



**Spokane Regional  
Transportation Council**

# **COMPREHENSIVE PLAN MANUAL UPDATE**

**Adopted by the SRTC Board of Directors 01/08/2026**

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**RESOLUTION  
of the BOARD OF DIRECTORS of the  
SPOKANE REGIONAL TRANSPORTATION COUNCIL  
R-26-03**

**ADOPTING THE VEHICLE MILES TRAVELED FRAMEWORK AND COMPREHENSIVE PLAN CERTIFICATION  
PROCESS UPDATE**

WHEREAS, the Spokane Regional Transportation Council (SRTC) Board of Directors serves as the Metropolitan Planning Organization (MPO) for the Spokane Metropolitan Planning Area (SMPA) and as the Regional Transportation Planning Organization (RTPO) for Spokane County; and

WHEREAS, SRTC partnered with the Washington State Department of Transportation to develop a regional Vehicle Miles Traveled Framework; and

WHEREAS, the Washington State Growth Management Act requires that RTPOs certify that the transportation elements of jurisdiction's comprehensive plans and the countywide planning policies are consistent with the regional transportation plan, Horizon 2050; and

WHEREAS, the Washington State Growth Management Act requires that RTPOs certify that the comprehensive plans and countywide planning policies meet the requirements of RCW 36.70A.070

WHEREAS, the Vehicle Miles Traveled Framework and Comprehensive Plan Certification Process Update has been developed under the direction of the SRTC Board in consultation with local government staff, Washington State Department of Transportation (WSDOT), and Spokane Transit Authority (STA); and with input from members of the public; and

NOW, THEREFORE BE IT RESOLVED, that the SRTC Board: adopts the Vehicle Miles Traveled Framework and Comprehensive Plan Certification Process Update.

**ADOPTED: 01/08/2026**

**ATTEST**

A handwritten signature in black ink, appearing to read "Anadia Grier".

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Anadia Grier  
SRTC  
Clerk of the Board

A handwritten signature in black ink, appearing to read "Cris Kaminskas".

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Mayor Cris Kaminskas  
City of Liberty Lake  
Chair, SRTC Board of Directors

# SRTC Comprehensive Plan Manual Update

## Introduction

As a Regional Transportation Planning Organization (RTPO) for Spokane County, SRTC is required under Growth Management Act (GMA) to certify that the **transportation elements of comprehensive plans** adopted by member agencies are consistent with the currently adopted regional transportation plan and, as applicable, conform with the requirements of Comprehensive Plan Mandatory Elements. SRTC is also required to establish guidelines, in cooperation with the member agencies, that provide direction for evaluation of the transportation elements as part of the certification process. SRTC last updated their Comprehensive Plan Certification Manual, which provides the required guidance for the Comprehensive Plan review process, in September 2015.<sup>1</sup> The GMA had major changes in 2022 and 2023 which impact the transportation certification review. Key changes include the requirements to include:

- A climate change and resiliency element that is designed to result in reductions in overall greenhouse gas emissions and enhance resiliency to avoid the adverse impacts of climate change. It must include efforts to reduce localized greenhouse gas emissions and avoid creating or worsening localized climate impacts to vulnerable populations and overburdened communities. The climate change and resiliency element must also include:
  - A greenhouse gas emissions reduction sub element
  - A resiliency sub element
- A transition plan for transportation as required in Title II of the Americans with Disabilities Act of 1990 (ADA).
- Identification of state and local system needs to equitably meet current and future demands. Local system needs should reflect the regional transportation system and local goals and strive to equitably implement the multimodal network.
- Multimodal level-of service (MMLOS) standards for all locally owned arterials, locally and regionally operated transit routes that serve urban growth areas, state-owned or operated transit routes that serve urban areas if the department of transportation has prepared such standards, and active transportation facilities to serve as a gauge to judge performance of the system.
- Inventory of active transportation facilities (inventory of multimodal facilities). Development impacts can be mitigated through active transportation facility improvements, increased or enhanced public transportation service, ride-sharing programs, demand management, or other transportation system management strategies funded by the development.

Additionally, in 2021 the state legislature passed SSB 5689, which directed the Washington State Department of Transportation (WSDOT) to develop a process for

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<sup>1</sup> SRTC Plan Review and Certification Process Instruction Manual [https://www.srtc.org/wp-content/uploads/2025/02/Plan-Review-and-Certification-Instruction-Manual\\_Sept\\_10\\_compressed.pdf](https://www.srtc.org/wp-content/uploads/2025/02/Plan-Review-and-Certification-Instruction-Manual_Sept_10_compressed.pdf)

establishing Vehicle Miles Traveled (VMT) targets. In response, WSDOT has issued guidelines for future VMT target setting as part of the Regional Transportation Plan (RTP).

Finally, Senate Bill (SB) 5412, Infill and housing development categorical exemption under the State Environmental Policy Act (SEPA), was codified in RCW 43.12C.229. SB 5412 allows proposed housing within urban growth boundaries to rely on environmental reviews completed at the comprehensive planning level rather than the individual project level, provided that certain criteria are met.

This memorandum provides recommendations for an update to the SRTC Comprehensive Plan Certification Manual to facilitate SRTC's review of Comprehensive Plans to reflect:

- Changes to the GMA
- An updated RTP, Horizon 2050 (in process)
- VMT target setting
- Senate Bill (SB) 5412, Infill and housing development categorical exemption (See Attachment A)

It is in part based on peer reviews of other Washington RTPOs certification manuals as well as interviews with the agencies to learn what is working well and could be improved.

## Peer Review

Certification manuals from the following agencies were reviewed to assess the state of the practice from other Washington State RTPOs:

1. Whatcom County Council of Governments (WCOG)
2. Southwest Washington Regional Transportation Council (RTC)
3. Puget Sound Regional Council (PSRC)
4. Thurston Regional Planning Council (TRPC)

## Key Findings

- The manuals and checklists have all been updated in the last 3 years to reflect the Comprehensive Plan update cycle and changes to the GMA.
  - The updated manuals do not address WSDOT VMT target setting. VMT reduction is addressed in the checklists as part of the GMA related to identifying actions for reducing GHG emissions and per capita VMT.
  - The updated manuals do not provide a methodology for determining MMLOS. Questions on the checklists address the requirements to include MMLOS and actions if services fall below an established MMLOS standard.
- The manuals typically include a general guidance document outlining the regulatory framework and certification process as well as a checklist for use in evaluating the comprehensive plans.

- Manuals generally provide a high level summary of relevant regulations with links to the full regulations.
- Most agencies use a single checklist for all consistency reviews (PSRC has multiple checklists).
  - RTC, PSRC, and TRPC require the applicant to complete the checklist as part of the submittal.
  - WCOG completes the checklist once the comprehensive plan has been submitted.
  - SRTC’s 2015 manual includes a checklist for use by jurisdictions to help guide consistency of the comprehensive plan but jurisdictions are not required to submit the checklist to SRTC. SRTC completes the checklist as part of the review process.
- Some checklists are divided by typical comprehensive plan elements, some by the RTP guiding principles/goals, and some by the GMA mandatory elements.

