

City of Kent Commute Trip Reduction Four-Year Plan Update: 2025–2029

Benefits of CTR

1. Describe the local land use and transportation context and objectives.¹

a. Describe the setting in the jurisdiction as it is today or will be in the near future.

The City of Kent is the regional epicenter of industry and the home of a diverse population. Kent is located in the Puget Sound region, about 20 miles southeast of Seattle. The City was incorporated in 1890 and has evolved from an agricultural center into a hub of high-tech manufacturing, distribution, and aerospace.

According to the 2020 Census, Kent has a population of 136,628 residents. Kent is diverse in multiple aspects of demographic identity including race, ethnicity, and educational attainment. When race and ethnicity are reviewed together, Kent is a majority-minority city with 56 percent of the population identifying as Hispanic, Latino, or non-White. The percentage of foreign-born residents, citizens, and non-citizens, and languages spoken at home reflects the City's diversity, which poses challenges for developing and implementing a TMP that captures many voices. Language barriers can impede these groups' ability to take full advantage of the transportation system, such as navigating regional transit, interpreting transportation wayfinding signs, and providing meaningful input in planning efforts. More than 29 percent of Kent residents were born outside of the United States, and 40 percent of residents speak a language other than English at home.

b. Describe features of land use and transportation facilities and services that affect commuters.

Kent's land use diversity, from residential neighborhoods to manufacturing and industrial districts, presents challenges for a transportation system meant to serve the needs of all users. Kent's East Hill and West Hill are comprised of predominantly residential neighborhoods whereas, manufacturing and industrial jobs are located within the Kent Valley. According to the City's 2015 Comprehensive Plan, the majority of land use in Kent remains single family. Multifamily housing and mixed-use developments are bringing increased density to the downtown urban core and adjacent neighborhoods as well as along major roadway and transit corridors.

Commercial land uses are concentrated within the downtown core and along major roadway corridors. Much of the commercial land is mixed use that supports connections to transit. The bulk of the industrial and manufacturing uses are located in the northern portion of the Kent Valley. A southern portion of Kent along the SR 167 remains agricultural.

¹ Sources: The plan shall highlight the existing and future land use and transportation conditions and characteristics considered most critical by the jurisdiction 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 CTR employers. (WAC 468-63-040(2)(a))

The state intends for local jurisdictions to use information in existing plans and programs, such as the local comprehensive plan, unified development codes, the transportation improvement program, economic development plans, and others, as much as possible in order to develop the local CTR plan. (WAC 468-63-040(2))

Kent's roadway network is made up of major and minor arterials, collectors, and local streets. Kent Industrial Valley is the fourth largest manufacturing and distribution area in the US, and much of the rail and truck freight from the ports of Tacoma and Seattle pass through the City. Trucks and rail movement have been noted to conflict within Kent. City Council and residents have expressed concerns with the impact of freight on Kent and the City aims to balance the needs of residents and freight-heavy land uses as well as mitigate heavy freight traffic.

In Kent, the majority of principal and minor arterials have sidewalks or paved shoulders, however, only a handful of lower classified roadways provide similar facilities. In terms of bike facilities, an increasing number of bike lanes have been added over the last decade with additional projects included in the Transportation Master Plan. There are three major trails that run through or border the city that provide north-south bicycle and pedestrian connections, including the Green River trail, Interurban trail, and Soos Creek trail.

A wide variety of transit services are available in Kent today, including fixed-route local and regional bus service provided by King County Metro, Dial-A-Ride-Transit (DART) which provides local, fixed and limited route service, and ACCESS which provides flexible paratransit services. Sound Transit serves Kent with regional express bus service and commuter rail service through Kent Station. Expanded service is anticipated with the upcoming Federal Way Link Extension opening in 2026. There will also be a future RapidRide route, known as the I Line, planned by King County Metro.

King County Metro provides additional commute programs in Kent, including Metro Flex, Vanpool, Vanshare, as well as the Vanpool and Vanpool Discount Pilot. Metro Flex offers door-to-door service within the Kent boundary. Vanpool and Vanshare involve groups of people forming a carpool using a Metro van. Each of these programs fill the gaps of the fixed route bus service, serve geographically challenging areas, and can be tailored to needs around timing, destination, and cultural needs.

c. Describe whether and how commuting patterns have changed in the past few years.

The City of Kent last administered the CTR program in 2022 as the COVID-19 pandemic was ongoing. Since then, commute patterns have affected how people get to work. According to the Puget Sound Regional Council (PSRC) Household Travel Survey, in-person work has increased from 48% in 2021 to 63% in 2023, but has not returned to pre-pandemic levels of 79% and 77% in 2017 and 2019, respectively. Hybrid work options have greatly increased to 25% in 2023 compared with 15% in 2017. The 2021 survey also found that 29% of employees worked fully at home, but have reduced to 12% in 2023. This figure is an increase from 6% working fully at home in 2017.

Due to the pandemic, hybrid and remote work have increased which resulted in a decreased drive-alone rate and vehicle miles traveled across the region. This impacted employees who were able to perform their jobs via telecommuting. The ability to telecommute reduces overall commute trips taken. However, the trends seen in PSRC Household Travel Survey represents regional data, which may differ from trends in the City of Kent due to many industrial and manufacturing jobs that cannot be done remotely.

Despite decreased transit ridership levels across the region during and in the years following the pandemic, cities in south King County have demonstrated resilient ridership. As stated in Metro's 2021 System Evaluation report, Metro reduced service across the system throughout 2020 and eventually restored service to 85% of pre-pandemic levels towards the end of the year. However, most routes in south King County maintained higher ridership levels in 2020 and had full service. This includes routes

150 and 160 in Kent, which were two of the 15 routes with highest average weekday boardings in October 2020. A reason for sustained ridership is that many riders along these routes cannot telecommute and have limited transportation options. Counter to that, Route 157, a Seattle downtown, commuter-focused route with an average daily ridership of 225 was suspended in 2020 along with other emergency service changes. In 2021, Metro rolled out on-demand, corner to corner Metro Flex services for portions of East Hill served by route 157 and the MIC Valley more broadly. Daily ridership on Metro Flex in Kent averaged 30 rides in the 2024 report period, serving a 70% equity focused population according to the annual service reporting by King County Metro.

