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MULTIMODAL CONCURRENCY STUDY

Executive Summary

Options for Making Concurrency More Multimodal

Response to 2005 Legislative Session (2SHB1565)

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Prepared by:

TRAC/UW Consultant Study Team

- **(Lead) Mark E. Hallenbeck, Washington State Transportation Research Center (TRAC-UW)**
- **Dan Carlson, Keith Ganey, University of Washington Evans School of Public Affairs**
- **Anne Vernez Moudon, Luc de Montigny, University of Washington Department of Urban Design and Planning**
- **Ruth Steiner, University of Florida**
- **King Cushman, Puget Sound Regional Council**

Prepared for:
Puget Sound Regional Council

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INTRODUCTION TO TRANSPORTATION CONCURRENCY

The Growth Management Act (GMA) introduced the idea of "concurrency" in 1990 as a way of more effectively linking land-use and infrastructure planning. The term reflects the policy's goal of ensuring that development not outpace the provision of infrastructure.[1] That is, the infrastructure improvements needed to serve new development should be in place "concurrent" with that development. The transportation infrastructure that a jurisdiction may examine to determine what might be required to serve a new development can include roads, transit service and facilities, or other modes of travel, depending on the nature of the city/county in which the development will occur.

The GMA directs jurisdictions to define and establish level of service (LOS) standards for their transportation systems. The transportation LOS standards serve as a baseline for determining whether current transportation facilities can accommodate the transportation impacts associated with new development. If the new development will cause the transportation system to exceed the pre-determined LOS standards, the jurisdiction must deny the development unless transportation improvements and strategies are implemented to accommodate the development within six years, a process known as *concurrency mitigation.*

STUDY INTENTION

In its July 2003 final report, *Assessing the Effectiveness of Concurrency,* The Puget Sound Regional Council concluded, "The transportation planning goal in the GMA focuses on developing efficient multimodal transportation systems – however, the majority of local concurrency programs focus almost exclusively on auto congestion." (Miller, Piro, 2003). In the geographic regions where the primary means of transportation is the local road system, transportation concurrency as currently applied has worked reasonably well. In the areas where a significant proportion of travel occurs on regional roadways, especially highways of statewide significance, or by modes other than the single occupant automobile, transportation concurrency in Washington has been less successful. To improve concurrency, the legislature passed 2SHB 1565 in 2005, which directs regional transportation planning organizations (RTPOs) to develop transportation concurrency strategies and regional level-of-service measures for regional growth centers

[1] This *concurrency* requirement applies to all aspects of a local government's infrastructure, including roadways, sewers, and water. However, the Act requires jurisdictions to adopt ordinances that establish a concurrency *measurement* system only for transportation.

that are multimodal. The legislation further *encouraged* local cities and counties to include multimodal strategies in their approaches to concurrency.

This study's purpose, by legislative intent, is to examine and propose multimodal improvements to concurrency. These include both alternative ways to measure the availability and effectiveness of multimodal transportation systems, and ways to use those measurements to implement more effective multimodal transportation systems that support the goals of the GMA.

LIMITATIONS IN TRANSPORTATION CONCURRENCY AS APPLIED

The current concurrency system is well designed for some land-use patterns, but is ill-suited to dense, urban environments. From the vantage point of low density, spread out, suburbanized America, relying on roadway congestion to measure transportation performance makes perfect sense. In exurban, underdeveloped areas with incomplete road systems, use of these measurement systems can help ensure that carefully designed grid road networks are completed in tandem with new development.

Unfortunately, because this approach only counts vehicles and fails to account for people who walk, drive with friends or co-workers, ride transit, or bicycle, it has proven insufficient for denser jurisdictions because eventually it becomes a choice between accepting more congestion, building more road lanes, or denying new development. Thus, the use of roadway-only concurrency systems poses an impossible choice for more fully developed urban communities where limited land availability prevents expansion of roadways and where roadway capacity becomes a poorer proxy for the transportation system because a growing share of travel occurs via alternative modes as density increases. . With roadway-only concurrency measurement systems, these communities can only choose between accepting increasing roadway size and/or congestion or denying development.

