



COMMUTE TRIP REDUCTION LAW UPDATE 2021

TECHNICAL REPORT

JANUARY 2022

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INTRODUCTION

The Transportation Demand Management (TDM) Technical Committee and the TDM Executive Board, with assistance from WSDOT, developed this technical report in response to a request from the Washington State Legislature to conduct an update to the Commute Trip Reduction (CTR) Program.

On September 28, 2021, the TDM Technical Committee forwarded an initial report, *The Commute Trip Reduction Law Update 2021- Evolution of a Proven Program to Better Address Equity and Climate*¹ to the House and Senate Transportation Committees of the Washington State Legislature. The report recommends CTR Program expansion and three possible emphasis areas:²

- Add support for essential workers and for people with special transportation needs.
- Address a larger share of urban congestion.
- Improve mobility in more locations.

This technical report provides background information on the existing CTR Program.

Section 1: CTR Program purposes, approach, and accomplishments

This section reviews the purposes of the CTR Program; the various aspects of the approach including affected areas, partnerships, employer investments, performance measurement, regional and local CTR plans, and growth and transportation efficiency centers; and CTR Program accomplishments.

Section 2: Current CTR Program

This section reviews objectives and requirements of the CTR Program, governance structure, operations, and funding.

Section 3: Outreach to date and summary of results

This section reviews the extensive outreach to date on the CTR Strategic Plan objectives, CTR Law Update project brief, legislative work plan, and the emphasis areas.

Section 4: Invitation to participate

This section issues an invitation for all interested parties to participate in the conversation.

¹ See Appendix J for the initial report.

² See Appendix A for more information about the emphasis areas.

SECTION 1

CTR Program purposes, approach, and accomplishments

PURPOSES

In 1991, the Washington State Legislature passed the CTR Law ([RCW 70A.15.4000](#) – 4110) to address air pollution, petroleum-fuel consumption, and traffic congestion. The CTR Program began as a response to the Exxon Valdez grounding and concerns of federal mandates through the federal Clean Air Act. The program was incorporated into the Washington Clean Air Act.³

The law details the CTR Program, giving the following purposes for the program:

The legislature further finds that reducing the number of commute trips to work made via single-occupant cars and light trucks is an effective way of reducing automobile-related air pollution, traffic congestion, and energy use. Major employers have significant opportunities to encourage and facilitate reducing single-occupant vehicle commuting by employees. (RCW 70A.15.4000)

APPROACH

The CTR Law mandates three major actions to accomplish the CTR Program's purposes:

1. Jurisdictions in affected areas must engage major employers to provide CTR programs.
2. Jurisdictions in affected areas must integrate and support employer efforts in local and regional CTR plans and programs.
3. The state must provide support and leadership.

Together, the actions taken by jurisdictions and employers enable and encourage commuters to ride transit, carpool, vanpool, walk, bicycle, telework, use flexible work schedules, and compress work weeks. Employers and property managers who provide CTR incentives to employees are eligible for a credit against their business-and-occupation or public-utility tax liability.

Affected jurisdictions and worksites

The CTR Program focuses on urban growth areas and worksites. The CTR Law identifies affected counties and cities.⁴ Within those counties and cities, major employers must provide a CTR program. The law defines major employers as those with 100 or more full-time employees (working 12 months per year) who begin their shift between 6 and 9 a.m. on weekdays.

³ See Appendix B for more information about the history and evolution of the CTR Program.

⁴ See Appendix C for more information about affected counties and cities.

Regional CTR plans and local partnerships

Collaboration required in the CTR Law led to the establishment of local partnerships focused on commute options. These coalitions involve state, regional, and local agencies; employers; and, in some cases, business associations, developers, and transportation management associations.

In 2006, legislators passed the CTR Efficiency Act, updating the original 1991 CTR Law. The act strengthened the relationship between local governments and affected employers and worksites by transferring performance accountability from employers to local governments. As a result, local CTR plans and programs are now more integrated with local land use and transportation plans, aligning policies and investments.

The law extended this planning integration to transit agencies as well. When developing their six-year transit plans, the agencies must consider the location of major employers when locating new services.

Additionally, affected regional transportation planning organizations (RTPOs) must adopt regional CTR plans that contain:

- Regional goals.
- Description of strategies for achieving the goals.
- Sustainable financial plan for meeting the goals.
- Description of how progress will be measured in meeting the goals.
- Criteria for growth and transportation efficiency centers.

Employer investments

State investment in the CTR Program and associated business-and-occupation tax credits fueled growth in employer-sponsored commute benefits. In terms of total investment, private investments in commute programs are substantially greater than the public's investment.

Performance measurement

Jurisdictions and employers measure progress toward CTR goals through biennial surveys of employees and employers. CTR performance data supports continuous program improvement; enhances transportation planning; and supports project development at worksites, jurisdictions, regions, and the state.

Local CTR plans

Local CTR plans provide structure that supports program delivery and results. The CTR Law spells out contents of the plan for jurisdictions. Major required elements of the plans are:

- Program goals.
- Description of requirements for major employers.
- CTR plan for the employees of the jurisdiction.
- Method of measuring progress towards goals.

Jurisdictions must also provide a description of the land use and transportation context in the jurisdiction within which the CTR Program will be implemented.

Collaboration is a requirement of the plans. Jurisdictions must develop the plans in consultation with transit agencies,

other levels of government, other agencies, and other interested parties. WSDOT's Public Transportation Division provides technical assistance to jurisdictions in formulating, implementing, and monitoring their plans.⁵

The structure of CTR plans, as required by the law, provides versatility by allowing wide discretion for jurisdictions to tailor the content of their plans to the needs of their community. Jurisdictions can apply CTR plan elements to an array of local conditions:

- Commuter preferences
- Available transit service
- Traffic congestion time, location, and duration
- Active transportation infrastructure
- Parking availability
- Telework suitability

Growth and transportation efficiency centers

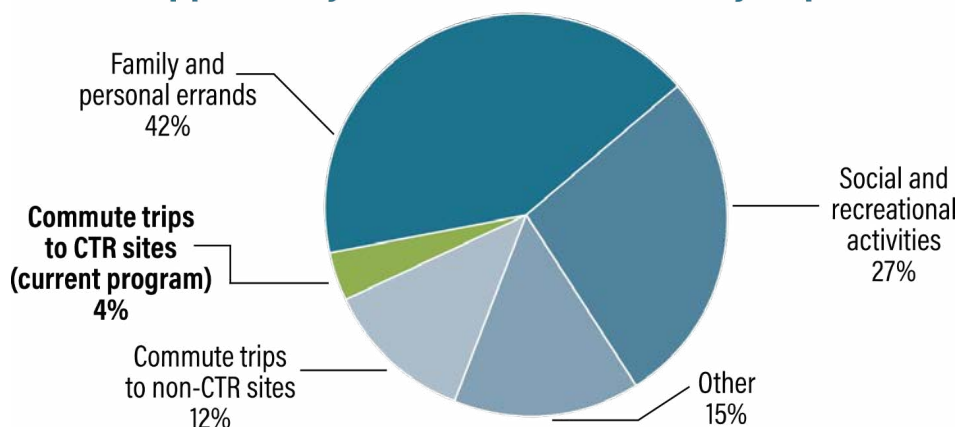
The 2006 CTR Law update created growth and transportation efficiency centers. The intent of the centers is to enable local governments to partner with economic development organizations and use enhanced TDM programs to enable and spur new growth.

These centers allow jurisdictions to establish TDM programs outside the parameters of the large-worksite-oriented CTR program. The programs correspond to local needs and may include but are not limited to:

- Commuters at worksites with fewer than 100 employees.
- Commuters in office parks and buildings.
- Neighborhoods and economic centers.
- People driving for errands, deliveries, or recreation.
- Historically underserved populations.

Since only 4 percent of all trips are addressed in the core CTR Program, these people and organizations represent a large untapped market for trip reduction. The state provided initial funding to support growth and transportation efficiency centers. The funding, which lasted two years (2007-2009), spurred significant and long-lasting innovation in

Opportunity to Address 96% of Daily Trips



⁵ See Section 2: Current CTR Program and Appendix C for more information about required elements of local CTR plans is in.

local trip reduction efforts.

In particular, growth and transportation efficiency centers greatly enhanced the role of the state's three preeminent transportation management associations: Commute Seattle, Move Redmond, and Tacoma's Downtown on the Go. A transportation management association is an administrative body designed to manage the transportation needs of a particular venue, district, or community. In most cases, the associations are nonprofit organizations that are usually controlled by members. The transportation management associations are deeply woven into the civic fabric of the cities they serve and are members of local business associations or chambers of commerce.

The flexibility and locally driven focus of growth and transportation efficiency centers attracted new community partners such as neighborhood groups, employers, economic development groups, community advocacy groups, and developers.

ACCOMPLISHMENTS

Using the system efficiently

In the graph below, just over half of the nearly 600,000 employees working at CTR-affected worksites from 2019-2020 chose alternatives to driving alone for their travel to and from work. This is 76 percent higher than the state average (28.8), and 115 percent higher than the national average (23.6).^{6 7}

The CTR Program also helped reduce roughly 30 percent of vehicle miles traveled per employee per day from 2007-2020 (10.9 to 7.6, respectively). The reduction in vehicle miles traveled means roughly 9 million fewer gallons of fuel used each year, saving commuters nearly \$58 million. This also leads to an annual reduction of about 175,000 metric tons in greenhouse-gas emissions.

Additionally, the cars left at home by CTR-affected employees every weekday represents about one lane of bumper-to-bumper traffic stretching 91 miles. This is equivalent to the distance from Olympia to Everett or Spokane to Grand Coulee Dam.

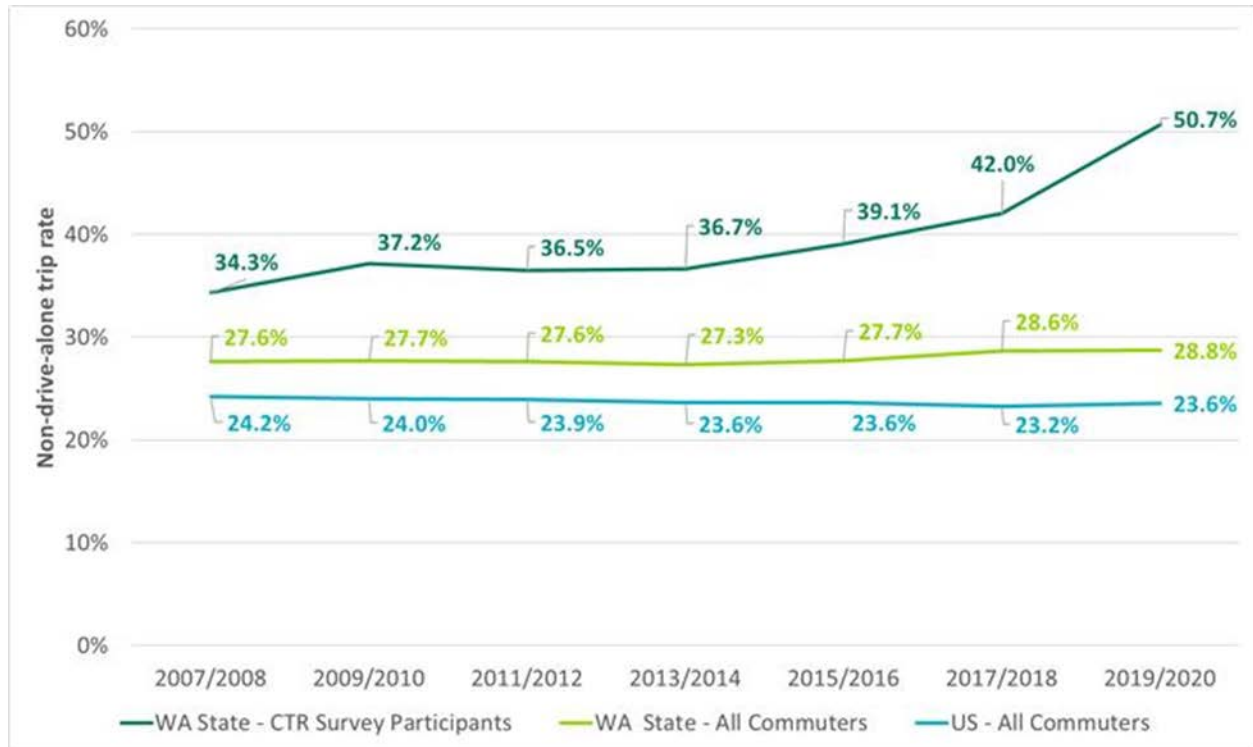
Local CTR programs work by enabling and incentivizing employees to ride the bus, rideshare, walk, bicycle, or telework. And over the years, local programs have delivered results. The programs have:

- Boosted transit ridership through widespread availability of employer-sponsored transit passes.
- Created thousands of employer-supported vanpools.
- Expanded the use of compressed work schedules, flex schedules, and telework.

⁶ WSDOT analysis of Commute Trip Reduction Survey and American Census Survey data.

⁷ Two unusual circumstances related to the COVID-19 pandemic affected performance data. First, there was a significant increase in telework for the sites that surveyed after March 2020 and Gov. Inslee's Stay Home, Stay Healthy order. Second, almost 200 fewer worksites surveyed in the 2019-2020 cycle than in 2017-2018. These sites have historically reported vehicle miles traveled above the current cycle's statewide average. It is likely that part of the improvement in the numbers is due to those sites not surveying. While the gains from telework are sustainable, the next cycle that surveys all commute trip reduction-affected worksites will likely have results that fall somewhere between the numbers from 2017-2018 and 2019-2020.

Figure 1: Non-drive-alone commute trip rate



Local and regional partnerships

Local and regional partnerships required in CTR plans are key elements to the CTR Program's success. These partnerships have helped boost multimodal commute trips through a variety of CTR strategies, including:

- Employer-sponsored transit passes.
- Employer-supported vanpools.
- Compressed work schedules, flex schedules, and telework.
- Land use planning.

Affected jurisdictions have integrated their CTR programs and strategies into their comprehensive plans and visions for their communities, creating a foundation for TDM planning and programming as well as more efficient land use and economic development.

SECTION 2:

Current CTR Program

This section reviews the objectives of the CTR Program, describes the governance structure, and provides a high-level summary of the program requirements. It also summarizes program administration and operations, describes WSDOT technical assistance, and explores the nature of TDM as it relates to the CTR Program. Finally, it presents the current funding resources available to jurisdictions in the CTR Program.⁸

CTR PROGRAM REQUIREMENTS

Program objectives

[WAC 468-63-040\(1\)\(a\)](#) provides the CTR Program objectives:

The state's intent in requiring local CTR plans is to ensure that CTR program goals and targets help jurisdictions achieve their broader transportation and land use goals, and that the jurisdiction in turn develops services, regulations, policies and programs that support the trip reduction investments of major employers. This can be achieved by integrating the local CTR plan and program with other transportation and land use plans and programs, and collaborating with local service providers, interest groups, and others to develop effective trip reduction strategies.

Governance

The CTR Law provides for the establishment of a 16-member board to oversee the program. The law specifies the composition of the board and its responsibilities. The law tasks the board with:⁹

- Establishing rules.
- Reviewing and approving CTR plans.
- Collaborating with other public agencies.
- Receiving periodic reports from affected jurisdictions.
- Evaluating the program and reporting to the Legislature on whether the program should be continued, modified, or terminated.

In 2019, stakeholders expanded their role beyond CTR programs to engage more broadly in TDM. The TDM Executive Board was created to provide vision, guidance, and support for TDM, including the CTR Program and other multimodal efforts. The WSDOT Secretary of Transportation serves as chair of this board, which is not codified in law. The original CTR Board was then renamed the TDM Technical Committee. This committee fulfills the CTR Board requirements and advises on additional TDM programs and projects. The WSDOT Assistant Secretary of Multimodal Development and Delivery is the chair of the TDM Technical Committee.

