

# Frequently Asked Questions

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This document compiles frequently asked questions on PSRC’s plan review process and local comprehensive planning. Questions were identified from surveys of jurisdictional staff, outreach discussions, and the kick-off event for the [Passport to 2044 workshop series](#). More information is available on the [Plan Review website](#), or please feel free to reach out directly to PSRC staff at [planreview@psrc.org](mailto:planreview@psrc.org) with any questions. More questions may be added to this document over time. Washington State Department of Commerce has [their own FAQ on the periodic update](#).

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## Plan Review and Certification

### What are PSRC’s review standards and what planning resources are available?

PSRC works with local governments to ensure that planning is coordinated and meets regional and state requirements. This includes review for consistency with the multicounty planning policies (MPPs) in [VISION 2050](#), the transportation components of the Growth Management Act, and the [Regional Transportation Plan](#). While PSRC will review and provide comments on a jurisdiction’s entire comprehensive plan, the focus areas for certification include policy areas with a nexus with transportation planning. PSRC’s [Plan Review Manual](#) provides information about the process, certification standards, and consistency tools for different types of plans. The process is also summarized in a June 2021 webinar—the [slides](#) and [recording](#) are available online.

PSRC has published several planning guides and data resources to help complete the update. These are available on PSRC’s [Planning Resources page](#) and more will be added through 2023. [Washington State Department of Commerce](#) and [MRSC](#) also provide many resources for plan updates and about the Washington Growth Management Act (GMA).

### What’s new in VISION 2050 and GMA since plans were last updated?

VISION 2050, the countywide planning policies, and countywide adopted growth targets have all been updated since the 2015/16 plans. PSRC has a [short overview](#) and [detailed matrix](#) of the policy changes



in VISION 2050. Many of these policy changes are reflected in updated countywide planning policies and targets. PSRC's [VISION 2050 Consistency Tools](#) include a "NEW" icon for new or expanded emphasis areas in VISION 2050.

The Growth Management Act has also been amended in several ways since the last plan updates, most notably changes to the Housing element (HB 1220) requirements. Commerce has a summary of [GMA amendments by year through 2020](#). MRSC also has summaries of GMA bills passed in [2021](#) and [2022](#), which included significant changes to the Housing element and plan deadlines, among other changes. The Commerce [periodic update checklist](#) highlights changes to state requirements since the last plan update cycle.

### **What is PSRC's review timeline?**

- **When would be a good time to meet with PSRC to review scope of work?**

PSRC encourages meeting and discussing plan scoping early in the update process and before you have a draft plan. The timing will depend on your plan update schedule, but generally, the earlier the better.

- **When would be a good time to send plan elements for review?**

We recommend submitting draft plans to PSRC during the planning commission's development of the draft, prior to your council's review. Drafts should be well-developed but should also be early enough in the process to provide sufficient time to address comments. The 60-day notification provided to the state before adoption provides limited opportunity to incorporate any recommended changes. Completing the consistency tool and providing early drafts to PSRC helps identify potential consistency issues before adoption.

### **What's the difference between Commerce's checklist and PSRC's consistency tool?**

Both documents have an important role in the periodic update, but their purpose and timing are different.

Commerce's [Periodic Update Checklists](#) helps counties and cities to identify components of comprehensive plans and development regulations that may need to be updated to reflect the latest local conditions or to comply with changes to GMA since the last periodic update cycle. Commerce's checklist is the first deliverable under the periodic update grants and should be completed and submitted to Commerce early in the planning process.

PSRC's Consistency Tool for Comprehensive Planning Policies ([PDF](#), [Formsite](#)) is used to evaluate consistency with certification requirements and should be submitted to PSRC with both draft and adopted comprehensive plans. Along with the [Plan Review Manual](#), the consistency tool is helpful when scoping plan updates, but the tool should be completed and submitted with the draft plan to reflect updated policy and page references. This will provide PSRC staff reviewing plans guidance on where to find elements under review.