A second limitation in the current process is a lack of consideration for the regional transportation impacts of new development. Although much of the worst congestion in the state involves regional travel, the existing concurrency process is locally focused. Unless a city specifically chooses to develop an interlocal agreement with one or more of its neighbors, development impact review is performed for transportation facilities within that single jurisdiction's boundaries. Even within those boundaries, highways of statewide significance are specifically exempted from concurrency review. The result of this tightly focused, local view of concurrency is that the regional impacts of development are rarely considered. Regional effects only become a concern of local jurisdictions when through-traffic volumes clog locally controlled roads that are included in a jurisdiction's concurrency calculations, or where congestion spillover from regional facilities affects the performance of local (non-state) roads that must meet concurrency LOS standards. When either of these cases occurs, a jurisdiction's conscientious efforts to set LOS standards and balance land-use and transportation investments can be overwhelmed by traffic that begins and ends in other jurisdictions.

OTHER CONSTRAINTS IDENTIFIED

Two significant additional issues were identified that detract from the benefits that have been, and can be, achieved through application of transportation concurrency. These issues are a lack of funding to improve transportation services, and a frequent disconnection between the expected level of transportation system performance, the adopted land use plans, and the adopted transportation system plans.

The lack of transportation funding is widely recognized at all levels of transportation systems – local, regional and state. Considerable interest exists among some groups to offset the transportation infrastructure costs new development imposes on the public sector through impact fees. However, high impact fees tend to discourage development, and thus most jurisdictions are reluctant to impose high fees for fear of moving development to neighboring jurisdictions. When this occurs, the initial jurisdiction often receives many of the same transportation impacts, but none of the benefits of the development. However, in areas of high desirability, the permit/do not permit nature of the existing concurrency process can result in "concurrency mitigation" fees being paid "voluntarily" by developers in order to fund the transportation improvements necessary to improve transportation system performance to the point where a development permit can be obtained. Thus, some jurisdictions use concurrency to provide supplemental funding for desired transportation system improvements.

It is somewhat surprising that a number of current laws and regulations do not actively support the combined analysis of transportation and land use. [2] That is, while laws exist requiring local jurisdictions to plan allowable land uses and to plan transportation systems, and these plans are reviewed for consistency regionally, there is no requirement that these plans result in transportation system performance that is consistent with the intentions (the adopted transportation concurrency standards) of the jurisdictions doing the planning. Additionally, as there are quite a number of different local definitions of LOS, it makes it even more challenging to identify or discern a consistently desired *regional* LOS for cross-jurisdictional facilities.

At the local level, long range comprehensive land use plans are often developed and adopted with transportation elements that can not realistically be expected to serve that total long-range projected development at the levels of service adopted in the transportation concurrency regulations. All too frequently the "built out" transportation system plan (i.e., the number of roadway lanes acceptable to the jurisdiction) does not accommodate the "built out" comprehensive plan, at the adopted "acceptable" level of roadway performance (LOS). On top of these performance issues is then added the impacts of regional through traffic and spillover from congested regional roadways. The result is that the transportation system often performs well below expected levels for a given level of development.

An unexpected consequence of this performance disconnect between the transportation system and land use plans is that as the planned roadway system plan is

[2] It is worth noting that the GMA requires the transportation plan to "implement" the land-use plan. The GMA neither defines "implement" nor provides consequences for a land-use plan which is impossible to implement.

built out, concurrency can become a cap on development, rather than simply a mechanism to delay development until the desired transportation system is in place. The transportation system necessary to serve the comprehensive plan's development at the performance levels specified is simply not in the transportation system plan. This is contrary to the intentions of transportation concurrency as written in State law.

Providing for consistency between land use and transportation plans is further complicated by the fact that these plans are typically developed by different departmental organizations within each jurisdiction, and transit system plans are most often developed by entirely different agencies.

These same issues are apparent at the regional level. The transportation and land use plans adopted at the regional level are "consistent" regionally and usually also consistent locally. That is, most individual jurisdiction's policies are consistent with each other and, as required by State law, consistent with regional policies and a region's regional transportation plan. Furthermore their local land use development plans are consistent with each other and their local transportation plans are consistent with each other. The problem is that the transportation systems planned and funded in those plans do not support the land uses that have been adopted *at the levels of service* that individual jurisdictions wish to achieve.

This disconnection between land use and transportation planning is fairly common. For example, the Buildable Lands Program (1997 Amendment to GMA) ensures that urban densities in the key mandated counties are being achieved within Urban Growth Areas (UGAs) and that the supply of land within UGAs is sufficient to accommodate population and job growth. If such balances in densities and land development are not being achieved, the program requires "reasonable measures" to increase "consistency" between local planning and *actual* development and to ensure sufficient housing and job capacity. It does NOT, however, address the impact of land use on travel demand or on transportation facilities. Thus, changes in development patterns that cannot be effectively served by the regional transportation system may be caused by the Buildable Lands Program, all in the name of growth management.