⁸ See Appendix C for more information on the Commute Trip Reduction Program.

⁹ See Appendix D for more information on CTR Board representation and duties.

Structure of the CTR Program

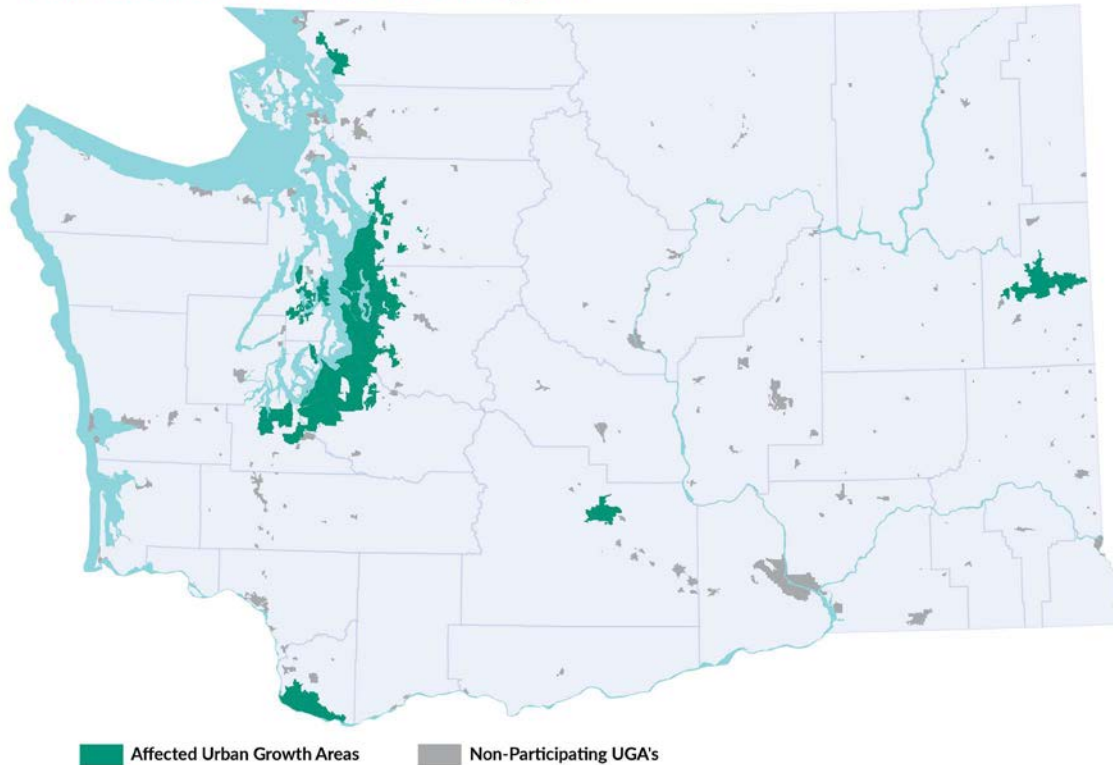
As mentioned previously,¹⁰ the Washington State Legislature passed the CTR Law—thus creating the CTR Program—in 1991 to address air pollution, petroleum fuel consumption, and traffic congestion.

Beginning with the 2006 Efficiency Act, the CTR Program targeted areas with congested highways. The CTR Law affects counties containing urban growth areas and cities in those areas with a congested state highway (i.e., more than 100 person-hours of delay per day). These counties and cities must develop a CTR plan and ordinance designed to reduce drive-alone trips at major employers in their jurisdictions. If a county or city does not have a major employer, it is not required to have a CTR plan. The definition of a CTR-affected area includes congestion and population metrics. The state's CTR-affected counties are Clark, King, Kitsap, Pierce, Snohomish, Spokane, Thurston, Whatcom, and Yakima (see Map 1).

The CTR Program is highly decentralized. While elements of regional and local CTR plans are in the CTR Law, the content of those elements is at the discretion of the RTPO and jurisdiction. This allows each RTPO and jurisdiction to tailor its CTR plan and program to address local needs and conditions. Further, the CTR Law calls for extensive collaboration in planning amongst all agencies and levels of government.

Map 1 – CTR-affected counties and cities

Affected Areas in the CTR Program



The CTR Law states that its intent is to require local governments in counties experiencing the greatest automobile-related air pollution and traffic congestion to develop and implement plans to reduce single-occupant vehicle commute trips. Cities and counties, RTPOs, the state, and major employers are all required to develop, implement, and report on CTR plans.¹¹ Further, WAC 468-63-030 (3)(c) states:

¹⁰ See Section 1, Purpose and Regional CTR plans and local partnerships for more information about CTR legislation.

¹¹ See Section 1, Regional CTR plans and local partnerships and Local CTR plans; and Appendix C for more information on CTR planning requirements.

In their local CTR plans, local jurisdictions shall communicate what local, regional and state benefits would be gained if the established targets were achieved. Benefits may include but are not limited to projected changes in transportation system performance, projected reductions in emissions of pollutants, projected reductions in energy consumption, and projected benefits for economic development.

Major innovations

The CTR Board has continuously worked with partners to develop and implement program improvements. Two of the most notable are growth and transportation efficiency centers and alternate plans. These improvements allowed communities to better align the program with the local context, needs, and opportunities.

Growth and transportation efficiency centers

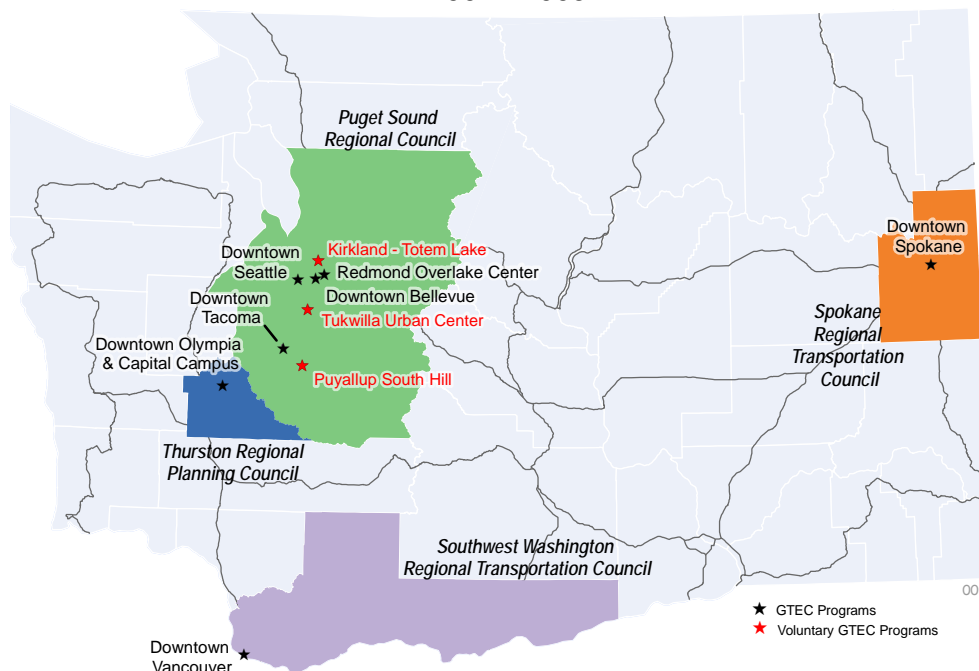
As mentioned previously,¹² In 2006 the Washington State Legislature passed the Commute Trip Reduction Efficiency Act, which allowed selected jurisdictions to form growth and transportation efficiency centers to focus on urban growth areas that were experiencing the greatest automobile-related air pollution and traffic congestion. Once established, a growth and transportation efficiency center became a part of a jurisdiction's CTR plan. As such, the plan had the same program requirements as a regular CTR plan with two notable exceptions:

1. The plan's goals were required to be more aggressive than state-specified goals.
2. Funding eligibility required an evaluation of local land use and transportation policy to determine the extent to which they complemented and supported TDM approaches.

The growth and transportation efficiency center jurisdictions were Bellevue, Kirkland, Olympia, Puyallup South Hill, Redmond, Seattle, Spokane, Tacoma, Tukwila, and Vancouver (see Map 2).

Map 2 – Growth and transportation efficiency center jurisdictions

Growth and Transportation Efficiency Centers (GTEC) 2007 - 2009



¹² See Section 1, Regional CTR plans and local partnerships and Appendix E for more information about the CTR Efficiency Act and growth and transportation efficiency centers.

Funding for growth and transportation efficiency centers lasted two years (2007-2009) and spurred innovation in local TDM programs that continue to provide meaningful value.

The centers focused on outreach and education to an entire geographic area (e.g., a downtown, a corridor, a whole region). Therefore, a center captured a broader and more diverse trip market (e.g., small businesses, students, non-peak trips) than the large-employer-focused CTR Program. The centers strengthened partnerships between transit agencies, RTPOs and chambers of commerce. About 226,000 employees who were not previously part of CTR were eligible to participate through the growth and transportation efficiency center program. In addition, the centers allowed for highly flexible and customized strategies that aligned with the resources, needs, and opportunities for each jurisdiction.

Growth and transportation efficiency centers established a manager to fulfill administrative and program management functions at the area-wide scale. This contrasted with the CTR program where an employer designates an employee transportation coordinator to administer the employer's CTR program at a worksite level. Essentially, the entire growth and transportation efficiency center was treated like a large worksite. Every employer within the center boundary had the potential to contribute to meeting local mobility goals and targets. Several jurisdictions have continued the growth and transportation efficiency center approach in their TDM programs including Seattle, Tacoma, Spokane, and Bellevue.

The rules for growth and transportation efficiency centers (WAC 468-63-060) are very detailed. The bar for acceptance into this pilot program was set high, so only those jurisdictions with more complex programs chose to apply. However, the goal of the centers is still valid. If the state funds efficiency centers again, more jurisdictions are likely to compete for this funding.

Alternate plans

In 2013, the CTR Board approved a four-year pilot rulemaking program to evaluate new trip reduction strategies, improve performance measurement, and identify administrative efficiencies. The board selected six jurisdictions (Redmond, Seattle, Snohomish County, Tacoma, Tukwila, and Yakima) to take part in an alternate plan during the pilot period. Like the growth and transportation efficiency center approach, alternate plans focused CTR Program resources in the areas with the greatest trip reduction potential.

The flexibility provided by the 2013 alternate plan pilot allowed jurisdictions to expand their CTR programs in ways that better fit the conditions of their particular jurisdiction. These jurisdictions implemented their alternate plans using their existing state funding for the program.¹³

As valuable as the alternate plan pilot program proved to be for jurisdictions, it ended after four years. The program participants identified ways to improve the overall CTR Program structure and implementation approach. As of yet, these improvements have not been incorporated into the CTR Law.

¹³ See Appendix F for comments from several alternate plan jurisdictions.

Program administration and operations

The CTR Program is decentralized. That is, for each individual county or city CTR jurisdiction, its program is managed by a local entity – usually staff at a transit agency, RTPO/metropolitan planning organization, transportation management association, or municipal or county government. This empowers each jurisdiction to have local control in designing, implementing, and managing its CTR plan within the guidance set out by the CTR Law and accompanying rules.

This decentralized approach has five key benefits:

1. Creates local oversight for CTR-affected businesses instead of all directives coming from the state, which increases local support for the program.
2. Allows each CTR program to be tailored to the circumstances and needs of each locality.
3. Encourages the formation of local coalitions to support the CTR program and fosters local ownership, developing additional buy-in from key stakeholders (e.g., decision makers, planners, and businesses).
4. Creates local CTR practitioners, experts, and institutional knowledge that can be leveraged to identify TDM solutions beyond CTR. For example, TDM skills learned by local CTR representatives can be applied to other scenarios, such as mitigating traffic disruptions caused by road construction or residential or commercial development.
5. Encourages jurisdictions and businesses to contribute their own funding for the CTR program to strengthen aspects of CTR they find most important.

CTR-affected jurisdictions are permitted to contract with another agency to administer their CTR program or portions of their program (e.g., surveying). The jurisdictions of Kent, Tukwila, Renton, SeaTac, and Federal Way have pooled their CTR funding and share additional resources (e.g., information, successful practices) to make the program work best for their common challenges.¹⁴

WSDOT provides technical assistance

The CTR Law requires WSDOT to provide staff support to the CTR Board in carrying out the requirements of the law. WSDOT must also provide technical assistance to RTPOs, counties, cities, towns, state agencies, and other employers in developing and implementing CTR plans and programs. Major areas where WSDOT assists jurisdictions are the development of CTR plans, employee surveys that measure progress, and employer reports that identify a worksite's TDM approaches and opportunities. WSDOT's Public Transportation Division carries out these requirements.¹⁵

CTR'S RELATIONSHIP TO TRANSPORTATION DEMAND MANAGEMENT (TDM)

TDM uses transportation options, motivation, and infrastructure to enhance access to and the use of transportation system capacity. TDM outcomes include increased equity and access to opportunity, more efficient use of existing transportation infrastructure and services, reduced greenhouse gas emissions, and reduced need for large mobility projects.

¹⁴ See Appendix G for more information about CTR program administration and operations.

¹⁵ See Appendix C for more information about WSDOT CTR technical assistance requirements.

TDM can be implemented by:

- Providing for non-drive-alone travel choices (e.g., walking, transit, compact development), and eliminating trips (e.g., teleworking, compressed work weeks).
- Motivating sustainable and efficient choices with incentives (e.g., transit pass programs, designated parking for carpools and vanpools) and disincentives (e.g., limiting parking availability, daily parking charges).
- Developing infrastructure that gives people choices on how they access their community (e.g., HOV and HOT lanes, bicycle lanes, enhanced sidewalks designed for people of all ages and abilities, broadband access).

Unlike the CTR Program's focus on peak commute trips in heavily populated areas, TDM programs can target multiple trip types regardless of origin, destination, time of day, or geographic location. CTR and TDM are often used interchangeably though they are not the same. The distinct differences are that the CTR Program is limited to commute trips with very specific programmatic parameters, and jurisdictions must have a CTR program to be eligible for an array of state grants.

Transportation professionals at the local, regional, state, and federal levels are increasingly turning to TDM solutions to advance transportation goals. TDM solutions help people use existing transportation infrastructure in ways that enhance system efficiency and mobility while reducing maintenance and preservation costs, as well as the need to invest in new and expensive capital construction projects.

TDM also supports equitable outcomes by providing access to opportunities and social services for all travelers, not just those who are fortunate enough to have the ability to drive alone. Black, Indigenous, and People of Color (BIPOC); immigrants; people with low incomes; older adults; and people with disabilities are much less likely to have a driver's license or access to a car¹⁶ and are more likely to be transit-reliant.¹⁷ As noted in the 2016 Washington State Public Transportation Plan, state law ([RCW 36.57A.180](#)) defines special needs populations as:

Persons, including their personal attendants, who because of physical or mental disability, income status, or age are unable to transport themselves or to purchase transportation.

Using this definition, more than 30 percent of Washington residents meet the criteria for special needs.

ALIGNMENT WITH OTHER STATE PLANS

There are multiple state plans that set forth similar and complementary goals to the CTR Program. There are also other state agencies and divisions in WSDOT that have similar goals. Examples are in Appendix H.

FUNDING

The CTR Program budget is \$5.67 million per biennium. Program funding has not increased from its original budget amount 20 years ago despite a significant increase in the number of employer worksites and a doubling of the employees covered by the program. Twenty years of inflation has eroded more than half of the budget's purchasing power.¹⁸

¹⁶ Disability Rights Washington. "Transportation Access for Everyone: Washington State Story Map," 2021. <https://www.disabilityrightswa.org/storymap/>.