Overall, the pandemic has changed how businesses operate and how employees get to work. This may affect which organizations are CTR-affected, how CTR requirements will be administered, and results from the employee surveys and program reports.

- d. *List the most important land use and transportation objectives from your city or county's plans that commute trip reduction most directly affects.*

Goals and policies from the Draft 2044 Comprehensive Plan that CTR most directly affects include:

- Examine commercial nodes, corridors, and subareas for opportunities to reinvigorate commercial uses, improve neighborhood amenities, and connect with surrounding areas. Identify opportunities in collaboration with the local community to mitigate displacement and enhance accessibility and inclusivity.
- Consider multimodal needs in the Kent Industrial Valley, particularly focusing on increased connections for commuters utilizing active transportation, ride-share, and public transit.
- Support commute trip reduction goals and multimodal forms of transportation via investments in improved multimodal connections and development standards pertaining to building setbacks, location of parking, parking standards, as well as increased amenities for pedestrians, cyclists, and trail users.
- Create connections for people and invest in places. Enhance connectivity between people and places—including in commercial corridors and industrial districts— by improving and expanding trails and roadways, as well as establishing welcoming entries into Kent. Emphasize the importance of multi-modal connections to elevate human experiences and foster a physically and emotionally healthy community.
- Continue planning and investments in Kent's two PRSC-designated Regional Growth Centers, Downtown and Industrial Valley, so they realize their visions of focal points for planned housing, economic development, and infrastructure investments.

Goals from the City's Transportation Master Plan that CTR most directly affects include: 1) Connectivity and Options, 2) Safety and Health, 3) Stewardship, and 4) Strategy.

- Connectivity and Options invokes the multimodal network, increasing options that support CTR objectives.
- Safety and Health improves walking biking and getting to transit as viable alternatives.
- Stewardship focuses on maintaining and improving what we have, for longer term community and economic benefit which can be supported by CTR objectives when access to quality jobs is provided.

- Strategy involves leveraging grants and partnerships to maximize resources and finding new efficiencies – where the CTR program offers both.
- e. *Describe critical aspects of land use and transportation that should be sustained and key changes that should be considered to improve commute trip reduction's contribution to the land use and transportation objectives you reference.*

Aspects of land use and transportation that should be sustained involve continuing to build mixed-use, redevelopment opportunities in downtown Kent and the Kent Valley. Downtown Kent serves as a Regional Activity Center and the Kent Valley serves as the Manufacturing/Industrial Center (MIC) for job locations and housing, both of which are in the City's comprehensive plan and regional growth strategy, known as hubs of activity. This leverages proximity to Sounder train and bus transit investments, particularly for transit served populations from neighboring cities that work at CTR sites in Kent. Throughout the pandemic, transit ridership in Kent remained above the regional averages, despite proven gains in work from home trends. Regional economic growth strategy continues to leverage manufacturing and industrial uses in the Kent MIC, due in part to their incompatibility with residential areas elsewhere, but also to leverage the rail and highway infrastructure in place. Continued success depends on maintaining relationships with businesses and community members. Continuing to build relationships is vital in improving CTR's contribution to land use and transportation objectives.

There are also changes that should be considered to improve CTR. Kent's MIC, the setting of most CTR sites, continues to be a challenge for centralized CTR efforts. This is due in part to the shift work nature and required in-person roles which does not have a work from home option. Transit service and bicycle-dedicated infrastructure continue to emphasize north-south movements, with east-west capacity limited. Continuing to increase connectivity, routes, or frequency of existing services, will help to bring the planned network supporting the transportation goals more into focus. Recent policy movement in City and King County land use policy include adding/reinforcing a third node of activity, the Benson Corridor on Kent's East Hill, to leverage RapidRide I-Line service investments due in 2026 with additional community redevelopment and local/access connection support.

2. Describe how the CTR program will help achieve the jurisdiction's land use and transportation objectives.²

- a. *Describe how and to what extent your CTR program will help your city or county achieve the land use and transportation objectives referenced in question 1.*

The Regional Growth Management strategy under the Growth Management Act (GMA) and the City of Kent's focus on increasing housing and land use density is mutually reinforcing for leveraging multimodal transportation connections and CTR efforts. The CTR program informs, encourages, and incentivizes employees of major employers in Kent, who may also be residents in Kent and neighboring communities to try new modes of commuting outside of driving alone. A key component of doing so requires building relationships with businesses in Kent to educate their employees about CTR. These

² Source: The local CTR plan shall describe how the CTR program will help achieve the jurisdiction's broader land use and transportation goals. (WAC 468-63-040(2))

support the City's transportation goals for better connectivity and leveraging existing investments in transportation.

The CTR program also supports the market for higher density housing in proximity to transit corridor investments such as Kent Station and the upcoming Federal Way Link Extension. The increased density in housing and commercial businesses near transit offer more opportunities for people to commute via alternative modes outside of driving alone, just as the concentration of trip-origins and destinations generate demand for multi-modal networks for local trips.

3. Describe how the CTR program will help achieve the jurisdiction's environmental objectives.³

a. Describe how the CTR program will support jurisdiction greenhouse gas emission reduction efforts.

Resolution No. 1878 is the City of Kent's adoption of Greenhouse Gas Emission Reduction Policies. The City recognizes that greenhouse gas emissions by human activities, including the burning of fossil fuels, contribute to increased global temperatures and climate change, which pose a profound threat to the region's natural and economic systems. The implementation of programs and policies that reduce traffic congestion and improved transportation choices are listed as methods for reducing the production of greenhouse gases. Specific actions that relate to, or involve CTR include but are not limited to:

- Encourage ride-sharing, van-pooling, bicycling, and the use of flex-time by employees.
- Consider free or reduced price transit passes to employees who wish to commute by transit as funds become available.
- Provide storage and shower amenities for employees who commute by bicycle and provide designated vanpool, carpool parking spaces.
- Support voluntary, employer-based trip reduction programs, including: Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program.
- Ensure that local Climate Action, Land Use, Housing, and Transportation Plans are aligned with and support any regional plans that have been developed consistent with state guidance to achieve reductions in greenhouse gas emissions.
- Promote ride sharing programs.
- Encourage businesses to provide amenities for employees who commute by bicycling.

