



COMPREHENSIVE PLAN REVIEW CHECKLIST



**RESOLUTION
of the BOARD OF DIRECTORS of the
SPOKANE REGIONAL TRANSPORTATION COUNCIL
R-26-03**

**ADOPTING THE VEHICLE MILES TRAVELED FRAMEWORK AND COMPREHENSIVE PLAN CERTIFICATION
PROCESS UPDATE**

WHEREAS, the Spokane Regional Transportation Council (SRTC) Board of Directors serves as the Metropolitan Planning Organization (MPO) for the Spokane Metropolitan Planning Area (SMPA) and as the Regional Transportation Planning Organization (RTPO) for Spokane County; and

WHEREAS, SRTC partnered with the Washington State Department of Transportation to develop a regional Vehicle Miles Traveled Framework; and

WHEREAS, the Washington State Growth Management Act requires that RTPOs certify that the transportation elements of jurisdiction's comprehensive plans and the countywide planning policies are consistent with the regional transportation plan, Horizon 2050; and

WHEREAS, the Washington State Growth Management Act requires that RTPOs certify that the comprehensive plans and countywide planning policies meet the requirements of RCW 36.70A.070

WHEREAS, the Vehicle Miles Traveled Framework and Comprehensive Plan Certification Process Update has been developed under the direction of the SRTC Board in consultation with local government staff, Washington State Department of Transportation (WSDOT), and Spokane Transit Authority (STA); and with input from members of the public; and

NOW, THEREFORE BE IT RESOLVED, that the SRTC Board: adopts the Vehicle Miles Traveled Framework and Comprehensive Plan Certification Process Update.

ADOPTED: 01/08/2026

ATTEST



Anadia Grier
SRTC
Clerk of the Board



Mayor Cris Kaminskas
City of Liberty Lake
Chair, SRTC Board of Directors

SRTC Comprehensive Plan Review Checklist

Introduction

Spokane Regional Transportation Council (SRTC) serves as part of the Regional Transportation Planning Organization (RTPO) for Spokane County. As an RTPO, SRTC is required under the Growth Management Act ([RCW 47.80.023](#)) to certify that the **transportation elements of comprehensive plans** adopted by member agencies are consistent with the currently adopted regional transportation plan, and, where applicable, conform with the requirements of [RCW 36.70A.070](#), Comprehensive Plan Mandatory Elements. SRTC is also required to establish guidelines, in cooperation with the member agencies, that provide direction for evaluation of the transportation elements which reflect the guidelines and principles of [RCW 47.80.026](#), Comprehensive plans, transportation guidelines, and principles.

The State of Washington mandates that counties and cities must be in compliance with the Growth Management Act (GMA), including attaining RTPO certification of comprehensive plans, in order to be eligible for grants through the Washington State Department of Commerce. The SRTC Board also encourages that the comprehensive plans produced by Spokane County and the cities and towns within the MPO be certified or they may not be eligible for federal funding through SRTC's Call for Projects process. For those agencies that participate in the SRTC Call for Projects process but are not required by the GMA to produce a comprehensive plan (Washington State Department of Transportation (WSDOT), Spokane Transit Authority (STA), the Spokane Tribe, the Kalispell Tribe, and the Spokane Regional Health District (SRHD)), the above-mentioned requirement does not apply.

The purpose of this manual is to provide guidance to SRTC staff when reviewing Comprehensive Plans. The manual outlines:

- The regulatory framework for the Comprehensive Plan review process
- Certification Process
- Review Checklist

Regulatory Framework

Counties and cities are required to periodically review their comprehensive plans and regulations to ensure compliance with GMA changes and accommodate updated growth targets. The GMA mandates full comprehensive plan updates every ten years.

Presented below is an overview of the GMA regulations relevant to the consistency review and certification process for the comprehensive plan transportation elements. The certification is based on the consistency of the local policies with the RTPO's adopted regional transportation plan as well as the general conformity of the local policies with

Mandatory Consistency and Coordination

- Internal consistency – differing parts of the plan must fit together
- Interjurisdictional (external) consistency – must be consistent and coordinated with other county and city plans

GMA requirements. SRTC has flexibility to determine how to address each of the factors listed below in evaluating local comprehensive plans.