### How do I submit my materials to PSRC and other agencies?

Materials can be submitted through the VISION 2050 Consistency Tool [Formsite](#) or via email to [planreview@psrc.org](mailto:planreview@psrc.org). Materials can be submitted to Commerce through the [PlanView](#) system. Plans can also be submitted to WSDOT for early coordination to the NW Region (King and Snohomish) or the Olympic Region (Kitsap and Pierce) by email ([more information](#)).

### How does PSRC's certification relate to appeals through the Growth Management Hearings Board?

PSRC's review and certification function is separate from challenges to the validity of policies or plans that may be brought before the Growth Management Hearings Board. PSRC's certification action is based on determining consistency with (1) the multicounty planning policies, which serve as the regional guidelines and principles, (2) the Regional Transportation Plan, and (3) Growth Management Act requirements for transportation planning. PSRC's certification process allows jurisdictions to be eligible for PSRC's federal transportation funding.

The Hearings Board has a quasi-judicial role when it is petitioned to review a set of policies or a plan. While there can be overlap with issues that are reviewed by the Hearings Board and PSRC, the Hearings Board process is set up to consider a much broader range of provisions from the entire body of requirements in the Growth Management Act and, unlike PSRC, can invalidate plans or regulations.

While appeals to the Growth Management Hearings Board are a separate process, appeals may address certification-related issues or require additional amendments. In some instances, PSRC may choose to delay certification until a Hearings Board appeal is complete.

### What is PSRC's availability to answer questions or present to planning commissions or city councils?

PSRC staff are happy to respond to questions and can provide presentations as needed. Please contact [planreview@psrc.org](mailto:planreview@psrc.org) to get in touch with staff. There are also a variety of materials on PSRC's [Plan Review web pages](#) that can be used to support council presentations if you want to incorporate content on regional plans or the plan review process into your own presentation and materials.

### In terms of certification, what are best practices from past comprehensive plan updates?

- **Use the consistency tool throughout the process.** This will help identify early on any topics that you should be sure to address in your plan.
- **Provide drafts to PSRC with sufficient time in advance of adoption.** A 60-day notice before adoption is required for Commerce, but we strongly advise providing additional time for us to review the plan so that comments can be addressed prior to adoption.
- **Consult your previous certification report.** Certification reports from the 2015/16 updates are available on [PSRC's website](#), and nearly all reports include comments for work that should be addressed in future plan updates.
- **Ask questions!** If you have questions or concerns, please reach out to [planreview@psrc.org](mailto:planreview@psrc.org). While PSRC's boards make the final certification decisions, PSRC staff are available to help all jurisdictions have a successful plan update process.



### **Are planning grants available to local governments?**

Grants to support the periodic update are available from the Washington State Department of Commerce on a formula basis, and Commerce has other planning grants available as well. Please visit the [Commerce website](#) for more information on planning grants. PSRC provides guidance and technical assistance but does not provide planning grants for jurisdictions.

### **What was changed when the Plan Review Manual was updated in September 2022?**

The [VISION 2050 Consistency Tools for Local Comprehensive Plans](#) (starting on pg. 32 of the [manual](#)) was updated with the direction of PSRC's Growth Management Policy Board to integrate the GMA requirements of HB 1220 and countywide housing needs. These updates put additional emphasis on increasing housing options, addressing racially disparate impacts and exclusion in housing, and better aligning housing choices with community needs.

### **Does the comprehensive plan need to be consistent with both the CPPs and the MPPs?**

In the central Puget Sound, plans must be consistent with both. PSRC has been actively involved with the updates to the countywide planning policies (CPPs), and the CPPs are largely consistent with the multicounty planning policies (MPPs). However, some counties have unique policies, topics, and requirements that extend beyond what is required in the MPPs. Please consult the CPPs to ensure consistency. While PSRC certifies both countywide planning policies and local comprehensive plans, PSRC does not review local comprehensive plans for consistency with countywide planning policies. However, plans could be appealed by interested parties to the Growth Management Hearings Board for inconsistencies with the CPPs.

### **What are the consequences if a city/county does not update a plan in compliance with PSRC and/or state requirements?**

There are several possible repercussions for either not adopting a plan or adopting a plan that isn't consistent with requirements.

