

Memorandum

To: Members of the Planning Commission
From: Paul Rogerson, AICP, Community Development Director
Date: 10/22/2010
Re: Puget Sound Regional Council comments on 2010 Summer Comprehensive Plan Amendments

During recent deliberations regarding the 2010 Comprehensive Plan amendment package, the Planning Commission has asked for clarification regarding comments received from the Puget Sound Regional Council (PSRC). This memo is to provide that clarification.

Who is PSRC?

Puget Sound Regional Council (PSRC) is a regional planning entity that is charged with a variety of policy tasks. The most relevant is preparation of multi-county planning policies called for by the Growth Management Act. The multi-county planning policies are envisioned to facilitate better coordination of planning efforts by jurisdictions in a four county area including Snohomish, King, Pierce, and Kitsap Counties. PSRC does not have any ultimate role or authority to approve or disprove comprehensive plans or amendments by cities and/or counties. The multi-county planning policies in question are called *Vision 2040*.

The PSRC is, at its top, made-up of elected officials representing the cities and counties in the four county area. However, comment letters are typically written by professional staff and not vetted by the elected "Policy Council". The comments are based on PSRC staff interpretation of the policy language contained in the *Vision 2040* document and have no regulatory effect.

PSRC does perform "plan certification" for purposes of determining that entities are eligible for their fair-share of federal transportation funding. Certification is done through a check-list process that assesses whether individual comprehensive plans are generally consistent with the policies found in the *Vision 2040* document. To staff's knowledge in 20 years of review PSRC has never failed to certify a local plan. The City's consultant has reviewed the PSRC checklist and finds that the City easily meets or exceeds its checkpoints.

PSRC does not have the ability to veto or otherwise invalidate a cities action regarding comprehensive plan adoption or amendment. Their role is essentially advisory.

PSRC's comments

Vision 2040, and correspondingly PSRC staff comments do favor tight UGA boundaries. Thus, it is not surprising that PSRC would raise questions about any proposal to expand a UGA. However, the PSRC comments received by the City do not appear to recognize that the City is likely to move forward with a

“hybrid” alternative which would result in an overall net reduction in the size of the Pierce County UGA. Moreover, PSRC and Vision 2040 do not address where, within a particular jurisdiction, a UGA should or should not be located. *Vision 2040* speaks to this topic only in broad policy language. Much of that policy language focuses on placing growth adjacent to services – including transportation facilities. The Sumner UGA expansion proposal is clearly consistent with and supportive of these policies – and most of the policy language found in *Vision 2040*. Of particular note is *Vision 2040* language calling for the preservation of farmland through the use of conservation easements and Transfer of Development Rights programs. In the current comp plan amendment proposal, Sumner proposes to be amongst the first in Pierce County to preserve farmland in this way.

There are several reasons why it is not accurate to assert that the proposed comp plan amendment and the City’s use of the proposed 2030 population allocation are or are not inconsistent with *Vision 2040*.

- Vision 2040 is a goal for the year 2040 and recognizes that during the time-period between now and then, jurisdictions may sometimes be above or below the trend-line. The City’s proposal is addressing the 2030 population not the ultimate 2040 target.
- Vision 2040 discusses recommended population allocations among the four counties and, within each county, among various categories of cities. These are called “regional geographies (e.g. metropolitan cities, large cities, small cities, etc.)” *Vision 2040* does not go to the level of advising specific population allocations for each city. That decision is made by individual counties and the jurisdictions within. With this as a methodology, it is not possible for PSRC to assert that any specific population allocation to a given city is consistent or inconsistent with their document. In fact Sumner is employing approved population allocations from the county for 2022 and in-county negotiated preliminary allocations for 2030.
- Vision 2040 also envisions a certain portion of population being placed in “unincorporated UGA’s”. This is a separate population from that assigned to each “geography”. The PSRC model does not anticipate that some portion of this population might – during the analysis period of nearly 30 years – be incorporated into an existing city. This is curious since this is precisely what the Growth Management Act sets forth as the ideal regional growth pattern – the one that should be pursued. Sumner’s proposed 2030 population target anticipates annexing a portion of the unincorporated UGA area and thus it would be eligible to receive a portion of the County unincorporated UGA population in addition to its share of the small city allocation. More on-point, population allocations are performed at the county level and are not a decision made by PSRC.
- Vision 2040 also anticipates cities seeking regional center designations. The Manufacturing Industrial Center (MIC) designation that Sumner is currently pursuing is one of these designations. Vision 2040 also anticipates cities moving from one “geography” to another (such as moving from the “small city” geographic group to the “large city” group). Either of these occurrences would also impact the population allocation given to an individual city.

In Sum

The DEIS and the response to comments provided to the Planning Commission on October 14th explain why staff believes that the proposed population allocations are consistent with *Vision 2040* goal and policy language. Staff interprets PSRC comments as providing reminders and raising cautions about any proposed UGA expansion. They do not, however, reflect PSRC denial, rejection, or even opposition to the decisions pending before the City and its decision makers.