¹⁷ Washington State Department of Licensing. "Statistics at A Glance, Fiscal Year 2021." <https://www.dol.wa.gov/about/docs/2021-FY-stats-at-a-glance.pdf>.

¹⁸ Conservatively assuming 3 percent inflation per year over 20 years.

SECTION 3:

Stakeholder outreach to date and summary of results

Stakeholder engagement is integral to the CTR Law update project and will continue.

SUMMARY OF IMPLEMENTERS OUTREACH

In June 2021, WSDOT held meetings with all CTR program implementers on program objectives put forward in the CTR Board's [2019-2023 Strategic Plan: Expanding Travel Options: Faster, Smarter and More Affordable](#).¹⁹ All implementers supported the objectives. In addition, the implementers commented on a wide array of topics. This feedback formed the foundation for the development of the recommended emphasis areas presented to the Legislature for consideration on Oct. 1, 2021, in *The Commute Trip Reduction Law Update 2021 – Evolution of a Proven Program to Better Address Equity and Climate*.

Implementer themes

Here is a summary of the major themes that emerged from June 2021 discussions with CTR program implementers.

Equity: Equity should be worked into all objectives more explicitly.

Funding: Every implementer in each outreach session raised the topic of funding. Implementers commented that, because funding has been flat since the establishment of the CTR Program in 2006, they are unable to do more with CTR funds due to decreased buying power. In many jurisdictions, agencies are marginally meeting state requirements due to a lack of resources.

Commute time: Several implementers commented that their community experiences routine traffic congestion outside the 6-9 a.m. timeframe specified in the CTR Program.

CTR-affected area: Some implementers commented that it would be good to revisit the definition of a CTR-affected area to be in better alignment with local conditions.

Flexibility to focus on other markets: All implementers commented that they would like to have the flexibility and funding to focus on markets beyond CTR-affected employers. This would allow implementers to meet the needs of their locality and expand the benefits of the program throughout their locality.

Keep requirement for large employers: Implementers stressed the importance and value of keeping the requirement stipulating that large employers have CTR plans. Implementers commented that it gives them a reason to engage with employers and allows them to develop strong relationships with employers and the business community. These relationships in turn help increase awareness, understanding, and support for CTR and other TDM strategies. If the requirement went away, implementers argued, they would lose those relationships and all the good groundwork they have established.

¹⁹ The plan's objectives are in Appendix I.

OTHER STAKEHOLDER ENGAGEMENT

Project brief

WSDOT staff developed a project brief at the beginning of the CTR Law update project to define the scope of the project. WSDOT staff asked several stakeholders for feedback on this document and staff made revisions accordingly. The project brief and the stakeholders contacted for feedback are in Appendix I.

Objectives

Three associations sent surveys to their membership on the objectives for the CTR Program: Washington Association of Washington Cities, Washington Association of Counties, and Washington Association of County Engineers. WSDOT staff also spoke with the Association of Washington Businesses. The responses to the surveys are in Appendix I.

Legislative workplan

WSDOT staff asked several stakeholders for feedback on the legislative workplan. The legislative workplan and a list of the stakeholders contacted is in Appendix I.

Emphasis Areas

Stakeholders provided feedback on possible emphasis areas for an updated CTR Program. They recommended program expansion to use TDM to address:

- Climate change
- Equity
- Mobility needs of low-income, rural, and tribal communities

More information is in Appendix I.

TDM Board and TDM Technical Committee engagement

In addition to reviewing the materials above, the TDM Technical Committee held two workshops. At its first workshop, the committee reviewed and revised the Oct. 1, 2021, report *The Commute Trip Reduction Law Update 2021- Evolution of a Proven Program to Better Address Equity and Climate*. At the second workshop, they reviewed and revised the one-page “leave-behind” document aligned with the report.²⁰ The TDM Executive Board then officially approved both documents.

²⁰ See Appendix J for the one-page “leave-behind” document.

SECTION 4:

Invitation to join the conversation

The TDM Technical Committee and TDM Executive Board will conduct outreach during 2022 to develop proposed improvements to the CTR Program and to formulate proposals to the Legislature. Communities throughout the state are invited to provide input. If you and your community would like to be included in these conversations, please contact Ricardo Gotla at ricardo.gotla@wsdot.wa.gov.

APPENDIX A:

Recommended expansion emphasis areas

The TDM Technical Committee and Executive Board recommend expansion of the CTR Program. The possible Program expansion emphasis areas for consideration that the committee and board included in *The Commute Trip Reduction Law Update 2021- Evolution of a Proven Program to Better Address Equity and Climate* sent to the Legislature Oct. 1, 2021, are:

- **Support essential workers and people with special transportation needs**
Expand the program to support more multimodal transportation options throughout the state for essential workers; shift workers; and people with special transportation needs, including historically marginalized communities, people with low incomes and/or disabilities, tribes, BIPOC, and residents of rural areas.
- **Address urban congestion**
Strengthen the program by providing current CTR jurisdictions greater flexibility to specifically address congestion at all hours.
- **Enable expansion to new locations**
Provide resources to enable WSDOT and interested local partners to expand the CTR Program beyond current locations to address major congestion anywhere on the transportation system (e.g., congestion in rapidly developing areas and during weekends, events, or seasonal activities).

These possible CTR Program expansion areas will be the subject of discussions with legislators and a wide array of stakeholders during 2022.

APPENDIX B

CTR program history and evolution

The Exxon Valdez oil spill: On March 24, 1989, the Exxon Valdez oil tanker struck a reef and spilled 10.8 million U.S. gallons of crude oil into Prince William Sound off the southern coast of Alaska. This stimulated discussion by Washington's legislators on how to best protect the state's environment and decrease dependence on petroleum.



Federal Clean Air Acts amendments: In 1990, the U.S. Congress amended the federal Clean Air Act to increase its effectiveness. The amendments authorized the Environmental Protection Agency to require non-attainment areas (i.e., those areas not attaining a minimum threshold for air quality) to develop and implement mitigation strategies to meet air quality requirements.

CTR Program begins: In 1991, the Washington State Legislature passed the CTR Law (RCW 70A.15) to address air pollution, petroleum fuel consumption, and traffic congestion. The program was begun in part as a response to both the Exxon Valdez grounding and concerns of federal mandates through the federal Clean Air Act. It was incorporated into the Washington Clean Air Act. The program was originally intended as a demonstration/case study with specific targets, mandatory evaluation, and reporting, with a sunset date in 1999.

The CTR Program is extended through a tax credit: Between 1995 and 1997, the CTR Program was extended through the creation of a tax credit for employers who provided financial incentives to employees for efficient commutes. The credit was intended to incentivize smaller employers to participate in CTR without requiring that they participate in the overall program.

The CTR Program is extended again: In 1997, the legislature modified the CTR Program's targets and extended the program through 2005. Employers were actively engaged in developing recommendations to improve the program including clarifying their liability for employees during the commute.

The CTR Program takes its current form: In 2006, legislators passed the CTR Efficiency Act requiring local governments in urban areas with traffic congestion to develop programs that reduce drive-alone trips and vehicle miles traveled for CTR-affected worksites and employees. This act amplified the role of local governments in CTR and strengthened the relationship between local governments and affected employers and worksites. Local plans and programs are now expected to be integrated with local land use and transportation plans to align policies and investments.

The CTR Efficiency Act also introduced growth and transportation efficiency centers, which allowed jurisdictions to promote multimodal options in a designated geographic activity area and reduce single occupancy trips within that area regardless of origin, destination, or time of day. The centers were tailored to specific community needs and conditions. The centers did this by focusing on businesses and worksites with fewer than 100 employees, non-commute trips (e.g., shopping, health care, recreation, education), midday congestion, weekend congestion, and areas targeted for economic development.

Nine jurisdictions (Bellevue, Kirkland, Olympia, Redmond, Seattle, Spokane, Tacoma, Tukwila, and Vancouver) chose to establish growth and transportation efficiency centers. State funding for growth and transportation efficiency centers lasted two years, 2007-2009. The centers remain allowable in state law and rules but unfunded.

Alternate CTR plan pilot 2013: In 2013, the CTR Board approved a four-year pilot rulemaking experiment to evaluate new trip reduction strategies, improve performance measurement, and identify administrative efficiencies. Six jurisdictions (Redmond, Seattle, Snohomish County, Tacoma, Tukwila, and Yakima) were selected to participate in an alternate CTR plan during the pilot period. The alternate plan focused program resources in the areas with the greatest trip reduction potential. The alternate plan pilot ended after four years.

APPENDIX C:

CTR program requirements

The CTR Law is spelled out at RCW 70A.15.4000 – 4110 and WAC Chapter 468-63-010 – 070. The law requires counties containing urban growth areas and cities in those urban growth areas that are also in affected areas to develop a CTR plan and ordinance to reduce drive-alone trips for the major employers in their jurisdictions that have 100 or more employees at one work site commuting between 6 a.m.-9:00 a.m. on weekdays for 12 consecutive months. If a county or city does not have a major employer, it is not required to develop a CTR plan. The definition of a CTR-affected area includes congestion and population metrics. CTR-affected counties and cities (WAC 468-63-020 (2)(b)) are in Table 1.

Table 1: CTR-affected counties and cities

County	Cities		
Clark	<ul style="list-style-type: none"> • Camas • Vancouver • Washougal 		
King	<ul style="list-style-type: none"> • Algona • Auburn • Beaux Arts • Bellevue • Black Diamond • Bothell • Burien • Clyde Hill • Covington • Des Moines • Federal Way 	<ul style="list-style-type: none"> • Hunts Point • Issaquah • Kenmore • Kent • Kirkland • Lake Forest Park • Maple Valley • Medina • Mercer Island • Newcastle • Normandy Park 	<ul style="list-style-type: none"> • Pacific • Redmond • Renton • Sammamish • SeaTac • Seattle • Shoreline • Tukwila • Woodinville • Yarrow Point
Kitsap	<ul style="list-style-type: none"> • Bainbridge Island • Bremerton • Port Orchard 		

County	Cities
Pierce	<ul style="list-style-type: none"> Bonney Lake DuPont Edgewood Fife Fircrest Gig Harbor Lakewood Milton Orting Puyallup Ruston Steilacoom Sumner Tacoma University Place
Snohomish	<ul style="list-style-type: none"> Arlington Bothell Brier Edmonds Everett Lake Stevens Lynnwood Marysville Mill Creek Monroe Mountlake Terrace Mukilteo Snohomish Woodway
Spokane	<ul style="list-style-type: none"> Airway Heights Liberty Lake Millwood Spokane Spokane Valley
Thurston	<ul style="list-style-type: none"> Lacey Olympia Tumwater
Whatcom	<ul style="list-style-type: none"> Bellingham Ferndale
Yakima	<ul style="list-style-type: none"> Selah Union Gap Yakima

REQUIREMENTS FOR COUNTIES AND CITIES

The CTR Law specifies the major components of a CTR plan for counties and cities. See Table 2 for required components.

Table 2: CTR plan requirements

CTR plan component	Counties and cities	RTPOs	Major employers	State	Growth and transportation efficiency centers
Description of land use and transportation context.	X	X			X
Executive summary.					X
Goals and targets for reductions in the proportion of single-occupant vehicle commute trips consistent with the goals of other levels of government.	X	X	X	X	X
Description of expected local, regional, and state benefits of achieving targets. Benefits may include, but are not limited to, projected changes in transportation system performance, projected reductions in emissions of pollutants, projected reductions in energy consumption, and projected benefits for economic development.	X				
Measurement methodology for determining base year values and progress toward meeting goals and targets.	X	X	X	X	X
Description of local services and strategies for achieving the goals and targets.	X	X	X	X	X
Description of the requirements for major public and private sector employers to implement CTR programs.	X				

CTR plan component	Counties and cities	RTPOs	Major employers	State	Growth and transportation efficiency centers
Jurisdictions may choose to institute trip reduction strategies for residents and employees in the urban growth area who are not affected by the local CTR ordinance. The progress of these efforts may be used in the jurisdiction's calculation of its progress toward its established urban growth area targets, if it is measured in a manner that is consistent with the measurement guidelines established by WSDOT and posted on the agency's web site.	X				
Documentation of consultation.	X				X
CTR program for employees of the county, city, or town.	X				
A sustainable financial plan describing projected revenues and expenditures to meet the goals.	X	X		X	X
Implementation structure.	X	X			X
Minimum criteria for growth and transportation efficiency centers, if applicable.	X	X			
Evaluation of which local land use and transportation policies apply, including parking policies and ordinances, to determine the extent that they complement and support the trip reduction investments of major employers.	X				X
Designation of an employee transportation coordinator and the display of the name, location, and telephone number of the coordinator in a prominent manner at each affected worksite.			X		
Regular distribution of information to employees regarding alternatives to single-occupant vehicle commuting.			X		

CTR plan component	Counties and cities	RTPOs	Major employers	State	Growth and transportation efficiency centers
Regular review of employee commuting and reporting to the county, city, or town on progress toward meeting the single-occupant vehicle reduction goals.			X		
Annual progress reports.	X	X			

Consultation and consistency required

The CTR Law further states that the local CTR plan must be developed in consultation with local transit agencies, the applicable RTPO, major employers, and other interested parties. The law goes on to state that the CTR plans adopted by counties, cities, and towns must be consistent with and may be incorporated in applicable state or regional transportation plans and local comprehensive plans. These plans must also be coordinated and consistent with the CTR plans of counties, cities, or towns with which the county, city, or town has, in part, common borders or related regional issues. Counties and cities are required to review their CTR Plans annually. As stated at WAC 468-63-040 (1) (b)(iii) and (iv):

Regional role. *It is critical that the local jurisdiction collaborate with the applicable RTPO in the development of its local CTR plan. By working closely with the RTPO, the local jurisdiction can produce a CTR plan that meets state requirements and is consistent with the regional CTR plan.*

Public outreach. *The local jurisdiction must follow, at a minimum, a comparable process to the local requirements and procedures established for purposes of public outreach for comprehensive plan development, adoption, or amendment, including public notices and public meetings and hearings.*

Waivers allowed

The local CTR ordinance must establish the requirements for major employers and provide an appeal process by which major employers who, as a result of special characteristics of their business or its locations, would be unable to meet the requirements of the ordinance, may obtain a waiver or modification of those requirements.

REQUIREMENTS FOR RTPOS

Each CTR-affected RTPO must also adopt a CTR plan for its region. See Table 2 for the required components. As noted in WAC 468-63-050 (1)(a) the state's intent in requiring regional CTR plans is to ensure that the region develops a consistent, integrated regional strategy for meeting CTR goals and targets. The region must use existing plan information as much as possible to determine how the CTR program can help the region achieve its transportation goals. The state intends for CTR services and strategies to be prioritized in regional funding programs.

Progress reporting and updates

RTPOs with a regional CTR plan must report progress annually to the CTR Board. RTPOs must update the regional CTR plan concurrent with the schedule for the regular update of the regional transportation plan or to establish new regional goals and targets, and incorporate information from updated local CTR plans.

Consultation and consistency required

RTPOs must also develop regional CTR plans collaboration with all affected local jurisdictions, transit agencies, and other interested parties within the region. The regional CTR plan must be consistent with and incorporated into TDM components in the regional transportation plan.

Further, the RTPO must develop minimum land use and transportation criteria for growth and transportation efficiency centers in collaboration among local jurisdictions, transit agencies, major employers, and other affected parties as part of the regional CTR plan. The state intends for RTPOs to develop minimum land use and transportation criteria for growth and transportation efficiency centers as early in the regional planning process as possible.

