

PSRC PLAN REVIEW REPORT & CERTIFICATION RECOMMENDATION

CITY OF ENUMCLAW COMPREHENSIVE PLAN

December 29, 2016



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.¹ 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 Enumclaw, adopted by the city on July 25, 2016. PSRC last certified the City of Enumclaw's comprehensive plan in 2005. PSRC staff reviewed the 2015 comprehensive plan update and coordinated with city staff in the development of this report.

CERTIFICATION RECOMMENDATION

Based on the review of the City of Enumclaw 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 Enumclaw 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 Enumclaw 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 needed to more fully address VISION 2040, Transportation 2040, and Growth Management Act planning requirements. PSRC recognizes that the timing and mechanism for addressing each of the comments will vary based on the jurisdiction, its resources and plan update process, and the nature of the comment.

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 Enumclaw'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:

- ☑ Section 5.10 outlines a variety of potential transportation demand management strategies that the city can pursue with employers, such as ridesharing and transit incentives.
- ☑ The plan includes provisions to promote walkability and maintain and expand pedestrian and non-motorized networks. Goal CD-4 promotes the city's walkability and improvements to the pedestrian environment, including the development of trails, sidewalks, and parking management. Goal T-3 and implementing policies support bicycle and pedestrian networks, including coordination with the Enumclaw School District to provide safe walking and bus routes.
- ☑ Goal LU-14 and implementing policies support the reduction of incompatible land uses to maintain the viability of the Enumclaw Airport. Airport policies are included in the land use element.

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 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 (MPP-DP-54-56). PSRC commends the city for including policy T-5.7, which supports future development of level-of-service standards for multiple modes of travel. 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>).
- The plan includes estimates of future travel demand that are based on growth assumptions that are higher than adopted growth targets for the city. Adjusted targets show the city adding approximately 1,550 housing units and 900 jobs by 2035, while the plan used PSRC small area forecasts to project growth of about 1,700 housing units and 1,400 jobs. In order to achieve greater consistency with adopted growth targets and the Regional Growth Strategy, the city should, when next updating its transportation plan, revise the land use assumptions to align more closely with adopted targets and incorporate updated PSRC forecasts.
- The Growth Management Act (RCW 36.70A.070(6)(a)(vii); and WAC 365-196-430(2)(j)) requires that local plans include an inventory of ground transportation facilities, including existing and planned bicycle and pedestrian facilities. Section 3.7 inventories the bicycle and pedestrian network in text. The city is encouraged to develop a mapped inventory of the bicycle and pedestrian network.
- 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), and the multicounty planning policies on air quality call for plans to address federal and state clean air laws and the reduction of pollutants (MPP-En-17 through 19). While the plan addressed air quality in regards to compatible land use and indirectly addresses air quality through strategies to reduce vehicle miles travelled, a policy that directly supports protecting and improving air quality should be added to the transportation element.

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 introduction to the Enumclaw comprehensive plan update includes a complete statement describing how the plan supports VISION 2040, including the multicounty planning policies (MPPs) and the Regional Growth Strategy.

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 Enumclaw comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- ☑ Goals NE-1 and NE-2 and implementing policies support open space preservation and enhancement with a focus on maintaining a network of connected spaces that provide recreational opportunities while also protecting natural systems.
- ☑ Goal NE-5 and implementing policies support the protection of critical areas and wildlife habitat.
- ☑ Policy T-4.8 supports development of transportation infrastructure and operations that are consistent with the city's adopted greenhouse gas policy.

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:

- ☑ Goal LU-3 and implementing policies support the maintenance of a transition area that buffers urbanized areas from adjacent rural and resource lands. This is compatible with the Regional Growth Strategy, MPP-DP-21-22, and MPP-DP-29 through 32.
- ☑ Goal CD-2 and implementing policies identify downtown Enumclaw as a focus for redevelopment and investment, building on a historic core that serves the city and surrounding area. Policies encourage new mixed-use and infill development and strategic expansion of the commercial core into adjacent areas, complemented by investment to improve walkability, policies to encourage compatible design in new development, and a master planned approach to development that links the central business district to the SR 410 corridor.
- ☑ Goal CD-1 and implementing policies promote a positive community image and appearance through high quality design and encouraging active, multimodal streetscapes.

