

City of Seattle
COMPREHENSIVE PLAN AMENDMENT APPLICATION

Use this application to propose an amendment to the goals, policies, Future Land Use Map, appendices, or other components of the adopted City of Seattle Comprehensive Plan.

Applications are due to the Seattle City Council (sent electronically to: compplan@seattle.gov) no later than 5:00 p.m. on May 15th for consideration in the next annual review cycle. Any proposals received after May 15th will be considered in the review process for the following year. *(Please Print or Type)*

Applicant: Megan Kruse

Date: May 15, 2019

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Contact person (if not the applicant):

Email:

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City: State: Zip:

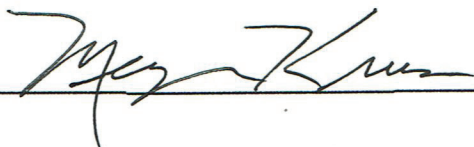
Phone:

Name of general area, location, or site that would be affected by this proposed amendment (attach additional sheets if necessary):

The Downtown/Lake Union Geographic Sector from Seattle 2035 Comp Plan Transportation
Appendix
Fig. A-11

If the application is approved for further consideration by the City Council, the applicant may be required to submit a State Environmental Policy Act (SEPA) checklist.

Acceptance of this application does not guarantee final approval.

Applicant
Signature: 

Date: May 15, 2019

City of Seattle

COMPREHENSIVE PLAN AMENDMENT APPLICATION

Submitted by Megan Kruse
on behalf of Escala

May 15, 2019

1. Describe the proposed amendment.

Seattle's downtown transportation grid is the base of a healthy, safe and vibrant community. It allows for the free flow of people and goods and for fire, medical and police to reach tens of thousands residents and office workers. Even when mass transit is prevalent, our roads will continue to serve as main arteries carrying goods and services to people living in a dense vertical urban village.

The functionality of this hub is threatened by ride hailing services and e-commerce delivery trucks that are going uncounted. Each of these transportation modes is growing annually in double digits yet they're barely or not discussed in the City or Regional comprehensive plans. Seattle must include them in its transportation and infrastructure planning or they will undermine the city's ability to sustain density and a healthy environment and economy. The consequences include:

- Even as personal SOV use drops to its Comp Plan target, urban core transit and HOV commuters will still be mired in traffic because these new mainstream sources of traffic are growing unchecked. This could lead public transit users' defection to less sustainable modes.
- Loss of critical infrastructure. As the City is being rebuilt, we have a one-time chance to create needed infrastructure. By ignoring these new transportation modes mixed-use towers are and will continue to be built without adequate loading and waste/recycling facilities. The result is service trucks circling city streets and blocking right of ways.
- The region won't meet its goals for carbon emissions because it failed to account for increased delivery trucks and TNCs that essentially act as SOVs.
- Seattle will forfeit revenue and foist congestion pricing and impact fees upon private SOVs while ignoring revenue from TNCs and e-commerce delivery trucks. This is inequitable.
- Omitting traffic from e-commerce freight deliveries means the City won't budget for the extra wear and tear placed on its roads by increased truck traffic.

The world has changed and stakes are high.

The purposed of Seattle's Comp Plan's is to forecast and provide a model to accommodate density and continued growth. TNCs and e-commerce deliveries have emerged as permanent fixtures of modern life and commerce. They need to be part of transportation and infrastructure planning.

The Seattle Comp Plan must be amended to include their impacts. We need a planning tool that will make the City a leader and not a casualty of the new global economy.

Question 1a. Specific language changes to amend a goal or policy.

**Change to language in p. 85 of Seattle's Comprehensive Plan
Transportation Element Appendix C 3.3
A. Building Urban Villages: Land Use and Transportation**

Amend as follows:

Goal: TG1: Ensure that transportation decisions, strategies, and investments are coordinated with land use goals and support [density and](#) the urban village strategy.

Policies: T1: Design [public and private](#) transportation infrastructure in urban villages to support land use goals for compact, accessible, walkable neighborhoods.