The state intends for RTPOs to coordinate the local and regional CTR planning process and work closely with local jurisdictions to ensure consistency in all of the plans. RTPOs must provide data and technical assistance to local jurisdictions to aid the development of their local CTR plans.

The regional CTR plan must describe which entities will be implementing the CTR program for each city and county, as determined locally. This description must include an identification of lead agencies and the expected contractual relationships for program administration.

Description of land use and transportation context

The state intends for RTPOs to evaluate the significance of regional land use and transportation conditions, characteristics, and trends to highlight factors that are considered critical to the success of the regional CTR plan. The plan must discuss the existing and future land use and transportation conditions and characteristics considered most critical by the RTPO and evaluate the degree to which existing local services, policies, regulations, and programs, as well as any documented future investments, will complement the trip reduction efforts of major employers and help employer programs be more effective.

The regional CTR plan must evaluate the existing barriers to the success of the CTR plan and identify how the RTPO and its partners can overcome these barriers. The plan must also discuss cross-boundary issues, such as pass-through commute patterns or extra-regional issues, and how these affect the regional plan.

Minimum criteria for growth and transportation efficiency centers

RTPOs must adopt minimum transportation and land use criteria that are appropriately scaled to the regional context. The RTPO may establish either absolute or relative criteria. The regional criteria may include, but are not limited to:

- Consistency with local and regional CTR plans and local comprehensive plans.
- Support for achievement of goals in the regional transportation plan.
- Minimum existing and/or target density thresholds (i.e., activity density, population density, employment density).
- Minimum and maximum geographic sizes.
- Existing and targeted levels of transit service.
- Existing and targeted commute trip mode splits.

- Current and forecasted level of delay on state and regional facilities of significance.
- Number of employees and/or residents
- Maximum parking development ratios for new commercial and residential development.
- Pricing strategies affecting parking demand (i.e., commuter and transient).
- Bicycle and pedestrian accessibility.

Regional program goals and targets

Regional CTR plans must describe the established CTR goals and targets for each of the region's affected urban growth areas and designated growth and transportation efficiency centers. The plan must also describe the entire region's goals and targets for CTR and how the regional goals and targets relate to the local goals and targets. The plan must describe how the regional CTR goals and targets will help the region achieve its other transportation goals.

REQUIREMENTS FOR EMPLOYERS

Once a jurisdiction adopts a CTR plan, the jurisdiction requires major employers to establish a baseline measurement consistent with the rules established by WSDOT. Then each major employer must develop a CTR program and plan and must submit a description of that program to the jurisdiction for review.

There are also required components for major employer CTR plans (see Table 2). The measures required in the employer plans to meet goals may include but are not limited to:

- Provision of preferential parking and/or reduced parking charges for HOVs and motorcycles.
- Instituting or increasing parking charges for single occupant vehicles.
- Provision of commuter ride matching services to facilitate employee ride sharing for commute trips.
- Provision of subsidies for transit fares.
- Provision of vans for vanpools.
- Provision of subsidies for carpooling or vanpooling.
- Permitting the use of the employer's vehicles for carpooling or vanpooling.
- Permitting flexible work schedules to facilitate employee use of transit, carpools, or vanpools.
- Cooperation with transportation providers to provide additional regular or express service to the worksite.
- Construction of special loading and unloading facilities for transit, carpool, and vanpool users.
- Provision of bicycle parking facilities, lockers, changing areas, and showers for employees who bicycle or walk to work.
- Provision of a program of parking incentives such as a rebate for employees who do not use the parking facility.
- Establishment of a program to permit employees to work part or full time at home or at an alternative worksite closer to their homes.
- Establishment of a program of alternative work schedules such as compressed workweek schedules that reduce commuting.
- Implementation of other measures designed to facilitate the use of high occupancy vehicles such as on-site day care facilities and emergency taxi services.

Transportation management associations allowed

Employers or owners of worksites may form or use existing transportation management associations or other transportation-related associations to assist members in developing and implementing CTR programs.

Good faith effort

Each jurisdiction must review each employer's progress and good faith efforts toward meeting the applicable CTR goals at least once every two years. If an employer makes a good faith effort but is not likely to meet the applicable CTR goals, the jurisdiction must work collaboratively with the employer to make modifications to the CTR program. Failure of an employer to reach the applicable CTR goals is not a violation of the law. Each jurisdiction implementing a CTR plan may impose civil penalties for failure by an employer to implement a CTR program or to modify its CTR program.

OPTING IN¹

All other counties, cities, and towns may adopt and implement a CTR plan consistent with WSDOT rules. Tribal governments are encouraged to adopt a CTR plan for their lands.

Criteria and process for opt-in: RCW 70.94.537 (2)(h) requires WSDOT to establish criteria and a process to determine whether jurisdictions that voluntarily implement CTR are eligible for state funding. Jurisdictions that are not required to implement CTR may volunteer to participate in the program. The state CTR board is not required to provide state CTR program funding to jurisdictions that opt in. WSDOT must provide technical assistance to opt-in jurisdictions that meet the requirements of these rules. The state intends for each jurisdiction participating in CTR to implement a consistent set of requirements for employers. Therefore, jurisdictions that opt into the CTR program must follow the requirements of the rules, with the following exceptions listed below.

Local CTR plan: Voluntary jurisdictions may, instead of developing a stand-alone CTR plan meeting the planning requirements described in WSDOT rules, develop an amendment to the transportation element of the local comprehensive plan. The amendment must contain the following:

- Goals and numerical targets for reductions in the proportion of single-occupant vehicle commute trips and vehicle miles traveled per CTR commuter for the area established by the jurisdiction.
- An assessment of current conditions and how attainment of the CTR program goal can help the jurisdiction meet its broader growth and transportation goals.
- A description of local services that will help the jurisdiction and its employers meet the goals and targets.
- A description of the requirements for employers.
- A determination of the base year value and how progress toward meeting the program goal will be measured, consistent with the measurement guidelines issued by WSDOT.
- A description of how the program will be funded and administered.

The jurisdiction must adopt the comprehensive plan amendment and adopt an ordinance implementing the CTR requirements described in the comprehensive plan to be considered an opt-in CTR jurisdiction.

State technical assistance: After an opt-in jurisdiction provides confirmation to the CTR board that a CTR ordinance has been adopted and the jurisdiction has updated its comprehensive plan to include CTR plan information, the jurisdiction must be eligible to receive a comparable level of technical assistance that WSDOT provides to other

¹The CTR Board made the decision to not allow any of these opt-ins due to the limited amount of funds available for the CTR Program.

jurisdictions required to adopt and implement CTR plans.

Criteria and procedure for RTPOs to propose to add urban growth areas: RCW 70.94.537(2)(f) requires WSDOT to establish criteria and procedures for RTPOs in consultation with local jurisdictions to propose to add urban growth areas.

Criteria and procedure for RTPOs to propose to exempt urban growth areas: RCW 70.94.537(2)(f) requires WSDOT to establish criteria and procedures for RTPOs in consultation with local jurisdictions to propose to exempt urban growth areas.

WSDOT PUBLIC TRANSPORTATION DIVISION TECHNICAL ASSISTANCE

WSDOT is required to provide staff support to the CTR Board in carrying out the requirements of the CTR Law. WSDOT is also required to provide technical assistance to RTPOs, counties, cities, towns, state agencies, and other employers in developing and implementing CTR plans and programs. WSDOT must provide information to support local CTR plan development. This information must include employer and jurisdiction base year values, calculated from CTR survey data, state highway system performance data, and other information as appropriate. The Public Transportation Division of WSDOT carries out these requirements.

The technical assistance must include:

- Providing guidance in single measurement methodology and practice to be used in determining progress in attaining CTR Plan goals.
- Developing model plans and programs appropriate to different situations.
- Providing consistent training and informational materials for the implementation of CTR programs. Model plans and programs, training, and informational materials must be developed in cooperation with representatives of RTPOs, local governments, transit agencies, and employers. WSDOT may contract with statewide associations representing cities, towns, and counties to assist cities, towns, and counties in implementing CTR Plans and Programs.
- Printing and processing of state CTR survey forms.
- Creation of survey reports and customized data reports.
- Online survey setup and assistance.
- Online annual report set-up and assistance.

APPENDIX D

CTR Board

RCW 70A.15.4060 establishes a 16-member state CTR Board with representation as follows:

- The WSDOT Secretary of Transportation or the secretary's designee who must serve as chair.
- One representative from the office of financial management.
- The director or the director's designee of one of the following agencies, to be determined by the WSDOT Secretary of Transportation:
 - Washington State Department of Enterprise Services.
 - Washington State Department of Ecology.
 - Washington State Department of Commerce.
- Three representatives from cities and towns or counties appointed by the secretary of transportation for staggered four-year terms from a list recommended by the Association of Washington Cities or the Washington State Association of Counties.
- Two representatives from transit agencies appointed by the WSDOT Secretary of Transportation for staggered four-year terms from a list recommended by the Washington State Transit Association.
- Two representatives from participating RTPs appointed by the WSDOT Secretary of Transportation for staggered four-year terms.
- Four representatives of employers at or owners of major worksites in Washington or transit management associations, business improvement areas, or other transportation organizations representing employers appointed by the WSDOT Secretary of Transportation for staggered four-year terms.
- Two citizens appointed by the WSDOT Secretary of Transportation for staggered four-year terms.

The board has all powers necessary to carry out its duties.

Rules and guidance

WSDOT establishes rules for CTR plans and implementation procedures. The CTR Board advises WSDOT on the content of the rules. The rules are intended to ensure consistency in CTR plans and goals among jurisdictions while fairly considering differences in employment and housing density, employer size, existing and anticipated levels of transit service, special employer circumstances, and other factors the board determines to be relevant.

The rules must include:

- Guidance criteria for growth and transportation efficiency centers.
- Data measurement methods and procedures for determining the efficacy of CTR activities and progress toward meeting CTR plan goals.
- Model CTR ordinances.

- Methods for assuring consistency in the treatment of employers who have worksites subject to the requirements of this chapter in more than one jurisdiction.
- Appeals process by which major employers, who because of special characteristics of their business or its locations would be unable to meet the requirements of a CTR plan, may obtain a waiver or modification of those requirements and criteria for determining eligibility for waiver or modification.
- Establishment of a process for determining the state's affected areas, including criteria and procedures for regional transportation planning organizations in consultation with local jurisdictions to propose to add or exempt urban growth areas.
- Listing of the affected areas of the program to be done every four years.
- Establishment of a criteria and application process to determine whether jurisdictions that voluntarily implement CTR are eligible for state funding.
- Guidelines and deadlines for creating and updating local CTR plans, including guidance to ensure consistency between the local CTR plan and the TDM strategies identified in the transportation element in the local comprehensive plan, as required by RCW 36.70A.070.
- Guidelines for creating and updating regional CTR plans, including guidance to ensure the regional CTR plan is consistent with and incorporated into TDM components in the regional transportation plan.
- Methods for regional transportation planning organizations to evaluate and certify that designated growth and transportation efficiency center programs meet the minimum requirements and are eligible for funding.
- Guidelines for creating and updating growth and transportation efficiency center programs
- Establishment of statewide program goals. The goals must be designed to achieve substantial reductions in the proportion of single-occupant vehicle commute trips and the commute trip vehicle miles traveled per employee, at a level that is projected to improve the mobility of people and goods by increasing the efficiency of the state highway system.

Approval by CTR Board

The CTR Board reviews and approves both the local and regional plans. Regions without an approved regional CTR plan are not eligible for state CTR program funds.

State CTR Plan

The CTR Board is tasked with creating the State CTR Plan that is updated every four years. The CTR Board works collaboratively with RTPOs in the establishment of the State CTR Plan. See Table 2 for State CTR Plan requirements.

The state CTR plan must include, but is not limited to:

- Statewide CTR program goals that are designed to substantially improve the mobility of people and goods.
- Identification of strategies at the state and regional levels to achieve the goals and recommendations for how TDM strategies can be targeted most effectively to support CTR program goals.
- Performance measures for assessing the cost-effectiveness of CTR strategies and the benefits for the state transportation system.
- A sustainable financial plan.

Program updates

The CTR Board must evaluate and update the State CTR Plan and program and recommend changes to the rules every four years to ensure that the latest data methodology used by WSDOT is incorporated into the program and to determine which areas of the state should be affected by the program.

Public awareness

The CTR Board works with affected jurisdictions, major employers, and other parties to develop and implement a public awareness campaign designed to increase the effectiveness of local CTR programs and support achievement of the goals identified.

Evaluation and report to the legislature

The CTR Board must review progress toward implementing CTR plans and programs and the costs and benefits of CTR plans and programs and must make recommendations to the Legislature and the governor Dec. 1 every two years on odd years.²

In assessing the costs and benefits, the board must consider the costs of not having implemented CTR plans and programs. The board must examine other TDM programs nationally and incorporate its findings into its recommendations to the Legislature. The recommendations must address the need for continuation, modification, or termination or any or all requirements of the CTR Program.

Technical advisory group

The CTR Board must invite personnel with expertise from state, regional, and local government; private, public, and nonprofit providers of transportation services; and employers or owners of major worksites in Washington to act as a technical advisory group. The technical advisory group must advise the board on the implementation of local and regional CTR plans and programs, program evaluation, program funding allocations, and state rules and guidelines.

²Requirement began Dec. 1, 2009.

APPENDIX E

Growth and transportation efficiency centers

The rules laid out for growth and transportation efficiency centers in WAC 468-63-060 are very detailed. To have a thorough understanding of the workings of a growth and transportation efficiency center requires a careful reading of these rules. This appendix includes only the major headings in the rules.

PURPOSE AND PROCESS

Purpose and objective of the growth and transportation efficiency center program

The state's goal for the growth and transportation efficiency center program is to provide greater access to employment and residential centers while increasing the proportion of people not driving alone during peak periods on the state highway system. Counties, cities, and towns may designate existing or new activity centers as growth and transportation efficiency centers to establish a TDM program in the designated area.

The state intends for growth and transportation efficiency centers to be developed in a collaborative planning process that builds upon the information in local and regional CTR plans as well as other existing plans and programs such as the local comprehensive plan, unified development codes, the transportation improvement program and economic development plans.

The state intends to focus state program resources provided for growth and transportation efficiency centers in those urban areas that can provide the greatest current or future benefits for highway system efficiency.

Jurisdictional coordination

The state encourages jurisdictions to discuss interjurisdictional issues and evaluate the possibility of creating a cross-boundary growth and transportation efficiency center.

Consistency for employers

Major employers that are affected by the base CTR program, when located within a designated growth and transportation efficiency center, must only be required to fulfill one set of requirements, if the growth and transportation efficiency center program and base CTR program requirements vary.

Designation and certification

RCW 70.94.537(2) requires WSDOT to establish methods for RTPOs to evaluate and certify that designated growth and transportation efficiency centers meet the minimum requirements and are therefore eligible for funding.

- **Minimum land use and transportation criteria:** RCW 70.94.537(2) requires WSDOT to establish guidance criteria for growth and transportation efficiency centers. The state's intent is to constrain funding resources to those areas that have the greatest potential to reduce single-occupant vehicle commute trips on the state highway system in the future. The state will use the RTPO certification of the growth and transportation efficiency center's potential system benefits as part of its funding prioritization.