A comparison summary of manuals is presented below followed by additional detail on VMT target setting and MMLOS.

**PEER REVIEW SUMMARY OF CERTIFICATION MANUALS**

Agency	2015 Certification Manual	Existing LOS/MMLOS Guidance
<b>SRTC</b> Plan Review and Certification Process Manual  Adopted 2015 (69 pages including 2 checklists)	1. Executive Summary 2. Purpose and Responsibility/Authority 3. Certification Process 4. Certification Criteria 5. Regional Level of Service Performance Analysis  <b>Key Appendices</b> <ul style="list-style-type: none"> <li>• Full Regulations</li> <li>• RTP Guiding Principals</li> <li>• Checklists (UZA and Non UZA) and list of required documentation</li> <li>• Regional Figures</li> </ul>	Outlines methodology for performing a regional LOS analysis using the regional travel demand model for the land use change and the transportation facility within the transportation element, Capital Facilities Plan, or Capital Improvement Program. Includes LOS for: <ul style="list-style-type: none"> <li>• Vehicular</li> <li>• Transit</li> <li>• Non-motorized</li> </ul>
<b>Whatcom Council of Governments (WCOG)</b> Development and Evaluation Process for Comprehensive Plan Transportation Elements  Approved July 2024 (6 pages including 1 checklist)	1. Purpose and Responsibility/Authority 2. Review and Certification Steps 3. Single Checklist	<ul style="list-style-type: none"> <li>• No guidance related to LOS/MMLOS beyond referring to RTP.</li> </ul>
<b>Puget Sound Regional Council (PSRC)</b> Vision 2050 Planning Resources Plan Review Manual  Adopted September 2022	1. Purpose and Responsibility/Authority 2. Review Process by Plan Type 3. Separate VISION consistency tools for each plan type: 1) countywide planning policies, 2) local comprehensive plans, 3)	<ul style="list-style-type: none"> <li>• No guidance related to LOS/MMLOS beyond referring to RTP</li> </ul>

Agency	2015 Certification Manual	Existing LOS/MMLOS Guidance
(77 pages + 4 checklists)	transit long-range plans, and 4) regional center plans. The tools provide discussion questions and highlight applicable requirements.  <b>Key Separate Documents</b> <ul style="list-style-type: none"> <li>• Checklists (Mirrors the consistency tools in manual)</li> <li>• FAQs</li> <li>• Robust web page with resources <a href="https://www.psrc.org/our-work/plan-review">https://www.psrc.org/our-work/plan-review</a></li> </ul>	
<b>Thurston Regional Planning Council (TRPC)</b> TRPC Comprehensive Plan Review Guidance & Certification Checklist Adopted November 2024  (6 pages including 1 checklist)	<ol style="list-style-type: none"> <li>1. Purpose and Responsibility/Authority</li> <li>2. Submittal Requirements</li> <li>3. Certification Determinations</li> <li>4. Single Checklist</li> </ol>	<ul style="list-style-type: none"> <li>• No guidance related to LOS/MMLOS beyond referring to RTP</li> </ul>
<b>Southwest Washington Regional Transportation Council (RTC)</b> Comprehensive Plan Review and Certification Guidebook –  Draft March 2025 (17 pages+ 1 checklist)	<ol style="list-style-type: none"> <li>1. Purpose</li> <li>2. GMA Requirements and Roles</li> <li>3. RTP Goals and Objectives</li> <li>4. Multimodal LOS Consistency</li> <li>5. Certification Process</li> </ol> <b>Appendix</b> Single Checklist	“The RTP recognizes that the LOS standards for locally owned arterials and transit routes will be set by local jurisdictions in their local comprehensive plans, and measurement of LOS occurs at the local, not regional, level. The role of RTC regarding LOS is to monitor and support the consistency requirements in the GMA. A table outlines the MMLOS set by WSDOT, CTRAN, and local agencies for their transportation facilities.”

## VMT Target Setting

*Per capita VMT is the number of miles traveled in a calendar year divided by the number of residents. The calculation excludes freight vehicle miles.*

VMT target setting guidelines are outlined in the WSDOT's VMT Targets – Final Report (WSDOT VMT Reduction Report (June 2023)<sup>2</sup> and the Implementation of Vehicle Miles Traveled Targets and Supporting Actions – Interim Report, June 2024.<sup>3</sup> The WSDOT Vehicle Miles of Travel (VMT) Target – Final Report made the following **recommendations** related to RTPOs. RTPOs **should**:

- Set local per capita VMT targets at the regional scale RTPOs based on what is feasible and likely to occur over the timeframe of long-range plans.
- Confirm that the comprehensive plan includes goals, policies, and strategies to reduce per capita VMT consistent with the regional target, when certifying the transportation elements.
- Perform an equity analysis prior to the finalization of regional VMT reduction targets.
- If an RTP is forecast to fail to meet the regional VMT reduction targets, use project selection criteria that favors transportation projects that would not increase roadway capacity (e.g., state of good repair, cross section reallocation, transit, active mode infrastructure, safety, etc.) unless the plan is accompanied by a statement of overriding considerations.
- Provide technical assistance to member jurisdictions to support land use decisions under GMA processes.

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*WSDOT is required to provide per capita VMT data by city. WSDOT uses the Highway Performance Monitoring System (HPMS) data. This data does not include all local roadways and counts all movements on through an area regardless of where they start or stop.*

*WSDOT has also provided data that includes the per capita VMT of both (1) people living in a place, and (2) people working in a location at a census block level. Information on per capita VMT by city and for parts of cities (e.g., census block groups) enables jurisdictions to choose strategies that would best respond to the needs of people who live and work within*

The guidance also states that there should be no enforcement/punitive actions against regions, cities, counties, or agencies if the VMT per capita is not decreasing in proportion to the VMT reduction target. Instead, resources should be directed to actions that can help improve performance.

At this time, there is no requirement that jurisdictions establish per capita VMT reduction targets at the regional or local level; therefore, it is not required as part of the Comprehensive Plan consistency review. At the regional level, peer agencies are:

- Monitoring and improving VMT estimation capabilities.
- Setting goals of reducing per capita VMT in support of the GMA climate change and resiliency mandatory elements.

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<sup>2</sup> Washington State Department of Transportation. (2023). *Vehicle Miles of Travel (VMT) Targets – Final Report*. Retrieved from <https://wsdot.wa.gov/sites/default/files/2023-06/VMT-Targets-Final-Report-June2023.pdf> on November 20, 2024.

<sup>3</sup> WSDOT. <https://wsdot.wa.gov/sites/default/files/2024-07/Implementation-VMT-Targets-Supporting-Actions-Interim-Report-June2024.pdf>

- Using the regional travel demand model and HMPS data to establish per capita VMT trends.
- Awaiting further guidance from WSDOT regarding the target setting.

