Chapter 8: Consistency and Coordination

The GMA calls for consistency among all elements in the comprehensive plan.\(^1\) It also requires that implementing development regulations be consistent with the comprehensive plan. These are often referred to as the “Internal Consistency” provisions. GMA also calls for consistency with adjacent jurisdictions, which is referred to as “External Consistency.” Perhaps the most significant consistency requirement in the GMA is that capital budget decisions be consistent with the comprehensive plan.\(^2\)

![Figure XX: Representation of Internal Consistency under the GMA.](image)

To achieve consistency of the comprehensive plan and budget, the capital facilities element plays a crucial role. Budget decisions must be consistent with and implement the comprehensive plan – and the capital facilities plan must be consistent with the comprehensive plan.

---

\(^1\) See 36.70A.070  
\(^2\) RCW 36.70A.120
**Internal Consistency**

WAC 365-196-415(3) provides guidance on the relationship between the capital facilities element and the land use element. It provides several recommendations for meeting this requirement:

a) *Providing adequate public facilities is a component of the affirmative duty created by the act for counties and cities to accommodate the growth that is selected and allocated, to provide sufficient capacity of land suitable for development, and to permit urban densities.*

b) *The needs for capital facilities should be dictated by the land use element. The future land use map designates sufficient land use densities and intensities to accommodate the population and employment that is selected and allocated. The land uses and assumed densities identified in the land use element determine the location and timing of the need for new or expanded facilities.*
c) A capital facilities element includes the new and expanded facilities necessary for growth over the twenty-year life of the comprehensive plan. Facilities needed for new growth, combined with needs for maintenance and rehabilitation of the existing systems and the need to address existing deficiencies constitutes the capital facilities demand.

Achieving consistency requires that all facilities and services over the life of the plan be considered, as discussed in Chapter 4. It includes infrastructure, public buildings, facilities, and services, parks and open space, transportation and utilities. There may also be economic development projects, programs, or improvements that should be included. The budget decisions of the 6-year Capital Improvement Plan and the adopted budget must be consistent.

Working with and involving all the capital facilities and services providers and stakeholders in the planning process will ensure consistency between all elements of the comprehensive plan. Once that is accomplished the budget proposals can more accurately reflect the current needs as well as keep the jurisdiction better prepared to address future needs.

**External Consistency & Coordination**

Early and regular coordination with adjacent jurisdictions and special purpose districts that provide services in your jurisdiction is invaluable. Over time this relationship can help all parties. Ideally, all parties should strive for the same outcome – the implementation of the comprehensive plan.

Coordination is key so that all stakeholders understand the patterns and intensities of growth planned within the planning horizon. When stakeholders work together they can share data and support each other. Of course, special purpose districts are not specifically required to plan under the GMA or to align their vision/plan with that of the comprehensive plan. However, special purpose districts may provide needed facilities or services and should be part of the overall planning process.

In the event that a service boundary for one or more of the special purpose districts does not match the boundary identified for urban growth, the city or county must demonstrate how those capital facilities and services that are deemed necessary to support growth will be provided and how they will be funded.

WAC 365-196-415(4) discusses the relationship to plans of other service providers or plans adopted by reference:

*A county or city should not meet their responsibility to prepare a capital facilities element by relying only on assurances of availability from other service providers. When system plans or master plans from other service providers are adopted by reference, counties and cities should do the following:*
Whatcom County has developed a process that coordinates county planning with the fire districts. The process generally includes:

1. **Preliminary Draft CFP** - Meetings of a fire district representative (typically the chief or assistant chief), the county fire marshal and county planner to develop a preliminary draft CFP. The District provides the inventory of existing buildings and apparatus, financial information, and future capital projects. The County provides information related to GMA requirements, LOS standards, and growth management plans. Each time this work occurs the county staff works with the district staff to find ways to improve the format and spreadsheets that were used in the last plan.

2. **Draft CFP** - A work group meets to transform the preliminary draft CFP into a draft that is ready for review by the fire district commissioners. This larger work group, has varied in composition, but may include:
   
   a. The fire district chief or assistant chief;
   b. An elected official from the fire district;
   c. The county fire marshal;
   d. A county planner;
   e. A city representative, if the district serves the city or the adjacent UGA;
   f. A port representative, when the district also serves an airport;
   g. A tribal representative, when the district serves tribal lands;
   h. A developer representative;
   i. A community representative.

3. **Fire District Approval** - Approval of the CFP by the fire district commissioners.

4. **Planning Commission** – Recommendations by the county planning commission.