These recommended actions in the Greenhouse Gas Emission Reduction Policy align with the CTR Program, which encourages and educates employers and employees to engage in similar activities.

b. Describe how the CTR program will support jurisdiction environmental objectives in addition to greenhouse gas emission reductions.

³ Source: The legislature also finds that increasing automotive transportation is a major factor in increasing consumption of gasoline and, thereby, increasing reliance on imported sources of petroleum. Moderating the growth in automotive travel is essential to stabilizing and reducing dependence on imported petroleum and improving the nation's energy security (...) The intent of this chapter is to require local governments in those counties experiencing the greatest automobile-related air pollution and traffic congestion to develop and implement plans to reduce single-occupant vehicle commute trips. (RCW 70A.15.4000)

The City of Kent has completed an environmental analysis as part of the Draft 2044 Comprehensive Plan update. It includes identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and potential mitigation consistent with the Washington State Growth Management Act.

The analysis examined alternatives for land use that were explored with stakeholders, and feedback incorporated. The recommended alternative considers focusing redevelopment in three areas of the city where transportation alternatives are more present. This includes the downtown core and adjacent MIC, the West Hill with the anticipated April 2026 opening of the Federal Way Link Extension, and East Hill along the Benson Corridor. The recommended land use pattern focuses redevelopment in the areas with prior and pending transportation investments.

PSRC analysis concludes that work from home trends stand to show some of the highest promise, lowest cost greenhouse gas reduction strategies. The City's analysis underlying the 2044 Comprehensive Plan recommendations do not currently include a variable for CTR effects, nor changes to work from home percentages, inferring that any benefits from CTR programs would be *in addition to* the land use and transportation trip-saving and reduced trip distances resulting from growth and infrastructure investments. Work from home assumptions for the City, in the PSRC-based travel demand model in particular, have not been assumed to be higher (or lower) despite the demonstrated gains since the pandemic.

4. Describe how your CTR program will help achieve regional and state objectives.⁴

- a. *Summarize the local, regional, and state benefits that would be gained if you achieve your CTR targets.*

Puget Sound Regional Transportation Plan 2022-2050

Goal: Create a safe, clean, and efficient transportation system essential to the region's quality of life, health, and economy while also improving mobility and ensuring all people equitably benefit from the region's transportation system.

Objectives:

- Achieve greenhouse gas emission reduction goals.
- Invest in growing communities.
- Maintain and promote economic vitality.
- Improve access to transit and expand travel choices.
- Apply an equity focus to all aspects of the plan.
- Advance a safe transportation system through a safe systems approach.
- Assist and inform local planning by cities and counties.

WSDOT State CTR 2023-2025 Draft Plan

Goal: Increase the use of high-efficiency transportation options for commutes.

⁴ Sources: 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:

Regional transportation planning organizations (RTPOs) and WSDOT shall provide applicable data, if available, to assist this analysis. (WAC 468-63-030(3)(c))

The plan shall also discuss cross-boundary issues, such as passthrough commute patterns or larger regional issues, and how these affect the local CTR plan. (WAC 468-63-040(2)(a))

Objectives:

- Improve delivery of CTR programs.
- Expand CTR market to address equity.
- Produce more useful transportation behavior data.
- Expand investment and service to advance equity and environmental justice.
- Respond to shifting mobility patterns.
- Reduce greenhouse gas emissions.

Summary of Benefits:

- **Reduce greenhouse gas emissions:** The state and region both have the goal of reducing greenhouse gas emissions. Each commute trip that is shifted to a non-drive alone mode through the Kent's CTR program reduces greenhouse gas emissions. One of the performance targets for CTR is the drive-alone rate, which WSDOT has set at 69% for CTR-affected worksites in the City of Kent. As CTR worksites in Kent make progress towards reaching the 69% drive-alone rate, greenhouse gas emissions related to commuting are expected to steadily decrease.
- **Advance equity:** By focusing particular attention on areas with higher concentrations of people of color and people with low incomes, Kent's CTR program would help to redress past neglect and bringing these neighborhoods up to par with the rest of the city thereby advancing equity, which is a goal of the region and the state. One of the ways in which City of Kent is doing so is through outreach opportunities and engagement events, including online and in person formats.
- **Improve delivery of CTR programs:** Capital improvement plans generally build out non-motorized network infrastructure that improves connectivity for all modes of travel. This in turn will make CTR actions more efficient and easier to deliver. This aligns with the region's and state's CTR goals. Achieving the targeted response rate for the CTR Employee Survey will represent education and awareness of CTR as well as serve as a way to collect transportation behavior data, which will continue to understand the needs of commuters and improve the CTR program.
- **Foster interagency collaboration:** The requirements of the CTR program to consider state, regional and adjacent goals naturally foster interagency collaboration which, in turn, yields a more integrated and robust multimodal transportation system that better meets the travel needs of citizens.

b. List adjacent CTR-affected cities and counties.

It is vital to connect Kent with neighboring cities within King County to actualize regional connectivity. Auburn, Renton, Federal Way, Des Moines, SeaTac, and Tukwila are nearby cities with CTR programs and plans.

c. Describe the top few cross-border and regional transportation issues that affect your jurisdiction.