## Multimodal Level of Service (MMLoS)

The transportation element of local comprehensive plans must include MMLoS standards, defined as the “minimum standards for how many public facilities or services are required to adequately serve the population.” MMLoS methodologies and standards consider the four major modes of travel (vehicle, transit, bicycle, and pedestrian), their impacts on each other as they share the street or intersection, and their mode specific requirements roadway design and operation. Concurrency requirements are summarized below.

Multi-Modal Level of Service Concurrency Requirements		
Concurrency Review Guidance		
<p><b>GMA Procedural Criteria for Adopting Comprehensive Plans and Development Regulations</b> <a href="#">WAC 365-196-840</a></p> <p>Concurrency ensures public facilities are available to serve new development at the time of occupancy, or within a specified time.</p>	<ul style="list-style-type: none"> <li>■ Counties and cities should set local MMLoS standards to reflect realistic expectations consistent with the achievement of growth aims.</li> <li>■ The MMLoS standards adopted by the county or city should vary based on the urban or rural character of the surrounding area and should be consistent with the land use plan and policies.</li> <li>■ The comprehensive plan should provide a strategy for responding when approval of any particular development would cause levels of service for concurrency to fall below the locally adopted standards.</li> </ul>	<ul style="list-style-type: none"> <li>■ Level of service standards for locally owned arterials and transit routes should be regionally coordinated.</li> <li>■ Levels of service for highways of statewide significance are set by the WSDOT.</li> <li>■ For other state highways, levels of service are set in the regional transportation plan. Local levels of service for state highways should conform to the state and regionally adopted standards.</li> <li>■ Other transportation facilities may reflect local priorities.</li> </ul>

Based on the WSDOT 2024 Highway System Plan, WSDOT is developing new MMLoS standards for state facilities. WSDOT is currently considering new MMLoS standards that incorporate the land use context. The standards for state facilities remain in effect until new standards are formally adopted. Local agencies are required at a minimum to incorporate the LOS standards established for both the HHS and regional state highway facilities (or non HSS) into the transportation elements.

State Facilities	MMLoS Standards	Concurrency
<p><b>State Highways of Statewide Significance (HSS)</b></p> <ul style="list-style-type: none"> <li>• I-90</li> <li>• US 2</li> <li>• US 195</li> <li>• US 395</li> </ul>	<p>Set by WSDOT (RCW 47.06.140):</p> <ul style="list-style-type: none"> <li>• LOS C in rural areas (outside urban growth areas)</li> <li>• LOS D in urban areas</li> </ul>	<p>HSS are statutorily exempt from local concurrency requirements; however, the transportation element must address the land use impact on the state highway facilities.</p>

<p><b>State-Owned Transportation Facilities (Non-HSS)</b></p>	<ul style="list-style-type: none"> <li>The regionally coordinated MMLOS standards adopted by SRTC in the RTP apply.</li> </ul>	<p>The law is silent in terms of including or exempting them from local concurrency rules, unless they are locally owned, such as SR 291 and SR 27, and then they would be subject to concurrency.</p>
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SRTC and peer agencies have taken the following approaches for non-HSS regionally significant state highway facilities:

- **SRTC (Horizon 2045 December 2021).** The RTP does not identify LOS standards. It states “As part of its review and certification process, SRTC evaluates regional LOS for the following modes: vehicular, transit, and non-motorized (combined bike/walk). SRTC’s regional vehicular LOS is evaluated for regional mobility corridors with data taken from the SRTC regional travel demand model. For vehicular LOS on interrupted flow facilities, SRTC conducts a corridor-level travel time analysis and for vehicular LOS on uninterrupted flow facilities, SRTC conducts the analysis using corridor-level vehicular volumes. For transit LOS, SRTC evaluates systemwide ridership and for non-motorized LOS, mode share is analyzed.” The 2015 Comprehensive Plan Certification Manual outlines the data required from local jurisdictions and a methodology for measuring regional LOS using the travel demand model.
- **RTC (Clark County RTP) (February 2024).** LOS ‘E’ or better for non-HSS urban state highway facilities and LOS ‘C’ or better on rural non-HSS facilities. Includes Regional Performance Measures for other modes to measure and monitor MMLOS.
- **WCOG (2045 RTP).** LOS C if the route is in a rural area and LOS D if it is in an urbanized area.
- **Benton Franklin Council of Governments (Transition 2045).** For urban areas over 5,000 in population the uniform LOS is “D”. For rural areas and small cities under 5,000 in population the uniform LOS is “C”.
- **TRPC (Draft 2050 RTP).** During the two-hour p.m. peak, the regional vehicle LOS standards are as follows: LOS E or better in urban centers and corridors. LOS D or better elsewhere inside city limits, urban growth boundaries, and rural/urban transition areas. LOS C or better elsewhere in rural areas. TRPC is considering the feasibility of establishing a regional MMLOS, which would set performance goals for transit, bicycle, and pedestrian facilities in addition to vehicles.

## Manual Update Recommendations

Based on a review of peer agency checklists and changes to the GMA, the following recommendations for updating the manual include:

### General Questionnaire

- Simplify manual.
  - Provide a summary of regulatory requirements with links to relevant code sections.
  - Keep manual generic, not tied to specific RTP, to facilitate future updates.
  - Remove Level of Service Performance Analysis (it remains part of the RTP)
  - Remove Appendices
- Develop a fillable form for the checklist with active links to relevant codes and update questions to address GMA changes related to climate change and resiliency and MMLOS.
- Consider requiring the agency to complete and submit application. This helps them identify and address any potential gaps before submittal.

### VMT

- At this time, there is no requirement that jurisdictions establish per capita VMT reduction targets at the regional or local level; therefore, VMT reduction targets are not required as part of the consistency review.

### Senate Bill (SB) 5412, Infill and Housing Development Categorical Exemption

Two additional review questions should be considered to enhance regional coordination and consistency with RCW 43.12C.229.

- If an Infill and housing development categorical exemption is being requested per RCW 43.12C.229, does the environmental analysis address the proposed use or density and intensity of use and analyze multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system?
- Is consultation with WSDOT on impacts to state-owned transportation facilities clearly documented, including any necessary mitigation?

### MMLOS

- SRTC should continue to set the regional MMLOS for **Non-HSS State-Owned Transportation Facilities**.
  - The regional travel demand model should be used to inform regional transportation policy decisions and provide forecasts (including MMLOS) for transportation plans, studies, and projects. The regional nature of the model inputs and outputs limits the model's sensitivity at the local scale which is why

- local agencies use a traffic impact analysis methodology to assess local impacts from developments.
- The GMA requires that local agencies set the MMLOS standards for **local arterials** and transit routes but does not prescribe what these standards should be. Measurement of the MMLOS should occur at the local, not regional level.
  - SRTC is required to review MMLOS methodologies used by cities and counties to promote a consistent regional evaluation of transportation facilities and systems. When reviewing comprehensive plans for MMLOS concurrency SRTC should verify the plans include:
    - A methodology to evaluate MMLOS (transit, bicycles, and pedestrians and autos).
    - Verification that local levels of service for state highways conform to the state and regionally adopted standards.
    - MMLOS standards for locally owned arterials and transit that reflect the community’s expectations for transportation performance during the comprehensive plan period.
    - Identification of existing and future deficiencies.
    - Projects, programs, or strategies that will address existing and future deficiencies.
  - To guide the review of comprehensive plans and the adoption of new regional MMLOS standards as part of the RTP update, typical approaches for evaluating the quality of transportation facilities and services for different modes of travel are summarized below:
    - Motor vehicles: Evaluating traffic flow and congestion.
    - Pedestrians: Assessing sidewalk and crosswalk conditions, safety, and convenience.
    - Bicycles: Measuring the ease, comfort, and safety of cycling infrastructure.
    - Public Transit: Evaluating service frequency, reliability, and passenger experience.

