provide clearly quantified metrics to guide local efforts over the full 20-year planning period. PSRC recently produced additional guidance about setting mode split goals that the city may find helpful in this work.

- □ VISION 2040 and Transportation 2040 address special needs transportation planning (see MPP-T-25). The plan should include discussion and policy language that more explicitly addresses mobility for people with special transportation needs, including persons with disabilities, the elderly, youth, and low-income populations.
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 Tukwila comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- **✓ Policies to promote conservation, demand management, and efficient use of public services.** For example, Policy 12.1.15 calls for making conservation an integral part of Tukwila’s utility operations and management. This is supported by implementation strategies to develop and practice conservation measures for each utility, use conservation as a means of deferring the development of new facilities or as a means of augmenting available resources, structure water rates to encourage conservation, and require conservation-conscious operation of all city facilities to provide a good model for the community.
- **✓ Policies addressing intergovernmental coordination on regional water issues.** For example, Policy 12.1.20 calls for actively participating in determining a regional solution to Tukwila’s water supply and addressing the potential impacts of climate change on regional water resources.
- **✓ The plan calls for reducing the rate of energy consumption, using efficiency and conservation as a means to lower energy costs and mitigate environmental impacts, promoting use of renewable and alternative energy resources to help meet long-term energy needs, and actively supporting conservation techniques and programs for both residential and commercial properties in Tukwila, with the goal of reducing the total city energy use by 25% by 2025 (Policies 12.1.42, 12.1.16, 12.1.43, 12.1.45, and 12.1.46).**

**DISCUSSION: AREAS FOR FURTHER WORK**
The city should address the following comment at the earliest opportunity as appropriate through future amendments to the comprehensive plan, subarea plans, or functional plans:

- **☐ MPP-PS-6 calls for obtaining urban services from cities and encouraging special service districts to consolidate or dissolve as a result, and CPP-PF-3 notes that cities will assume local urban services as time and conditions warrant. Policy 12.1.11 calls for allowing special-purpose sewer and water districts to continue to operate and serve Tukwila residents and businesses, when appropriate. Within its local context, the city should consider how to address long-term countywide and regional goals to encourage consolidating service providers.**

**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 Liz Underwood-Bultmann at 206-464-6174 or LUnderwood-Bultmann@psrc.org.