

## MEMORANDUM

---

**Date:** April 16, 2025

---

**To:** Whatcom County Councilmembers

---

**From:** Chris Comeau, Senior Transportation Planner, Transpo Group

---

**Subject:** Presentation of Draft Active Transportation Network & MMLOS Standards

---

### Introduction

We look forward to the opportunity to provide an information presentation to the Whatcom County Council on April 29, 2025, regarding the 2025 Comprehensive Plan Transportation Element update. The meeting will primarily be focused on:

- New Growth Management Act (GMA) requirements for transportation
- Development of countywide Active Transportation Network
- Development of Multimodal Level of Service (MMLOS) standards
- Initial cost estimates, future funding, and financial limitations.

We look forward to making a presentation and answering any questions the County Council may have and receiving feedback on all the information that we will share with you at the meeting. Your comments will help as we continue to develop a complete Transportation Element draft this spring and summer.

### Background

The Washington State Growth Management Act (GMA) requires cities and counties to adopt Comprehensive Plans, which are 20-year policy documents to guide the community vision for growth (Population, housing, and employment), transportation, capital facilities and utilities, parks, recreation and open space, rural areas, and protection of natural resource lands (RCW 36.70A.070).

GMA requires cities and counties to update Comprehensive Plans and implement development regulations every 10 years (RCW 36.70A.130). While the deadline to update the comprehensive plan was June 30, 2025, recent legislation (House Bill 2296) extended the deadline to December 31, 2025.

Since December 2023, Transpo Group has been working with Whatcom County staff from the Planning, Public Works, and Parks Departments, as well as members of the Bicycle Pedestrian Advisory Committee to update the 2016 Transportation Element and incorporate new GMA, RCW, and WSDOT requirements for active transportation, multimodal level of service (MMLOS) standards, Complete Streets on State highways, and more.

## GMA Transportation Element Requirements

Since 1990, the Washington Growth Management Act (GMA) transportation element requirements have changed from auto-oriented to multimodal with an emphasis on active/human-powered modes, such as walking, biking, and rolling (wheelchairs, mobility devices, etc.). The GMA and RCWs now require goals, policies, and emphasis on:

- ADA Transition Plans
- Multimodal Level of Service (MMLOS)
- Active Transportation Networks (ATN)
- Complete Streets for County roads and State Routes
- Safety for Vulnerable Road Users
- Equity in transportation investments
- Transportation/Land Use integration
- Reduction of Vehicle Miles Traveled (VMT)
- Reduction of Greenhouse Gas (GHG) emissions

## Legislative Changes, State Plans, and Implementation

The legislation listed below may affect Transportation Element requirements:

[ESSHB 1181 Climate Change - Planning](#). Requires new Climate Element in Comprehensive Plans to include multimodal level of service (MMLOS) standards in Transportation Element and policies to reduce VMT and GHG.

[RCW 47.04.035 Complete Streets for State highways](#). Requires all WSDOT projects of \$500,000 or more in population centers to include sidewalks, bikeways, crossings, etc. for all ages and abilities, consistent with Complete Street principals.

[2021 WSDOT Active Transportation Plan](#). Requires WSDOT to provide “Level of Traffic Stress Type 1 or Type 2” (Physically separated) pedestrian and bicycle facilities on State highways within population centers, consistent with needs identified by local agencies.

[2024 Target Zero WSDOT Strategic Highway Safety Plan](#) with a goal of reducing deaths and injuries to zero, adoption of the Safe System Approach with a new Safer land Use element, and an emphasis on equity and vulnerable users.

[SB 5452 Transportation Impact Fee \(TIF\)](#). Authorizes GMA-compliant cities and counties implementing Transportation Impact Fee (TIF) ordinances to collect revenue to fund improvements to bicycle and pedestrian facilities intended for commuting.

[SB 5412 SEPA Categorical Exemption for Housing Projects](#). Requires non-project level SEPA analysis for transportation and identification of mitigation measures, which then eliminates requirements for project-specific transportation impact analysis and mitigation for housing projects or mixed-use development with residential units.

## Active Transportation Network and MMLOS Standards

Transpo Group obtained and reviewed work conducted by the County BPAC and then met with them in May 2024 to explain the GMA requirements, intent, and rationale for developing the countywide Active Transportation Network (ATN) and MMLOS standards.