- **Eligibility and designation process:** To be eligible for certification as a designated growth and transportation efficiency center, the jurisdiction must submit a growth and transportation efficiency center certification application to the applicable RTPO that:
 - Describes how the growth and transportation efficiency center meets the minimum land use and transportation criteria established by the RTPO as part of the regional CTR plan.
 - Includes a copy of the growth and transportation efficiency center program plan and the required elements identified in this rule.
 - Identifies when and how the growth and transportation efficiency center program plan will be incorporated into future updates or amendments of the applicable local comprehensive plan.
 - Includes letters of support for the growth and transportation efficiency center program plan from partners that are expected to contribute resources to the plan or intend to work with the local jurisdiction to develop future strategies and funding resources for the growth and transportation efficiency center.
- **Schedule:** For growth and transportation efficiency center programs to be eligible for state CTR program funds, the CTR board must receive growth and transportation efficiency center certification reports, or local jurisdiction requests for appeal, for new or updated growth and transportation efficiency center programs by April 1 every two years on odd years.³
- **Certification:** RCW [70.94.528](#) (1)(b) requires designated growth and transportation efficiency centers to be certified by the applicable RTPO to be eligible for state funding.
- **Appeal:** RCW 70.94.528 (1)(b) allows jurisdictions denied certification of a designated growth and transportation efficiency center by an RTPO to appeal the decision to the CTR board.
- **Adoption:** The jurisdiction must designate the growth and transportation efficiency center by adopting the growth and transportation efficiency center program plan via official resolution or ordinance within one hundred 20 days following receipt of the notice of the state growth and transportation efficiency center funding allocation.
- **Funding:** State funding for growth and transportation efficiency centers must be allocated by the CTR board, based on the board's funding policy developed pursuant to RCW [70.94.544](#).

GROWTH AND TRANSPORTATION EFFICIENCY CENTER PROGRAM PLAN

Program development process

RCW [70.94.528](#) (1)(a) requires the growth and transportation efficiency center program plan to be developed in consultation with local transit agencies, the applicable RTPO, major employers, and other interested parties. Public outreach is required.

Required elements

The growth and transportation efficiency center program plan must describe local conditions and use projections of future growth to define the scope of the problem that the growth and transportation efficiency center goals and strategies are designed to address. The growth and transportation efficiency center program plan must contain the following elements (See Table 2 for a summary):

³Requirement began Oct. 1, 2007.

- **Executive summary:**
 - The growth and transportation efficiency center program goals and targets.
 - The growth and transportation efficiency center target population.
 - Proposed program strategies, including policy and service changes needed to execute the plan and proposed land use strategies to support the plan.
 - Key funding and service partnerships.
- **Background information:** The growth and transportation efficiency center program plan must include.
 - A description of the geographic boundaries of the growth and transportation efficiency center.
 - Documentation that the growth and transportation efficiency center is located within the jurisdiction's urban growth area.
 - A brief description of the jurisdiction's vision for the growth and transportation efficiency center, including information from the local comprehensive plan, other transportation plans and programs, and funded transportation improvements.
- **Evaluation of land use and transportation context:** Jurisdictions must evaluate the significance of local conditions, characteristics, and trends to determine which factors are most critical to the success of the plan.
 - Existing conditions and characteristics. These may include, but are not limited to:
 - Existing land uses.
 - Existing transportation network.
 - Local and regional economic development plans.
 - Projected future conditions and characteristics:
 - Projected population and employment growth for at least 10 and 20 years.
 - Projected changes in land use types and intensities for at least 10 and 20 years.
 - Forecasts of traffic, delay, mode share, and parking needs for at least 10 years.
 - Identification of jurisdiction plans, policies, and capital programs for the provision of infrastructure, services, and amenities to support planned growth and reduce single-occupant-vehicle trips.
- **Gap analysis:** Using the information gathered in discussion of the existing and projected future conditions and characteristics, the local jurisdiction and its partners must evaluate the degree to which existing and future services, policies, and programs will be sufficient to maintain or improve transportation access and increase the proportion of non-drive-alone travel as the area grows.
- **Description of program goals and measurements:** The state's goal for the growth and transportation efficiency center program is to provide greater access to employment and residential centers while increasing the proportion of people not driving alone during peak periods on the state highway system. The growth and transportation efficiency center program plan's established goals and targets must be more aggressive than the minimum goal for the urban growth area established by the jurisdiction, in accordance with RCW 70.94.528(1).
 - **Goals and targets.** Jurisdictions must have flexibility in establishing growth and transportation efficiency center goals and targets.
 - **Performance measures.** The growth and transportation efficiency center program plan must describe the methodology for measuring the program's performance.

- **Description of program strategies.** Using the gap analysis evaluation, the local jurisdiction and its partners must identify what new or revised services, policies and programs may be needed in order to meet the growth and transportation efficiency center’s established goals and targets.

The growth and transportation efficiency center program plan must identify the target population that will be the focus of the plan, as well as the services, policies and programs that will be needed in order to meet the growth and transportation efficiency center’s established goals and targets.

The growth and transportation efficiency center program plan may include but is not limited to the following strategies:

- Improvements to policies and regulations.
- New services and facilities.
- New marketing and incentive programs.
- **Financial plan:** The growth and transportation efficiency center program plan must include a sustainable financial plan that demonstrates how the jurisdiction plans to implement the growth and transportation efficiency center program to meet its goals and targets.
- **Proposed organizational structure for implementing the program:** The growth and transportation efficiency center program plan must identify the organization or organizations that are proposed to administer the growth and transportation efficiency center program.
- **Documentation of public outreach:** The growth and transportation efficiency center program plan must document the level and frequency of outreach and consultation with local transit agencies, the applicable RTPO, major employers, and other affected parties in the development of the growth and transportation efficiency center program plan.
- **Description of relationship to local CTR plan:** Jurisdictions must describe the relationship of the growth and transportation efficiency center program plan to the base CTR program in the local CTR plan.

SUPPORT FOR GROWTH AND TRANSPORTATION EFFICIENCY CENTERS

Prioritization

RCW 70.94.528 requires transit agencies, local governments, and RTPOs to identify certified growth and transportation efficiency centers as priority areas for new service and facility investments in their respective investment plans including:

- Transit development plan.
- City and county six-year comprehensive transportation programs.
- Regional transportation plan.

State plans Integration

The growth and transportation efficiency center program plan must be incorporated into other plans and programs, including local comprehensive plans and transportation improvement programs, as they are updated after Jan. 1, 2008.

APPENDIX F

CTR, growth and transportation efficiency center, and alternate plan benefits

Below are just a few examples, in their own words, of what the jurisdictions were able to do with CTR, growth and transportation efficiency centers and alternate plans.

Kent

City of Kent states in their 2015-2019 CTR plan:

“Using the existing network of streets more efficiently is a fiscally sound way to improve traffic conditions and safety. TDM policies and strategies are designed to reduce automobile travel and shift some vehicle trips to non-peak periods (before or after the commute hours).”

Kirkland

City of Kirkland states in their 2015-2019 CTR plan:

“Because roughly half of greenhouse gas emissions are transportation related, it is virtually impossible to meet adopted climate change goals without changing the way we travel. Auto-based transportation is also a primary contributor to water and air pollution. It is increasingly being recognized that active transportation like walking and bicycling can play important roles in promoting public health in a community. Sustainability also encompasses accessibility of transportation. The transportation system should be accessible and provide benefit to all users throughout Kirkland regardless of mobility, vision, hearing and cognitive capabilities.

“The City of Kirkland comprehensive plan transportation vision is to provide a safe, well maintained and extensive systems of roads, bicycle routes, pedestrian paths, and transit corridors for all users that interconnect neighborhoods and connect to the region. Kirkland understands that we cannot feasibly build our ways out of congestion.”

Redmond

City of Redmond reported in their alternate plan proposal:

“Increasing the use of alternatives to driving alone is an integral part of realizing Redmond’s vision for two vibrant urban centers and offering a diversity of choices. Community priorities emphasize actions to help support a vibrant business community, foster Redmond’s greenness, and community character, encourage efficient use of existing and planned infrastructure, and promote efficiency and innovation as a responsible government. Creating an opportunity for and fostering a dialog with both regulated businesses and the business community more broadly has the potential to increase awareness and improve understanding of the reasons underlying the CTR goals.”

Renton

In the arterial, transit, and HOV chapters, City of Renton states in its 2015-2019 CTR plan:

“A major challenge of the Renton Transportation Plan will be to better manage the existing transportation system

and reduce traffic demand by encouraging the use of alternatives to single occupant vehicles. The TDM/CTR Chapter addresses this challenge by focusing on encouraging and facilitating reductions in trip-making, dispersion of peak period travel demand throughout the day, increased transit usage, and increased ride sharing.”

Seattle

Seattle reported in their 2017-2019 two-year CTR plan update:

“Seattle Department of Transportation has evolved the CTR program from being a regulatory program to one that provides value-added to businesses. WSDOT’s flexible framework for goal setting and local programming played a significant role in the success of the Alternate Plan process from 2013 to 2017. Setting location-specific goals and identifying strategies tailored to Seattle’s diverse geographies, and their individual infrastructure and travel options, made the program relevant to the wide array of worksites throughout the city. Seattle is a city diverse in its land use, transportation, and demographic context. “

Snohomish County

As stated in Snohomish County’s 2017-2019 CTR plan:

“This plan uses the flexibility provided within the 2015 CTR Alternate Plan Pilot to continue the successful strategies of the pilot alternate plan program.”

Spokane County

Spokane Regional Transportation Council states in their 2015-2019 CTR plan update:

“Horizon 2040 policy framework outlines a variety of goals related to travel demand management. These goals or strategies include TDM through education, promotion, ride matching services, employer programs, sharing infrastructure across modes and providing multimodal options region-wide. In addition to Horizon 2040, SRTC’s Congestion Management Process (CMP) was revamped in December 2014 and includes the following objectives related to TDM: invest in solutions that maximize the use of existing facilities across modes; and provide accessible multi-modal transportation for all abilities.”

Tacoma

City of Tacoma stated in their alternate plan proposal:

“The goal is to build a program based on education and positivity, rather than state regulations and requirements. While CTR-affected businesses will still be required to survey, minimal effort will be involved coercing non-compliant businesses to participate. And a significant amount of effort will be put into creating a program that makes sense for downtown travel efficiency and business’ bottom lines.”

APPENDIX G

Administration and operations

IDENTIFICATION OF CTR-AFFECTED EMPLOYERS

Each CTR jurisdiction is responsible for identifying and onboarding CTR-affected worksites within its geographical boundaries. There is no set process for worksite identification. In the past, jurisdictions have used business licenses, ORCA transit pass inquiries, websites with details about employers (e.g., Glassdoor), and newspaper articles to determine if a site might meet the criteria for being CTR-affected.

In addition to these methods, many worksites that learn about the CTR law and think they are affected will also self-report to jurisdictions.

CTR EMPLOYEE SURVEY

Onboarding worksites

When a potential CTR-affected site is discovered, the common practice is for the jurisdiction to send a letter to the business telling them they are potentially affected and will need to have their employees take the CTR survey within the next six months. If the business meets the criteria of being CTR-affected, the jurisdiction brings them into the program and requires the employer to develop a CTR implementation plan (i.e., a plan to reduce the amount of a worksite's employees driving alone to work). Traditionally, the jurisdiction uses the metrics from the baseline survey for single-occupancy-vehicle-equivalent vehicles miles traveled (VMT) and the non-drive alone travel rate (NDAT) to assign performance targets for VMT and NDAT. Worksites also have greenhouse gas emissions (GHG) targets, but GHG is calculated from VMT performance. If a worksite achieves its VMT target, it will automatically achieve its GHG target as well.

If the worksite eventually drops and stays below the threshold of 100+ CTR-affected employees for two years or moves to a new location where the CTR law does not apply, the site is then no longer required to participate in the program. Less than 50 percent of the original CTR-affected sites from 2006 are still in the program, but approximately the same number of new sites have joined in that period. For each survey cycle, there have been between 900 and 1,000 CTR-affected worksites in the program.⁴

Frequency of survey

Jurisdictions must require worksites to survey once a cycle. From 2006 through 2018, cycles ran from Jan. 1 on odd years through Dec. 31 on even years. The 2019-2020 survey cycle was scheduled to end on Dec. 31, 2020, but was extended by six months to June 30, 2021, because of the COVID-19 pandemic.

This shift in survey cycles' timing will be continued. Starting July 1, 2021, the cycles will run from July 1 of an odd year to June 30 of the next odd year.⁵

⁴When an employer has several CTR-affected worksites within a city or county, the jurisdiction administers a separate survey at each worksite. The jurisdiction does this in recognition that each worksite has its own factors that affect performance (e.g., nearby transit service, parking availability and cost, amenities like showers and bike lockers). It also makes surveying easier when employers have worksites in different jurisdictions.

⁵Jurisdictions are permitted to forego surveying during the current cycle (July 1, 2021, to June 30, 2023).

Originally, the CTR Law required worksites to measure performance every year. After worksites reported the significant administrative burden required to survey annually, the CTR Board approved a new approach for gathering CTR data. Each worksite was allowed to survey its employees during one year of the cycle and, to meet the performance measurement requirement for the other year, worksites would complete the CTR employer report and program description. See the section on employer report below for more details.

Taking the survey

The jurisdiction representatives set up surveys for each worksite in their geographical area. While each worksite is required to have an employee transportation coordinator who oversees the company's CTR program, the jurisdictions preferred that the employee transportation coordinators not be allowed to setup their own surveys.

For data consistency, WSDOT asks the jurisdictions to conduct worksite surveys from mid-September through early November for the fall survey, or late February through mid-May for the spring survey. These periods were selected because they minimize holidays and common vacation periods (e.g., Thanksgiving, Christmas/winter break, summer) and help to avoid extreme weather that can reduce the amount of active transportation such as walking and biking.

WSDOT prefers that worksites reach a 70 percent response rate. However, WSDOT will accept any worksite's survey results if they reach a 50 percent response rate.

WSDOT accepts the results of worksites with several hundred employees that receive enough survey responses to result in a 95 percent confidence level with a seven percent margin of error, regardless of response rate.

If a site does not reach the minimum response rate (or equivalent), the CTR Board requires that the site survey again.

WSDOT has just completed an extensive evaluation and redesign of the survey tool and process. This included extensive stakeholder involvement. WSDOT expects that all sites will find the new survey both easier to administer and more useful.

Uses of survey data

For each survey a worksite takes, WSDOT creates a CTR Employer Survey Report. This report has graphs, charts, and tables that show the results from the most recent survey, as well as comparisons for VMT and NDAT to previous survey results. WSDOT post these reports to an [FTP site](#). It is the jurisdiction's responsibility to store and maintain those files once they retrieve them from the FTP site.

WSDOT maintains an Excel file (i.e., aggregate report) with summary information for each survey a worksite has taken. The Excel file also aggregates key measurements and metrics (e.g., VMT, NDAT, GHG) from those individual survey results to the city, county, and state level for each survey cycle. In fall of odd years, WSDOT uses this information to create a statewide CTR report for the Legislature on the CTR performance for the most recently completed cycle.

Jurisdictions use the CTR data to strengthen their programs. The most common practice is for jurisdictions to go over the CTR Employer Survey Report with a worksite's employee transportation coordinator and other interested parties at the site to identify trends and areas for improvement. Jurisdictions use survey results in other ways, as well. Examples include using the survey results for worksite awards programs, mining successful programs at comparable sites for strategies to strengthen a worksite's CTR plan, and prioritizing what worksites need the most help or attention.

VOLUNTARY WORKSITES

Worksites can choose to join the program even if they do not meet the criteria to be CTR-affected. These voluntary worksites also develop a CTR implementation plan, use the CTR survey, and submit an employer report. In 2006, the CTR Board allowed jurisdictions a one-time choice about whether their voluntary sites would count towards their jurisdiction's aggregated performance numbers.

