

**CITY OF SEATTLE**

**ANALYSIS AND DECISION OF THE DIRECTOR  
OF THE DEPARTMENT OF PLANNING AND DEVELOPMENT**

**SEPA Threshold Determination  
for  
Transportation Management Programs (TMP) Director’s Rule Update**

**Project Sponsor:** City of Seattle Department of Planning and Development

**Location of Proposal:** This proposal affects development proposals in most zones, e.g., where larger developments (generally non-residential) could be required to create TMPs. This may include low density and residential zones where institutional uses may be permissible.

**BACKGROUND**

**Proposal Description**

In Seattle’s codes, TMPs are impact-mitigating instruments that record sets of strategies that will be pursued in given locations by building owners and tenants for the purpose of improving efficiencies in transportation and parking performance. TMPs are prepared and reviewed during permitting processes, and are included where required as conditions of approval. These commitments aid in accomplishing performance levels that enable levels of transportation system performance that support ongoing functionality and efficiency even as growth occurs. Over the long-term, this is recognized as an important factor in the overall capabilities of the city to maintain livability and sufficient circulation capabilities for individual residents and employees.

The current DPD Director’s Rule 10-2012 explains numerous details about how TMPs should be prepared and their contents. The current action revises and expands the contents of the Rule and makes it a joint DPD and Seattle Department of Transportation (SDOT) Director’s Rule. SDOT staff and DPD staff provide monitoring and enforcement of TMPs over time. The proposal updates Director’s Rule 10-2012 with numerous edits that are intended to provide up-to-date information about contents and preferable strategies of TMPs. The edits provide additional background explanation of the rationales supporting several possible elements, and their applicability to future development, and also add a definition of a TMP and a soft threshold for TMPs for non-residential developments at 100,000 square feet or greater (but not precluding requirement of TMPs for smaller developments if they are deemed warranted by future reviews of development proposals).

The edits also consolidate indications in a table about when certain elements must or should be included, by eliminating a “location dependent” column and changing the guidance to be either “required for all projects” or “recommended.” Examples of changes in this guidance include the following previously-included strategies that will become newly required:

- “Participation in a transportation management association where available”;

- “Provide bicycle storage and amenities that meet City standards”;
- “Provide or require tenants to offer transit pass subsidy to employees who work at the site”;
- “Provide information about ride-match opportunities”;
- “Participate in transportation promotion and encouragement programs”;
- “Offer guaranteed ride home.”

Other items that are new strategies added to the Rule include:

- “Building Transportation Coordinator will attend at least 1 training per year” will become a required item;
- “Participate in e-Park or other low-rate parking programs” (recommended item);
- “Contribute to cost of providing on-site bike share station” (recommended item);
- “Provide shared vehicle/bicycle fleets for tenant use” (recommended item);
- “Provide or require tenants to offer bike share membership to all employees who work at the site” (recommended item).

Similarly, other items will change from being “location dependent” strategies to “recommended” strategies. These include:

- “Reduce parking supply below market demand...”;
- “Provide more bicycle parking than required by code”;
- “Provide on-site commuter shower and locker facility”;
- “Provide reserved spaces for registered vanpools...”;
- “Provide parking discount for carpools”;
- “Offer telecommuting program for employees...”;
- “Allow flexible working hours”;
- “Provide subsidy to employees for car-sharing program”; and
- “Provide subscription bus service or shuttle to site.”

## **ANALYSIS - OVERVIEW**

The following describes the analysis conducted to determine if the proposal is likely to have a *probable significant adverse environmental impact*. This threshold determination is based on:

- *the proposal*, as described above and in memoranda;
- the information contained in the *SEPA checklist*;
- additional information, such as analyses prepared by City staff; and
- the experience of DPD analysts in reviewing similar documents and actions.

## **ELEMENTS OF THE ENVIRONMENT**

Adoption of the proposed Rule amendments would result in no immediate adverse short-term impacts because the adoption would be a non-project action. The discussion below evaluates the potential long-term impacts that might conceivably result from differences in future development patterns due to the proposed Rule amendments.

