



Puget Sound Regional Council

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August 14, 2024

Chris Pasinetti, Community Development Director
City of Enumclaw
1309 Myrtle Avenue
Enumclaw, WA 98022

Subject: PSRC Comments on City of Enumclaw Draft Comprehensive Plan

Dear Mr. Pasinetti,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the City of Enumclaw's comprehensive plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan. We appreciate the chance to review the plan while in draft form. This timely collaboration provides an opportunity to review plan elements and prepares the city well for [certification](#) by PSRC once the full plan has been adopted.

We suggest the city consider the following comments as further work is completed for the comprehensive plan update to align with [VISION 2050](#) and the Growth Management Act. In particular, we encourage the city to work towards a final plan that addresses the required air quality policy and provides information on Enumclaw's employment target.

We reviewed the draft plan using the PSRC [VISION 2050 Consistency Tool](#). Key sections of the consistency tool are listed below on the left along with relevant comments on the draft plan on the right.

Regional Growth Strategy

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<p>Demonstrate sufficient zoned development capacity to accommodate targets (RCW 36.70A.115)</p>	<p>The plan shows capacity for jobs but does not include the target. The plan should include Enumclaw’s employment target and a comparison of the target to the capacity for employment in the land use or economic development element.</p>

Transportation

<p>Provide travel demand forecasts and identify state and local system projects, programs, and management necessary to meet current and future demands and to improve safety and human health (RCW 36.70A.070, MPP-T-4-5)</p>	<p>The travel forecast analysis for 2044 identifies four locations intersecting with state highways that do not meet level of service standards. The city is encouraged to work with WSDOT to address these issues. If WSDOT-led projects to address the deficiencies have been identified, they should be mentioned in the plan. Information on these requirements is provided in Commerce’s Transportation Guidebook.</p>
<p>Identify maintenance and system preservation projects and programs necessary to maintain the ability of the transportation system to provide safe, efficient, and reliable movement of people, goods, and services (RCW 36.70A.070, MPP-T-1-2, T-4)</p>	<p>The city is commended for having a transportation maintenance program. The plan states that because maintenance is a program, it is not part of capital projects. The plan should include at least a conceptual plan for maintenance in the 20-year project list and financing plan. PSRC’s Transportation Element Guidance provides information for developing a project list.</p>
<p>Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system</p>	<p>The plan includes text on transportation demand management. To strengthen these strategies, it should also include a policy on demand management</p>

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management activities that improve the efficiency of the current system (RCW 36.70A.070(6)(a)(vi), MPP-T-3)	strategies that are appropriate for Enumclaw. Both PSRC and Commerce have transportation element guidance that include a variety of transportation demand management strategies.

Environment

Ensure all federal and state air quality standards are met and reduce emissions of air toxics and greenhouse gases (WAC 173-420-080, MPP-En-22)	The plan must include a policy to meet federal and state air quality standards and reduce emissions of air toxics.
Identify open space, trail, and park resources and needs, and develop programs for protecting and enhancing these areas (MPP-En-11-12, En-15, En-Action-4)	Consistent with VISION 2050 and national best practices, PSRC recommends including a policy and parks level-of-service to provide parks within a 10-minute walk of all residents. This will set the foundation for adding or expanding parks to create equitable access. PSRC uses the Trust for Public Land’s ParkServe mapping tool to identify park gaps. ParkServe shows that 92% of Enumclaw’s residents live within a 10-minute walk of a park. According to ParkServe, one gap appears to have higher levels of heat island risk and low-income populations.

Housing/Public Services

Expand housing choices in centers and near transit (MPP-H-7-8) Locate community facilities and services, including civic places like parks, schools, and other public spaces, in centers and near transit, with consideration for climate change, economic, social and health impacts (MPP-PS-18, PS-20, PS-29, DP-11)	The plan includes policies supportive of Enumclaw’s downtown. It should also include a policy to expand housing and prioritize investments, such as community facilities, in the center.
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PSRC has resources available to assist the city in addressing these comments and inform development of the draft plan. We have provided links to online documents in this letter, and additional resources related to the plan review process can be found at <https://www.psrc.org/planning-2050/vision/vision-2050-planning-resources>.

We appreciate all the work the city is doing and the opportunity to review and provide comments. We are happy to continue working with you as the draft progresses through the update and adoption process. If you have any questions or need additional information, please contact me at eharris@psrc.org.

Sincerely,

A handwritten signature in cursive script that reads "Erika Harris".

Erika Harris, AICP, Growth Management Planning
Puget Sound Regional Council

cc: Review Team, Growth Management Services, Department of Commerce