Cross-community travel affects both Kent as a through-community as well as those needing to travel via Kent to get to their destination. This can create challenges for wanting to support regional goals, with local-focused networks. One challenge the City of Kent faces is the lack of east-west connections. Due to geography, the transportation network in the Puget Sound region is predominantly north-south, which is reflected in the existing transit system. Kent is in the middle of the several South King County cities, including Des Moines, Federal Way, Auburn, Tukwila, Covington, SeaTac and Renton. Whereas

Kent hosts above-average concentration of jobs, particularly manufacturing and aerospace, many people are coming from cities near and far to their workplace in Kent.

A second, related regional challenge is stewardship. Where the City aspires to deliver services for residents and businesses strategically and cost-effectively, but also maintains and operates much of the arterial network, including the corridors serving transit. Stewardship is related to another regional issue of sustainable funding. Cities in Washington, including Kent are constrained in the sources of revenues they can reliably use for system expansion. Fortunately, external funding is available in the source of grants, such as CTR and FHWA grants via PSRC and WSDOT, but the resulting incentive for competition between Cities attempting to secure funds for what seem like basic services, can create friction and distrust between organizations that otherwise share the same mission – safe and efficient transportation outcomes.

- d. *Describe the strategies you, adjacent cities and counties, and your region have agreed to use to address the top issues described in the previous bullet.*

The City will continue to coordinate directly with neighboring cities through monthly south King County CTR meetings and through PSRC. Cities in our region look to the state for dispersal of funds, including for the CTR program. Cities coordinate for guidance, support, and to allocate resources to address the aforementioned issues around cross-community travel and stewardship.

Performance targets

5. List your jurisdiction's CTR performance target(s).⁵

- a. *List performance targets that reflect only CTR-affected worksites.*

WSDOT recommended a weighted average drive-alone rate of 69% or less for CTR-affected worksites in Kent. The City of Kent will be taking a baseline measurement during the survey period in Fall 2024 to measure against and aim for a drive-alone rate of 69% in the subsequent years.

- b. *List any additional performance targets.*

The City of Kent adopts an annually updated version of the Six-Year Transportation Improvement Program (TIP). Part of the TIP includes a metrics dashboard which is connected to the Transportation Master Plan goals on mode share, access and mobility, and funding. The mode share metrics are specifically tied to CTR.

In 2024, the City adopted the 2025-2030 TIP. The dashboard compares numbers between the years 2020 versus 2021. Numbers have stayed steady in percent of trips via walking, percent of commute trips taken by a mode other than a single occupancy vehicle, and percent of trips via single occupancy vehicle. During the same period, there was a decline of 1.1% of trips taken via transit and carpool trips declined by 1.4%. The percent of workers that work from home has increased by 2.4% between 2020

⁵ Source: *The plan shall establish the jurisdiction's CTR goals and targets. (WAC 468-63-040(2)(b))*

and 2021. With the CTR program reestablished since the pandemic and as commute habits resume to a new normal, a positive change in these metrics is expected over the course of the next few years.

6. List the base value you'll use for each performance target.⁶

- a. For each performance target, provide the number you'll use as the baseline (or starting number). You'll measure the difference between this number and your results to report performance.*

Performance targets will be tied to the CTR survey. A base value will be established during the 2023-2025 survey cycle and progress will be measured using 2025-2027 survey results.

7. Describe the method you used to determine the base value for each target.

- a. Provide the source for each base value listed.*

Performance targets will be tied to the CTR survey. A base value will be established during the 2023-2025 survey cycle and progress will be measured using 2025-2027 survey results.

8. Describe how you'll measure progress toward each target.

- a. List the method you'll use to measure progress for each target.*

Progress will be measured using the 2025-2027 survey results.

⁶ Source: The plan's measurement methodology shall be consistent with the measurement guidelines established by WSDOT and posted on the agency's website. (WAC 468-63-040(2)(c))

9. List your jurisdiction’s CTR-affected worksites.⁷

a. List all your CTR-affected sites.

1. Amazon BFI4
2. Barghausen Engineering
3. Blue Origin
4. The Boeing Company
5. City of Kent
6. Digital Control
7. Exotic Metals Forming Co.
8. Flow International Corp
9. Hexcel
10. Hytek Finishes
11. Kent School District
12. King County Regional Justice Center
13. Manheim Seattle
14. Quanex
15. Oberto Sausage Company
16. OMAX Corporation
17. PCC Airframe Products
18. Puget Sound Energy
19. Sysco Food Services of Seattle
20. Taylor Farms
21. WA Department of Child, Youth, and Family

10. List a performance target for each CTR-affected worksite.⁸

a. For any performance targets tied to the CTR survey, indicate that you’ll establish performance targets during the 2023-2025 survey cycle.

Base year performance targets will be established during the 2024-2025 survey cycle.

11. List the base value you’ll use for each site.

a. For any performance targets tied to the CTR survey, indicate that you’ll establish a base value during the 2023-2025 survey cycle.

A base value will be established during the 2023-2025 survey cycle.

⁷ Source: The plan shall also identify the major employer worksites, including affected state agency locations, within the jurisdiction's affected urban growth area and any major employment installations. (WAC 468-63-040(2)(e))

⁸ Source: The plan shall describe the base year values and numerical targets for each major employer worksite required to participate in the CTR program. (WAC 468-63-040(2)(b))LU

Services and strategies

12. Describe the services and strategies your jurisdiction will use to achieve CTR targets.⁹

The City is pursuing the following actions in its CTR program:

- Implement the CTR Coordinator role to offer CTR education and outreach, and to complete the requirements, including the CTR Survey and Program Report.
- Partner with King County Metro which offers discounted vanpool program and Metro Flex within boundary of Kent. Work with them to disseminate information and resources to employees in Kent.
- Conduct outreach to businesses with support from the Economic and Community Development team.
- Engage in citywide campaigns around alternative commutes, such as Bike to Work Week, and Switch Your Trips.
- Implement marketing initiatives and provide tax credit information and incentives for both employers and employees.
- Review the City's CTR Ordinance and present recommended changes to the City Council for consideration.