B. Make the Best Use of the Streets We Have to Move People and Goods

Goal: TG2: Manage the street system safely and efficiently for all modes and users and seek to balance limited street capacity among competing uses [specifically including the new mainstream mode shares of Transportation Network Companies \(TNC's\) and E-commerce delivery trucks.](#)

Question 1.b. Any changes to SMC?

Answer. Yes, possibly expanding CB119398 LOS bill to include TNCs and E-commerce trucks as forms of circulating SOVs.

2. How is this amendment to goals and polices currently addressed in the Comp Plan?

Answer: Counting and addressing the impacts of TNCs and e-commerce trucks are currently not being considered at all.

3. Describe why the proposed change meets each of the criteria in Resolution 31807?
Please see attached sheets.

1. BILL SUMMARY

1. Legislation Title:

A RESOLUTION relating to the Seattle Comprehensive Plan; revising the procedures and the criteria for consideration of proposed amendments to the Comprehensive Plan as part of the annual "docket," and repealing Resolutions 31402 and 31117.

2. Summary and background of the Legislation:

This resolution revises the procedures and the criteria for Council's consideration of proposed amendments to the Comprehensive Plan as part of the annual "docket," and repeals Resolutions 31402 and 31117. These two past amendments dealt with criteria and process, respectively. Also, this resolution states that Council will not call for annual Comprehensive Plan amendments from the public for the 2018-2019 annual Comprehensive Plan amendment cycle.

2. CAPITAL IMPROVEMENT PROGRAM

a. Does this legislation create, fund, or amend a CIP Project? ☐ Yes ☒ No

If yes, please fill out the table below and attach a new (if creating a project) or marked-up (if amending) CIP Page to the Council Bill. Please include the spending plan as part of the attached CIP Page. If no, please delete the table.

3. SUMMARY OF FINANCIAL IMPLICATIONS

a. Does this legislation amend the Adopted Budget? ☐ Yes ☒ No

If there are no changes to appropriations, revenues, or positions, please delete the table below.

b. Does the legislation have other financial impacts to the City of Seattle that are not reflected in the above, including direct or indirect, short-term or long-term costs?
No.

If so, describe the nature of the impacts. This could include increased operating and maintenance costs, for example.

c. Is there financial cost or other impacts of *not* implementing the legislation?

3.c. Not implementing the legislation will result in loss of revenue from growth and development related congestion pricing and impact fees to generate revenue to support the increased transportation costs from density.

If there are no changes to appropriations, revenues, or positions, please delete sections 3.d., 3.e., and 3.f. and answer the questions in Section 4.

3.d. Appropriations

This legislation adds, changes, or deletes appropriations.

If this box is checked, please complete this section. If this box is not checked, please proceed to Revenues/Reimbursements.

3.e. Revenues/Reimbursements



This legislation adds, changes, or deletes revenues or reimbursements.

3.e. This legislation has potential to add revenue to support density impacts to the transportation system.

3.f. Positions

This legislation adds, changes, or deletes positions.

If this box is checked, please complete this section. If this box is not checked, please proceed to Other Implications.

4. OTHER IMPLICATIONS

a. Does this legislation affect any departments besides the originating department? *N/A*

If so, please list the affected department(s) and the nature of the impact (financial, operational, etc.).

~~The legislation updates the annual Comprehensive Plan amendment process that typically includes Council's request to the Office of Planning and Community Development to review amendments and provide recommendations to the Council. This work is already included in OPCD's work program.~~

b. Is a public hearing required for this legislation? *4.b. Yes NONE HELD YET*

If yes, what public hearing(s) have been held to date, and/or what public hearing(s) are planned/required in the future?

c. Does this legislation require landlords or sellers of real property to provide information regarding the property to a buyer or tenant? *No.*

If yes, please describe the measures taken to comply with RCW 64.06.080.

d. Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required for this legislation? *No.*

For example, legislation related to sale of surplus property, condemnation, or certain capital projects with private partners may require publication of notice. If you aren't sure, please check with your lawyer. If publication of notice is required, describe any steps taken to comply with that requirement.

e. Does this legislation affect a piece of property? *No.*

If yes, and if a map or other visual representation of the property is not already included as an exhibit or attachment to the legislation itself, then you must include a map and/or other visual representation of the property and its location as an attachment to the fiscal note. Place a note on the map attached to the fiscal note that indicates the map is intended for illustrative or informational purposes only and is not intended to modify anything in the legislation.