### **Natural Environment**

#### **Earth, Air, Water, Plants and Animals, Energy, Natural Resources, Environmentally Sensitive Areas, Noise, Releases of Toxic or Hazardous Materials**

The proposal would not likely cause significant or adverse increases in potential for discharges to water, emissions to air, release of toxic or hazardous substances, or noise generation. Rather, by enabling more efficiently defined and effective TMPs it would be likely to help moderate the patterns of transportation by non-residential uses by reducing the frequency of single-occupant vehicle travel, and supporting increased use of transit, walking, bicycling, etc., which would tend to reduce the potential for worst-case impacts to water, air and regarding toxics hazards and noise generation. This is due in part to the general contributions of vehicle traffic to air pollution, and water pollution (through runoff), which are likely to be indirectly reduced through the implementation of this proposal. For the same reasons, the proposal would not likely cause significant or adverse increases in potential impacts upon plants, animals, fish or marine life.

### **Built Environment**

#### **Land & Shoreline Use, Height/Bulk/Scale**

No adverse land use impacts, compatibility impacts or height/bulk/s cale impacts are identified as probable due to this proposal. The proposal improves explanations about the rationale for, and details about, numerous particular elements of TMPs. Most of these relate to programmatic details about the future definition and implementing of transportation/parking management strategies that will be used to encourage use of alternatives to single-occupant vehicle driving for commuting purposes. Most of these details would have little or no bearing on the potential for adverse built environmental impacts of future development itself. Guidance that encourages less parking for vehicles could in operation lead to positive impacts, by encouraging lesser levels of traffic impacts (including impacts generated by traffic circulating in the neighborhood for parking reasons) with fewer physical impacts of development upon the urban environment. Land use-related physical differences would likely be subtle – for example, providing less parking could enable less above-ground exposure of parking garage spaces to outdoor areas. Such differences conceptually could assist in allowing future development designs that are more compatible with area land use patterns.

The changes and additions to the Rule indicated in the Proposal Description are nearly all about programmatic elements or choices that have little or no direct bearing on environmental impacts. However, aspects such as bicycle area requirements and shower room requirements are likely to positively influence the future design and quality of buildings, and the recommended ability to streamline or reduce parking provided means that future buildings could be built more efficiently

with fewer financial resources dedicated to parking facilities that are inherently a “drag” on building costs and a negative factor in architectural design flexibility.

### **Transportation, Public Services and Utilities**

TMPs are impact-mitigating instruments that are in many cases required for new development in Seattle, and thus they will inherently reduce the potential for transportation and parking impacts. The proposed amendments would not result in direct adverse impacts on transportation, public services or utilities. Rather, the probable effects of a well-defined TMP program for future developments will be positive, by helping accomplish more efficiently designed buildings with fewer potential impacts on transportation systems and lesser likelihood of effects upon public service demands such as police and fire protection.

The elements of changes and additions to the Rule indicated in the Proposal Description are nearly all about programmatic elements or choices that have little direct bearing on environmental impacts. However, aspects such as parking program improvements, more mobility/mode choice options, bicycle area requirements and shower room requirements are likely to positively influence the ability of building users to make transportation choices that are preferable to single-occupant vehicle travel, and thus would contribute to positive transportation system impacts over time.

### **DECISION - SEPA**

This decision was made after review by the responsible official on behalf of the lead agency of a completed environmental checklist, the proposed Code amendment, and other information on file with the responsible department. This constitutes the Threshold Determination and form. The intent of this declaration is to satisfy the requirement of the State Environmental Policy Act (RCW 43.21.C), including the requirement to inform the public of agency decisions pursuant to SEPA.

- Determination of Non-Significance. This proposal has been determined to not have a significant adverse impact upon the environment. An EIS is not required under RCW 43.21C.030(2)(c).
- Determination of Significance. This proposal has or may have a significant adverse impact upon the environment. An EIS is required under RCW 43.21C.030(2)(c).

### **RECOMMENDED CONDITIONS - SEPA**

None.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_  
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Department of Planning and Development