

# PSRC PLAN REVIEW REPORT & CERTIFICATION RECOMMENDATION

## CITY OF BLACK DIAMOND COMPREHENSIVE PLAN

January 17, 2020



### 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.<sup>1</sup> 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](#), [the Regional Transportation Plan](#), 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 Black Diamond, adopted by the city on May 2, 2019. PSRC last certified the City of Black Diamond’s comprehensive plan in 2010. PSRC staff reviewed the 2018 major update and coordinated with city staff in the development of this report and the city acknowledges and understands the conditions outlined on pages 2-4.**

In King County, cities and the county work cooperatively to establish 20-year housing and employment targets to coordinate growth expectations. The City of Black Diamond expects substantial growth that will exceed its adopted targets for 2035 – 7,674 housing units are anticipated by the city compared to an adopted target of 2,204 housing units, largely due to the potential development of the “Lawson Hills” and “The Villages” Master Planned Developments (MPDs). This inconsistency is due, in part, to a history of land use decisions, including an agreement with King County and property owners that set the urban growth area in the mid-1990s, annexation in 2005, and issuance of the MPD permits in 2010. Growth that substantially exceeds adopted targets has the potential to result in unmitigated traffic impacts on neighboring communities and other potential impacts.

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<sup>1</sup> 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.

While PSRC looks for cities' comprehensive plans to be substantially consistent with their adopted targets, this certification report recommends conditional certification as a means to recognize the unique circumstances of the City of Black Diamond and its ongoing work to address the implications of growth that significantly exceeds the adopted targets.

### **CERTIFICATION RECOMMENDATION**

Based on the review of the City of Black Diamond 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 Black Diamond 2018 Comprehensive Plan 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 ensure consistency with the Regional Transportation Plan in regards to SR-169, and adopts a resolution committing the city to work to narrow the gap between the plan's anticipated housing and employment growth to align with adopted countywide targets, and to manage growth from vested projects. The schedule for addressing the conditions is:**

- 1. Council adoption of a work plan that addresses the conditions identified in the certification report by April 30, 2020.**
- 2. Submission of draft comprehensive plan amendments and supporting documents that address the conditions to PSRC for review and comment in advance of adoption.**
- 3. Submission of a draft council resolution committing the city to work to align housing and employment growth with adopted countywide targets to PSRC for review and comment in advance of adoption.**
- 4. Once the conditions are adequately addressed, submission of the adopted amended comprehensive plan, council resolution and supporting documents by December 31, 2020, for review and certification by PSRC.**

Discussion of the conditional requirements is provided in Part 1, below. Additional recommendations for future work are provided in Part 2, which may be considered during the next comprehensive plan update or during other planning efforts and are not required to satisfy the conditional certification. 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, [the Regional Transportation Plan](#), 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 Black Diamond'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 demonstrates a substantial focus on developing the city into a more walkable and bikeable community. Policy LU-6, for instance, requires new developments to be designed around alternative modes of transportation and Policy PRTO-4, specifically, outlines continued development of a trail system interconnected with the city's historic center and the regional trail system. Planning for greater walking and bicycle access will be one important way to help offset transportation impacts.

## DISCUSSION: AREAS FOR FURTHER WORK

The following provides additional discussion regarding the conditional certification the city should address by December 31, 2020, through comprehensive plan amendments and a council resolution:

- ☐ The plan includes information about the potential widening of SR-169 that is inconsistent with the Regional Transportation Plan. The plan should be amended to indicate that a route development plan has not been completed for SR-169, and the transportation demand modeling and project list do not assume a widening of SR-169.
- ☐ In 2006, HB 3266 designated SR 169 as a highway of statewide significance. The plan should be amended to acknowledge this designation and the associated level of service. More information is available at <https://www.psrc.org/level-of-service>, including a map available at [https://www.psrc.org/sites/default/files/los\\_hss\\_king.pdf](https://www.psrc.org/sites/default/files/los_hss_king.pdf).

- The plan should be amended to provide a more detailed explanation of contingency plans to address any funding shortfalls that may occur if the planned improvements through the Master Planned Developments are not fulfilled. (RCW 36.70A.070(6)(a)(iv)(C))
- The city’s anticipated growth significantly exceeds its adopted growth targets. The plan acknowledges the inconsistency between the anticipated growth in Black Diamond, the growth targets, and the Regional Growth Strategy and commits the city to work with PSRC, King County, and neighboring jurisdictions to manage growth and mitigate its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system. While the language included in the plan is important, this does not resolve the inconsistency between anticipated growth and the adopted growth targets. As such, the City of Black Diamond should commit through a council resolution to continue to work with regional, county, and local planning agencies to ensure the impacts of the Master Planned Developments are managed appropriately, specifically to:
  - Coordinate with King County and other jurisdictions during the 2021 target setting process to narrow the gap between growth targets and anticipated growth.
  - Avoid increases in development capacity that would significantly surpass adopted targets.
  - Continue to coordinate with other jurisdictions regarding unanticipated growth levels, and to assess and mitigate traffic impacts from growth.

## 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 the Regional 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 policies emphasizing consistency with 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 Black Diamond comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- ☑ The plan includes policies (Goal NE 10) for restoring native vegetation in and around the city.
- ☑ Goal NE-1 demonstrates a great appreciation for the natural environment and includes policies for developing in environmentally sensitive ways.
- ☑ The plan includes policies (Goal LU 13) for protecting and acquiring open space and establishing a well-maintained network of trails throughout the city. This network of trails also aims to make the city more walkable, bikeable, and climate friendly.
- ☑ The plan includes policies (Policy NE-5) for intergovernmental coordination with adjacent jurisdictions and tribes to protect and enhance a network of natural habitat and wetlands.