Regulation	Summary Description Related to Comprehensive Plan Reviews
Duties of RTPOs <u>RCW 47.80.023</u> <u>WAC 365-196-210(8)</u>	• Certify the transportation element of comprehensive plans. • Certify that countywide planning policies adopted under RCW 36.70A.210 for consistency with the Regional Transportation Plan and regional guidelines and principles. • Review multimodal level of service methodologies used by cities and counties to promote a consistent regional evaluation of transportation facilities and corridors. • Work with cities, counties, transit agencies, WSDOT, and others to develop MMLOS or alternative transportation performance measures. • For purposes of certification, "consistency" means that no element of a plan is incompatible with any other feature of a plan or regulation; and that consistency is indicative of a capacity for orderly integration or operation with other elements in a system.
Comprehensive plans, transportation guidelines <u>RCW 47.80.026</u>	Provide specific direction for the development and evaluation of the transportation elements to address the relationship between transportation systems and: • Concentration of economic activity • Residential density • Development corridors and urban design that, where appropriate, support high capacity transit, freight transportation and port access • Development patterns that promote pedestrian and nonmotorized transportation • Circulation systems • Access to regional systems • Effective and efficient highway systems • The ability of transportation facilities and programs to retain existing and attract new jobs and private investment and to accommodate growth in demand • Transportation demand management • Joint and mixed-use developments • Present and future railroad right-of-way corridor utilization • Intermodal connections
Comprehensive Plans-Mandatory Elements <u>RCW 36.70A.070</u>	Related to transportation, the plan must include: • An inventory of air, water, and ground transportation facilities and services, including state-owned transportation facilities • Forecasts of multimodal transportation demand and needs - Land use assumptions used in estimating travel demand • Forecasts of multimodal traffic for at least ten years based on the adopted land use • Land use assumptions used in estimating travel demand • Assessment of the impacts of the transportation and land use policies on the transportation systems of adjacent jurisdictions, including the State Highway System • Adopted MMLOS standards - Specific actions and requirements for bringing into compliance locally owned transportation facilities or services that are below an established LOS • Transportation demand management strategies • Active transportation component • Actions that reduce GHG emissions and per capita vehicle miles traveled • Multi-year financing plan • Americans with Disabilities Transition Plan • Intergovernmental coordination efforts

Regulation	Summary Description Related to Comprehensive Plan Reviews
Comprehensive plans – Must be coordinated <u>RCW 36.70A.100</u> Interjurisdictional consistency <u>WAC 365-196-510</u> Coordination with other county and city comprehensive plans <u>WAC 365-196-520</u>	Comprehensive plans must be coordinated with, and consistent with, the comprehensive plans adopted by other counties or cities with which the county or city has, in part, common borders or related regional issues.
Comprehensive plans—Transportation element—Multimodal transportation improvements and strategies <u>RCW 36.70A.108</u>	The transportation element may include, in addition to improvements or strategies to accommodate the impacts of development authorized under RCW <u>36.70A.070</u>(6)(b), multimodal transportation improvements or strategies that are made concurrent with the development.

Certification Review Process

It is strongly recommended that update/amendment sponsors coordinate with SRTC staff throughout the comprehensive planning processes to allow for sufficient time to resolve potential consistency issues that could delay certification.

Certification Step	Review Process
Local Jurisdiction Submits Request for Review	Submit the following at least 60 days prior to planned adoption by local legislative body. - Completed certification checklist. - Draft Comprehensive plan.
SRTC Staff Review	Reviews plan and prepares initial certification report with a recommendation.
SRTC Staff Presentation to the SRTC Committees and Board of Directors	Presents initial findings to the SRTC Transportation Technical Committee (TTC), the Transportation Advisory Committee (TAC), and Board of Directors for review and possible modifications.
Local Jurisdiction Adopts Comprehensive Plan	If substantial changes are made to the Draft Plan, the local jurisdiction must resolve with SRTC or resubmit 30 days prior certification action by the SRTC Board of Directors.
SRTC Staff Finalizes Certification Report	SRTC staff will prepare final report with recommendations to the SRTC Board of Directors.
SRTC Board of Directors Decision	Board decision on consistency certification.
SRTC to Issue Certification Letter	Certification letter issued.
Notes - For amendments that are not anticipated to have an impact on regional LOS, land use, and/or transportation facilities or policy, SRTC Board of Directors' action will not be required. - If SRTC finds that a jurisdiction's transportation element is nonconforming with state requirements or inconsistent with the RTP, SRTC will coordinate with the local jurisdiction to resolve issues in a manner that will allow the transportation element to be certified.	

Review Checklist

The checklist will be used to conduct and document the certification of comprehensive plan related to 1) conformity with the GMA transportation element content requirements and 2) consistency with the adopted RTP. If "no" is checked for any criterion, additional coordination with the applicant/agency will occur to document and resolve any outstanding issues.