- If a plan or required development regulations are not adopted, jurisdictions can lose eligibility for state grants. The Washington State Department of Commerce emphasizes that it is important to clearly document when the jurisdiction is taking final action on plan adoption. Commerce tracks plan adoptions on their [website](#).
- If PSRC does not certify the plan, jurisdictions can lose eligibility for PSRC-managed federal transportation funds and for adding projects to the Regional Transportation Improvement Program (TIP). Jurisdictions with conditionally certified plans are eligible to compete for funds. Jurisdictions that have not adopted a plan in a timely manner or followed conditions are not eligible for funding or adding projects to the TIP.
- Plans could be appealed to the [Growth Management Hearings Board](#) by interested parties for failure to act or inconsistencies with the Growth Management Act, the multicounty planning policies, or countywide planning policies.



## Growth Targets, Capacity, and Housing

### **Does our plan need to be consistent with countywide growth targets? Are targets a minimum or a maximum? What is the rationale?**

For PSRC certification, VISION 2050 states that plans need to demonstrate substantial consistency between the land use assumptions used throughout the plan and the adopted countywide growth targets. See p. 42 of [VISION 2050](#) and the VISION 2050 Consistency Tool for Comprehensive Plans for more information. A growth target is the amount of growth for the 20-year planning period that each jurisdiction has agreed to through the countywide process. A jurisdiction must provide sufficient capacity to accommodate the growth targets. Capacity for growth can exceed growth targets, which may be particularly important in planning for growth under new affordability requirements in HB 1220 (see questions below). Each county should have a process if growth targets need to be amended.

VISION 2050 emphasizes that where growth happens is important. Coordination and consistency among jurisdictions is critical in planning for transportation, achieving climate goals, understanding actual forecasted growth, and jobs-housing balance, among other reasons. Planning for growth targets that have been developed through the countywide process ensures coordinated growth throughout the region. For more information, please consult PSRC's overview on [Planning for Housing Needs and Growth Targets](#).

### **Do employment growth targets factor in the increase of working at home? What does COVID mean for growth targets?**

While work at home increased during the pandemic, most employees work outside of the home, and most jobs continue to have a physical location.

Over the long-term, PSRC's forecasts have been [reliable](#), even factoring in the ups and downs of employment cycles. Employment targets are focused on providing space for sufficient employment-related uses. While there is always uncertainty in planning for the future, it continues to be important to provide enough capacity and planning for employment uses. For the purpose of PSRC review, jurisdictions may consider work at home as a portion of their capacity for employment growth, provided that work at home can only accommodate a limited and justifiable amount of the workforce.

To explore data on telecommuting, there are several resources. PSRC fields a household travel survey every two years and asks about telecommuting within the region. PSRC's [survey data](#) provides information on telecommuting under the Worker drop-down. The Census Bureau also asks about [travel to work](#) in the American Community Survey (ACS). PSRC's [Community Profiles](#) (which mostly draw from ACS data) includes work at home shares in the Transportation -> Mode Share to Work tab.

### **What has been the process to update targets based on revised OFM forecasts or housing need estimates from Commerce?**

The 2022 Office of Financial Management (OFM) Growth Management Act projections were released in late 2022 and were substantially similar to the 2017 series that was used to develop growth targets. Counties reviewed the county control total used to ensure population targets remained within the OFM



range. Counties have also worked with Commerce directly on consistency between adopted housing targets and housing need estimates derived from the Housing for All Planning Tool (HAPT).

Any consideration of changes should occur through countywide planning forums before making adjustments to targets for individual communities.

### **Suppose planning to meet the housing requirements of HB 1220 results in a community having surplus residential capacity?**

Capacity and targets are related but different. Growth targets represent total growth expected during the 20-year planning period and are determined through the countywide process to allocate projected growth. VISION 2050 and the comprehensive plan review checklist state that capacity for growth can exceed targets. PSRC recognizes that additional capacity will help achieve adopted growth targets based on the type, location, and timing of development. Many jurisdictions may lack sufficient capacity to accommodate growth at lower income bands. That may mean revisiting capacity but doesn't necessarily mean the total amount of growth should change. The counties should have a process in place to adjust the targets if necessary. One caveat is that VISION 2050 includes a policy discouraging adding capacity in regional geographies that do not have high-capacity transit. When a community substantially increases capacity beyond its adopted target it should document how the additional capacity is necessary to support regional policies. For more information, please consult PSRC's overview on [Planning for Housing Needs and Growth Targets](#).