- f. Please describe any perceived implication for the principles of the Race and Social Justice Initiative. Does this legislation impact vulnerable or historically disadvantaged communities? None.**

If yes, please explain how this legislation may impact vulnerable or historically disadvantaged communities. Using the racial equity toolkit is one way to help determine the legislation's impact on certain communities.

- g. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s). N/A**

This answer should highlight measurable outputs and outcomes.

List attachments/exhibits below: N/A

4. What other options are there for meeting the goal or objectives of the amendment? Why is a change to the Comp Plan needed?

Answer: These transportation modes did not exist or were not major factors in 2005. Today they are now mainstream staples of our economy and transportation network. As a planning tool, the Seattle Comp Plan is inadequate without counting them.

5. What will be the impacts and benefits of the amendment. Provide data, research and analysis that support the proposed amendment.

This amendment will bring Seattle transportation and infrastructure planning into the 21st Century by including two mainstream transportation modes that didn't exist or weren't factors in 2005 when the Comp Plan was created and have not been included in subsequent updates or Environmental Impact Statements (EIS).

The Puget Sound Regional Council (PRSC) has defined the transportation mode categories for Seattle's Comp Plan, the King County Comp Plan and all other regional plans that inform transportation and infrastructure legislation for municipalities under the Washington State Growth Management Act. PRSC only counts SOVs, HOVs, ride shares (van/car pools), transit, bicycles and pedestrian commutes but omits the two sources of traffic that have disrupted transportation grids across the country.

Ride hailing services, i.e. Uber and Lyft, know collectively as Transportation Network Companies (TNCs) and burgeoning fleets of delivery trucks serving e-commerce have become mainstream modes of transportation. Both are forms of SOVs and are on a fast track to out pace personal solo vehicle use in terms of daily road miles because they circle repeatedly through the urban core and are distinct from commuter traffic.

Omitting these modes of traffic means Seattle is unable to plan and require sufficient public and private transportation infrastructure to sustain its growth forecasts. The City will also will forfeit sources of revenue as it contemplates implementing transportation congestion pricing and impact fees.

Here's what we know

The region's white-hot economy and natural beauty have brought companies and investors from around the world. Puget Sound is on track to absorb an additional 1.8 million people and 1.2 million jobs.

TNCs and e-commerce deliveries increase directly with density. Neither existed or was a factor in 2005 but today their impacts are dominating strained public right-of-ways and limited transportation infrastructure.

Municipalities across the country have reported their effects on urban freight volumes and traffic mobility. The University of Washington and Seattle's Department of Transportation (SDOT) have led nationally recognized research on e-commerce. Yet delivery trucks and rideshare vehicles are not addressed in Seattle or any other regional plan or EIS.

Urban density is creating more traffic even if people don't own cars

Seattle's 2018 transportation Level of Service (LOS) legislation identified Single Occupancy Vehicles (SOVs) as the biggest source of urban congestion and pollution. That may be true in some areas but in downtown Seattle/Capitol Hill, the epicenter of density SOV use is 23% and falling. Transit use is nearly 50% and planned density puts people in easy proximity of multi-modal options.

The problem is TNCs and e-commerce deliveries are separate sources of traffic that correlate directly with density. Here's what local and national research tell us about their impact on travel behavior, land use and loading.

TNCs: an established mode that doesn't replace SOVs but draws users from transit.

Local and national TNC research shows ride hailing service in city cores is growing unchecked. Affluent urbanites are the prime market. This is borne out by the latest available TNC statistics obtained from Uber/Lyft for the zip code of 98101; home to over a dozen downtown mixed use mega tower developments.

In the half square mile of zip code 98101:

- TNC rides rose 30% in 2017 to 4,893,444.
- The first two quarters of 2018 registered 3,009,062 total rides up 27% from the first two quarters of 2017.
- The 2nd quarter of 2018 averaged over 17,500 daily rides in this compact area. ([Exhibit 2](#)).