Applicant/Agency:			
Type of Review: Comprehensive Plan ☐ Periodic Update ☐ Amendment		Date of Submission: Anticipated Date of Plan Adoption:	
Contact Person: Email:			
Regional Consistency and GMA Conformity The checklist will be used to assess and document for conformity with the GMA transportation element content requirements and consistency with the adopted regional transportation plan (RTP).			
Checklist Criteria	Agency Response	Plan	Page #
1. Was the update coordinated with neighboring jurisdictions and tribes (if applicable) and regional transportation agencies? <u>RCW 36.70A.100</u>	☐ Yes ☐ No If yes, check all the apply: ☐ WSDOT ☐ STA ☐ Kalispel Tribe of Indians ☐ Spokane Tribe of Indians ☐ _____ ☐ _____	If no, please provide explanation:	
SRTC Comments:			
2. Is the plan consistent with relevant countywide planning policies? <u>RCW 36.70A.100</u>	☐ Yes ☐ No	If no, please provide explanation:	
SRTC Comments:			

Checklist Criteria	Agency Response	Plan	Page #
6. Are travel demand management (TDM) strategies included? <u>RCW 36.70A.070(6)(a)(vi)</u> <u>WAC 365-196-430(2)(i)(i)</u>	☐ Yes ☐ No	If no, please provide explanation:	
SRTC Comments:			
7. Is there an active transportation component that addresses and encourages mode choice and alternatives to driving alone? <u>RCW 36.70A.070(6)(a)(vii)</u> <u>WAC 365-196-430(2)(j)</u>	☐ Yes ☐ No	If no, please provide explanation:	
SRTC Comments:			
8. Do bicycle and pedestrian-supportive policies, programs, and projects address SRTC's Regional Bicycle Route Priority Network?	☐ Yes ☐ No	If no, please provide explanation:	
SRTC Comments:			
9. Do the land use and transportation elements address and plan for freight mobility and accessibility on the corridors within SRTC's Regional Freight Priority Network?	☐ Yes ☐ No	If no, please provide explanation:	
SRTC Comments:			

Checklist Criteria	Agency Response	Plan Page #
14. Does the plan include a forecast of multimodal transportation needs for a minimum of 10 years? <u>RCW 36.70A.070(6)(a)(i) and (iii)(E)</u> <u>WAC 365-196-430(2)(f)</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		
SEPA Infill and Housing Development Categorical Exemption		
15. Is an Infill and Housing Development Categorical Exemption is being requested per <u>RCW43.12C.229?</u>	☐ Yes, see questions 16 and 17 ☐ No	
SRTC Comments:		
16. Does the environmental analysis address the proposed use or density and intensity of use and analyze multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system?	☐ Yes ☐ No	
SRTC Comments:		
17. Is consultation with WSDOT on impacts to state-owned transportation facilities clearly documented, including any necessary mitigation?	☐ Yes ☐ No	
SRTC Comments:		

Checklist Criteria	Agency Response	Plan Page #
Multimodal Level of Service (See Attachment A for MMLOS Evaluation Methodology)		
18. Does the plan address multimodal levels of service (MMLOS) standards for all locally owned transportation facilities and transit routes? <u>RCW 36.70A.070(6)(a)(iii)(B) and (C).</u> <u>WAC 365-196-430</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		
19. Does the plan reference WSDOT MMLOS standards for the HSS and SRTC's MMLOS standards for the Non-HSS state highways? <u>RCW 36.70A.070(6)(a)(iii)(B) and (C).</u> <u>WAC 365-196-430</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		
20. Does the transportation element describe the plan's ability to meet local, regional and state MMLOS standards? Does the plan identify specific actions to bring transportation facilities and services to the established MMLOS if they do not meet standards? <u>RCW 36.70A.070(6)(a)(iii)(D)</u> <u>WAC 365-196-430</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		

Checklist Criteria	Agency Response	Plan Page #
Climate		
21. Does the transportation element include goals and policies to support reductions in greenhouse gas emissions and per capita vehicle miles traveled (VMT)? <u>RCW 36.70A.070(9)</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		
22. Does the resiliency element include goals and policies to improve climate preparedness, response and recovery efforts? <u>RCW 36.70A.070(9)</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		
Finance Plan		
23. Does the plan include an analysis of the capability to fund identified need? <u>RCW 36.70A.070(6)(a)(vi)</u> <u>WAC 365-196-430(2)(i)(i)</u>	☐ Yes ☐ No	If no, please provide explanation:
SRTC Comments:		