13. Describe how jurisdiction services and strategies will support CTR-affected employers.¹⁰

With the role of the CTR coordinator, as well as education and outreach around CTR, employers will be more informed, educated, and have resources at their disposal. Employee Transportation Coordinators at CTR-affected worksites are supported through the CTR Coordinator. The City contacts and conducts outreach to CTR-affected worksites. City staff provide the opportunity for employers to be compliant with the CTR law as well as provide resources to make it easier for them to become compliant.

14. Describe barriers your jurisdiction must address to achieve CTR targets.¹¹

a. Describe how you'll address these barriers.

Lack of worksite support: The lack of engagement from CTR-affected worksites could be due to a combination of time and staff constraints, high turnover for Employee Transportation Coordinators, disinterest in commute options, and lack of enforcement to stay compliant.

How addressing: In order for businesses to increase engagement, we are making in-person site visits, sending letters, as well as offering incentives to those who participate in the program to increase

⁹ Source: The plan shall describe what local services and strategies will be implemented to achieve the plan's goals and targets, and how these services and strategies will support the CTR programs of major employers. Strategies may include, but are not limited to: (i) Modifications of local policies and regulations, including the transportation concurrency system, street design standards, parking, and zoning; (ii) Investments in services and facilities, including transit services, nonmotorized facilities and amenities; and (RCW 70.94.527(5))(iii) Marketing and incentives. Transit agencies shall work with counties, cities and towns as a part of their six-year transit development plan established in RCW 35.58.2795 to take into account the location of major employer worksites when planning and prioritizing transit service changes or the expansion of public transportation services, including rideshare services. (WAC 468-63-040(2)(d))

¹⁰ Source: The plan shall describe ...how these services and strategies will support the CTR programs of major employers. (WAC 468-63-040(2)(d))

¹¹ Source: The plan shall evaluate the existing barriers to the success of the CTR program and identify how the jurisdiction and its partners can overcome these barriers. (WAC 468-63-040(2)(a))

compliance and encourage participation. Consistent treatment of CTR affected sites across South King County affected sites, many of which are manufacturing- or manual labor-oriented, continues to require a careful balancing act for the City as compared to worksites that lend themselves to work-from-home or transit-proximity.

Non-motorized access incomplete: Alternative commute options tend to not be competitive with driving alone and many CTR-affected worksites are situated in areas that have limited access for non-motorized modes. Buses may have low rates of reliability and frequencies. There is also the perception of security issues. With other commute options, the current infrastructure is uncomfortable for biking and walking as there are gaps in non-motorized infrastructure networks.

How addressing: The City is working with Metro and Sound Transit to prioritize and improve bus routes, as well as commute services for trips originating from Kent to other parts of the region. The City has constructed and will continue to build out protected bike lanes, shared-use paths, sidewalks, and pedestrian crossings. However, this is a multi-year effort. The City has made non-motorized connections more of a priority in the 2021 Transportation Master Plan (TMP) update, with increased multimodal projects and the annual Transportation Improvement Program update Prioritizes projects that meet more of the TMP's 5 goals, which include multimodal connectivity for local trips, like trips by foot and bike and first/last mile connections to transit. The City also continues to leverage development and redevelopment to help close gaps that are related to where development is happening.

Language barrier: In previous years, a challenge the CTR coordinator faced was a language barrier when employees at CTR-affected worksites were asked to complete the employee survey.

How addressing: The employee survey and program report are now administered on a new platform and are both offered in 14 languages.

15. Describe the transportation demand management technologies your jurisdiction plans to use to deliver CTR services and strategies.

King County Metro and Kent employees use the RideshareOnline.com platform to form car and vanpools, to track their use, and to promote and incentivize non-drive alone modes. They also use WSDOT's CTR tool to conduct CTR surveys and gather program reports and promote the regional transit trip planning application. Metro Flex is also available in Kent and the City plans to share the program as a resources for CTR-affected employees and Kent residents.

16. Transcribe or link to your local CTR ordinance.¹²

The City of Kent's CTR ordinance can be found here:

<https://www.codepublishing.com/WA/Kent/html/Kent06/Kent0612.html#6.12>

¹² Source: The plan shall describe the requirements for major employers that will be outlined in the local ordinance. (WAC 468-63-040(2)(e))

17. Describe your financial plan.¹³

a. Describe the estimated average annual costs of your plan.

Activity	Estimated average annual cost
Employer engagement*	\$25,000
Commute Trip Reduction 4-Year Plan	\$16,000
Performance reporting**	\$14,000
Administration and Coordination***	\$25,000
Total	\$80,000

* Includes identifying worksites and ETCs, conducting trainings, providing technical assistance, and reviewing employer CTR plans.

**Includes worksite surveys and program reports.

***Includes financial and program management and interagency coordination

b. Describe likely funding sources, public and private, to implement your plan.

All funding will come from the WSDOT Commute Trip Reduction grant.

18. Describe your implementation structure.¹⁴

a. Describe who will conduct the activities listed in your plan.

Activities in the plan will be conducted in large part by the City of Kent. Staff include the CTR Coordinator and City Transportation Planner.

b. Indicate who will monitor progress on your plan. List job title, department, and name.

Progress will be monitored by the CTR Coordinator and the City Transportation Planner as part of the Public Works department.

19. List your implementation schedule.¹⁵

a. Provide the timeline for anticipated projects.