EMPLOYER REPORT

The CTR Employer Report and Program Description, also known as the employer report, is a questionnaire filled out by the employer that asks around 120 questions on topics like CTR-related activities, amenities, and the built environment at the worksite. Employers submit these reports to their respective jurisdictions in the non-surveying year of the survey cycle to meet the annual performance measures requirement.⁶

PROGRAM GOALS AND TARGETS

WSDOT defines a goal as the category that a jurisdiction wants to change such as VMT, NDAT, or a specific mode split. A target is the number the jurisdiction wants to achieve in that category.

Jurisdictions can choose between three options created by the CTR Board/TDM Technical Committee:

Option 1: Use the state's goals (i.e., VMT/GHG and NDAT) and targets (i.e., 18 percent reduction and 6 percentage point increase, respectively).

Option 2: Use the state's goals and have the jurisdiction define the targets. This is usually done to decrease the change that needs to be made (e.g., Spokane reduced their VMT target from an 18 percent reduction to a 13 percent reduction).

Option 3: Use their own goals and targets, with approval by the CTR Board.

From 2013 to 2016, additional flexibility was offered to jurisdictions by encouraging them to propose CTR pilot projects that were better designed for their specific region's challenges and opportunities. Several pilots were enacted, with two continuing under option 3 past 2016:

- Seattle permanently shifted its focus to drive alone rate at the neighborhood level.
- Whatcom continued its Smart Trips system, which uses a website to track and reward people for using non-drive-alone modes of transportation.

The following jurisdictions use option 1 (i.e., state goals and targets):

- King County (Bothell, Issaquah, and Redmond).
- Kitsap County (all).
- Pierce County (all, except for Puyallup).
- Snohomish County (Everett).
- Yakima County (all).

⁶See Appendix G, Frequency of surveying for more information.

The following jurisdictions use option 2 (i.e., state goals and their own targets):

- King County (Auburn, Bellevue, Burien, Des Moines, Federal Way, Kent, Kirkland, Mercer Island, Renton, SeaTac, Shoreline, Tukwila, Woodinville, Unincorporated King County).
- Pierce County (Puyallup).
- Snohomish County (all, except for Everett).
- Spokane (all).
- Thurston (all).

The following jurisdictions use option 3 (i.e., their own goals and targets):

- Clark County (all): use carpool and bicycle percentage point increases.
- King County (Seattle): use drive-alone rate, which is set by neighborhood.
- Whatcom County (all): does not use the CTR survey but, instead, continues to use their Smart Trips website as the foundation of their CTR work.

WORKSITE PERFORMANCE

The jurisdictions apply their respective goals and targets to the baseline performance of each worksite. For example, if a jurisdiction uses the option 1 goals and targets (i.e., VMT reduction of 18 percent and NDAT increase of six percentage points), and a worksite's baseline survey shows a VMT of 10.0 and an NDAT of 60 percent, that worksite's goals would be a VMT of 8.2 (i.e., 10.0 reduced by 18 percent) and an NDAT of 66 percent (i.e., 60 percent plus six percentage points).

The worksite conducts surveys in each cycle it is CTR-affected, and the jurisdiction compares the results to the worksite's baseline and targets. This helps jurisdictions understand how much support a worksite needs. Looking at the specific data also allows jurisdictions to help develop or guide employers' CTR implementation strategies.

WSDOT, the TDM Executive Board, TDM Technical Committee, the Legislature, and most other TDM partners do not focus on the data at this granular a level. It is not directly used to develop rules or laws.

JURISDICTION PERFORMANCE

WSDOT determines jurisdictional performance by aggregating the numbers for all of the surveys in the municipality or county, weighted by the number of respondents.

STATEWIDE PERFORMANCE

WSDOT determines statewide performance by aggregating all surveys taken during a cycle. These statewide numbers are what WSDOT reports to the Legislature.

DISTRIBUTION OF FUNDS FORMULA

For each of the first few survey cycles, WSDOT recalculated the CTR funding distribution to the jurisdictions using a formula that included a guaranteed base amount plus a variable amount determined by the number of worksites in the jurisdiction and the number of trips the jurisdiction needed to reduce to reach their targets. The intent was that jurisdictions that did worse would get more money to help them improve their performance. The jurisdictions struggled with staffing their CTR efforts when the amounts would fluctuate considerably, so this practice was

discontinued with the 2013-2014 survey cycle, and the funding distributions have remained the same since that time.

PROGRAM ENFORCEMENT

Many jurisdictions put specific CTR rules into their ordinances/municipal code to have an additional mandate they can point to for why CTR activities need to happen. Examples include requiring the 50 percent response rate, codifying targets, or even requiring certain metrics (e.g., a 50 percent non-drive-alone rate) before building permits will be issued.

Jurisdictions also have the legal right to impose fines on worksites operating in bad faith. While fines have only been used twice, implementers report that having the option gives them leverage in encouraging compliance.

Jurisdictions occasionally ask WSDOT to facilitate compliance discussions to get worksites to comply. When WSDOT has done this in the past, it took up valuable time and resources with little positive result. When someone forces a recalcitrant worksite to survey, that employer rarely uses the information to try to improve their performance. As an alternative, WSDOT offers talking points or other options to help the employer see the many advantages of having a successful CTR program, and hopefully get them to engage of their own accord.

APPENDIX H

Alignment with other state plans

ALIGNMENT WITH OTHER STATE PLANS

There are multiple state plans that set forth similar and complementary goals to the CTR Program. There are also other divisions in WSDOT and the state that have similar goals. Some examples are presented below.

WA State Public Transportation Plan 2016

VISION: All transportation partners in Washington state will work together to provide a system of diverse and integrated public transportation options. People throughout the state will use these options to make transportation choices that enable their families, communities, economy, and environment to thrive. (p. 3)

WSDOT 2017 ADA Transition Plan

The Washington State Department of Transportation understands the vital role it plays in ensuring tangible and meaningful equal access for persons with disabilities in their communities. (Forward, p. 3)

The WSDOT Public Transportation Division is committed to ensuring that no entity must discriminate against a person with a disability in connection with the provision of transportation service as outlined in 49 CFR Part 27, Part 37, and Part 38. Many of the grants the division awards are specifically geared towards providing access to those who would not otherwise have it. (p. 12)

State TDM Strategic Plan, 2019-2023: Expanding Travel Options: Faster, Smarter and More Affordable

Expanding Travel Options: Faster, Smarter and More Affordable was developed by the Washington State Commute Trip Reduction (CTR) Board, Washington State Department of Transportation (WSDOT) and community stakeholders statewide. This plan is designed to strengthen the position of demand management in transportation decision-making and investment strategies to better serve people, communities, and Washington state. (p. 2)

WSDOT Active Transportation Plan, 2020 and Beyond

The Active Transportation Plan defines the state's interest in the statewide active transportation network as:

Reducing traffic congestion, greenhouse gas emissions, and energy use by shifting uses from driving to active transportation, as per RCW 47.26.300.

Acknowledging the effects of infrastructure decisions on safety and mobility in places with deeper health and transportation inequities, including redlined neighborhoods, reservations, and places where more people rely on active transportation and/or transit access to meet every day travel needs. (p. 10)

Human Services Transportation Plan 2021 – Draft

The Statewide Human Services Transportation Plan’s primary objectives include:

- *Identify statewide human services transportation unmet needs, gaps, and barriers.*
- *Investigate best practices in improving human service transportation planning and service delivery as implemented both nationally and in Washington state.*
- *Develop strategies and recommendations to improve access and mobility, safety, and the user experience for people with special transportation needs.*

(p. 8)

The Department of Commerce’s 2021 State Energy Strategy

WSDOT, in partnership with the Legislature, transit agencies and the private sector, should expand the reach of and funding for Washington’s CTR program. (p. 58)

Office of Financial Management State Facilities Action Plan: 2021 – 2027 Six Year Facilities Plan

Office of Financial Management is reassessing space needs as agencies consider expanded telework opportunities as a long-term strategy. (Dashboard)

WSDOT Local Programs Office

Active Transportation Programs

Active Transportation is about giving people safe options for getting from one place to another using “active” modes such as walking and bicycling. The Active Transportation Programs Section provides technical services and funding assistance to public agencies in support of active transportation for health, safety and economic development. The unit works to focus state and federal funding from the [Pedestrian and Bicycle Program](#) and [the Safe Routes to School Program](#) towards projects in areas of the state with the highest need and potential for success. (WSDOT website)

WSDOT MANAGEMENT OF MOBILITY DIVISION

The mission for Management of Mobility Division, developed in 2019, states:

Management of Mobility Division Mission:

We work with partners to create innovative solutions that safely and efficiently move people and goods around the Central Puget Sound Region.

Management of Mobility Division Description:

- *Address near and long-term multimodal challenges in the Central Puget Sound region, including those that do not have defined borders*
- *Serve as WSDOT's chief liaison with PSRC*
- *Collaborate and build relationships within WSDOT and with external jurisdictions and agencies*
- *Ensure that planning activities are focused, cohesive, and coordinated across WSDOT region boundaries*
- *Advocate for WSDOT planning work to guide future transportation investments and actions*

WSDOT Regional Transportation Coordination Division

The mission of the RTCD is the following:

The Regional Transit Coordination Division is the liaison between WSDOT and transit agencies in the Puget Sound region. The division addresses WSDOT's mission, values and goals by ensuring transit-agency-initiated projects are completed efficiently and effectively to advance a sustainable, integrated multimodal transportation system. We are a cross-disciplinary team, including staff with expertise in policy, planning, environmental, design, construction, real estate, traffic and communications. (WSDOT website)

APPENDIX I

Stakeholder Responses

Outreach has been conducted at every phase of the CTR Law Update effort. This includes the objectives in the 2019-2023 TDM Strategic Plan, the project brief, legislative work plan, emphasis areas. The content of this outreach is below.

OBJECTIVES

Summary of implementers outreach

During June 2021 WSDOT Public Transportation Division staff (Ricardo Gotla and Carol Thompson) held outreach meetings with all CTR Program implementers on CTR Program objectives going forward. CTR implementers were asked to comment on the objectives set forth in the WSDOT 2019-2023 Strategic Plan: Expanding Travel Options: Faster, Smarter and More Affordable. The primary question was, “Are these still the correct objectives for the CTR Program going forward?” The objectives are the following:

1. INCREASE THE USE OF HIGH-EFFICIENCY TRANSPORTATION OPTIONS FOR COMMUTES.

- A. Streamline program administration*
- B. Provide more flexibility*
- C. Produce more useful transportation behavior data*

2. EXPAND THE AVAILABILITY AND USE OF TRANSPORTATION OPTIONS.

- A. Thoroughly integrate TDM into state transportation projects and programs*
- B. Expand TDM funding*
- C. Encourage TDM at the local level*

3. INCREASE POLICY MAKERS' SUPPORT FOR TDM.

- A. Collaborate with policy makers*
- B. Enlist and support ambassador*

The response from all implementers was “yes, these are the right objectives for the program moving forward.” Implementers made several additional comments. These comments are below by theme.

Implementer comments

Objectives

- No changes for objectives.
- Objectives resonate.
- Support objectives and believe they're still relevant.
- Support strategic plan objectives.
- All agreed that objectives were still valid.

Equity

- Overall good objectives [in TDM Strategic Plan 2019-2023], but lacking equity focus. Equity should be worked into/throughout all objectives. Make more explicit. WSDOT should develop "equity guidance" for implementers.
- Objectives need to do a better job of emphasizing equity.
- The CTR focus on large worksite is at the cost of equity. As written, CTR does not address Equity. Benefits mostly white-collar workers.

Funding

- Have to look at funding.
- Don't spread funding out thinner. More money is required.
- Have additional competitive funding for new initiatives.
- New funding would be used for incentives for engagement and increased participation.
- Local support at leadership level to do more TDM, but slim TDM funding is a major barrier.
- Lack of funding for residential programs, need funding for marketing and education.
- Program is very hard to administer with static funding! Lack of resources is a real barrier, especially for bringing in new employers. Took two years to bring on Amazon.
- Corridor planning is so much more expensive and intensive than traditional CTR.
- Whatcom County Smart Trips receives local dollars, easier because Smart Trips is open to all and all trips.
- CT, Snohomish County – County lends its eligibility for CMAQ grants to helping fund CTR
- Cannot pursue capturing additional trip types with existing resources. Flexibility without additional resources is a tough sell and could make relationships and jobs harder. But worth pursuing if existing relationships are not set back.
- Funding formula dictates what gets addressed.
- CTR funding is currently being used to support new employers, employer employee transportation coordinators, survey process, quarterly and annual reporting.
- Would be easier to get jurisdictions to invest local dollars if the state can match funding and vice versa.

Commute time frame

- Remove/alter commute time language 6-9 a.m. to add greater flexibility.
- Need to broaden commute time requirements and trip types (e.g., non-commute trips and shift workers)
- Would be good to cover shift workers and contractors at sites.
- Would like to undertake including working on trips outside of the 6-9 a.m. timeframe and high-density housing.
- 6-9 AM is no longer the peak window for Bellevue.
- Need more flexibility in defining commute times and shift workers to address local conditions. Shipyard with 40,000 workers who get off at 4 p.m.

CTR-affected area

- Opportunity to reevaluate CTR-affected areas. Revisit measure of congestion to be CTR affected.
- Need a mandate on who affected under the law.

Flexibility to focus on other markets

- Would like to focus on downtown commutes, or specific corridors – would target high commute markets.
- Ideal – System that is efficient and accessible to all with lots of choices.
- Non-commute trips should receive credit within CTR program.
- Statute language change regarding creating options: some large, some small, businesses. Give options to tailor their program.
- Would be great to be able to absorb grant funded pilots when grant funding ends. Flexibility would help with this.
- Recognizes that jurisdictions have a lot of flexibility within existing program.
- Community based programs successful. In Motion funded via the Congestion Mitigation and Air Quality Improvement Program.
- Tailoring program gives jurisdiction ability to customize program to meet their local needs – another incentive for program participation.
- Would like more flexibility to work with smaller worksites
- Grant local control on how to approach worksites.
- Flexibility desired to reach smaller worksites.
- Like the idea of adding students, shift workers and other markets. Exciting! chance to freshen the Program.
- Having flexibility would allow Implementers to be more proactive.
- At the very least providing the flexibility would be appreciated and is desired. Would provide an opening for jurisdictions to apply for additional funding.

Keep requirement for large employers

- Quitting employer engagement could lead to the loss of employer partners – don't want to lose progress made.
- Existing law mandate is a foot in the door to work with worksites and helps support residential programs. Local TDM ordinances.

- Reduce company size for voluntary or mandatory employers.
- It is good to do everything possible to keep their partners engaged.

Other stakeholder responses to objectives

Three associations sent out surveys to their membership: Washington Association of Washington Cities, Washington Association of Counties and Washington Association of County Engineers. WSDOT Public Transportation Division staff also spoke with the Association of Washington Businesses. The responses to the surveys can be viewed at [\(link\)](#) and [\(link\)](#).

Other stakeholders engagement

Project brief

Below is the project brief for the CTR Law Update 2021.

PROJECT BRIEF: CTR PROGRAM LEGISLATIVE UPDATE

1. What is the origin of this project?

As defined in [SUBSTITUTE HOUSE BILL 1514](#), Chapter 135, Laws of 2021

SHB1514: the WA state legislature directed WSDOT to conduct an update of the CTR program.

NEW SECTION. Sec. 4. The department of transportation and the commute trip reduction board must prepare a report regarding, and an update to, the statutes governing the commute trip reduction program, within existing resources. The department of transportation must provide the transportation committees of the legislature with the report and update by October 1, 2021.