SRTC Comprehensive Plan Review Checklist

Checklist Criteria	Agency Response	Plan Page #	
24. Does the plan include a multi-year financing plan based on the identified needs identified? <u>RCW 36.70A.070(6)(a)(iv)(B)</u> <u>RCW 35.77.010</u> <u>WAC 365-196-430(2)(k)(ii)</u>	☐ Yes ☐ No	If no, please provide explanation: 	
SRTC Comments:			
25. Does the plan discuss probable funding short falls in meeting identified needs and how additional funding will be secured, or how land use assumptions will be reassessed to meet MMLOS standards? <u>RCW 36.70A.070(6)(a)(iv)(A)</u> <u>WAC 365.196-430(2)(k)(iv)</u>	☐ Yes ☐ No	If no, please provide explanation: 	
SRTC Comments:			

[illegible]



ATTACHMENT A: MULTIMODAL LEVEL OF SERVICE METHODOLOGY

SRTC MULTIMODAL LEVEL OF SERVICE

Introduction

The transportation element of local comprehensive plans must include multimodal level of service (MMLOS) standards, defined as the “minimum standards for how many public facilities or services are required to adequately serve the population.” MMLOS methodologies and standards consider the four major modes of travel (vehicle, transit, bicycle, and pedestrian), their impacts on each other as they share the street or intersection, and their mode specific requirements roadway design and operation.

As mandated by RCW 47.80.023(8) SRTC is required to review MMLOS methodologies used by cities and counties to promote a consistent regional evaluation of transportation facilities and systems. When reviewing comprehensive plans for MMLOS concurrency SRTC will verify the plans include:

- A methodology to evaluate MMLOS (transit, bicycles, and pedestrians and autos).
- Verification that local levels of service for state highways conform to the state and regionally adopted standards.
- MMLOS standards for locally owned arterials and transit that reflect the community’s expectations for transportation performance during the comprehensive plan period.
- Identification of existing and future deficiencies.
- Projects, programs, or strategies that will address existing and future deficiencies.

This document outlines the methodology SRTC will use for the MMLOS review.

Concurrency Requirements and MMLOS Standards

Concurrency requirements are summarized below.

Multi-Modal Level of Service Concurrency Requirements		
Concurrency Review Guidance		
GMA Procedural Criteria for Adopting Comprehensive Plans and Development Regulations WAC 365-196-840 Concurrency ensures public facilities are available to serve	■ Counties and cities should set local MMLOS standards to reflect realistic expectations consistent with the achievement of growth aims. ■ The MMLOS standards adopted by the county or city should vary based on the urban or rural character of the surrounding area and should be consistent with the land use plan and policies. ■ The comprehensive plan should provide a strategy for	■ Level of service standards for locally owned arterials and transit routes should be regionally coordinated. ■ Levels of service for highways of statewide significance are set by the WSDOT. ■ For other state highways, levels of service are set in the regional transportation plan. Local levels of service for state highways should conform to the state and regionally adopted standards.

new development at the time of occupancy, or within a specified time.	responding when approval of any particular development would cause levels of service for concurrency to fall below the locally adopted standards.	■ Other transportation facilities may reflect local priorities.
	MMLOS Standards	Concurrency
State Highways of Statewide Significance (HSS) • I-90 • US 2 • US 195 • US 395	Set by WSDOT (RCW 47.06.140): • LOS C in rural areas (outside urban growth areas) • LOS D in urban areas	HSS are statutorily exempt from local concurrency requirements; however, the transportation element must address the land use impact on the state highway facilities.
State-Owned Transportation Facilities (Non-HSS)	• Set by SRTC through coordination with WSDOT and member agencies	The law is silent in terms of including or exempting them from local concurrency rules, unless they are locally owned, such as SR 291 and SR 27, and then they would be subject to concurrency.
Locally-owned Arterials and Transit Routes	• Set by local agency	Conform with state and SRTC regional MMLOS standards

MMLOS Review Methodology

SRTC uses the travel demand model to analyze regional MMLOS for the following modes: vehicular, transit, and non-motorized (combined biking/walking). The regional MMLOS analysis is based on changes to land use and the transportation system that will occur as a result of comprehensive plan updates or amendments. The model assesses current conditions and forecasts demand based on projections of future employment and household demographics. The SRTC model uses specific analytical processes that consider choices based on destination, mode, time of day and route and then represents the resulting traffic flow at the macroscopic level.

Macroscopic models, such as SRTC's, are used for high-level, regional travel analysis and can be used to predict the extent of congestion caused by traffic demand or incidents in a network. Travel demand models are limited in their ability to estimate changes in operational characteristics (such as speed, delay, and queuing) down to the individual transit route, road segment or intersection level.