ALTERNATIVES DEVELOPED

The project team developed a number of alternative approaches for making the transportation concurrency process more multimodal. Each of these ideas can be categorized as fitting into one of five basic strategies for improving the transportation concurrency process. These five basic strategies include:

A) Measure mobility performance and land development capacity differently and more appropriately
B) Modify concurrency from an on/off switch to a more flexible management tool
C) Provide physical infrastructure capacity to accommodate transit, high occupancy vehicles, and non-motorized ways to get around
D) Provide and fund transit and other HOV services
E) Develop regional and sub-regional concurrency standards accompanied by institutional authority to enforce them

These strategies and implementation alternatives are not mutually exclusive; they can be mixed, matched, and tailored to meet the needs of different jurisdictions.

Each of the five basic strategies is introduced below. Within each of the strategies two or more specific implementation alternatives were developed and evaluated. More detailed descriptions of each of the alternatives are included in the main body of this report.

Strategy A: Measure Mobility Performance and Land Development Capacity Differently and More Appropriately

This strategy evaluates multimodal concurrency by expressly examining factors other than peak period roadway volume and capacity to determine whether the land uses and/or transportation systems in place allow development to take place regardless of the commute period performance of the roadway system. The thought behind this consideration is best illustrated by Manhattan. The roadway system in Manhattan is definitely congested, but the trips generated by new development can still be accommodated within the existing transportation system. This is in part because of the availability of a very significant transit system (buses and subways), but it is also true that many people in Manhattan walk from one activity to another because the mix and density of land uses present in the city and the availability of sidewalks and other pedestrian facilities make walking between destinations convenient.

Specific implementation alternatives explored in the main body of this report include:

- Use of tools such as the Transportation-Efficient Land Use Mapping Index (TELUMI) to identify those geographic areas with the land capacity and land-use conditions necessary to support significant travel movements in non-SOV modes.
- Use of off-peak traffic volumes
- Development of new level-of-service measures that directly account for the level of transit service provided.
- Development of multimodal "seat capacity" performance measures that determine whether sufficient motorized transportation capacity exists entering/exiting a geographic area, relative to the number of person trips entering/exiting that area.
- Development of a person capacity measure which accounts not only for motorized seat capacity, but also the number of walking and biking trips made and the available sidewalk and bike facility capacity.
- The application of mode split standards
- Multimodal level-of-service computations
- Travel-time based measurements for distinct modes

Strategy B: Modify Concurrency From an On/Off Switch to a More Flexible Management Tool

Strategy B suggests that the state legislature change the concurrency legislation to allow a more graduated approach to concurrency level-of-service and its resulting

mitigation. Rather than having only one level-of-service standard, which results in a yes/no, build/no build decision, jurisdictions could set several standards, with each standard being associated with a different level of required mitigation.

Currently, because only a binary decision (yes/no) is possible, considerable "mathematical gymnastics" are undertaken by developers, development opponents, and local jurisdictions trying to push each proposed development to one side or the other of that yes/no decision. In many cases, developers "volunteer" to pay for specific transportation system improvements that allow the estimated level-of-service to improve to within the adopted concurrency standard and, therefore, permit development. Thus, concurrency can become a "de facto" impact fee system, but one that concentrates those fees only on infrastructure projects that affect the level-of-service measurement.

Instead of stopping development when a somewhat arbitrary boundary condition relating to transportation system performance was reached, Strategy B would increase the cost of development impact fees as congestion became greater. With this strategy, development permitted in the comprehensive plan would, technically, never need to be denied. However, when congestion was bad enough, the mitigation required from that development might be very substantial. The impact fees generated by such an approach to concurrency would then be used to fund transportation services and system improvements that would provide mobility to the region being affected by that new development.

Two specific implementation alternatives are examined in the main body of this report. These include:

- Variable impact fees based on roadway level-of-service
- Regional concurrency fees based on the presence of multimodal travel capacity.

Strategy C: Provide Physical Infrastructure Capacity to Accommodate Transit, High Occupancy Vehicles, and Non-Motorized Ways to Get Around

This strategy is based on the assumption that in our already well built out urban areas, there is likely to be little, if any, further investment in the vehicular capacity of the infrastructure that already exists, and therefore, the existing network of streets and roads is assumed to be the total supply of available roadway facilities. Strategy C is intended to help new development achieve concurrency by better utilizing that fixed supply of facilities.