2. Context/background for opportunities/need for change

The CTR is 30 years old. The last update to the law was in In 2006, when legislators passed the CTR Efficiency Act ([RCW 70.94.521](#)). This act amplified the role of local governments in CTR and strengthened the relationship between local governments and affected employers and worksites. The Program has evolved since then and the Statute needs to be amended to reflect this evolution. Jurisdictions would also like flexibility to do more with their CTR programs.

3. What are the goals for the update?

- Develop consent among stakeholders on the **goals** the updated CTR Program will achieve.
- Develop consent among stakeholders on the **scope** (what is wanted in the program) of the updated CTR Program. Illustrative examples are:
 - Housekeeping: such as technical fixes.
 - Moderate updates: such as giving equal priority to targeting non-commute trips as commute trips and changing surveying requirements.
 - Major updates: such as changing required participants in the program and creating new program goals .
- Develop a revised statute that accurately reflects the operations of the updated CTR Program.

4. What deliverables are necessary to produce the update?

- Project brief.
- Work plan.
- Program funding analysis, examples may include program cost-benefit, needs assessment.
- Description of program current status.
- Stakeholder engagement, including:
 - Summary of input.
 - Proposed revisions to CTR legislation based on input.
 - Analysis of why feedback may not be included in the CTR revised program.
- Outline of report to the legislature.
- Final Report on the CTR Program and recommendations for updates.
- Presentation to Joint Legislative Transportation Committee.

5. What principles will guide this work?

- The effort will be guided by the TDM Technical Committee and TDM Executive Board.
- The updated CTR Program will require broad based support.
- The program will continue to be decentralized and locally led.
- Ensure the recommended updates to the CTR Program support safety, engagement, inclusion, and sustainability.
- Alignment with legislative intent.
- Realistic expectations regarding viability of recommended changes.
- Decisions about needs and strategies based on long-term CTR Program success.
- Opened mindedness about what an updated program will achieve and how it will be structured.

6. What are some key questions this work will answer?

- National CTR program best practices?
- Questions related to the revised CTR program work:
 - What is the scope of the revised CTR program? Desire expressed to cover all day trips, non-work trips, and small businesses.
 - How do we add desired program flexibility?
 - What permissions are needed to allow the experimentation needed to improve the Program?
 - Should full-time remote workers be counted as CTR-affected employees?
 - How can the CTR law Update support increased statewide telework?
 - Are there other congestion causing activities or geographic locations that should be addressed by CTR (e.g., special and sporting events, concerts, seasonal congestion (e.g., ski areas, summer tours))?
 - Should we enable more voluntary participation?
 - Should jurisdictions in non-affected areas be allowed to participate in CTR?
 - Should jurisdictions outside of UGAs be allowed to participate in CTR?

- Should the state encourage and support more Growth and Transportation Efficiency Centers? How?
- Should the CTR program support geographic areas with multiple small employers, like business districts, manufacturing industrial centers, and airports? How?
- Should the CTR program support commuters that travel outside of peak times, like early mornings and late nights? How?
- Should the CTR program support employees outside of central business districts that may have limited access to mass transit infrastructure, like manufacturing industrial centers? How?
- What is achievable given existing resources?
- What could be achieved with additional resources?
- Who is responsible for identifying additional resources?
- Who is responsible for implementing the revised program?
- How will success be measured?
- What is the change management strategy?
- Questions related to the context of the revised CTR program's place regarding current and future issues:
 - How can the CTR program be updated to help meet today's mobility challenges and opportunities (e.g., mobility on demand, first-last mile connections, non-peak period congestion, mobility hubs, regional multimodal investments, and plans)?
 - How will the new Environmental Justice Law influence project engagement and program recommendations?
 - How can an updated CTR Program support a new Rideshare On-line Platform?
 - How can the CTR program be updated to help improve equity, access, and opportunity?
 - How do we assure that CTR is part of all Transportation Planning efforts in the State?
- Questions related to the TDM Executive Board and TDM Technical Committee:
 - How to formalize the establishment of the TDM Executive Board?
 - Define the role, responsibility, and powers of TDM Executive Board.
 - Define the relationship between TDM Executive Board and TDM Technical Committee.
 - Analyze if changes need to be made to existing statute related to the CTR Board (now the TDM Technical Committee).

7. How does this effort align with other mobility initiatives that involve WSDOT and our mobility partners?

This effort will consider how an updated CTR program can support existing and related WSDOT multimodal planning efforts. Examples include, but are not limited to:

- Sound Transit 3 station access
- Managed Park and Ride facilities
- Active Transportation Plan
- Mobility on Demand outcomes, programs, and pilots
 - Cooperative Autonomous Transportation Plan
 - Safe Routes to School
 - Statewide telework support

8. What is outside the scope of this update?

- Additional program restraints (e.g., prescription of travel modes to implement, prescription of incentive mechanisms).
- Increasing the state's role in program management.
- CTR Program funding allocation formula.

9. How is this update organized?

- As specified in the authorizing law, the TDM Technical Committee (also known as the CTR Board) and the TDM Executive Board are responsible for overseeing this project.
- WSDOT staff will provide technical, policy, research, engagement, and logistical support.
- Meaningful engagement with stakeholders will play a central role in shaping the report.
- Development of sprint teams comprised of committee and possibly non-committee members.

10. Who are the key staff or this work?

- Ricardo Gotla, project manager
- Carol Thompson, lead staff

11. Who are additional PTD resources for this work?

- Stan Suchan, key advisory staff
- Brian Lagerberg, key advisory staff
- TDM Technical Committee
- CTR Implementers
- Business Services
- Colin Pippin-Timco
- Liz Bastian
- Alon Bassok
- Monica Ghosh
- Michael Wandler
- Kate Ito
- Ian Wesley

12. Who will the update engage?

- Governor's Office
- Key House and Senate Transportation Committee legislators
- Legislative staff
- WSDOT executive management
- WSDOT Legislative Affairs
- WSDOT Government Relations
- PTD senior management

- Additional WSDOT divisions (e.g., Regional Transit Coordination, Traffic Operations, Active Transportation)
- Additional state agencies (e.g., Office of Financial Management)
- Metropolitan and Regional Transportation Planning Organizations (metropolitan planning organizations/ RTPOs)
- TDM Executive Board
- TDM Technical Committee
- Affected jurisdictions
- Association of Washington Businesses
- Washington State Association of Counties
- Association of Washington Cities
- Labor
- Tribes
- CTR implementers
- Transit agencies
- Nonprofit services providers
- Private mobility providers
- Mobility advocacy groups
- Social justice and environmental justice organizations
- WSTA, specifically the vanpool committee

13. How will decisions be made?

The TDM Technical Committee, with consultation with the TDM Executive Board, will have decision-making authority for interim deliverables and the final report and update.

14. Who will use the deliverables created by this update?

- WSDOT
- TDM Technical Committee
- TDM Executive Board
- Legislature
- Legislative staff
- TDM practitioners
- Businesses

Stakeholders contacted

- 5/17/21: Heidi Speight, TDM Technical Committee, Transportation Program Manager, Puget Sound Salesforce at Tableau
- 5/19/21: TDM Technical Committee
- 5/24/21: Robin Mayhew, Management of Mobility, Director Urban Mobility and Access, WSDOT

- 5/24/21: Marmust Elizer, Chair of TDM Technical Committee, Assistant Secretary, Multimodal Development and Delivery, WSDOT
- 5/24/21: Allison Camden, Deputy Assistant Secretary, Multimodal Development and Delivery, WSDOT
- 5/24/21: Mark Hallenbeck, Washington State Transportation Center, University of Washington
- 5/27/21: Jenna Forty, Budget Assistant – Transportation, Office of Financial Management, State of WA
- 5/27/21: Dan Hoyt & Zach Howard, Regional Transit Coordination, WSDOT
- 6/2/21: Kirk Hovenkotter, Move Redmond Transportation Management Association, Redmond WA
- 6/2/21: Gil Cerise, Puget Sound Regional Council

Legislative work plan

Several stakeholders were asked for feedback on the legislative work plan. The list of stakeholders is below as well as the legislative work plan. All Stakeholders were supportive of the plan.

CTR Law Update, 2021 – Workplan

June 2021

Purpose

Develop consent on a strategy to leverage the CTR Program update report ([SHB 1514 - 2021-22, Sect. 4](#)) to advance [TDM Strategic Plan](#) goals, with an emphasis on goal 3:

1. Increase the use of high-efficiency transportation options for commutes.
2. Expand the availability and use of transportation options.
3. Increase policy makers' support for TDM.

Report is due to the Legislature **October 1, 2021**.

Proposed report deliverables

1. **Program objectives** – Objectives of a future CTR Program:
 - Foundation for all project work moving forward.
 - Supported by board, committee, and key legislators.
 - Developed with engagement of all stakeholders outlined in project brief.
2. **Menu of options** – Menu of updates legislators may make to CTR Law:
 - Minimal (e.g., housekeep and technical changes).
 - Moderate (e.g., adding flexibility and streamlining).
 - Comprehensive (e.g., program stretch, such as reducing employer threshold from 100 employees to 50 employees).
3. **Possible bill change for 2022 session** – Identify discrete CTR program legislative update (e.g., technical fix) to preparation for possible comprehensive CTR Program change:
 - May help lay the foundation for more ambitious legislative effort in 2023 session.

- ° Outcomes may include stakeholder relationship development, education, building awareness, identifying opposition and support, and general learning for board and committee.

Considerations

General

- Report deadline (i.e., October 1) is a touchpoint and not the beginning or end of legislative engagement.
- Legislative and stakeholder engagement will occur July-September and targeted engagement will continue into the 2022 legislative session.
- Legislative engagement on CTR Program update may flow into the 2023-2024 legislative session.
- Any legislative deliverable (e.g., report, legislative language) will include meaningful engagement with CTR implementers and stakeholders with a high level of legislative influence (e.g., Association Washington Businesses, labor, chambers).
- Meaningful engagement is resource intensive and requires considerable time, important factors when considering what and when to deliver legislative products.
- Meaningful engagement is critically important to the success of the committee and board's legislative proposals.

For legislative engagement

- Key legislators should feel ownership of recommended strategies. As such, there is value in developing or identifying a champion.
- The committee and board's role is to build a sense of legislative ownership. WSDOT staff can assist as recommended by the committee and board.
- Legislators should be involved in shaping the committee and board's CTR Program update recommendations.
- The committee and board should identify if it is important to develop bipartisan support.

Stakeholders Contacted

- 6/30/21: Marmust Elizer and Allison Camden
- 7/7/21: Candice Bock, Association of Washington Cities
- 7/8/21: David Munnecke, House Legislative staff, and Daniel Masterson, Senate Legislative staff
- 7/13/21: Mellani McAleenan, Washington Association of Counties
- 7/14/21: Zach Carstensen
- 7/15/21: Kevin Futhey and Olivia Holden, Commute Seattle
- 7/19/21: Mike Ennis, Association of Washington Businesses

Possible Emphasis Areas

Several stakeholders were also asked for feedback on possible emphasis areas to be sent to the legislature for consideration. The document they reviewed is below and the stakeholders are listed.

CTR Law Update 2021 – Summary of Possible Program Emphasis Areas

The purpose of this document is to help identify possible emphasis areas for an updated CTR Program. It lays out those emphasis areas, in no order, based on feedback from and outreach to a wide array of stakeholders over the past several years.

The goal of the existing CTR Program is to make the transportation network more effective and efficient by changing how people use the transportation system. Primarily this is done by reducing the number of drive-alone commutes by shifting trips away from single occupant vehicles to other travel modes such as transit, van pooling, carpooling, biking, and walking. Making the system more effective and efficient increases access to goods and services while reducing VMT and GHG emissions.

The current CTR Program requires jurisdictions in affected urban growth areas to implement CTR programs that require CTR plans of employers having 100 or more employees at a work site who commute to work between 6 a.m. and 9 a.m. on weekdays. Existing CTR-affected jurisdictions include Clark, King, Kitsap, Pierce, Snohomish, Spokane, Thurston, Whatcom, and Yakima.

Possible new emphasis areas for the CTR Program are listed below.

- **Climate and Sustainability** – In this emphasis area the CTR program focus would shift to reducing polluting emissions in personal travel anywhere in Washington.
- **Access in Rural Areas and Tribal Lands (equity focus)** – In this emphasis area the CTR Program focus would shift to assuring residents of rural areas and Tribal lands throughout Washington have multimodal options to access opportunity, social services, and community.
- **Access in Urban Areas (equity focus)** - In this emphasis area the CTR Program focus would shift to assuring low-income urban and suburban residents have multimodal options to access opportunity, social services, and community.
- **Access in Economically Disadvantaged Areas (equity focus)** – In this emphasis area the CTR Program focus would shift to assuring access to multimodal options in all low-income areas throughout Washington.
- **Housekeeping (status quo)** – In this emphasis area the CTR Program would stay the same as it is now, with the focus on reducing drive-alone commute trips to work sites with 100+ employees in affected Urban Growth Areas during the 6:00 – 9:00 AM time frame on weekdays.
- **Emphasize Congestion Mitigation in Existing CTR Program Areas (climate focus)** – In this emphasis area the CTR Program would be expanded in existing CTR jurisdictions to include peak periods designated by the jurisdiction based on local conditions and to address commute and non-commute trip types.
- **Emphasize Congestion Mitigation in Rapid Growth Areas Outside Existing CTR Program (climate focus)** – In this emphasis area the CTR Program would be expanded to include urban/suburban areas, outside of currently designated “affected Urban Growth areas,” that are experiencing rapid growth.

Stakeholders Contacted

- 7/21/21: Michelle Rasmussen, Director of Parking and Transportation Services, Eastern Washington University. Employer Representative on TDM Technical Committee.
- 7/22/21: State Representative Kirsten Talley-Harris.
- 7/22/21: State Representative Bill Ramos.
- 7/22/21: TDM Board and TDM Technical Committee.
- 7/26/21: Andrea Weckmueller-Behringer, Walla Walla Metropolitan Planning Organization Planner.
- 7/28/21: Jamila Taylor, State Representative, 30th Legislative District.
- 7/30/21: Debbie Driver, Governor's Office; Eric Hansen, Washington Government Relations; Jenna Forty, Office of Financial Management.
- 7/30/21: Jake Fey, State Representative, District 27 (Tacoma), Chair of House Transportation Committee, Co-chair of Joint Transportation Committee.

APPENDIX J

Initial report and one-page leave-behind



SEPTEMBER 2021

Commute Trip Reduction Law Update 2021

EVOLUTION OF A PROVEN PROGRAM TO BETTER ADDRESS EQUITY AND CLIMATE

PURPOSE

Excitement is building among local, regional, and state interests to broaden commute trip reduction to further address equity and climate. The state Legislature has provided an opportunity for transportation demand management stakeholders across the state to share their ideas. The purpose of this report is to provide a framework that supports an inclusive and effective policy discussion.

The Transportation Demand Management (TDM) Executive Board, TDM Technical Committee, and WSDOT propose program expansion to enhance mobility for people with special transportation needs, midday and weekend congestion, and congestion in locations currently not covered. Once we receive feedback from legislators and stakeholders, the TDM Executive Board, TDM Technical Committee, and WSDOT will develop and propose program changes and identify funding needs.

POTENTIAL NEW CTR PROGRAM EMPHASIS AREAS

In the 2021 regular session, the Legislature directed the Commute Trip Reduction Board (aka the TDM Technical Committee and Executive Board) and WSDOT to conduct an update of the commute trip reduction law ([SHB 1514](#), Sec. 4).