MMLOS Standards

In the event of a comprehensive plan update or amendment not meeting the established LOS on an HSS, SRTC will participate in a discussion between WSDOT and the local jurisdictions to identify planning level mitigation strategies (including CMP strategies) as well as generalized cost estimates and funding sources for those strategies.

For vehicular, transit, and non-motorized analyses, a decrease in LOS is not in itself cause for SRTC to withhold certification of a plan.

State Highways of Statewide Significant (HSS)

LOS is set by WSDOT in consultation with local governments (RCW 47.06.140) for State Highways of Statewide Significant (HSS).

State Highways of Statewide Significant	Vehicular LOS*
- I-90 - US 2 - US 195 - US 395	- LOS C in rural areas (outside urban growth areas) - LOS D in urban areas

Regional Mobility Corridors/ State-Owned Transportation Facilities

MMLOS for regional mobility corridors/ State-Owned Transportation Facilities (Non-HSS) is set by SRTC in consultation with WSDOT and local governments. The standard is LOS C in rural areas and LOS D or above in urban areas. A jurisdiction may set a different LOS for their own local processes, such as concurrency. The SRTC LOS is for regional analysis purposes as required by 47.80.023(9). If the vehicular LOS on a regional mobility corridor decreases as a result of a comprehensive plan update or amendment, SRTC will coordinate with the jurisdiction on mitigating strategies.

Transit LOS

Transit LOS is evaluated for the change in systemwide transit ridership. If system wide transit ridership decreases as a result of a comprehensive plan update or amendment, SRTC will discuss mitigating strategies with the jurisdiction and STA.

Non-Motorized (Bike/Walk) LOS

Non-motorized LOS is evaluated for the change in non-motorized mode share. If the systemwide non-motorized mode share decreases as a result of a comprehensive plan update or amendment, SRTC will discuss mitigating strategies with the jurisdiction.

Local Arterials and Transit

SRTC will verify the Comprehensive Plan includes:

- A methodology to evaluate local MMLOS (transit, bicycles, and pedestrians and autos).
- MMLOS standards reflect the community's expectations for transportation performance during the comprehensive plan period.
- Identification of existing and future deficiencies.
- Projects, programs, or strategies that will address existing and future deficiencies.

SRTC will look for typical approaches for evaluating the quality of transportation facilities and services for different modes of travel such as:

Mode	Example LOS Potential Performance Metrics
Vehicle	• Volume-to capacity (V/C) ratio • Intersection delay • Corridor travel time
Pedestrian	• Level of traffic stress (along corridors and/or at crossings) • Network continuity • Network quality (proper design, widths, and maintenance) • Traffic protection (separation from motorized traffic, particularly high speed and high volumes) • Arterial crossing frequency
Bicycle	• Level of Traffic Stress • Network connectivity • Network quality (proper design, widths, and maintenance) • Traffic protection (separation from motorized traffic, particularly high speed and high volumes)
Transit	• Reliability • Frequency • Accessibility • Infrastructure/Amenities
All	• Mode split • VMT • Person trips • Person delay

Data Requirements

Agencies will be asked to submit the following information for regional modeling at the TAZ level.

Land Use

- Any land use changes including addition or reduction in the number of units/zone, rooms or camp spaces/zone, or number of employees/zone
- Data related to the land use types shown in Table 1 and unit measurements based on the land use proposal

TABLE 1 REGIONAL MODEL LAND USE TYPES

Land Use	Description	Unit Measurement Per TAZ
1	Single-family, duplex, triplex, manufactured or mobile home	# of housing units
2	Four or more residential units on a single parcel	# of housing units
3	Hotel, motel, or campsite	# of rooms or camp spaces
4	Agriculture, forestry, mining, industrial, manufacturing, wholesale	# of employees
5	Retail Trade (Non-Central Business District (DBD))	# of employees
6	Services and Offices	# of employees
7	Finance, Insurance, and Real Estate Services	# of employees
8	Medical	# of employees
9	Retail Trade (CBD)	# of employees
10	College and university commuter students	# of students
11	Education employees (K-12)	# of employees
12	Education employees (college and university)	# of employees

Transportation

For all transportation projects that are on facilities included in the regional travel demand model network:

- Schematic drawing or description showing name, location, distance, alignment, number of lanes, speed limit, facility type (Federal Functional Classification (FFC)), capacity, intersection control, and intersection geometry.
- Corridor-level vehicular volumes for interrupted flow facilities (roadways with fixed elements like traffic signals, stop signs, and yield signs that interrupt the traffic flow).