This strategy aims to modify the current infrastructure design and to shift its current emphasis on accommodating cars to that of accommodating other modes of travel. The rationale is that if there are no walkways, no bike paths or bike lanes, or no bus pull-outs and shelters, it is very difficult for people to choose and use alternatives to the private auto. In contrast, if public policy and practice assured that such multimodal facilities were in place or would be in place in a six-year time frame, then the intent and test of transportation concurrency would be met.

Under Strategy C, multimodal concurrency would be furthered through design and construction standards (codes) guiding the implementation of infrastructure that supports transit and non-motorized modes. This approach would be, at least in part,

familiar to the many local jurisdictions that already require new development to build sidewalks, bicycle parking, and other non-single occupancy vehicle (SOV) facilities. In the context of multimodal concurrency, however, the standards could be instigated not only by individual jurisdictions, but also by multiple jurisdictions (through inter-jurisdictional agreements) or by regional bodies such as MPOs/RTPOs to gain more complete inter-jurisdictional consistency and system/network connectivity. Implementation alternatives would emphasize the provision of the physical infrastructure necessary to encourage the use of non-SOV modes of travel. There is a growing body of data supporting the rationale for mandated such standard urban infrastructure improvements as sidewalks and designated bike-routes/paths. PSRC's analysis of its extensive personal travel survey data reveals significant differences in travel behavior for people living and working inside or outsider of regional growth centers. For traveling to work, the data shows greatly reduced levels of single-occupant vehicle travel and greatly increased levels of transit, walking and biking travel for people who either live or work in regional growth centers.

The main body of this report examines how the following transportation infrastructure attributes might be incorporated into a multimodal concurrency system.

- Sidewalks,
- Bicycle lanes,
- On-street parking and dedicated transit or non-motorized lanes,
- Re-striping,
- Bus pull-outs,
- Signalization

Strategy D: Provide and Fund Transit and Other HOV Services

This strategy is designed to improve the multimodal application of concurrency in areas where the desired road network has been completed but does not perform to a desired standard, or where expansion of existing roadway capacity has a lower priority than the provision of alternative forms of mobility. In this basic approach, additional development would be permitted in these congested areas as long as sufficient funding was provided by the developer to expand the availability and use of shared ride modes of travel within the geographic area occupied by the proposed development. Instead of spending mitigation fees on widening roads or building turning lanes, jurisdictions would use development fees to assure adequate levels of service by supplying additional transit services, or by increasing the availability and desirability of van pooling, carpooling, walking, and other non-SOV modes of travel.

Three different options are explored in the main body of the report. The first two are specifically aimed at generating new funding that can be used to support the provision of transit or other ongoing services. The third explores how travel demand management actions could be incorporated into concurrency.

- Transit service as mitigation
- Transit endowment funds as mitigation
- Travel demand management (TDM) as mitigation

Strategy E: Develop Regional and Sub-Regional Concurrency Standards Accompanied by Institutional Authority to Enforce Them

The flow of traffic and of public transportation does not respect political and geographic boundaries, and long-term regional plans like Vision 2020 envision over twenty distinct urban-level centers with travel and improved access among them. As previously noted, metropolitan development and travel patterns occur at a regional level while land-use and level-of-service (LOS) responsibilities are delegated to local governments. In addition, while localities control land use, they generally do not control the funding or provision of transit service that provides a key modal alternative to the private automobile. These simple facts are at the root of a significant disconnect between the policy intent of transportation concurrency and the ability of any single municipality to effectively manage growth through LOS standards, which are currently employed in a fragmented manner.

This strategy specifically examines ways to incorporate a more regional outlook to concurrency. The specific mechanisms examined in the main body of the text for this report include:

- Adoption of regional LOS standards, especially for key regional facilities and regional growth centers
- LOS standards enforcement regionally
- Adoption of regional SOV VMT (vehicle miles traveled) targets
- A Regional Transportation Commission assumes responsibility for transportation concurrency

CONCLUSIONS AND RECOMMENDATIONS

The project team concludes that jurisdictions must use multimodal concurrency measures where multiple modes are needed to effectively serve development. In addition, we conclude that no single concurrency measurement system will work for all jurisdictions. The measures that should be used, need to be flexible enough to change from jurisdiction to jurisdiction based on the attributes of each location and the transportation system plans for that locality. The choice of what measures to use should be driven by the modes that are expected to serve key transportation movements identified and incorporated in the adopted transportation plan.

