Director's Report

Ordinance to Amend Chapter 23.52
Transportation Concurrency Level-of-Service Standards

Introduction

The Office of Planning and Community Development is proposing to amend Chapter 23.52 of the Land Use Code to implement a new level-of-service (LOS) standard that was adopted into the City's Comprehensive Plan in 2016. This report describes the proposal and provides background and analysis of the Land Use Code amendment and an associated Joint Directors' Rule.

Background

The Growth Management Act (GMA) requires level-of-service (LOS) transportation standards to be adopted in the comprehensive plans of local jurisdictions in order "to serve as a gauge to judge performance of the system." "Level of Service" is a measure of transportation system performance that establishes a standard for managing and accommodating trips generated by new development in order to maintain concurrency (see *RCW 36.70A.070)*. The GMA does not specify a method for establishing a LOS standard, and the Growth Management Hearings Board has ruled that cities have flexibility in setting the transportation LOS standard.

Before the 2016 update, the City's Comprehensive Plan defined the transportation LOS standard as the ratio between actual vehicle volumes and roadway capacity, as measured at "screenlines." A screenline is an imaginary line drawn perpendicular to one or more parallel arterials. The Plan identified several screenlines in the city with a LOS ratio for each. As described below, the 2016 Comprehensive Plan update redefined the LOS standard based on geographic sector targets for reductions in single-occupant vehicle (SOV) mode share.

The Comprehensive Plan LOS standard is implemented through Seattle Municipal Code (SMC) Chapter 23.52. The proposed Ordinance and a related proposed Joint Directors' Rule implement the newly adopted LOS standard with a concurrency approach that accounts for project location and uses a menu of options to promote non-SOV travel.

Policy Guidance

The new LOS standard adopted in the Seattle 2035 Comprehensive Plan (and the proposed revisions to SMC Chapter 23.52) represents a policy shift in how the City

evaluates transportation concurrency. In the Comprehensive Plan update in 2016, the City approved a methodology for measuring transportation LOS that would better align with long-standing City policies that promote moving people rather than moving vehicles. These policies support a wider variety of transportation choices; support more efficient use of the City's limited right-of-way (ROW); and promote other social, environmental and health benefits for residents and workers.

Regional Planning Policies. The Comprehensive Plan policies and the new LOS standard follow regional planning policies. The GMA requires that LOS "standards should be regionally coordinated." The Puget Sound Regional Council (PSRC) adopted policies that address the new approach in VISION 2040, the long-range growth management plan for the central Puget Sound region. VISION 2040 directs jurisdictions, including Seattle, to include multimodal options in their concurrency programs, as stated in the Multicounty Planning Policies (MPPs) and described in the VISION glossary:

> MPP-DP-55: Address nonmotorized, pedestrian, and other multimodal types of transportation options in concurrency programs — both in assessment and mitigation
>
> Multimodal Concurrency: Addressing transportation system performance by taking into account land development and transportation solutions that provide alternatives to driving alone. Moves beyond the assessment of vehicle travel to focus more on the people-moving capacity of the system

Vision 2040 does not specify a particular technique for measuring LOS and allows local jurisdictions to choose a measurement method. The new methodology and standards adopted in the Comprehensive Plan represent a shift from the more automobile-centric screenlines approach to a metric that addresses multiple modes of travel. City staff consulted with PSRC staff in developing the LOS approach described in the Plan and implemented through this ordinance. Subsequently, the PSRC certified the City's Comprehensive Plan as consistent with Vision 2040.

Seattle Comprehensive Plan Policies. To guide implementation of the new LOS standard, the Transportation Element of the 2016 Comprehensive Plan includes the following policies:

> TG9: Use LOS standards as a gauge to assess the performance of the transportation system.

T 9.1: Define arterial and transit LOS to be the share of drive-alone trips made during the late-afternoon peak period (3:00 to 6:00 p.m.)

T 9.2: Provide a menu of transportation-demand management tools for future development to meet non-drive-alone mode share targets.

T 9.3: Pursue strategies to reduce drive-alone trips in order to increase the ability of the city's transportation network to carry people.

The City's adopted LOS standard is further defined in the form of SOV reduction targets for each of eight geographic sectors of the City, as shown in Figure 1 on the following page. The proposed Code amendment includes this map in Chapter 23.52.