These local findings are in line with a 2018 study recognized by SDOT. It reports TNC impacts on the country's top nine rideshare markets including Seattle.

<http://www.schallerconsult.com/rideservices/automobility.pdf>

The Schaller report finds:

- "Instead of 'replacing the personal auto' TNCs in large cities are primarily supplanting more space-efficient modes such as bus, subway, biking and walking. (p. 15).
- Most Uber and Lyft rides are still private rides (each traveling party riding by themselves) and the addition of pooled options fails to offset TNC traffic-clogging effects. (p. 3)
- TNCs add 2.8 driving miles to streets compared to 1 mile for every SOV for an overall 180% increase in driving on city streets (p. 3)
- 38% of TNC trips are in the city center City. Ridership in the city core averages 45 TNC trips per person in 2017. (p. 8)
- TNCs are not making a dent in vehicle ownership. Seattle household ownership of vehicles has continued to rise with its population. (p. 21, Table 10). This is confirmed by many residential towers' plans to provide private parking stalls for 60-80% of their residential units despite being surrounded by multi-modal options.

Density + E-commerce + Rising Freight Tonnage = Surging Truck Trips

It may have started with Cyber Monday in 2005 but now every day is cyber day. E-commerce grew from 3.5% of retail sales in 2008 to 9.8% in the latest Census Bureau statistics. It is mainstream retail and growing 15% annually.

The PSRC Regional Transportation Plan-2018 in Figure 12 p. 58 shows lock step correlation between increasing population, employment and truck tonnage. WSDOT reports 80% of all metro area truck trips are generated by deliveries of goods and services to regional and local delivery areas.

In today's e-economy residents receive deliveries of food, furniture, hard and soft goods, clothing, recreational items and household supplies every day—and with on-demand and free

1-day delivery service, sometimes many times daily. The UW and SDOT predict that with NO population growth, e-commerce deliveries will double in Seattle's urban core.

We know that density increases e-commerce deliveries but Seattle doesn't have and isn't creating infrastructure to serve the fleets of trucks it takes to deliver e-purchases. Trucks that can't find dedicated space to unload end up blocking right of ways.

These issues are found nationwide. The University of Washington and Seattle Department of Transportation (SDOT) join other public/private entities researching and predicting impacts. Here are some key findings:

#1: Residential towers are generating deliveries that require loading berths.

A 2017 Hofstra University study quantifies average deliveries generated by the number of units in apartment buildings. Analyzing deliveries at an apartment complex with upper middle class demographics, it determined each unit would generate an average 1.5 package deliveries per week. It speculated higher-end properties would generate more.

https://www.metrans.org/sites/default/files/MF%205.1a_Residential%20Parcel%20Deliveries_Final%20Report_030717.pdf

The study found that deliveries are concentrated Monday through Friday and that from January 2015 through 2017 parcel deliveries grew 17% annually correlating with the 15% annual growth estimates for U.S. online retail sales.

Applying the Hofstra ratio of 1.5 weekly packages per unit, a typical Seattle residential tower of 900 people would average a minimum 784 weekly packages delivered mostly Monday-Friday. However, data from four Seattle luxury condos in the downtown core suggests the 1.5 package ratio is low and respondents note the variety of service providers that deliver by truck.

More recent insight on the situation comes from a December 2018 *Time* magazine article. It explored the adverse impacts of e-commerce on urban transportation grids across the country, including Seattle's.

<http://time.com/5481981/online-shopping-amazon-free-shipping-traffic-jams/>

Among its findings:

- "Apartment and office towers are particular chokepoints because they receive large numbers of daily deliveries from Amazon and other retailers. Yet they typically have no loading docks or reserved parking for the UPS, Federal Express and U.S. Postal Service delivery trucks streaming to their curb-fronts."
- "University of Washington (UW) researchers in Seattle, the birthplace of both Amazon and United Parcel Service (UPS), have found that about half of the trucks making deliveries downtown are forced to park in unauthorized spots — blocking alleys, double parking on already congested streets or parking in bike lanes and other no-parking zones."
- Trucks make up 7% of total traffic but they account for 28% of the nation's congestion. (Texas A&M University's Transportation Institute.)