1st Biennium

July 2025 – June 2027

- Identify CTR worksites and update Employee Transportation Coordinator (ETC) contact list
- Provide commute and other ETC services to city employees
- Train and provide technical assistance to ETCs
- Conduct financial and program management
- Schedule and conduct outreach and engagement events

¹³ Source: The plan shall describe the funding revenues from public and private sources that are reasonably expected to be available, as well as the expected costs, to implement the plan and achieve its goals and targets. (WAC 468-63-040(2)(g))

¹⁴ Source: The plan shall describe how the various strategies identified in the CTR plan will be implemented, either by the local jurisdiction, its partners, or its contracting partners... (WAC 468-63-040(2)(h))

¹⁵ Source: The plan shall describe ...when the elements of the plan are expected to be implemented. (WAC 468-63-040(2)(h))

- Engage in comprehensive, regional transportation and transit planning
- Provide transportation demand management technical assistance to capital projects
- Conduct 2025 Program Report
- Conduct 2026 Survey

2nd Biennium

July 2027 – June 2029

- Identify CTR worksites and update ETC contact list
- Provide commute and other ETC services to city employees
- Train and provide technical assistance to ETCs
- Conduct financial and program management
- Schedule and conduct outreach and engagement events
- Engage in comprehensive, regional transportation and transit planning
- Provide transportation demand management technical assistance to capital projects
- Conduct 2027 Program Report
- Conduct 2028 Survey
- CTR 4-Year Plan for 2030-2034

20. Describe the CTR plan for jurisdiction employees.¹⁶

- a. *Describe the services, programs, information, and other actions your city or county put in place to help its employees reduce their drive alone commute trips.*

The CTR Program Coordinator in the Public Works department, works alongside the HR Analyst in the Human Resources department who serves as the ETC for the City in its role as a CTR-affected worksite. The Transportation Engineering Manager and the Director of Public Works will provide oversight.

The CTR Coordinator and the HR analyst will work together to administer the program elements required of the employer including:

A review of employee commuting and reporting of progress toward meeting the single-occupant vehicle reduction goes to the City consistent with the method established in the CTR plan and the rules established by the Department of Transportation under RCW 70A.15.4060

Regular distribution of information to employees regarding alternatives to single-occupant vehicle commuting.

Implementation of the following measured designed to achieve the City's CTR plan goals:

- Provide and administer ORCA card subsidies
- Publicize promotional challenges and campaigns
- Conduct Lunch and Learn sessions for City staff to learn about various commute programs and how to sign up for the City's subsidy
- Serve as commuter advisor to employees

¹⁶ Source: *The plan shall also describe the program that the local jurisdiction will offer to its employees. (WAC 468-63-040(2)(e))*

- Provide briefings to various employee groups on the program and its benefits
- Administer CTR surveys and tabling sessions
- Report results of survey to City council and executive management
- Produce City of Kent's program report

21. Describe how the CTR plan for jurisdiction employees contributes to the success of the overall plan.¹⁷

a. Describe how the plan for jurisdiction employees reinforces the success of the jurisdiction plan?

The actions included in the city-as-employer plan indicate the city's commitment and are similar to those included in all the CTR-affected work site plans. Thus, they create a mutually reinforcing community focused on CTR. Employers know that the City is involved and committed to CTR along with them. The regular forums for employee transportation coordinators foster relationships through sharing experiences and best practices. They provide a place for mutual problem solving and support. This strengthens the program at all affected sites in the city.

Moreover, employees are making choices each day based on the commute they take, whether it is driving alone or an alternative mode. These choices are based on options, incentives, and needs. As the City, we provide the tools, resources, and education to help improve their information and available options in order to make that choice.

¹⁷ Source: *The plan shall also describe the program that the local jurisdiction will offer to its employees and how this contributes to the success of the overall plan. (WAC 468-63-040(2)(e))*

Alignment with plans

22. List the transit agencies that provide service in your jurisdiction.

- King County Metro
- Sound Transit

23. List the transit plans you reviewed while developing this plan.

King County Metro

Metro Connects (2021 Update)

The plan details how Metro conducted an equity gap analysis to identify households with the greatest need in transit service and make improvements in transit access. Among the services envisioned in the Metro Connects plan, connections to Kent East Hill was one of the identified equity focus areas, which would be improved through increased frequencies and an additional RapidRide branded service line. Metro evaluated bus routes to serve which areas and determined how transit access could be improved. Areas with equity gaps are defined as “areas with high proportions of high populations who are farther than one-quarter miles from local service or one-half mile from frequent service.” Metro Connects plans to evolve its transit service network by 2050 so that transit will be a more competitive option to driving alone by improving travel time savings and reliability. Another component of the 2050 transit service network is improving travel time savings between growth and manufacturing/industrial centers.

Strategic Plan for Public Transportation 2021-2031

This plan describes transportation challenges that abound due to displacement. Metro found data showing that low-income households in King County are being displaced from urban centers such as Seattle and moving into more affordable communities in south King County. These groups face longer and more challenging journeys to get to work, school, and other services. Fixed route service not as effective for communities that lack high population density and travel throughout the day as opposed to a 9-5 office schedule. This is a challenge for Metro and will work toward its vision of an equitable mobility system. Employ strategies that encourage dense, affordable housing near transit and minimize displacement. New mobility options need to be developed to tailor to the needs of these populations. Metro launched a feeder-to-fixed-route pilot in Kent to address needs of works in Kent industrial valley in 2022 called Ride-Pingo to Transit. The program was converted and rebranded as Metro Flex in 2023, expanded to corner-to-corner on demand service, similar to other Metro Flex served areas in King County. As of summer, 2024, the service is well received and utilized. However, the service is constrained by the number of available vehicles and operators in service, and can reach capacity in peak periods, leading to delays.

Sound Transit

Sound Transit’s Transit Development Plan 2024-2029

The Federal Way Link Extension will extend south with a station in the Kent Des Moines area. Although there are few Kent CTR sites near the anticipated Link Light Rail station, CTR will be essential in educating people on connecting Sound Transit’s light rail to multimodal networks, including Kent Station. The Kent/Des Moines Light Rail station is 4.1 miles away from Kent Station. Sound Transit Strategic Plan’s mission is to connect more people to more places.

24. Describe how this CTR plan supports the transit plans.

The City's CTR Plan supports the above transit plan through a variety of ways:

Employer engagement and promotion: Through engaging with CTR-affected worksites and promoting transit services, use of transit will increase through awareness and increased availability of subsidized transit passes. Planning for CTR enhances employer engagement and promotion of transit as a mode. New transit routes may lead to increased use of transit network development as well as awareness and involvement by larger businesses. There is also increased potential for transit use through awareness of incentives for transit passes, vanpool, and carpooling as viable alternatives to driving alone.