Mode	Example LOS Potential Performance Metrics
<b>Vehicle</b>	<ul style="list-style-type: none"> <li>• Volume-to capacity (V/C) ratio</li> <li>• Intersection delay</li> <li>• Corridor travel time</li> </ul>
<b>Pedestrian</b>	<ul style="list-style-type: none"> <li>• Level of traffic stress (along corridors and/or at crossings)</li> <li>• Network continuity</li> <li>• Network quality (proper design, widths, and maintenance)</li> <li>• Traffic protection (separation from motorized traffic, particularly high speed and high volumes)</li> <li>• Arterial crossing frequency</li> </ul>
<b>Bicycle</b>	<ul style="list-style-type: none"> <li>• Level of Traffic Stress</li> <li>• Network connectivity</li> <li>• Network quality (proper design, widths, and maintenance)</li> <li>• Traffic protection (separation from motorized traffic, particularly high speed and high volumes)</li> </ul>

<b>Transit</b>	<ul style="list-style-type: none"><li>• Reliability</li><li>• Frequency</li><li>• Accessibility</li><li>• Infrastructure/Amenities</li></ul>
<b>All</b>	<ul style="list-style-type: none"><li>• Mode split</li><li>• VMT</li><li>• Person trips</li><li>• Person delay</li></ul>

See Attachment B for the revised checklist and MMLOS methodology.



# **ATTACHMENT A: COMPREHENSIVE PLAN CERTIFICATION PROCESS AND SB 5412**

# SRTC Comprehensive Plan Certification Process and SB 5412

## Introduction

As a Regional Transportation Planning Organization (RTPO), Spokane Regional Transportation Council (SRTC) is required under the Growth Management Action (GMA - RCW 47.80.023) to certify that the **transportation elements of comprehensive plans** adopted by member agencies are consistent with the currently adopted regional transportation plan, and, where applicable, conform with the requirements of RCW 36.70A.070, Comprehensive Plan Mandatory Elements.

The purpose of this memo is to provide an understanding of SRTC's role in the comprehensive plan certification process related to Senate Bill (SB) 5412, Infill and housing development categorical exemption under the State Environmental Policy Act (SEPA), and codified in RCW43.12C.229. SB 5412 allows proposed housing within urban growth boundaries to rely on environmental reviews completed at the comprehensive planning level rather than the individual project level, provided that certain criteria are met. Based on the review of relevant regulations and guiding documents, to qualify for an exemption, the development must be consistent with the comprehensive plan and all development regulations adopted under the GMA. Furthermore, cities and counties must:

- Include an environmental analysis that considers the proposed use or density and intensity of use and analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system.
- Consult with WSDOT as part of the environmental analysis.

The exemption has raised two primary questions:

1. Does SRTC need to modify their Comprehensive Plan Certification Manual to address the exemption?
2. What is the review mechanism for development projects covered under the categorical exemption to understand impacts to the transportation network and proposed mitigation strategies? More specifically, who enforces compliance and verifies proposed development projects are consistent with the comprehensive plan including any proposed mitigation strategies?

**In response to question one**, because SRTC already certifies that the transportation elements of comprehensive plans adopted by member agencies are consistent with the currently adopted regional transportation plan, and, where applicable, conform with the requirements of RCW 36.70A.070, Comprehensive Plan Mandatory Elements, no additional level of review is required per the regulations for the categorical exemption under SEPA. Additionally, as an RTPO, SRTC does monitor or enforce SEPA actions.

**In response to question two**, for the land use permitting and housing exemption aspects of SB 5412, cities and counties are responsible for implementing the new categorical exemption and adhering to the environmental analysis and consultation requirements. Local governments must also adopt procedures to monitor and enforce permit decisions and conditions.

## Recommendations

Because RTPOs do not monitor or enforce SEPA actions, changes to the SRTC's Comprehensive Plan Certification Manual are not required. Two additional review questions could be considered to enhance regional coordination and consistency with RCW43.12C.229; however, they could also be considered as overreach given an RTPO's role.

- If a an Infill and housing development categorical exemption is being requested per RCW43.12C.229, does the environmental analysis address the proposed use or density and intensity of use and analyze multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system?
- Is consultation with WSDOT on impacts to state-owned transportation facilities clearly documented, including any necessary mitigation?

## SB 5412 Overview

SB5412 (RCW43.12C.229) categorically exempts development proposed to fill in an urban growth area, where current density and intensity is roughly equal to or lower than called for in the goals and policies of the applicable comprehensive plan and the development is:

- Residential development;
- Mixed-use development; or
- Commercial development up to 65,000 square feet, excluding retail development.

It does not exempt government action related to development that **is inconsistent with the applicable comprehensive plan** or would clearly exceed the density or intensity of use called for in the goals and policies of the applicable comprehensive plan.

The requirements may be addressed in locally adopted comprehensive plans, subarea plans, adopted development regulations, other applicable local ordinances and regulations, or state and federal regulations. To qualify for the categorical exclusion, the city or county must:

- Adopt an ordinance, likely as part of the GMA periodic update process.
- Have a comprehensive plan that was previously subjected to environmental analysis through an environmental impact statement **or** prepared an environmental impact statement that considers the proposed use or density and intensity of use in the proposed development area.

- Prepare an environmental analysis that considers the proposed use or density and intensity of use and analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system. The analysis must:
  - Document that the requirements for protection and mitigation have been adequately addressed.
  - Document consultation with WSDOT on impacts to state-owned transportation facilities including consideration of whether mitigation is necessary. Per the Department Ecology, New SEPA Housing Exemptions - Guidance on Implementing SSB 5412, WSDOT provided the following information regarding consultations:

*“At the time of establishing categorical exemptions and conducting environmental analysis, jurisdictions are required to consult with WSDOT related to housing development near state facilities. WSDOT will request that local jurisdictions document the safety and operations of state facilities, the adopted multimodal level of service standards, and the nature of the locations being considered. WSDOT expects the environmental and multimodal transportation analysis required pursuant to RCW 43.21C.229 to assess potential safety, mobility, connectivity, preservation, maintenance, resiliency, equity, and climate change concerns from increased travel demand on the state transportation system.”*

- Give a minimum of 60 days’ notice prior to finalizing the analysis to affected tribes, relevant state agencies, other jurisdictions that may be impacted, and the public. If mitigation measures are needed to address probable adverse impacts, cities and counties must identify them in the environmental analysis and environmental determination.