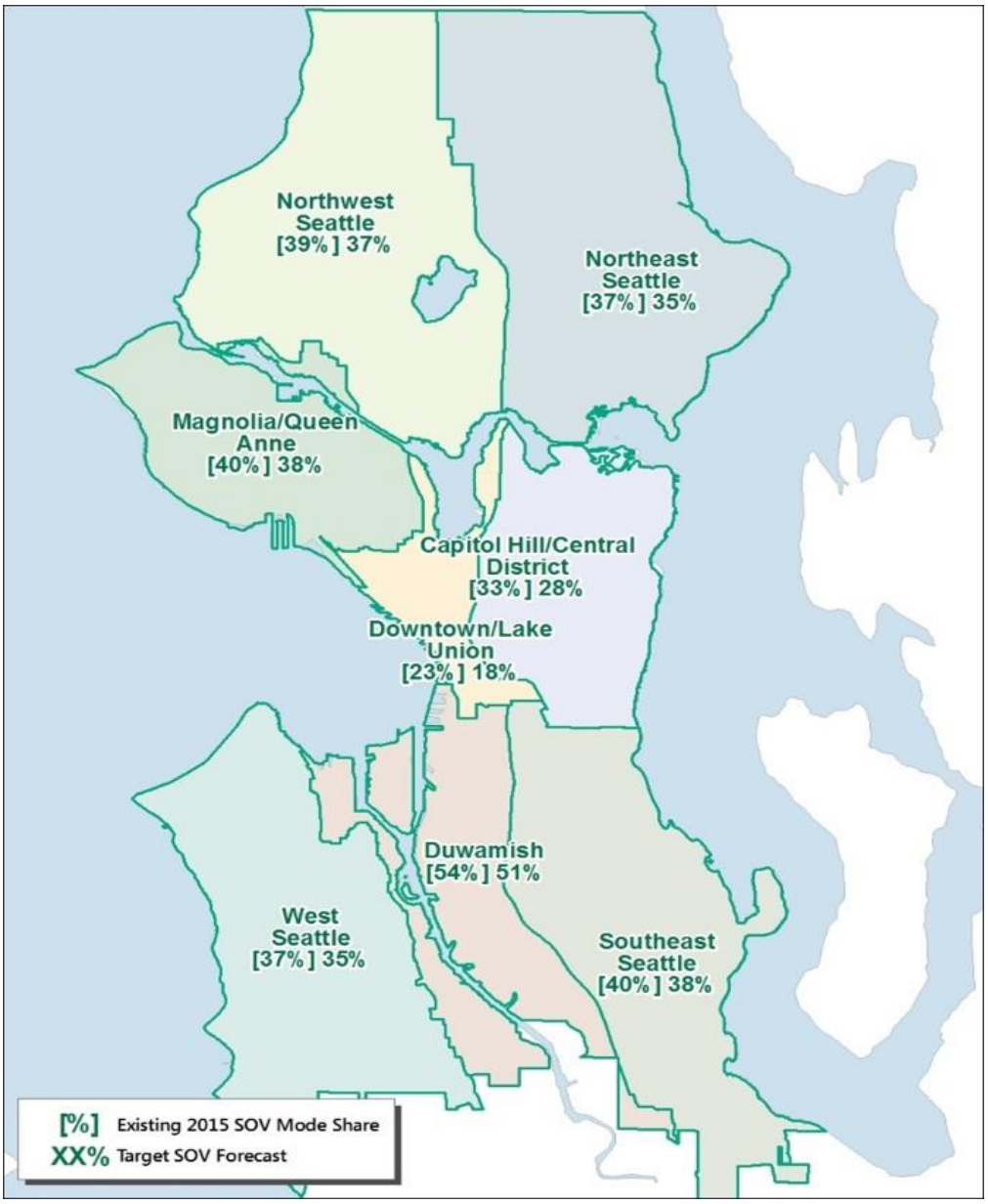

Fig. 1: 2035 SOV Mode Share Targets by Geographic Sector

Source: Seattle 2035 Comprehensive Plan Transportation Appendix, Fig. A-11

Analysis

Development of the new LOS standard was supported by technical analyses prepared for the Seattle 2035 Comprehensive Plan Environmental Impact Statement (EIS). The EIS included analysis of likely transportation impacts, using the PSRC's travel demand forecasting model, and based on the following assumptions for the planning period through 2035:

- Additional growth of 70,000 households and 115,000 jobs
- Additional density and mix of uses in urban centers and villages
- Addition of more transit options, including new bus-rapid transit (BRT) identified in the Move Seattle levy and new light rail lines in the ST3 funding package
- Implementation of new bicycle and pedestrian mobility projects as defined in the Seattle Bicycle Master Plan and Pedestrian Master Plan
- Freight access improvements identified in the Freight Master Plan

In order to consider impacts at a manageable scale, the analysis divided the city into eight geographic sectors. For each sector, the analysis identified the impacts of growth on a variety of transportation measurements, such as total vehicle miles traveled, average trip length, average travel time, and percentage of trips by each mode, including SOVs.