See Commerce's project page for more information on resources to [implement HB 1220 and update GMA Housing Elements](#), including guidance on land capacity.

### **The vast majority of our housing need allocation is in income bands under 80% AMI. We need more higher income housing to make our market-based affordable housing tools like inclusionary zoning and Multifamily Tax Exemption work to develop these lower-cost units. It's likely that we'll get more higher income units, based on our current trends. Can we increase our growth target?**

For PSRC certification, VISION 2050 states that jurisdictions need to plan for their countywide growth target. Increasing growth targets is not necessary to meet the requirements of HB 1220 and risks inconsistency with housing need allocations.

Growth targets are based on actual forecasted growth to the county and underpin collaborative planning to size the urban growth area, plan for transportation investments, and shape where growth happens across the county to meet climate goals. The adopted growth targets are consistent with forecasts - the most recent GMA projections at the end of 2022 showed only minor changes in forecasted growth to the counties. The region needs more housing, but jurisdictions should coordinate through the countywide process if they want to change their housing targets.

Capacity is related to but distinct from growth targets. Capacity within cities and urban areas may be higher than the target to ensure densities at different income levels are possible.

Changing growth targets and housing needs allocations in comprehensive plans risks inconsistency with the countywide housing need allocations. A city or county's allocated housing need is based on a



collaborative process. If individual jurisdictions increase allocations at higher incomes, this risks planning for growth that does not align with the distribution of countywide need. For more information, please consult PSRC's overview on [Planning for Housing Needs and Growth Targets](#).

The role of housing need allocations is to provide sufficient capacity at different affordability levels and to demonstrate jurisdictions are removing barriers to potentially developing affordable housing. Comprehensive planning is about setting up the conditions for growth to occur. The GMA requirements are to identify appropriate tools and strategies to enable housing development to occur, not to guarantee development or preservation of units at different income levels.

**Buildable lands says we have adequate housing capacity. Reality says we don't. How does the GMA resolve this incongruity?**

Buildable Lands uses a number of reasonable assumptions to estimate capacity, but the timing, location, and type of capacity documented in Buildable Lands may not be sufficient for the growth your jurisdiction is planning for or experiencing. Like the question above, jurisdictions should evaluate capacity across several factors and may need to provide additional capacity to ensure the growth targets in the plan can be achieved during the planning period.

**Our jurisdiction contributes to a subregional housing organization that builds and preserves affordable housing. How do we take credit for these units in addressing requirements under HB 1220? [new question]**

Among other requirements from HB 1220, jurisdictions need to document barriers to addressing housing needs and appropriate tools and strategies to address needs at different income levels. Jurisdictions should document the tools and strategies they plan to take to meet housing needs, which may include direct financial contributions. PSRC's review focuses on planning-level assumptions - cities and counties do not need to provide a unit-by-unit accounting of how all housing need can be achieved with adopted housing tools. Financial contributions to building and preserving affordable units are an important approach to leveraging resources, even if the units are located in a different jurisdiction. Please also see [Commerce's guidance on housing elements](#), particularly discussion of "adequate provisions"

Regardless of the tools and strategies jurisdictions plan to use, GMA requires all cities and counties to demonstrate they have sufficient zoned capacity to meet their allocated housing needs.

## Conditional Certification

**What is conditional certification?**

Plans that are conditionally certified meet a majority of planning requirements for consistency with the multicounty planning policies, the Regional Transportation Plan, and the Growth Management Act. They require limited additional work in order to be in full conformity with criteria for certification. PSRC staff will reach out to jurisdictional staff on certification issues prior to board review.



Jurisdictions that are conditionally certified are eligible to apply for regional funding and may proceed with projects submitted into the Regional Transportation Improvement Program, provided that they follow the required conditions of approval.