The total proposal must be assessed before the categorical exemptions can be applied. “Total proposal” means all interdependent parts of a proposal, including all proposed phases. For example, under the infill exemption, if infrastructure improvements are needed, such as a sewer or water distribution line extension, the improvement may not be exempt from SEPA review unless it meets the exemption level specified in SEPA rules for the infrastructure improvements.<sup>4</sup>

## Enforcement

For the land use permitting and housing exemption aspects of SB 5412, cities and counties are responsible for implementing the new categorical exemption and adhering to the environmental analysis and consultation requirements.<sup>5</sup> They must also

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<sup>4</sup> Department of Ecology, <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-faq>

<sup>5</sup> [Lead agency determination and responsibilities - Washington State Department of Ecology](#)

adopt procedures to monitor and enforce permit decisions and conditions. Rules and procedures that provide for the integration of environmental review with project review as provided in RCW **43.21C.240**.

SEPA does not require any additional documentation when a project is categorically exempt; however, as a best practice, the Department of Ecology and the Department of Commerce recommend the placement of a note in the file or on the permit application to indicate that SEPA compliance has been satisfied.

Related to WSDOT's role in the review process, WSDOT Design Manual M 22-01.23, September 2024, Chapter 1130 provides guidance related to WSDOT's Development Services involvement with land use development proposals and projects led by local jurisdictions, transit agencies, tribes, and developers. Key excerpts related to decision-making and SEPA are provided below:

- **11.30.03. Local Decision-Making Authority.**
  - Under SEPA and GMA, a local government makes local land use decisions. The local decision-making authority is typically delegated to a hearings officer, planning commission, city council, board of commissioners, or an administrative body such as a Variance Committee or Design Commission.

■ **11.30.03 (2) WSDOT's Role In Development Review.**

- WSDOT's authority to review land use proposals and request or require mitigation is founded in state law, specifically the State Environmental Policy Act, the Growth Management Act, and through our state managed and limited highway access connections laws, policies and procedures.
- When developers request connections to the state system, WSDOT may require improvements to the transportation system as a condition of issuance of a highway access permit. Any such requirement must be appropriate and reasonable to mitigate the impact to the transportation system resulting from the development.
- In other cases, WSDOT works with the lead agency and developer to request recommended development mitigation that is appropriate and reasonable.
- The responsibility for a land use decision is with the local governing body. Like other interested parties, when there is legal standing, WSDOT can appeal the local land-use decision.

■ **1130.04 (1) SEPA Proposals**

- Not all proposals require a SEPA review. Some project proposals will be categorically exempted from SEPA review if their size or type of activity is deemed unlikely to cause a significant adverse impact. WSDOT does not typically review projects with a CE SEPA determination. Note that multiple exempted projects could affect WSDOT's ability to review impacts fairly and accurately, and in the cumulative, could create an unforeseen adverse impact on the state transportation system. Consider developing an interlocal agreement with the lead agency, or other options.



# **ATTACHMENT B: COMPREHENSIVE PLAN REVIEW CHECKLIST**

# SRTC Comprehensive Plan Review Checklist

## Introduction

Spokane Regional Transportation Council (SRTC) serves as part of the Regional Transportation Planning Organization (RTPO) for Spokane County. As an RTPO, SRTC is required under the Growth Management Action ([RCW 47.80.023](#)) to certify that the **transportation elements of comprehensive plans** adopted by member agencies are consistent with the currently adopted regional transportation plan, and, where applicable, conform with the requirements of [RCW 36.70A.070](#), Comprehensive Plan Mandatory Elements. SRTC is also required to establish guidelines, in cooperation with the member agencies, that provide direction for evaluation of the transportation elements which reflect the guidelines and principles of [RCW 47.80.026](#), Comprehensive plans, transportation guidelines, and principles.

The State of Washington mandates that counties and cities must be in compliance with the Growth Management Act (GMA), including attaining RTPO certification of comprehensive plans, in order to be eligible for grants through the Washington State Department of Commerce. The SRTC Board also encourages that the comprehensive plans produced by Spokane County and the cities and towns within the MPO be certified or they may not be eligible for federal funding through SRTC's Call for Projects process. For those agencies that participate in the SRTC Call for Projects process but are not required by the GMA to produce a comprehensive plan (Washington State Department of Transportation (WSDOT), Spokane Transit Authority (STA), the Spokane Tribe, the Kalispell Tribe, and the Spokane Regional Health District (SRHD)), the above-mentioned requirement does not apply.

The purpose of this manual is to provide guidance to SRTC staff when reviewing Comprehensive Plans. The manual outlines:

- The regulatory framework for the Comprehensive Plan review process
- Certification Process
- Review Checklist

## Regulatory Framework

Counties and cities are required to periodically review their comprehensive plans and regulations to ensure compliance with GMA changes and accommodate updated growth targets. The GMA mandates full comprehensive plan updates every ten years.

Presented below is an overview of the GMA regulations relevant to the consistency review and certification process for the comprehensive plan transportation elements. The certification is based on the consistency of the local policies with the RTPO's adopted regional transportation plan as well as the general conformity of the local policies with

### Mandatory Consistency and Coordination

- Internal consistency – differing parts of the plan must fit together
- Interjurisdictional (external) consistency – must be consistent and coordinated with other county and city plans

GMA requirements. SRTC has flexibility to determine how to address each of the factors listed below in evaluating local comprehensive plans.