City staff and transportation consultants determined that measuring the percentage of trips made by SOV would be an effective way to understand how well the transportation system was performing relative to growth.

A reduction in SOV trips will enable Seattle's network to move the same number of people within the existing ROW capacity, freeing up road space for other, more efficient travel modes. As illustrated in Figure 2 on the following page, an SOV trip consumes the most space per person, while other modes use considerably less street space per person. For example, travel by transit requires roughly 97% less right-of-way space than driving alone, so that each shift from a SOV to transit frees up significant space in the right-of-way. It is impractical and environmentally unsustainable to further expand Seattle's street system. Therefore, as Seattle accommodates more residents and jobs, mobility can be maintained if people choose more space-efficient modes of travel. The new method will measure Seattle's success in encouraging non-SOV options.

Simultaneously, capital improvement strategies that accommodate alternatives to SOV travel are contained in the City's pedestrian, transit and bicycle master plans. As

the City completes the networks described in these master plans it will be more convenient for people traveling in Seattle to shift to alternate modes.

The City will measure progress against the new LOS standard through PSRC's household travel survey and travel model. The travel survey, which is updated every two years, will allow the City to estimate the percentage of trips made by SOV and compare that to the SOV mode share reduction target. This data will also enable City staff to evaluate how efficiently arterials are performing, consistent with GMA requirements to assess the performance of locally owned arterials and transit routes. As the City monitors progress towards the reduction targets, it can evaluate whether a more ambitious Comprehensive Plan SOV reduction goal should be established. Measuring progress can also indicate whether further improvements are needed for transit, pedestrian and bicycle facilities.

Figure 2: Street Capacity Gains with SOV

Source: Seattle 2035 Comprehensive Plan Transportation Appendix

Ordinance Amending Chapter 23.52

Subchapter I

Amendments to Subchapter I of Chapter 23.52 establish thresholds to identify which projects are required to take mitigation measures to reduce the number of SOV trips as a condition of development approval. A Joint Directors' Rule, described below, provides a variety of options to satisfy this requirement.

Proposed thresholds are based on analyses of trips likely to be generated by various uses and project sizes, and projects located in certain areas of the city. Projects required to take mitigation measures are those likely to produce more than 30 trips (in the PM peak hour), a concurrency standard shared by other Washington cities.

Specifically, the following projects are subject to the requirement to adopt measures to reduce SOV trips:

- Residential projects with more than 30 dwelling units or sleeping rooms
- Non-residential (primarily commercial) projects with more than 4,000 square feet of gross floor area
- For projects in IG1 and IG2 zones, with uses that fall within the agricultural, high impact, manufacturing, storage, transportation facilities or utility categories (see Table A of 23.50.012), the concurrency threshold would be more than 30,000 square feet of gross floor area. The threshold for industrial uses is higher, due to lower trip generation rates and generally fewer peak period trips.

Location is also a factor used in determining how a project contributes to the City's mode share targets. Transportation research and analysis for the Comprehensive Plan EIS show that development projects located in proximity to frequent transit service, employment opportunities, shops and services produce fewer SOV trips. In addition, data from the PSRC travel survey indicates similar mode shift benefits in key locations within Seattle, in particular urban centers, which have a mix of uses and robust levels of transit service.

Based on these findings, all projects located within urban centers, hub urban villages, and within ½ mile of a light rail station are deemed to have met the SOV reduction standard by virtue of their location. All projects in these locations are exempt from needing to take further steps to reduce SOV trips. Based on past development trends and existing policies directing growth to centers and villages, staff estimates that the majority of new development will occur in these areas.

Numerous other Land Use Code sections (applying to different geographical areas and zones) will continue to require compliance with Chapter 23.52. No changes to the language in those Code sections is necessary.