- The Active Transportation Network establishes a foundation for the County to focus pedestrian and bicycle infrastructure investments on. This can be expanded over time and developed into mode-specific Pedestrian and Bicycle Plans
- Establishing minimum MMLOS standards will allow the County to meet and maintain the standard over time to remain GMA-compliant, while also having the flexibility to go above and beyond the standard, if funding allows
- Whatcom County Code 20.78.100, Annual Transportation Concurrency Report, requires that “the director shall prepare an annual report presenting current capacities and levels of service (LOS) for affected roads.” The report is completed by end of year and accounts for vehicle traffic counts collected for that year.
- The Annual Concurrency Report can be enhanced with ATN maps and spreadsheets documenting status of active transportation network and transit LOS
- Public Works staff and BPAC can use the Annual Concurrency Report to recommend active transportation projects for inclusion on the six-year transportation improvement program (TIP), if local funding is available or if a realistic grant funding opportunity exists
- Elected officials, as well as the public, will be provided with more information to support decisions and priorities for multimodal transportation investments

## Strategic Planning to Increase Transportation Funding

An initial review of historic (2014-2023) and future (2026-2045) transportation infrastructure costs vs revenues indicates that Whatcom County is expected to have limited financial capacity to widen existing roadways to add shoulders or to construct significant new active transportation infrastructure separated from existing roadways. The Active Transportation Network and MMLOS standards have been developed based on this limited financial capacity, but also offer the flexibility for the County to go above and beyond the minimum standards if additional funding becomes available. Transpo Group proposes several strategies to increase transportation funding available to Whatcom County in the future to implement active transportation facilities.

- State and federal transportation grant funding programs occur in cycles, can be extremely competitive (20-25% success rate), and can include significant (20%) local funding match requirements.
- The Annual Concurrency Report and Six-Year TIP can be used strategically to:
  - Identify ‘over-the-horizon’ grant funding opportunities and program projects to meet applicable grant funding cycles

- Prepare project candidates tailored to the scoring criteria and typical funding amount of each grant program
- Program funding to be set aside to meet local match requirements
- The County can become eligible for additional grant funding sources by:
  - Completing Local Road Safety Plans every odd-numbered year, which are required for WSDOT County Safety Program grants. Funding awards can range from \$100,000 to \$2,000,000 every two years.
  - Adopting a Complete Streets ordinance to be eligible for the Washington Transportation Improvement Board (TIB) Complete Streets grant. Funding awards can range from \$100,000 to \$1,000,000 every year.
  - Updating the 2011 Nonmotorized Plan to be consistent with the 2025 Transportation Element, which would generally make the County more competitive for active transportation grants
  - Developing funding partnerships with cities, ports, school districts, businesses, and other organizations

## Overview of Work Completed To Date

As of April 15, 2025, the items listed below have been completed as preliminary drafts or work is currently on-going:

- Regular meetings with County Public Works and Planning staff
- Multiple presentations and discussions with:
  - Whatcom County and City Planners
  - Whatcom Council of Governments (WCOG) staff
  - WSDOT Mt. Baker Region staff
  - Whatcom County Bicycle and Pedestrian Advisory Committee (BPAC)
- Review of multiple Whatcom County transportation documents, including:
  - 2011 Non-motorized Plan
  - 2016 Transportation Element
  - 2019 active transportation work conducted by BPAC
  - 2022 Blaine-Birch Bay Multimodal Connectivity Study
  - January 2024 consultant interviews with BPAC
- Updated inventory of existing County transportation conditions in 2024
- 2016 Transportation Element goal-policy audit and recommended changes for compliance with new GMA requirements
- WSDOT 2019-2023 crash data documentation and safety analysis

- Whatcom Council of Governments (WCOG) travel demand model documentation of existing (2024) conditions and future (2044) forecast of transportation impacts associated with 20-year growth and development
- Draft Environmental Impact Statement (DEIS) Analysis and Findings
- Recommendations for Multimodal Level of Service (MMLOS) standards
- Development of countywide Active Transportation Network (ATN) based on existing roadways with shoulders, including State Routes serving population centers to ensure WSDOT compliance with RCW 47.04.035 Complete Streets
- GIS map development for multimodal transportation and trail facilities
- Development of 20-year ATN project list for County roads and State Routes
- Development of planning-level project cost estimates for a variety of bicycle and pedestrian facility types
- Initial review of County 20-year revenue projections

## What's Next?

Whatcom County will publish the Draft Environmental Impact Statement (DEIS) with an evaluation of growth alternatives for public review in early May 2025. After review, comment, and discussion a “preferred growth alternative” is expected to be chosen. Multimodal transportation needs and funding strategies will be developed to help implement this preferred growth alternative.

### CC:

Mark Personius, Director, Planning & Development Services

Matt Aamot, Senior Planner, Planning & Development Services

Cliff Strong, Senior Planner, Planning & Development Services

Doug Ranney, County Engineer, Public Works

Ryan Morrison, Engineering Manager – Traffic, Public Works

Jason Ardt, Capital Project Management Specialist – Traffic/BPAC Liaison, Public Works