Regulation	Summary Description Related to Comprehensive Plan Reviews
<p><b>Duties of RTPOs</b> <u>RCW 47.80.023</u></p> <p><u>WAC 365-196-210(8)</u></p>	<ul style="list-style-type: none"> <li>• Certify the transportation element of comprehensive plans.</li> <li>• Certify that countywide planning policies adopted under RCW 36.70A.210 for <b>consistency</b> with the Regional Transportation Plan and regional guidelines and principles.</li> <li>• Review multimodal level of service methodologies used by cities and counties to promote a consistent regional evaluation of transportation facilities and corridors.</li> <li>• Work with cities, counties, transit agencies, WSDOT, and others to develop MMLOS or alternative transportation performance measures.</li> <li>• For purposes of certification, "consistency" means that no element of a plan is incompatible with any other feature of a plan or regulation; and that consistency is indicative of a capacity for orderly integration or operation with other elements in a system.</li> </ul>
<p><b>Comprehensive plans, transportation guidelines</b> <u>RCW 47.80.026</u></p>	<p>Provide specific direction for the development and evaluation of the transportation elements to address the relationship between transportation systems and:</p> <ul style="list-style-type: none"> <li>• Concentration of economic activity</li> <li>• Residential density</li> <li>• Development corridors and urban design that, where appropriate, support high capacity transit, freight transportation and port access</li> <li>• Development patterns that promote pedestrian and nonmotorized transportation</li> <li>• Circulation systems</li> <li>• Access to regional systems</li> <li>• Effective and efficient highway systems</li> <li>• The ability of transportation facilities and programs to retain existing and attract new jobs and private investment and to accommodate growth in demand</li> <li>• Transportation demand management</li> <li>• Joint and mixed-use developments</li> <li>• Present and future railroad right-of-way corridor utilization</li> <li>• Intermodal connections</li> </ul>
<p><b>Comprehensive Plans-Mandatory Elements</b> <u>RCW 36.70A.070</u></p>	<p>Related to transportation, the plan must include:</p> <ul style="list-style-type: none"> <li>• An inventory of air, water, and ground transportation facilities and services, including state-owned transportation facilities</li> <li>• Forecasts of multimodal transportation demand and needs <ul style="list-style-type: none"> <li>- Land use assumptions used in estimating travel demand</li> </ul> </li> <li>• Forecasts of multimodal traffic for at least ten years based on the adopted land use</li> <li>• Land use assumptions used in estimating travel demand</li> <li>• Assessment of the impacts of the transportation and land use policies on the transportation systems of adjacent jurisdictions, including the State Highway System</li> <li>• Adopted MMLOS standards <ul style="list-style-type: none"> <li>- Specific actions and requirements for bringing into compliance locally owned transportation facilities or services that are below an established LOS</li> </ul> </li> <li>• Transportation demand management strategies</li> <li>• Active transportation component</li> <li>• Actions that reduce GHG emissions and per capita vehicle miles traveled</li> <li>• Multi-year financing plan</li> <li>• Americans with Disabilities Transition Plan</li> <li>• Intergovernmental coordination efforts</li> </ul>

Regulation	Summary Description Related to Comprehensive Plan Reviews
<p><b>Comprehensive plans – Must be coordinated</b> RCW <a href="#">36.70A.100</a></p> <p><b>Interjurisdictional consistency</b> WAC <a href="#">365-196-510</a></p> <p><b>Coordination with other county and city comprehensive plans</b> WAC <a href="#">365-196-520</a></p>	<p>Comprehensive plans must be coordinated with, and consistent with, the comprehensive plans adopted by other counties or cities with which the county or city has, in part, common borders or related regional issues.</p>
<p><b>Comprehensive plans—Transportation element—Multimodal transportation improvements and strategies</b> RCW <a href="#">36.70A.108</a></p>	<p>The transportation element may include, in addition to improvements or strategies to accommodate the impacts of development authorized under RCW <a href="#">36.70A.070(6)(b)</a>, multimodal transportation improvements or strategies that are made <b>concurrent</b> with the development.</p>

## Certification Review Process

It is strongly recommended that update/amendment sponsors coordinate with SRTC staff throughout the comprehensive planning processes to allow for sufficient time to resolve potential consistency issues that could delay certification.

Certification Step	Review Process
<p><b>Local Jurisdiction Submits Request for Review</b></p>	<p>Submit the following at least 60 days prior to planned adoption by local legislative body.</p> <ul style="list-style-type: none"> <li>• Completed certification checklist.</li> <li>• Draft Comprehensive plan.</li> </ul>
<p><b>SRTC Staff Review</b></p>	<p>Reviews plan and prepares initial certification report with a recommendation.</p>
<p><b>SRTC Staff Presentation to the SRTC Committees and Board of Directors</b></p>	<p>Presents initial findings to the SRTC Transportation Technical Committee (TTC), the Transportation Advisory Committee (TAC), and Board of Directors for review and possible modifications.</p>
<p><b>Local Jurisdiction Adopts Comprehensive Plan</b></p>	<p>If substantial changes are made to the Draft Plan, the local jurisdiction must resolve with SRTC or resubmit 30 days prior certification action by the SRTC Board of Directors.</p>
<p><b>SRTC Staff Finalizes Certification Report</b></p>	<p>SRTC staff will prepare final report with recommendations to the SRTC Board of Directors.</p>
<p><b>SRTC Board of Directors Decision</b></p>	<p>Board decision on consistency certification.</p>
<p><b>SRTC to Issue Certification Letter</b></p>	<p>Certification letter issued.</p>
<p>Notes</p> <ul style="list-style-type: none"> <li>- For amendments that are not anticipated to have an impact on regional LOS, land use, and/or transportation facilities or policy, SRTC Board of Directors' action will not be required.</li> <li>- If SRTC finds that a jurisdiction's transportation element is nonconforming with state requirements or inconsistent with the RTP, SRTC will coordinate with the local jurisdiction to resolve issues in a manner that will allow the transportation element to be certified.</li> </ul>	

## Review Checklist

The checklist will be used to conduct and document the certification of comprehensive plan related to 1) conformity with the GMA transportation element content requirements and 2) consistency with the adopted RTP. If “no” is checked for any criterion, additional coordination with the applicant/agency will occur to document and resolve any outstanding issues.

<b>Applicant/Agency:</b>				
<b>Type of Review:</b> <b>Comprehensive Plan</b> <input type="checkbox"/> Periodic Update <input type="checkbox"/> Amendment			<b>Date of Submission:</b>  <b>Anticipated Date of Plan Adoption:</b>	
<b>Contact Person:</b> <b>Email:</b>				
<b>Regional Consistency and GMA Conformity</b> The checklist will be used to assess and document for conformity with the GMA transportation element content requirements and consistency with the adopted regional transportation plan (RTP).				
<b>Checklist Criteria</b>	<b>Agency Response</b>	<b>Plan Page #</b>	<b>SRTC Comments</b>	
1. Was the update coordinated with neighboring jurisdictions and tribes (if applicable) and regional transportation agencies? <i>RCW 36.70A.100</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all the apply: <input type="checkbox"/> WSDOT <input type="checkbox"/> STA <input type="checkbox"/> Kalispel Tribe of Indians <input type="checkbox"/> Spokane Tribe of Indians <input type="checkbox"/> _____ <input type="checkbox"/> _____	If no, please provide explanation:		
2. Is the plan consistent with relevant countywide planning policies? <i>RCW 36.70A.100</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:		
3. Does the plan (or plan update/amendment) support the SRTC RTP Guiding Principles and policies?	<input type="checkbox"/> Economic Vitality <input type="checkbox"/> Cooperation & Leadership <input type="checkbox"/> Stewardship <input type="checkbox"/> System Operations, Maintenance, & Preservation <input type="checkbox"/> Safety & Security <input type="checkbox"/> Choice & Mobility <input type="checkbox"/> Quality of Life	If no, please provide explanation:		
4. Does the transportation element include an inventory of air, water, and ground transportation facilities and services, including state-owned transportation facilities? <i>RCW 36.70A.070(6)(a)(iii)(A)</i> <i>WAC 365-196-430</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:		