5. **County Approval** - Adoption of an ordinance by the county council incorporating information from the CFP into the county comprehensive plan.

The process has worked well so far for Whatcom County. The county has found that it also helps develop relationships between the county and the fire districts that are mutually beneficial.
Intergovernmental Coordination
Many cities and counties partner with each other and special purpose districts to provide joint use facilities. Examples include partnerships with school districts to use gyms and playfields for recreational programs, developing regional partnerships to address wastewater issues, or sharing staff with an adjacent jurisdiction for project review or building inspections. In some cases several jurisdictions may share professional staff through a Council of Governments, such as the Yakima Valley Conference of Governments which is made up of fifteen jurisdictions in Yakima County.

Examples of Intergovernmental Coordination
Walla Walla County and the City of Walla Walla have partnered to provide a joint planning agency to process planning applications and building permits.

The City of Monroe makes use of joint or shared facilities when it makes the most sense for them. They have a process in place to analyze the cost-benefit of shared facilities versus separate facilities.

City of Bonney Lake, in partnership with the Sumner School District, shares school facilities to help meet their parks and recreation needs. Additionally, the city has an agreement with the City of Sumner to use Sumner’s wastewater treatment facility.

As discussed in an earlier chapter, the Cities of Lacey, Olympia, Tumwater, and Thurston County (LOTT) have entered into a partnership for shared sewage treatment facilities in Thurston County.

What can a city or county do when a desired project is not on a state agency’s project list?
In one case, a city had an intersection improvement planned for Main Street where it intersected a state highway. Although WSDOT was not opposed to the improvements, WSDOT did not have any state funding allocated for the project. The city was able to fund the improvements, in large part, due to a fee-in-lieu-of mitigation agreement for transportation impacts resulting from a large development that was proposed at the corner of the intersection. The public was satisfied because they saw the roadway improvements occurring at the same time as the private development took place.

In other instances, a city or county may need to note in their comprehensive plan or functional plan that a project is planned for by the city or county, but is not currently included on the state agency’s project list. If this approach is used, the city or county should include discussion of why the project is included locally but not at the state level, and any work the city or county will do in collaboration with the state agency or agencies involved, other stakeholders, and the public to address the issue. The city or county should also include a discussion of how the improvement(s) will be financed.
If a project is on a state list will it really get funded? How can a city or county maintain a partnership commitment and accountability for the project with the state agencies?

State agencies often have requirements to prepare plans, identify and prioritize projects, and seek funding to implement them. However, in order to proceed they must obtain funding by the legislature or grants from federal agencies. It isn’t always a given that any one project identified in a state agency plan will actually be funded and constructed. However, state agencies work closely with their stakeholders and elected officials to implement their plans as best they can. For some projects, such as transportation projects, having the project identified as a priority in a local plan, a priority in a regional plan, and identified in WSDOT’s plan, will certainly help keep the project at forefront during the project selection processes.

Long term funding packages, like “the nickel package” approved in 2003, can include multiple projects to be completed over time. This package included highway improvements, highway preservation, state ferry improvements, freight mobility projects, and multimodal improvements. The nickel package consisted of 158 projects across the state totaling 3.9 billion dollars, primarily funded by a 10-year, five cent increase in the gas tax. In this example, the projects were identified and a funding source was provided.

Maintaining a partnership with the state agencies involved in any needed improvements is prudent. Staff can have on-going conversations about funding and stay informed of any potential changes in funding or timing. Setbacks in funding or timing may necessitate the need to modify the comprehensive plan, 6-year capital improvement plan, or the Capital Facilities Plan if specific projects and funding have been identified for years 7 to 20.

What can a jurisdiction do for an identified need that does not have an identified funding source, such as adding a holding cell at the police station or bringing non-ADA-compliant facilities up to current standards?

Projects that do not have an identified funding stream must generally be paid for out of general funds or through successfully obtaining grants or loans. If the improvements must occur over a large enough area, such as adding sidewalks, stormwater improvements, and building ADA-compliant crosswalks in a certain area, there may be opportunities to create a local improvement district to pay for improvements. Often a combination of funds are sought, such as general funds and grant funds from 2-3 different sources. Low interest loans may be an option for certain improvements.

One Eastern Washington County identified a deficiency in their transportation plan, citing numerous deficient school bus turnarounds on some of its older rural roads. To help address the problem, the county plans to fund 2-3 turnaround improvements per year, prioritizing those roads that are not likely to be extended or connected to another road. At this rate, it will take the county several years to correct the deficiency. However, they are addressing the problem to the best of their ability, in balance with other obligations.