#2: Shrinking Seattle curb space won't contain e-commerce deliveries

Seattle-specific research speaks to the impacts of e-commerce and lack of curb space and dedicated internal loading infrastructure.

The situation is described in a groundbreaking SDOT-sponsored report called **The Final Fifty Feet**. That report concludes 87% of delivery trucks rely on street parking. As previously stated, it concludes even with zero population growth, e-commerce deliveries will double in the Seattle core by 2023.

https://depts.washington.edu/sctlctr/sites/default/files/SCTL_Final_50_full_report.pdf

#3: Cities need private sector infrastructure to sustain urban density

In late 2018 the UW and SDOT Alley Infrastructure Inventory and Occupancy Study documented all Seattle's City Center alleys. If Seattle doesn't start counting e-deliveries and requiring private infrastructure we're creating an unsustainable traffic mess.

To avoid that fate the report included the following recommendations: (p. 7)

- Encourage the use of and/or development of new building and load/unload equipment designs to get vehicles out of the alley and into adjacent loading bays quickly.
- Revise alley design standards for future development so that Center City area alleys provide loading bays with entrances that angle in the correct direction for alley flow
- Provide sufficient space for trucks to fully extend equipment
- Provide space for trash/recycle containers to be stored out of travel lanes

Seattle has done the important research showing how density and rising e-commerce will impact its City Center. Both UW/SDOT studies are being hailed and copied around the country. Its time Seattle's Comp Plan and new tower design incorporate these findings to build a sustainable future.

6. How does the proposed amendment support the existing goals and policies of the Comprehensive Plan?

Answer: It would add two growing transportation elements currently overlooked that are contributing to traffic congestion and pollution. Including these two transportation modes in target shares will make the Comp Plan a better tool for planning and evaluation.

Describe how the proposed amendment is consistent with the Washington State Growth Management Act, the PSRC Vision 2040 and the King County Countywide Planning Policies.

Answer: All these planning tools and their EIS's omit counting these modes of transportation. After 10 years they are no longer disrupters. They are part of the mainstream. Their double digit annual rate of growth requires they are part of city, regional and state planning.

7. Is there public support for this proposed amendment? Has it been proposed before?

Answer: The public supports controlling congestion. It's a big quality of life issue. City officials and academics have identified TNCs and e-delivery trucks as contributing to gridlock. This amendment would be the first step to addressing and mitigating their impacts.

8. Has the proposed amendment been considered before by the Council?

Answer: No

Exhibits to follow:

Exhibit 1: Comp Plan Map of Seattle by Geographic Sectors. The sector for this amendment is Downtown/Lake Union

Exhibit 2: TNC volumes in zip code 98101

Exhibit 1: Comp Plan Map of Seattle by Geographic Sectors. The sector for this amendment is Downtown/Lake Union