Incentive: Promoting incentive-based transportation demand management events, such as Switch Your Trips Washington, will encourage more workers to change drive-alone trips to transit or other alternative modes. Incentives provided through performance reports, including the employee survey and program report, may also lead to increased transit use and awareness.

Marketing: Increased marketing will increase employees' awareness of the transit options that are available. Marketing can be shared online through email communications, through employee surveys, and in-person events.

Engagement with the planning process: This increases awareness of and support for transit and other travel modes. Conversations around transportation options increase the visibility and interactivity of the decision-making process, which also supports more equitable outcomes. This involves engagement with CTR and addressing the needs of employees who may not work a typical 9-5 shift.

25. Describe any comprehensive plan updates that are needed and when they will be made.¹⁸

The Transportation Element of the Draft 2044 Comprehensive Plan update incorporates the multimodal goal and project updates from the Transportation Master Plan (2021), its focus on Underserved Communities for goal, policy, and project recommendations. The Draft 2044 Comprehensive Plan includes updates since 2021 to meet King County Countywide Planning Policies and Metropolitan Planning Policies, ensuring that the policies and regional goals are consistent across planning documents.

Engagement

26. Describe stakeholder engagement.¹⁹

a. Who did you talk to?

¹⁸ Source: The local jurisdiction shall review the local comprehensive plan to ensure that it is consistent with the local CTR plan. If the local jurisdiction determines that the local comprehensive plan needs to be updated or amended to be consistent with the local CTR plan, the local jurisdiction shall identify in the local CTR plan what changes may be needed and when the changes will be made. (WAC 468-63-040(1)(c))

¹⁹ Sources: The plan shall be developed in consultation with local transit agencies, the applicable regional transportation planning organization, major employers, and other interested parties. (RCW 70A.15.4020(4))

The local jurisdiction shall invite, as appropriate, representatives of major employers, local transit agencies, the applicable RTPO, business associations and economic development organizations, nonprofit transportation and land use advocacy organizations, pedestrian and bicycle advocacy organizations, public health agencies, tribal governments, and residents, employees and businesses that will be affected by the CTR plan to participate in the development of the local CTR plan.

Engagement included a range of people, including traditional CTR-affected stakeholders, the general public, and community based organizations. Engagement with traditional CTR stakeholders involved conversations with ETCs and employees from CTR-affected worksites. City staff contacted worksites via phone and email as well as visited in person. This period consisted of refreshing the CTR program after a hiatus in programming, informing worksites of the requirements, and offering training and educational sessions. The City also engaged with ETCs throughout Fall 2024 when administering the CTR Survey and reviewing the results.

Additionally, stakeholder feedback from traditional CTR stakeholders as well as the general public was gathered from an online engagement platform for the 2044 Comprehensive Plan's Transportation Element, presentation to City Council's Committee of the Whole, and receiving feedback through a CTR-specific 4-Year Plan website ([Engage.Kentwa.gov/ctr](https://engage.kentwa.gov/ctr)). City staff also presented on the CTR program and spoke with the Kent Bicycle Advisory Board.

b. When did you talk to them?

Engagement with ETCs and worksites took place in Spring and Summer 2024 when visiting worksites in person and contacting via phone and email. Additional engagement took place in Fall 2024 when the CTR survey was administered, including a presentation to City Council committee. Online engagement involving the 2044 Comprehensive Plan's Transportation Element occurred in Summer 2024. Engagement with Kent Bicycle Advisory Board occurred November 2024.

c. What did they have to say?

While administering the CTR survey and reviewing the results in Fall 2024, ETCs and employees at CTR-affected worksites expressed common themes in the challenges they face regarding alternative transportation options. For instance, worksites are not conveniently located near transit stops, transit availability does not match shift work schedules, concerns for security on transit, and that the need for flexibility by driving alone is essential. Moreover, free parking is provided at most of the worksites and therefore, there is a lack of incentive to encourage alternative commute options or to offer commute benefits. Additionally, some worksites in Kent are manufacturing and warehousing facilities, which cannot allow for teleworking for most employees. Fluctuating employment term-periods and turnover make vanpool arrangements less attractive for shift work at some of the larger manufacturing sites.

In the 2044 Comprehensive Plan online engagement, respondents indicated their support for and the importance of four policy directions related to CTR and travel demand management, generally, which were:

- Prioritize street and sidewalk maintenance using local funds, and grants to expand access for pedestrians, bicyclists, and transit users.

The state intends for the invited partners to work collaboratively with the local jurisdiction by providing data and plans and discussing opportunities, including new and reprioritized investments and policy changes, to reduce drive-alone commute trips in the jurisdiction and increase transportation access to affected major employer worksites. (WAC 468-63-040(1)(b)(i))

The plan shall include documentation from the local jurisdiction that verifies consultation with employers, transit agencies and others to develop the plan. (WAC 468-63-040(2)(f))

- Focus transportation investments in proposed growth areas where existing and future residents and business can take advantage of transit, biking, sidewalks, and other walking/rolling improvements to reduce vehicle trips on streets.
- Increase the number of people who use transit, walking, and bicycling instead of single occupancy vehicles (e.g., driving alone).
- Increase the use of carpooling, vanpooling, transit and other means of getting to work, focused on balancing various modes of travel.

The highest levels of support were given to the first policy direction around street and sidewalk maintenance, followed by the second and third policy directions. Respondents gave moderate levels of support toward the last policy direction around alternative modes of getting to work. Additional comments related to these policies include:

- There is no need for additional public awareness or education, as the public is aware of transportation options. Rather, accessibility and availability continues to be a limiting challenge.
- Support for improving sidewalks and making streets safer.
- Reducing the spread-out pattern of development and overreliance on cars.
- Interest in increasing transportation options.
- Improving security on transit.

Lastly, the Kent Bicycle Advisory Board provided feedback and recommendations on community groups to contact regarding community outreach opportunities.

d. How did what they said influence the plan?