### **Why were plans conditionally certified in the past? Any lessons learned?**

There were a few reoccurring certification issues in the 2015/16 updates. Here are the main issues identified in conditional certification and tips for addressing them:

- **Growth targets.** Local plans are expected to use land use assumptions that are substantially consistent with the targets adopted by the county or countywide planning organization. Jurisdictions were conditionally certified for planning for growth in their comprehensive plan that was substantially out of alignment with growth targets. Land use capacity may exceed targets. [VISION 2050](#) includes additional guidance (see p. 42) on aligning local plans with the Regional Growth Strategy and targets.
  - **Rate of growth.** Local plans were not conditioned due to the rate of actual growth occurring in a community. Certification review focuses on comprehensive plans and how communities account for adopted targets and, if necessary, discrepancies between targets and anticipated growth.
- **Capacity.** A fundamental expectation of the Growth Management Act is providing enough capacity for growth. RCW 36.70a requires that plans provide sufficient capacity for planned growth. If the most recent Buildable Lands report or other land capacity analysis shows a shortfall, the plan must document how growth can be accommodated. Housing need at various income bands may require different types of capacity, even if the total housing capacity in a jurisdiction is sufficient. Zoned development capacity should at least meet if not exceed growth allocations for both housing capacity and employment capacity.
- **Nonmotorized transportation.** The Growth Management Act requires planning for bicycle and pedestrian facilities, and PSRC reviews to ensure plans address nonmotorized transportation. WA Department of Commerce's [Guide to your Transportation Element](#) provides an overview of the planning requirements.
- **Internal inconsistencies.** The comprehensive plan must use the same growth assumptions throughout. This is sometimes a simple drafting error and sometimes a much more complex problem, but the plan should clearly state one set of assumptions for future population, housing, and jobs across all plan elements. The Transportation element includes travel forecasting based on those land use assumptions. If you are working with a consultant on travel modeling, please ensure that they are working with assumptions that are consistent with other elements of the plan.
- **Projects in the Regional Transportation Plan.** Most communities are served by state routes. Travel modeling and other planning assumptions should assume transportation investments only on state routes that have been formally identified in the Regional Transportation Plan. Your plan





can identify community desires for investments or changes on state facilities, but travel forecasts or project lists shouldn't be predicated on unplanned investments from other agencies.

While conditional certification provides additional time to address specific issues, full certification after adoption is the preferred outcome for jurisdictions and PSRC. Please reach out to PSRC staff or consult the [Plan Review Manual](#) if you have any questions on requirements.

## Other Comprehensive Planning Policy Topics

### **Can I use PSRC's SEPA work on VISION 2050 for our environmental review?**

The VISION 2050 Supplemental Environmental Impact Statement (SEIS) was prepared with the recognition that countywide planning groups, local jurisdictions, and other agencies developing plan amendments and updates could reference the regional environmental analysis (see WAC 17-11-655 Incorporation by Reference). Plans and plan amendments demonstrating consistency with VISION 2050 could use the VISION 2050 SEIS as a supporting document to address anticipated impacts within the range analyzed by the SEIS. To make this assessment of consistency, an independent SEPA review and document should be completed.

### **Which Tribes should we coordinate with on the comprehensive plan update?**

To identify which Tribes might be interested in coordinating on your comprehensive plan update, visit the Department of Archaeology and Historic Preservation's [Tribal Consultation](#) webpage. It has an interactive map of Tribal areas of interest. Click on each Tribe to see which Tribes include your jurisdiction in their area of interest. PSRC developed a short guide on [Coordination with Tribes in Comprehensive Planning](#). While it cannot replace communication with Tribe members and staff, the guide provides an overview of topics of interest to Tribes.

### **Does PSRC have data to support plan updates?**

Yes, PSRC has a variety of data resources that can help inform your plan. PSRC's [Community Profiles](#) make it easy to see Census data at the jurisdictional level, and the [Transportation System Conditions Tool](#) could be helpful for updating Transportation elements. PSRC has a [Data Portal](#), which allows users to access, explore and build maps using regional datasets, including employment data, Displacement Risk Mapping, Opportunity Mapping, and the Regional Open Space Network. PSRC will release an updated forecast product in 2023 (LUV-it) that will represent the adopted growth targets and the VISION 2050 Regional Growth Strategy.