Checklist Criteria	Agency Response	Plan Page #	SRTC Comments
5. Is the transportation element consistent with the land use element including land use assumptions, population forecasts and planning periods? <u>RCW 36.70A.070(6)</u> <u>WAC 365-196-430 (1) (a)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
6. Are travel demand management (TDM) strategies included? <u>RCW 36.70A.070(6)(a)(vi)</u> <u>WAC 365-196-430(2)(i)(i)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
7. Is there an active transportation component that addresses and encourages mode choice and alternatives to driving alone? <u>RCW 36.70A.070(6)(a)(vii)</u> <u>WAC 365-196-430(2)(j)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
8. Do bicycle and pedestrian-supportive policies, programs, and projects address SRTC's Regional Bicycle Route Priority Network?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
9. Do the land use and transportation elements address and plan for freight mobility and accessibility on the corridors within SRTC's Regional Freight Priority Network?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
10. Does the land use element support increased urban densities and transportation-efficient development and redevelopment?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
11. Does the plan address an ADA transition plan that includes a program to address deficiencies and obstacles that limit accessibility, methods to make facilities accessible, an implementation schedule, and identification of public officials responsible for plan? <u>RCW 36.70A.070(6)(a)(iii)(G)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
12. Does the transportation element address how transportation investments are equitably made? <u>RCW 36.70A.070(6)(a)(i) and (iii)(E)</u> <u>WAC 365-196-430(2)(f)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
13. Does the transportation element demonstrate how system investments will reduce the number of traffic fatalities and serious injuries? <u>WAC 365-196-430 (2)(b)(i)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
14. Does the plan include a forecast of multimodal transportation needs for a minimum of 10 years? <u>RCW 36.70A.070(6)(a)(i) and (ii)(E)</u> <u>WAC 365-196-430(2)(f)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	

Checklist Criteria	Agency Response	Plan Page #	SRTC Comments
<b>SEPA Infill and Housing Development Categorical Exemption</b>			
15. Is an Infill and Housing Development Categorical Exemption is being requested per <u>RCW43.12C.229?</u>	<input type="checkbox"/> Yes, see questions 16 and 17 <input type="checkbox"/> No		
16. Does the environmental analysis address the proposed use or density and intensity of use and analyze multimodal transportation impacts, including impacts to neighboring jurisdictions, transit facilities, and the state transportation system?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
17. Is consultation with WSDOT on impacts to state-owned transportation facilities clearly documented, including any necessary mitigation?	<input type="checkbox"/> Yes <input type="checkbox"/> No		
<b>Multimodal Level of Service (See Attachment A for MMLOS Evaluation Methodology)</b>			
18. Does the plan address multimodal levels of service (MMLOS) standards for all locally owned transportation facilities and transit routes? <u>RCW 36.70A.070(6)(a)(iii)(B) and (C), WAC 365-196-430</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
19. Does the plan reference WSDOT MMLOS standards for the HSS and SRTC's MMLOS standards for the Non-HSS state highways? <u>RCW 36.70A.070(6)(a)(iii)(B) and (C), WAC 365-196-430</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
20. Does the transportation element describe the plan's ability to meet local, regional and state MMLOS standards? Does the plan identify specific actions to bring transportation facilities and services to the established MMLOS if they do not meet standards? <u>RCW 36.70A.070(6)(a)(iii)(D), WAC 365-196-430</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
<b>Climate</b>			
21. Does the transportation element include goals and policies to support reductions in greenhouse gas emissions and per capita vehicle miles traveled (VMT)? <u>RCW 36.70A.070(9)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
22. Does the resiliency element include goals and policies to improve climate preparedness, response and recovery efforts? <u>RCW 36.70A.070(9)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	
<b>Finance Plan</b>			
23. Does the plan include an analysis of the capability to fund identified need? <u>RCW 36.70A.070(6)(a)(vi)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:	

<u>WAC 365-196-430(2)(i)(i)</u>				
24. Does the plan include a multi-year financing plan based on the identified needs identified? <u>RCW 36.70A.070(6)(a)(iv)(B)</u> <u>RCW 35.77.010</u> <u>WAC 365-196-430(2)(k)(ii)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:		
25. Does the plan discuss probable funding short falls in meeting identified needs and how additional funding will be secured, or how land use assumptions will be reassessed to meet MMLOS standards? <u>RCW 36.70A.070(6)(a)(iv)(A)</u> <u>WAC 365.196-430(2)(k)(iv)</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If no, please provide explanation:		



# **ATTACHMENT A: MULTIMODAL LEVEL OF SERVICE METHODOLOGY**

# SRTC MULTIMODAL LEVEL OF SERVICE

## Introduction

The transportation element of local comprehensive plans must include multimodal level of service (MMLOS) standards, defined as the “minimum standards for how many public facilities or services are required to adequately serve the population.” MMLOS methodologies and standards consider the four major modes of travel (vehicle, transit, bicycle, and pedestrian), their impacts on each other as they share the street or intersection, and their mode specific requirements roadway design and operation.

As mandated by RCW 47.80.023(8) SRTC is required to review MMLOS methodologies used by cities and counties to promote a consistent regional evaluation of transportation facilities and systems. When reviewing comprehensive plans for MMLOS concurrency SRTC will verify the plans include:

- A methodology to evaluate MMLOS (transit, bicycles, and pedestrians and autos).
- Verification that local levels of service for state highways conform to the state and regionally adopted standards.
- MMLOS standards for locally owned arterials and transit that reflect the community’s expectations for transportation performance during the comprehensive plan period.
- Identification of existing and future deficiencies.
- Projects, programs, or strategies that will address existing and future deficiencies.

This document outlines the methodology SRTC will use for the MMLOS review.

## Concurrency Requirements and MMLOS Standards

Concurrency requirements are summarized below.

Multi-Modal Level of Service Concurrency Requirements		
Concurrency Review Guidance		
<p><b>GMA Procedural Criteria for Adopting Comprehensive Plans and Development Regulations</b> <a href="#">WAC 365-196-840</a></p> <p>Concurrency ensures public facilities are available to serve</p>	<ul style="list-style-type: none"> <li>■ Counties and cities should set local MMLOS standards to reflect realistic expectations consistent with the achievement of growth aims.</li> <li>■ The MMLOS standards adopted by the county or city should vary based on the urban or rural character of the surrounding area and should be consistent with the land use plan and policies.</li> <li>■ The comprehensive plan should provide a strategy for</li> </ul>	<ul style="list-style-type: none"> <li>■ Level of service standards for locally owned arterials and transit routes should be regionally coordinated.</li> <li>■ Levels of service for highways of statewide significance are set by the WSDOT.</li> <li>■ For other state highways, levels of service are set in the regional transportation plan. Local levels of service for state highways should conform to the state and regionally adopted standards.</li> </ul>

new development at the time of occupancy, or within a specified time.	responding when approval of any particular development would cause levels of service for concurrency to fall below the locally adopted standards.	■ Other transportation facilities may reflect local priorities.
	MMLOS Standards	Concurrency
<b>State Highways of Statewide Significance (HSS)</b> <ul style="list-style-type: none"> <li>• I-90</li> <li>• US 2</li> <li>• US 195</li> <li>• US 395</li> </ul>	Set by WSDOT (RCW 47.06.140): <ul style="list-style-type: none"> <li>• LOS C in rural areas (outside urban growth areas)</li> <li>• LOS D in urban areas</li> </ul>	HSS are statutorily exempt from local concurrency requirements; however, the transportation element must address the land use impact on the state highway facilities.
<b>State-Owned Transportation Facilities (Non-HSS)</b>	<ul style="list-style-type: none"> <li>• Set by SRTC through coordination with WSDOT and member agencies</li> </ul>	The law is silent in terms of including or exempting them from local concurrency rules, unless they are locally owned, such as SR 291 and SR 27, and then they would be subject to concurrency.
<b>Locally-owned Arterials and Transit Routes</b>	<ul style="list-style-type: none"> <li>• Set by local agency</li> </ul>	Conform with state and SRTC regional MMLOS standards