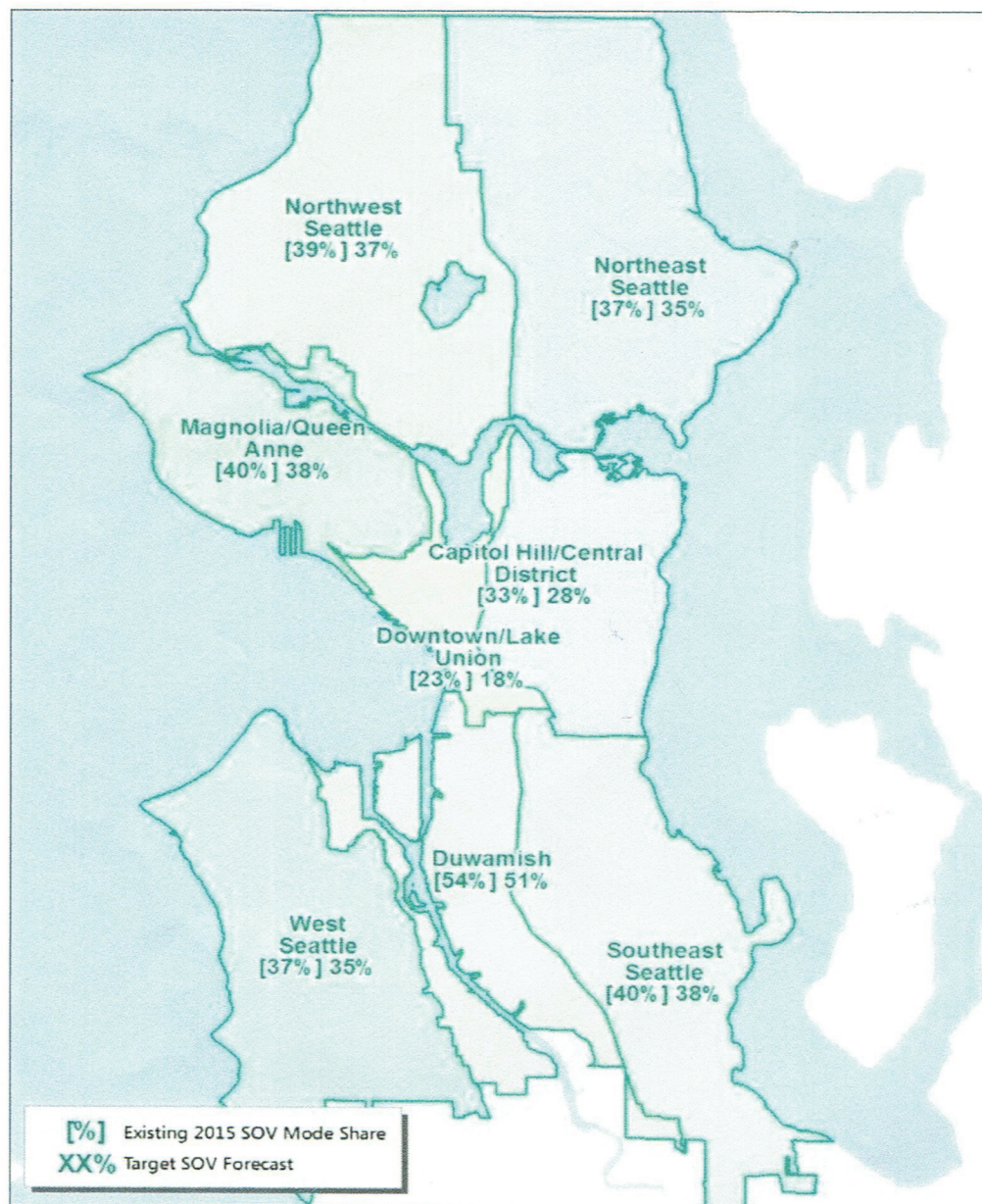


Fig. 1: 2035 SOV Mode Share Targets by Geographic Sector

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

EXHIBIT 2: Aggregated Transportation Network Company (TNC) data for 98101

Source: TNCs via SDOT

SDOT Aggregated TNC data-OO- zip code pairs.xlsx

	A	B	C	D	E	F
1						
2						
3						
4	2015_q4	641,119	641,119			
5	2016_q1	706,899				
6	2016_q2	768,699				
7	2016_q3	929,231				
8	2016_q4	1,025,953	3,430,782			
9	2017_q1	988,427				
10	2017_q2	1,197,825				
11	2017_q3	1,357,295				
12	2017_q4	1,349,897	4,893,444			
13	2018_q1	1,428,955				
14	2018_q2	1,580,107	3,009,062			
15	Grand Total	11,974,407	11,974,407			
16						
17						
18						
19						
20						

TNC Stats for 98101 (.5 sq mile)

* Total TNC rides rose 30%
in 2017 to 4,893,444 million.

*The first two quarters of
2018 showed 3,009,062
rides, up 27% from the first
two quarters of 2017.

*Second quarter of 2018
averaged 17,500 daily rides.

98101

98102

98121

combined

Aggregated TNC data - zip code