### **Does PSRC provide support for transportation demand modeling?**

Yes, PSRC can provide some types of modeling support for local governments. Since the last periodic comprehensive plan updates, PSRC has replaced its trip-based travel demand model with SoundCast, an activity-based model. While SoundCast requires parcel-level inputs to run, PSRC staff have developed a tool that enables users to shift around a baseline set of parcel inputs (which can be provided from PSRC's Land Use Vision forecast product) to align with scenario assumptions. Given the trip-based model is no longer being updated, jurisdictions and their consultants may wish to learn more about what [SoundCast](#) offers.



For jurisdictions that are continuing to use the legacy trip-based model, the most common support PSRC provides is trip generation. PSRC can run city-developed land use inputs through the regional model to provide projected trips by origin and destinations. After that, consultants or local staff typically complete additional modeling work to understand the impacts to local facilities. PSRC does not run multiple travel demand modeling scenarios for jurisdictions, recognizing that the networks and zone system used in the regional model lack the detail needed to support the subarea analysis typically done for comprehensive plan updates. Other commonly requested modeling support has been travel growth rates by facility, where PSRC provides outputs from the Regional Transportation Plan modeling. These can be useful in some types of studies, with the important caveat that the future year volumes are tied to network and land use assumptions that may not align with local scenario or growth assumptions. Data requests can take time, so please plan ahead if you are seeking modeling support from PSRC. For more information on PSRC travel model support, contact Kris Overby ([koverby@psrc.org](mailto:koverby@psrc.org)).

### **How should we address regional growth centers and manufacturing/industrial centers in the comprehensive plan update?**

Local comprehensive plan updates are an important time to consider the role of designated regional centers. VISION 2050 calls for communities to focus growth and prioritize investments in centers. Jurisdictions should also consider the role of regional growth centers in addressing affordable housing needs and steps to reduce and mitigate displacement of existing residents and businesses. The comprehensive plan update is an ideal time to address planning expectations for centers.

In 2025, PSRC will conduct a monitoring review to ensure that all existing regional centers fully meet eligibility and designation criteria similar to new centers. These requirements include local commitment, an updated subarea plan, and other criteria as documented in the [Regional Centers Framework Update](#). More information about the requirements and process are included in the December 2022 [Passport to 2044: TOD & Centers](#) webinar.

Considering a new regional center in your community? Review the [eligibility requirements](#) and contact PSRC staff for more information and discuss the process.

### **How should we address airports that are in or adjacent to our community in the comprehensive plan?**

State law (RCW 36.70.547) and VISION 2050 (MPP-DP-48) require protecting airport operations by discouraging incompatible adjacent uses. PSRC has published guidance on [Airport Compatible Land Use](#) that jurisdictions adjacent to airports should consult. Jurisdictions should also coordinate with WSDOT on aviation issues. WSDOT provides more guidance on land use adjacent to airports on [their website](#) and through an [online mapper](#).

### **Do we need to plan for multimodal level-of-service standards in our 2024 update? [new question]**

In the central Puget Sound region, jurisdictions should include multimodal level of service standards in their 2024 comprehensive plans per VISION 2050 (see MPP-DP-52 and DP-53). PSRC's [Transportation Element Guide](#) outlines minimum standards for comprehensive plans to address:

- A methodology to evaluate levels of service for transit, bicycles, pedestrians and vehicles
- A level-of-service standard based on the methodology



- Identification of existing and future deficiencies
- Measures for addressing existing and future deficiencies

Please see [the guidance](#) for additional information.

HB 1181 includes several updated requirements for comprehensive plans, including a statewide requirement for multimodal level of service standards and new concurrency requirements. Jurisdictions in the central Puget Sound with more than 6,000 residents have until 2029 to meet the complete set of updated climate and transportation requirements, but several aspects of HB 1181 are already required through the multicounty and countywide planning policies. Jurisdictions in this region will have a head-start on multimodal level of service standards because they are already required in 2024 plans per regional policy. We expect the state will provide additional guidance on meeting new requirements under HB 1118.