The City will continue to build relationships and connections with CTR-affected businesses, share commute alternatives, benefits, and opportunity information, and conduct in-person visitations and events to increase awareness and encourage participation. This helps to build trust and connections between the City, businesses, and their employees – even though they may not take advantage of the commute trip reduction program themselves, they may be encouraged that the options are available and utilized where it is beneficial. There will also be a continued emphasis on user-driven opportunities of carpools, vanpools, and vanshares in outreach and education, due to ongoing service and/or funding challenges projected for local public transit in the near-term.

27. Describe vulnerable populations considered.

In the 2021 TMP, the City compiled an Underserved Community score to understand, inform and guide policy discussion on the intersection of equity populations. The Underserved Community score represents

an equity index of the communities that have fewer transportation options that could be due to historical disadvantages and underinvestment including:

- People of color
- Low-income households (less than \$50,000 per year, 200% of the federal poverty line)
- Limited English proficiency
- People with disabilities
- Youth (Under 18)
- Seniors (65 and older)

To better understand how transportation investments may benefit or burden historically disadvantaged communities, the City identified areas within Kent with a high concentration of Underserved Communities which informed the City's Transportation Master Plan's goals, plans, and projects.

Additional tools and indexes used to assess community needs, risks, and spatial evaluation, are the State's Overburdened Communities (2021) and Federal CEJST Disadvantaged Communities (2022). As Kent's demographics continue to shift, the city will continue to rely on data and collaborate with community members and partners to advance equity to meet the community's evolving needs.

28. Describe engagement focused on vulnerable populations.

a. Who did you talk to?

The CTR 4-Year plan engagement and outreach included a combination of virtual and in-person events, including functionality for vulnerable populations such as translation and in-person promotion options. The draft plan was made available for public review on the <https://engage.kentwa.gov> website. The website includes a survey to allow for public feedback on the plan. The website and survey are available in multiple languages. The survey asked the following questions with multiple choice selection along with demographics questions:

- Thinking about employers of larger businesses in Kent, what would be the most effective ways that companies can encourage more employees to take alternative modes of getting to work? Select up to three.
- Also thinking about employers of larger businesses in Kent, which modes would you like to see employees in Kent using more? Select up to three.
- Considering your employer, whether you work in Kent or elsewhere, what commuter incentives or subsidies do they offer?
- How would you benefit from the CTR program if employees in Kent reduced driving alone?

To promote the survey, the City reached out to community based organizations in Kent in person and virtually with a combination of CTR awareness information and 4-Year Plan Draft information. Staff visited six organizations in person to share information about the CTR program and to encourage their staff and patrons to take the survey. These organizations included Peer Kent, Refugee Women's Alliance, Kent Youth and Family Services, Integrated Living Services, and UTOPIA.

Staff also held tabling events at the Kent YMCA Community Day and at the Kent Senior Center with Indian American Community Services. At these events, participants took the survey on the engage.kentwa.gov website and shared questions and feedback.

For those responding and also filling in demographic questions, the survey received 19 responses. Demographics of respondents included a higher response rate from persons aged 60 years and up. Asian was indicated as the race for five responses, two for White, one for American Indian or Alaska Native, and one for Native Hawaiian or Pacific Islander. Income levels range from Under \$30,000 up to \$61,000-\$75,0000.

b. When did you talk to them?

Both in-person outreach and online engagement were conducted throughout Fall 2024.

c. What did they have to say?

Respondents in the engage.kentwa.gov online survey shared that carpool/vanpool and transit subsidies, carpool/vanpool ride matching assistance, guaranteed ride home for emergencies, and dedicated carpool parking spots would be the most effective ways that companies can encourage alternative commutes. They also want to see more employees in Kent taking transit, carpooling, and working from home – supporting the note above that though respondents may not benefit directly from CTR, they benefit from others who do. Among the comments included the belief that they would benefit from CTR due to less congestion and vehicle traffic, improved air quality through reduced pollution, and an increased presence in people walking and biking in the City. Staff at each of the CTR-engaged sites also expressed appreciation for the local-sourced food provided as incentive and encouragement for the engagement and participation where provided.

d. How did what they said influence the plan?

The City will continue to build relationships and connections with community-based organizations and reach underrepresented populations, including those employed at CTR-affected worksites which include entry-skill and family-wage jobs some populations need. Staff will share out information and conduct in-person visitations or events. This helps to build trust and connections between the City and its communities. The City will continue to partner with King County Metro to promote transportation programs for low-income populations, such as the discounted Vanpool Pilot Program and Metro Flex.

29. List employers' suggestions to make CTR more effective.²⁰

While administering the CTR survey and reviewing the results in Fall 2024, ETCs and employees at CTR-affected worksites expressed common themes in the challenges they face regarding alternative transportation options. For example, transit stops or service lines not being conveniently located near worksites, transit availability not matching shift work schedules, concerns for security on transit, and

²⁰ Source: *The state intends for the plan to be a mechanism through which employers can describe what policy changes, services and support they need to make their CTR programs more effective. (WAC 468-63-040(2)(a))*

that the need for flexibility by driving alone being essential. Moreover, availability of free parking at most worksites provides little disincentive compared to other commute options. Additionally, some worksites in Kent fall under the manufacturing and warehousing industry, which does not benefit from telework in the way that office-based work does, generally. In response, the City will tailor its CTR program outreach and education with these challenges in mind and promote transportation programs that may better suit a broader spectrum of the City, such as Metro Flex and carpool/vanpool. This way City staff can best assist employers and employees in alternative commute options.

30. Describe results of engagement focused on vulnerable populations that will be provided for use in comprehensive plan and transit plan updates.

All engagement for City of Kent's CTR Plan will be influential in the upcoming 2026-2031 Transportation Improvement Program as well as the Transportation Master Plan. These plans will inform future Comprehensive Plan updates as well. These plans and the CTR Plan will be updated and drafted alongside each other with open communication between the teams and departments writing all plans.

Regional transportation planning organization CTR plan review

RTPO comments

Attached under PSRC letterhead.