Subchapter II

Amendments to Subchapter II do not address concurrency directly, but provide an important procedural clarification about additional transportation analysis that may be required. Chapter 23.52 currently requires a transportation impact study for development proposals of a certain size, irrespective of whether the development is subject to SEPA review. This requirement preserves the City's ability to address substantive impacts on traffic and streets even if SEPA review is not required. The provisions of Subchapter II identify specific numerical thresholds for developments subject to the impact study, types of impact that may be addressed, and a range of allowable measures to address those impacts. The proposed changes to Subchapter II conform the thresholds with 2017 legislation that updated SEPA thresholds and makes minor clarifications to other provisions.

Joint SDCI and SDOT Directors' Rule

The City's project review will be guided by the proposed Joint Directors' Rule (Rule).[1] Adoption of the Directors' Rule is undertaken through a separate action and is not a subject of legislation. The Rule establishes a menu of options from which developers can choose to reduce the share of SOV trips generated by the project. A developer may also propose an alternative option. As proposed, projects within Seattle's urban centers, hub urban villages, or within ½ mile walking distance of a light rail station are deemed to have satisfied this requirement by virtue of their location and are not required to use the tools in the menu.

The Rule's menu of options for developers includes:

- **Pedestrian improvements, specifically sidewalks or curb ramps.** These options help complete the City's pedestrian network and encourage more pedestrian trips from new and existing development. This is especially true if the improvement allows for walking trips that connect to retail or commercial destinations, parks or transit stops that allow people to readily substitute a walking trip for a SOV car trip.

[1] SDCI's existing rule, DR 5-2009, provided information to applicants about how the volume/capacity methodology worked in practice. The new proposed Joint Directors' Rule will replace this existing Rule.

- **Reduced parking.** Developers can reduce the amount of parking that they might otherwise build. Putting parking on a "diet"—not building excess supply—helps reduce the easy availability of parking which can generate SOV trips. Providing less parking in a new building also encourages residents and commercial tenants to use nearby transit options, ride share, or other travel modes including Transportation Network Companies such as Uber or Lyft.
- **Mix of land uses.** A mix of land uses within a project, such as retail mixed with residential, can directly reduce those SOV trips that would have been needed to travel to another retail shopping area. For instance, a mixed-use project with a convenience store on the ground floor allows someone who lives in the building or nearby to walk to the store.
- **Transit pass subsidies.** Provision of subsidized transit passes to residents and on-site employees through King County Metro's Orca Passport program can directly reduce SOV trips in peak commuting periods by making transit cheaper and/or easier than driving. The passes can also be used outside of peak commuting periods for non-work trips, with the potential of further lowering SOV trips.
- **Alternate options to reduce SOV trips.** Developers can also propose an option not on the menu by showing it is equally effective in reducing SOV mode share.

The aggregate effect of developers' choices will help meet the SOV mode share reduction targets in each geographic sector of the City. For example, constructing a length of sidewalk helps complete the City's overall sidewalk network, thus contributing to shifting trips system-wide to non-SOV modes. [2]

As developers take action to reduce SOV trips by their project-level choices, these actions are further leveraged and enhanced by City capital initiatives to improve mobility. These include completion of SDOT's Pedestrian Master Plan sidewalk improvements and major expansion of frequent transit routes identified in SDOT's Transit Master Plan. In addition, the City's policy choices and regulatory improvements, such as making parking requirements more efficient, can also leverage developers' actions to reduce SOV trips.

Conclusions and Recommendation

The thresholds and requirement established by amendments to the Land Use Code combined with the Directors' Rule's menu of options for developers can effectively contribute to a cumulative reduction in SOV trips, helping to meet sector SOV reduction targets. The combined effect of developers' choices and implementation of the City's transportation capital investments and land use regulatory changes will

[2] See, for example, the Index 4DMethod: A Quick-Response Method of Estimating Travel Impacts from Land-Use Changes (US Environmental Protection Agency, 2001).

provide attractive and convenient travel options for residents and workers. The net effect is to help achieve the Comprehensive Plan's transportation and mobility policies and key components of the urban village strategy, including more efficient use of limited road space, greenhouse gas emissions reductions, greater choice in travel modes, and support for neighborhood-serving compact mixed-use development.

The Executive recommends adoption of the proposed Land Use Code amendment as a reasonable and effective means to advance multiple City policies, meet GMA requirements, and implement the new LOS standard adopted into the City's Comprehensive Plan, including through revisions to Chapter 23.52 and SDCI and SDOT's implementation of the Joint Directors' Rule.