



Puget Sound Regional Council

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March 20, 2025

Andy Williamson, Interim Community Development Director
City of Black Diamond
24301 Roberts Drive
Black Diamond, WA 98010

Subject: PSRC Comments on City of Black Diamond Draft Comprehensive Plan

Dear Mr. Williamson,

Thank you for providing an opportunity for the Puget Sound Regional Council (PSRC) to review a draft of the Black Diamond draft comprehensive plan. We appreciate that the city has invested a substantial amount of time and effort in developing the draft plan and appreciate the chance to review it while in draft form. This provides an opportunity to review plan elements and help prepare the city for [certification](#) by PSRC once the full plan has been adopted.

PSRC's review of the 2015 plan generated several comments about the inconsistency between the plan and the adopted King County targets and the regional transportation plan. The city is encouraged to review the [prior certification report](#) and ensure that past comments are fully addressed.

The following comments on the current draft plan highlight potential issues for certification. 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:

Regional Growth Strategy

Plan Review Consistency Tool	PSRC Comment on Draft Black Diamond Plan
Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)	The discussion of targets in the Housing Element should clarify that targets are set by the King County Growth Management Planning Council and adopted by King County, not by PSRC. The figures attributed to PSRC appear to be a modeling forecast that do not precisely represent individual targets. Due to the MPDs, the plan assumes that housing growth will exceed the adopted housing targets. The plan also anticipates 721 new jobs compared to the adopted target of 690. The plan should identify work to improve alignment with the adopted targets. Are there specific strategies under consideration? Recognizing that the development of the MPDs may exceed the targets, how is the city planning to mitigate the impacts of that growth, including on the regional transportation system?
Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit (MPP-RGS-12)	The draft plan contemplates several land use changes. How will these changes support alignment with the growth targets? What additional impacts might result from these changes?

Climate

Plan Review Consistency Tool	PSRC Comment on Draft Black Diamond Plan
Support achieving regional greenhouse gas emission reduction goals by: Electrifying the transportation system, Reducing vehicle miles traveled through increasing alternatives to driving alone and using land use strategies that reduce trips and trip length, and Expanding the use of conservation, alternative energy sources, and energy management technology (MPP-CC-1, CC-3, CC-5, CC-11-12, CC-Action-3)	The city has made important progress on addressing climate change and policy NE-327.6 in the draft plan encourages reducing vehicle trips. The plan should recognize regional greenhouse gas reduction goals in the plan. PSRC's Climate Change and Resilience Guidance provides further resources. The transportation network in Black Diamond is generally auto-oriented. To support achieving greenhouse gas emission reductions, the plan should identify specific strategies to significantly reduce car dependence and vehicle miles traveled. The Department of Commerce plans to release final guidance on climate planning consistent with House Bill 1181 in 2025, which will apply to the implementation progress report for jurisdictions in the Puget Sound region. The city should be aware of this upcoming deadline and monitor whether the plan's current state reflects the new requirements.

Housing

Plan Review Consistency Tool	PSRC Comment on Draft Black Diamond Plan
Expand the diversity of housing types for all income levels and demographic groups, including low, very low, extremely low, and moderate-income households (MPP-H-2-6, H-9)	The plan discusses housing need by income band. The plan also needs to include specific information about the capacity for housing at each income level. The information included in the

	capacity memo should explain the assumption that pipeline units will contribute to meeting housing need for households below 80% AMI. Guidance is available from Commerce. Information about capacity to accommodate emergency housing should be added to the comprehensive plan.
	The plan needs to include an analysis of exclusion or racially disparate impacts, as required by the Growth Management Act and acknowledged in policy 1-2.10.

Transportation

Plan Review Consistency Tool	PSRC Comment on Draft Black Diamond Plan
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) Use land use assumptions substantially consistent with countywide growth targets (RCW 36.70A.070, WAC 365-196-430, VISION 2050 Regional Growth Strategy)	The Transportation Appendix discusses travel forecasting, however, the appendix doesn't provide a complete discussion of the model inputs or results. Please include the transportation modeling analysis. The plan would be strengthened with additional clarity on how the model assumes growth based on the MPD build-out or the targets, and whether it compares impacts between the scenarios.
Support alternatives to driving alone, including walking, biking, and transit use, through design of local streets, land use development tools, and other practices (MPP-T-16-18) Emphasize transportation investments that provide alternatives to single occupancy vehicle travel, increase	While the plan supports active transportation generally, and the provision of sidewalks and bike lanes, more attention should be made to create truly pedestrian-oriented environments that will facilitate alternate modes of travel.

travel options, especially to and within centers, and support compact, pedestrian- and transit-oriented densities and development (MPP-T-12-13, T-15)	
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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 also 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 adoption process. If you have any questions or need additional information, please contact me at PHONE or EMAIL.

Sincerely,

Paul Inghram

Paul Inghram, FAICP
Puget Sound Regional Council

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