After consultation with key stakeholders, the TDM Technical Committee, Executive Board, and WSDOT developed a set of recommended emphasis areas for an updated CTR law and program to address trends that are driving change in transportation. **These emphasis areas would be in addition to the original program** focus on commute trips at large employer worksites. If the program is expanded to address one or more of these emphasis areas, **CTR jurisdictions would customize their program based on local conditions** to address commute and non-commute trips and travel outside the peak morning commute. Recommended emphasis areas:

- **Support essential workers and people with special transportation needs.**

Expand the program to support more multimodal transportation options throughout the state for essential workers; shift workers; and people with special transportation needs, including historically marginalized communities, people with low incomes and/or disabilities, tribes, BIPOC, and residents of rural areas.

- **Address urban congestion.**

Strengthen the program by providing current CTR jurisdictions greater flexibility to specifically address congestion at all hours.

- **Enable expansion to new locations.**

Provide resources to enable WSDOT and interested local partners to expand CTR beyond current locations to address major congestion anywhere on the transportation system (e.g., congestion during weekends, events, or seasonal activities).

ACCOMPLISHMENTS OF THE CURRENT CTR PROGRAM

As stated in the CTR law (RCW 70A.15.4000-4110), the purpose of the state's CTR Program is to improve air quality, ease congestion, and reduce gasoline consumption.

There are two major actions mandated by the CTR law to accomplish this purpose: 1) engage major employers to provide commute trip reduction programs, and 2) engage local and regional governments to support/collaborate with them on these programs.

The CTR Program has been very effective in accomplishing its stated goals. In the 30 years since the CTR law was adopted in 1991, jurisdictions have partnered with employers and state, regional, and local agencies to implement CTR programs in affected urban growth areas. As required by the CTR law, the CTR programs largely focus on employers who have 100 or more full-time employees who commute to a worksite on weekdays between 6 and 9 a.m.

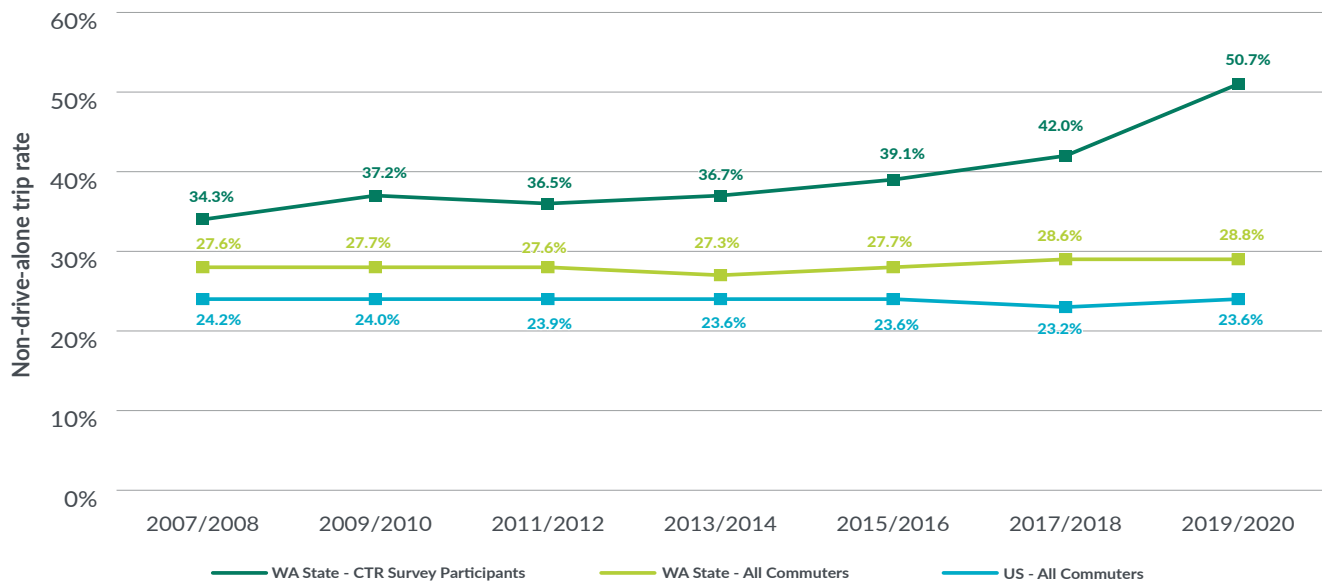
The CTR programs helped to **reduce roughly 30 percent of vehicle miles traveled per employee per day** from 2007 to 2020 (10.9 to 7.6, respectively). The **reduction in vehicle miles means roughly 9 million fewer gallons of fuel used each year**, saving commuters nearly \$58 million. This also leads to an **annual reduction of about 175,000 metric tons in greenhouse-gas emissions**. Additionally, the cars left at home by commute trip reduction-affected employees every weekday represents about one lane of bumper-to-bumper traffic for 91 miles (equivalent to the distance from Olympia to Everett or Spokane to Grand Coulee Dam).

These programs largely focus on enabling and incentivizing employees to ride the bus, rideshare, walk, bicycle, or telework. Local CTR coalitions have:

- Boosted transit ridership through widespread availability of employer-sponsored transit passes.
- Created thousands of employer-supported vanpools.
- Expanded the use of compressed work schedules, flex schedules, and telework.

Of the nearly 600,000 employees working at CTR-affected worksites from 2019 to 2020, 50.7 percent chose alternatives to driving alone for their commute to and from work. This is 76 percent higher than the state average (28.8 percent), and 115 percent higher than the national average (23.6 percent).⁷

⁷ Performance data were influenced by two unusual circumstances related to COVID-19. First, there was a significant increase in telework for the sites that surveyed after March 2020. Second, almost 200 fewer worksites surveyed in 2019-2020 than in 2017-2018. These sites have historically reported vehicle miles traveled above the current cycle's statewide average. It is likely that part of the improvement in the numbers is due to those sites not surveying. While the gains from telework are sustainable, the next cycle that surveys all CTR-affected worksites will likely have results that fall somewhere between the numbers from 2017-2018 and 2019-2020.



While CTR has continued its focus on large employers over the years, the CTR law also provides discretion for the program to evolve and to allow a broader reach and more flexibility to jurisdictions. Several jurisdictions including Redmond, Seattle, Snohomish County, Spokane, Tacoma, Tukwila, Vancouver, and Yakima have availed themselves of the flexibility provided in CTR to form Growth and Transportation Efficiency Centers (GTECs) or submit alternate plans to focus CTR efforts on all trips in a geographic area.

WHY EXPAND THE CTR PROGRAM?

Despite all the worthy accomplishments of the current CTR Program, there are a number of important statewide considerations that cannot be addressed under the current law. Expansion of the law would enable these considerations to be addressed in the CTR Program. Gaps identified by the current law include:

- **The CTR Program addresses only 4 percent of daily trips in Washington** with its current focus on commute trips at large employers. Expansion of the program to the recommended emphasis areas would begin to capture the other 96 percent of daily trips in the state. That substantial number of trips and their effects on congestion and air quality could now be addressed under CTR.
- **The current program reaches largely white-collar office workers.** The current program does not address shift workers, retail workers, hospitality workers, health care workers, part-time workers, workers at small businesses, or any workers traveling outside of the 6-9 a.m. weekday timeframe. It does not address congestion happening on weekends; congestion caused by events such as sports, conferences, or concerts; or congestion caused by recreational activities such as skiing and hiking. Expansion of the program to include these groups and activities would extend the program benefits to underserved people and localities and address congestion wherever and whenever it occurs.
- **The current program is required only in affected urban growth areas.** Most of the state is not covered. By expanding the program to communities that are currently not covered by the program (see map on page 4), program benefits would increase to more communities. These benefits include more travel options, reduced congestion, and improved air quality.
- The current CTR law allows other communities to opt in. However, funding levels have kept this from happening. **Funding would need to be increased to cover expansion of the program.**

NEXT STEPS

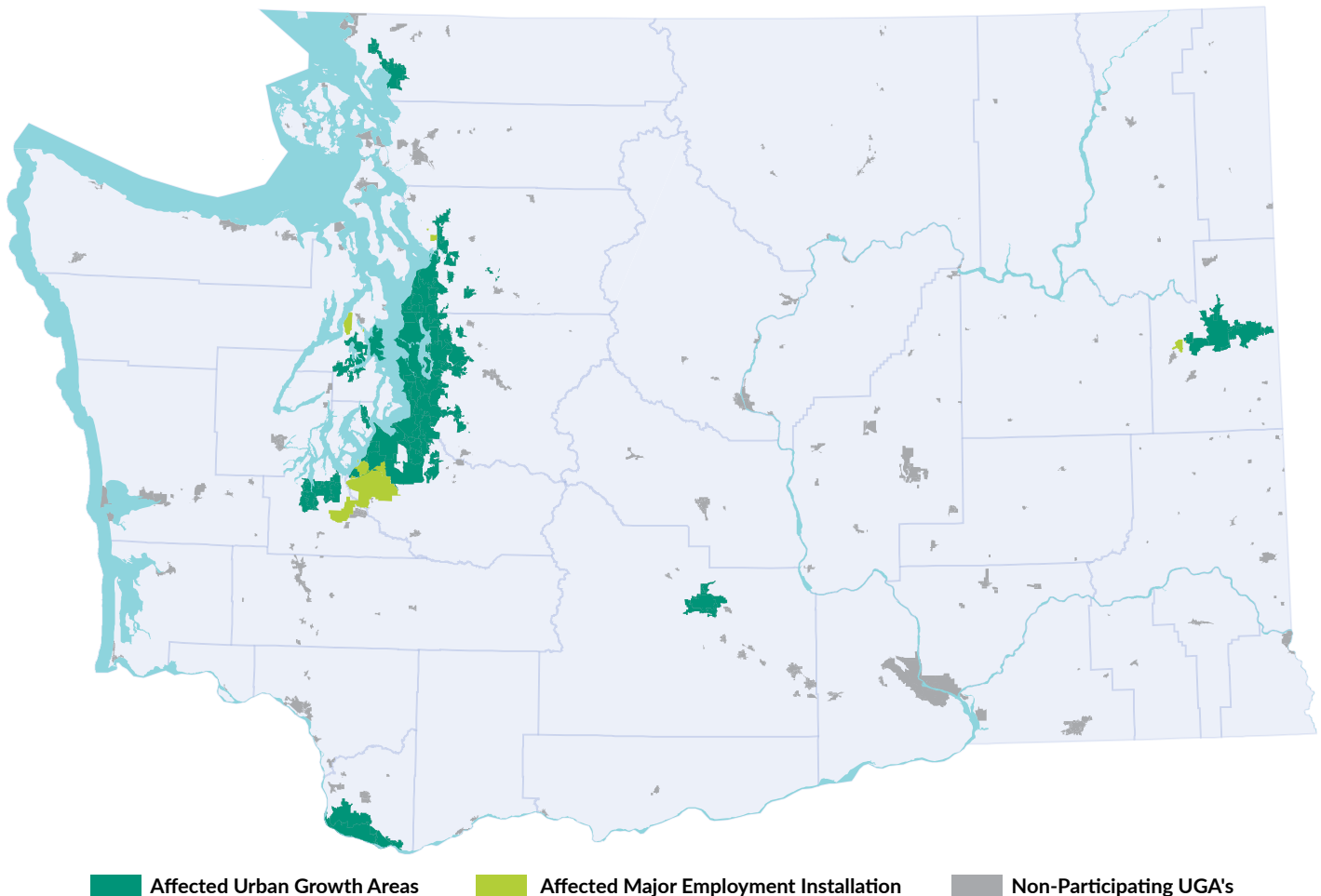
The TDM Board and TDM Technical Committee will take the following steps to explore expansion of the CTR Program:

First Quarter 2022 – Deliver a comprehensive report to the Legislature on an update to the CTR Program. The technical report will detail CTR Program history and requirements, governance practices, and relevant social and economic trends.

Spring/Summer 2022 – Engage the Legislature and other stakeholders to gain their unput on future CTR Program emphasis areas.

Fourth Quarter 2022 – Develop and submit legislation that supports updated CTR Program emphasis areas.

Affected Areas in the CTR Program



Commute Trip Reduction (CTR) Law

2021 Update: Improve Mobility to Advance State Equity and Climate Goals

**CTR
Board
+
WSDOT**

RECOMMENDED PROGRAM EXPANSION EMPHASIS AREAS

Add support for essential workers and for people with special transportation needs

Improve mobility in more locations

Address a larger share of urban congestion



STATEWIDE DEMAND FOR EXPANDED PROGRAM



Workers at small- and mid sized businesses want more travel options.



Shift workers and essential workers traveling outside the 6-9 a.m. weekday are looking for new ways to travel.



Additional urban growth areas, suburban, and rural communities want to be in the program.

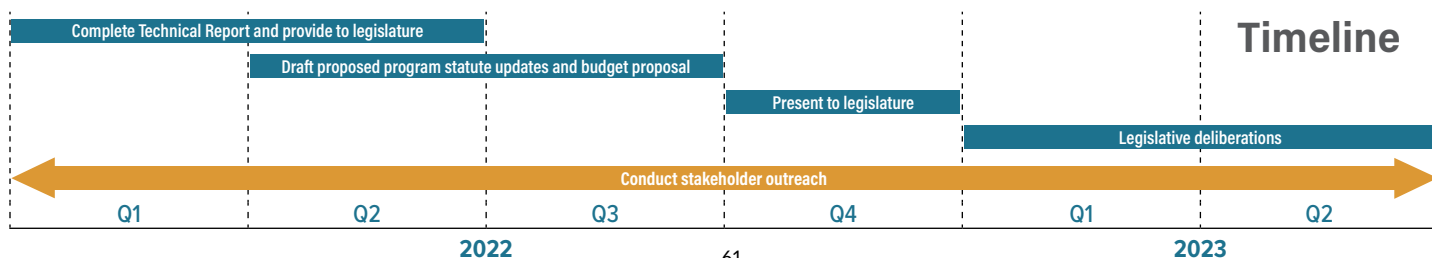
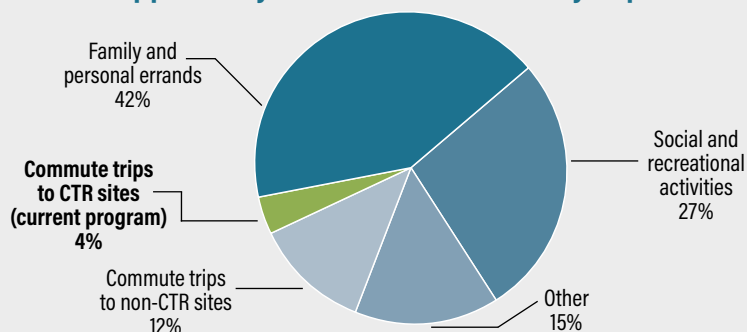


People are looking for more travel options to healthcare, groceries, medications, education, worship, and visits with family and friends.

TO EXPAND THE PROGRAM
legislative direction and
increased funding are needed.

For more information, contact:
Ricardo.Gotla@wsdot.wa.gov
NOVEMBER 2021

Opportunity to Address 96% of Daily Trips



THE COMMUTE TRIP REDUCTION PROGRAM: 30 YEARS OF SUCCESS

Goals:

- Improving air quality
- Easing congestion
- Reducing gasoline consumption

Approach:

- Require larger employers in affected urban growth areas to encourage non drive alone commute trips
- Require local and regional governments to support and collaborate with large employers

Results:

- Boosted transit ridership through employer sponsored transit passes
- Created thousands of employer supported vanpools
- Expanded compressed and flex work schedules and telework

CURRENT PROGRAM ACCOMPLISHMENTS

30%

LESS VEHICLE MILES
TRAVELED PER EMPLOYEE
PER DAY

9,000,000

FEWER GALLONS
OF FUEL USED
EACH YEAR

175,000 metric
tons

ANNUALLY REDUCED
IN GREENHOUSE-GAS
EMISSIONS

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