#### DISCUSSION: AREAS FOR FURTHER WORK

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- ☐ Though the plan takes steps to reduce harmful air pollutants (Goal NE 8), VISION 2040 asks cities in the region to offer significant measurable steps to reduce criteria pollutants beyond adopted standards. (MPP-En-17). The city is encouraged to strengthen polices on air pollution.

## 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 Regional Transportation Plan 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 demonstrates an appreciation for the preservation of regional historic, visual, and cultural resources. Land use policies such as LU-17 protect views of Mt. Rainier as the city grows and expands.
- ☑ Many aspects of the plan emphasize the importance of physical activity and recreation for the health and well-being of Black Diamond residents. Policies such as LU-5 incorporate opportunities for physical activity and recreation into development proposals.

### DISCUSSION: AREAS FOR FURTHER WORK

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- ☐ VISION 2040 supports the development of centers within jurisdictions, including town centers and activity nodes (MPP-DP-11) and the city is commended for including policies to advance its town center. The city is encouraged to do additional planning for the neighborhood centers identified in the plan.

## Housing

### SCOPE OF REVIEW

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

**Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.

**Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.

**Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

### DISCUSSION: EXEMPLARY PLAN PROVISIONS

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

- ☑ The plan includes policies and goals to promote a variety of affordable housing types and levels within the city. H Goal 1 outlines a series of policies to support the creation of affordable and diverse housing options, such as Policy H-4, which provides for flexible zoning and subdivision regulations.
- ☑ Policies such as Policy H-8 promote the construction of affordable housing in coordination with transportation options to ensure residents of Black Diamond can easily access local services.

#### **DISCUSSION: AREAS FOR FURTHER WORK**

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- ☐ RCW 36.70A.070(2) requires comprehensive plans to include an inventory and analysis of existing and projected housing needs and adequate provisions for existing and projected needs of all economic segments of the community. The plan presents a number of relevant data points that describe housing need. The city should consider supplementing this analysis with a comparison of: (1) the need for housing that is affordable to that share of the county’s households earning 80% and 50% of AMI, and (2) the share of the existing housing stock in the city that is affordable at these income levels. This information will enable more direct comparisons with other jurisdictions and provide useful guidance for implementation strategies. Additional guidance on the housing element and needs assessment can be found in WAC 365-196-410 and PSRC’s Housing Element Guide ([http://www.psrc.org/assets/11660/Housing\\_Element\\_Guide.pdf](http://www.psrc.org/assets/11660/Housing_Element_Guide.pdf)).

## **Economy**

### **SCOPE OF REVIEW**

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

Include an **economic development element** that addresses: business, people, and places.

**Retention and recruitment efforts** that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.

**Equitable benefits and impacts**, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.

**Adequate housing growth in centers** through collaboration with the private sector and provision of infrastructure.

### **DISCUSSION: EXEMPLARY PLAN PROVISIONS**

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

Highlights include:

- ☑ The plan promotes the creation of local businesses. Policy ED-1.2 encourages the city to take an active role working with businesses to identify and promote possible sites for local employment opportunities.
- ☑ The plan creatively addresses the creation of new businesses of all scales, from providing guidelines for home-based businesses (ED-1.3) to enabling and encouraging light industrial businesses such as commercial kitchens and small-scale manufacturers (ED-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 the economy.

## Transportation

### SCOPE OF REVIEW

VISION 2040 and the Regional Transportation Plan 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 Regional Transportation Plan physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

### DISCUSSION: EXEMPLARY PLAN PROVISIONS

The Black Diamond comprehensive plan addresses the major transportation emphases in VISION 2040 and the Regional Transportation Plan, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

- ☑ LU Goal 10 outlines policies to encourage mixed-use development and create self-sufficient neighborhoods such as policy LU-46, which outlines the Town Center as multi-purpose and pedestrian oriented.
- ☑ The pedestrian and bicycle components of the plan outline a safe, full network of trails and paths throughout the city while promoting health and recreation. Policy T-10 in the plan promotes cleaner travel choices by creating infrastructure and safety measures for bicyclists, pedestrians, and transit riders.

### DISCUSSION: AREAS FOR FURTHER WORK

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- ☐ The Growth Management Act requires level-of-service standards for all locally owned arterials and transit routes, and the multicounty planning policies call for other modes, such as biking and walking, to be addressed as well (RCW 36.70A.070(6)(a)(iii)(B)). PSRC commends the city for including policies that are supportive of walking, biking and transit and encourages Black Diamond to continue developing policies, standards, and regulatory approaches that incorporate multiple travel modes. The plan should include level-of-service standards that address multiple modes of transportation. This analysis will help with the evaluation of needs when comparing the inventories to the standards, as well as respond to the MPPs on multimodal concurrency. 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) (<http://www.commerce.wa.gov/Documents/GMS-Transportation-2012.pdf>).



## 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 Black Diamond comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:

- ☑ The plan outlines multiple policies and strategies to conserve water and meet long term water needs. Policy U-10, for instance, encourages high volume, non-potable water users such as parks and schools to reuse and reclaim water.

### 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.

### 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 <https://www.psrc.org/our-work/plan-review>. If the city has questions or needs additional information, please contact **Laura Benjamin at (206) 464-7134 or [lbenjamin@psrc.org](mailto:lbenjamin@psrc.org)**.