## MMLOS Review Methodology

SRTC uses the travel demand model to analyze regional MMLOS for the following modes: vehicular, transit, and non-motorized (combined biking/walking). The regional MMLOS analysis is based on changes to land use and the transportation system that will occur as a result of comprehensive plan updates or amendments. The model assesses current conditions and forecasts demand based on projections of future employment and household demographics. The SRTC model uses specific analytical processes that consider choices based on destination, mode, time of day and route and then represents the resulting traffic flow at the macroscopic level.

Macroscopic models, such as SRTC’s, are used for high-level, regional travel analysis and can be used to predict the extent of congestion caused by traffic demand or incidents in a network. Travel demand models are limited in their ability to estimate changes in operational characteristics (such as speed, delay, and queuing) down to the individual transit route, road segment or intersection level.

## MMLOS Standards

In the event of a comprehensive plan update or amendment not meeting the established LOS on an HSS, SRTC will participate in a discussion between WSDOT and the local jurisdictions to identify planning level mitigation strategies (including CMP strategies) as well as generalized cost estimates and funding sources for those strategies.

**For vehicular, transit, and non-motorized analyses, a decrease in LOS is not in itself cause for SRTC to withhold certification of a plan.**

## State Highways of Statewide Significant (HSS)

LOS is set by WSDOT in consultation with local governments (RCW 47.06.140) for State Highways of Statewide Significant (HSS).

State Highways of Statewide Significant	Vehicular LOS*
<ul style="list-style-type: none"><li>• I-90</li><li>• US 2</li><li>• US 195</li><li>• US 395</li></ul>	<ul style="list-style-type: none"><li>- LOS C in rural areas (outside urban growth areas)</li><li>- LOS D in urban areas</li></ul>

## Regional Mobility Corridors/ State-Owned Transportation Facilities

MMLOS for regional mobility corridors/ State-Owned Transportation Facilities (Non-HSS) is set by SRTC in consultation with WSDOT and local governments. The standard is LOS C in rural areas and LOS D or above in urban areas. A jurisdiction may set a different LOS for their own local processes, such as concurrency. The SRTC LOS is for regional analysis purposes as required by 47.80.023(9). If the vehicular LOS on a regional mobility corridor decreases as a result of a comprehensive plan update or amendment, SRTC will coordinate with the jurisdiction on mitigating strategies.

### Transit LOS

Transit LOS is evaluated for the change in systemwide transit ridership. If system wide transit ridership decreases as a result of a comprehensive plan update or amendment, SRTC will discuss mitigating strategies with the jurisdiction and STA.

### Non-Motorized (Bike/Walk) LOS

Non-motorized LOS is evaluated for the change in non-motorized mode share. If the systemwide non-motorized mode share decreases as a result of a comprehensive plan update or amendment, SRTC will discuss mitigating strategies with the jurisdiction.

### Local Arterials and Transit

SRTC will verify the Comprehensive Plan includes:

- A methodology to evaluate local MMLOS (transit, bicycles, and pedestrians and autos).
- MMLOS standards reflect the community's expectations for transportation performance during the comprehensive plan period.
- Identification of existing and future deficiencies.
- Projects, programs, or strategies that will address existing and future deficiencies.

SRTC will look for typical approaches for evaluating the quality of transportation facilities and services for different modes of travel such as:

Mode	Example LOS Potential Performance Metrics
<b>Vehicle</b>	<ul style="list-style-type: none"> <li>• Volume-to capacity (V/C) ratio</li> <li>• Intersection delay</li> <li>• Corridor travel time</li> </ul>
<b>Pedestrian</b>	<ul style="list-style-type: none"> <li>• Level of traffic stress (along corridors and/or at crossings)</li> <li>• Network continuity</li> <li>• Network quality (proper design, widths, and maintenance)</li> <li>• Traffic protection (separation from motorized traffic, particularly high speed and high volumes)</li> <li>• Arterial crossing frequency</li> </ul>
<b>Bicycle</b>	<ul style="list-style-type: none"> <li>• Level of Traffic Stress</li> <li>• Network connectivity</li> <li>• Network quality (proper design, widths, and maintenance)</li> <li>• Traffic protection (separation from motorized traffic, particularly high speed and high volumes)</li> </ul>
<b>Transit</b>	<ul style="list-style-type: none"> <li>• Reliability</li> <li>• Frequency</li> <li>• Accessibility</li> <li>• Infrastructure/Amenities</li> </ul>
<b>All</b>	<ul style="list-style-type: none"> <li>• Mode split</li> <li>• VMT</li> <li>• Person trips</li> <li>• Person delay</li> </ul>

## Data Requirements

Agencies will be asked to submit the following information for regional modeling at the TAZ level.

### Land Use

- Any land use changes including addition or reduction in the number of units/zone, rooms or camp spaces/zone, or number of employees/zone
- Data related to the land use types shown in Table 1 and unit measurements based on the land use proposal

**TABLE 1 REGIONAL MODEL LAND USE TYPES**

Land Use	Description	Unit Measurement Per TAZ
1	Single-family, duplex, triplex, manufactured or mobile home	# of housing units
2	Four or more residential units on a single parcel	# of housing units
3	Hotel, motel, or campsite	# of rooms or camp spaces
4	Agriculture, forestry, mining, industrial, manufacturing, wholesale	# of employees
5	Retail Trade (Non-Central Business District (DBD))	# of employees
6	Services and Offices	# of employees
7	Finance, Insurance, and Real Estate Services	# of employees
8	Medical	# of employees
9	Retail Trade (CBD)	# of employees
10	College and university commuter students	# of students
11	Education employees (K-12)	# of employees
12	Education employees (college and university)	# of employees

## Transportation

For all transportation projects that are on facilities included in the regional travel demand model network:

- Schematic drawing or description showing name, location, distance, alignment, number of lanes, speed limit, facility type (Federal Functional Classification (FFC)), capacity, intersection control, and intersection geometry.
- Corridor-level vehicular volumes for interrupted flow facilities (roadways with fixed elements like traffic signals, stop signs, and yield signs that interrupt the traffic flow).