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 Growth Management Act (RCW 36.70A.070) and multicounty planning policies MPP-DP-43 through 47 call for land use elements in local plans to address planning approaches that advance physical activity where possible. The plan should be updated to more explicitly address how the city’s planning provisions advance health and well-being, including healthy environment, physical activity and well-being, and safety.
- ☐ 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 (MPP-DP-54-56). Policy T-5.7 states that the city will consider establishing multimodal level-of-service standards and a supporting concurrency program. The city is encouraged to move forward with T-5.7. Progress in this area would strengthen and reinforce the plan’s vision of supporting walking, biking and transit. For example, the city could adopt implementation tools to identify transit, pedestrian, and bicycle projects as mitigation for development impacts.

Housing

SCOPE OF REVIEW

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

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

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

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

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The city’s comprehensive plan effectively addresses the housing provisions contained in VISION 2040.

Highlights include:

- ☑ Goal H-2 and implementing policies support the King County Countywide Planning Policies, specifically policy H-1, to address the countywide and local provision of housing for low-income households.

- ☑ The plan includes strong provisions related to the variety of housing types and levels of affordability. Goal LU-5 and implementing policies promote housing supply and diversity of type to meeting household needs and incomes. Policy LU-5.2 calls for a cottage housing demonstration project, and Policy LU-5.3 promotes flexible and innovative development standards for a variety of housing types. Goal H-3 and implementing policies support various densities and diverse housing types for a variety of needs, including support of accessory dwelling unit regulations.

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 should address how the city intends to balance policies under Goal LU-6, calling for “upper middle income” housing with the plan’s other housing goals and polices, including meeting the affordability needs of existing cost-burdened renters and seniors.

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:

- ☑ Goal ED-1 and implementing policies support the boosting of employment in local-serving retail and services, in light industrial activities, and in tourism.
- ☑ The plan includes provisions tailored to the city’s size, historic role, and rural setting, such as Policy LU-14 which supports agro-tourism in the designated agricultural protection zone.

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 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 Enumclaw 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:

- ☑ Goal LU-8 and related policies encourage land use patterns that promote alternative modes of transportation. Policy LU-8.1 promotes housing in mixed-use developments. Policy LU-8.2 supports locating higher density housing in proximity to retail and services, jobs, and transit. Policy LU-8.4 supports live-work units in multi-family residential areas. Policy CD-1.4 encourages alternative modes of transportation along highway environments, including traffic calming measures such as narrowing lane widths, encouraging alternative modes of transit along highway corridors such as bicycle and pedestrian pathways, and reducing parking requirements.
- ☑ Goal T-4 and implementing policies, specifically Policy T-4.1, support context sensitive design for transportation facilities.

DISCUSSION: AREAS FOR FURTHER WORK

The certification review did not identify any major areas for further work needed to better align the plan with regional guidelines and principles on transportation (see comments addressing Growth Management Act transportation planning requirements on page 3).

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

- Goal CF-2 and implementing policies support the efficient use of existing services, including minimizing operating and maintenance costs through planning and design.

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:

- VISION 2040 contains policies in several areas that promote energy conservation, renewable energy, and alternative energy sources (MPP-PS12-13; MPP-En-21-23; MPP-T-6). The plan partially addresses these issues in Policy NE-9.1, which encourages green building techniques. The city should consider additional policies that address energy and water conservation in public services delivery and usage.

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/>. If the city has questions or needs additional information, please contact Michael Hubner at 206-971-3289 or MHubner@psrc.org.