The project team also concludes that to achieve the intended land-use and transportation balance intended by the GMA, transportation concurrency must exist at both the regional and local levels. The permitting decisions that currently are performed at the local level must remain exclusively at the local level. (That is local jurisdictions must still have the ability to limit development until the local transportation system can accommodate it.) Regional concurrency would measure the regional impacts of development and would evolve to be an incentive/disincentive system overlaid on the local concurrency system to encourage development in those planned and desired places where the regional travel movements the new development generates can be most efficiently served. The regional concurrency system would not prevent any development from occurring. Instead, it would impose disincentives (financial or otherwise) on

developments permitted by local jurisdictions that had disproportionate impacts on the regional transportation system. The corollary is also suggested wherein the regional concurrency system should also "reward" positive developments that can demonstrate more "transportation efficient" land use with considerations for priority funding for supporting infrastructure facilities.

Finally, the project team concludes that the goals of transportation concurrency and growth management would be well served if the legislature were to examine the existing land use and transportation statutes to ensure that they complemented each other as much as possible.

Specific Recommendations

The recommended multimodal concurrency practices take ideas from each of the five strategies presented earlier. The primary emphasis is on Strategies A, B, and E; a two-tiered concurrency system that provides a more flexible incentive and disincentive system at the regional level, while incorporating the key transportation system attributes that are actually desired by local agencies.

Local Concurrency

The project team recommends the use of multimodal concurrency measures that detail the existence (or lack thereof) of the key facilities and services required to serve the geographic subarea for which the concurrency system has been developed, regardless of the mode involved. This means that the concurrency measures will change from jurisdiction to jurisdiction, and may even change from subarea to subarea within a jurisdiction.

As with the existing concurrency systems, failure of the "local" portion of the recommended multimodal concurrency system results in a denial of the development permit. That is, if the locally identified transportation system cannot accommodate the proposed development, it may not be built.

In urban centers where the desired street system has been built out, we suggest that the concurrency system be based on the operational performance of that system in terms of the multimodal travel time between key activity centers or along key travel corridors or the multimodal travel time between regional growth centers and the outer limits of a radius of the average regional work trip distance (currently about 10 miles). The standard against which actual and predicted travel times are compared might be set for both HOV and SOV modes and if either travel time met the adopted standard, the concurrency standard would be met. Such an approach would indicate that if either mode was sufficiently fast, it was possible to travel between those activity centers or to/from a given center in an acceptable amount of time, and thus, that sufficient mobility was available. If both travel time measures could not be met, the jurisdiction would have the option of improving travel conditions for whichever mode could most cost effectively meet the desired performance goal. For example, this might entail providing transit signal priority on arterials along the key routes in order to speed transit, and thus improve HOV travel times.

In lightly developed residentially oriented jurisdictions on the fringe of a metropolitan region, a multimodal concurrency measurement system might be more facilities based. One suggested system combines traditional arterial level-of-service calculations and park and ride space availability.[3] In this case, because it is a developing region with a (presumed) lack of transportation infrastructure, the jurisdiction might set their concurrency standard as being met only if both roadway level-of-service and park and ride space availability measures were met. Failure of either standard would require mitigation of that failure by the developer. In cases where non-SOV modes are not expected to provide mobility to the jurisdiction, the concurrency system could even be completely auto oriented.

For suburban jurisdictions that fall between these two extremes, the real multi-modal issue is likely to be the amount of transit service that is present, rather than the performance (travel time) of that service. Cities that were once "suburban" residential communities that are becoming more dense might wish to develop a composite approach to concurrency that started with an arterial based roadway level-of-service calculation and then modified that calculation if sufficient transit service was present/planned for that arterial. For example, an adopted arterial standard might be LOS D unless more than ten buses per hour traveled on that roadway during the peak period, in which case the acceptable roadway standard could be LOS E.

Alternatively, the city might designate its geographic core or regional growth area "exempted" from LOS calculations, but where all employers within that core area must join the transportation management association (TMA) for that area, and where the TMA and the city have agreed to specific programs for limiting single occupant vehicle use to/from the TMA district during peak periods.

Regional Concurrency

The project team recommends that regional agencies be given the authority to develop, and apply a "regional concurrency system" that is in addition to the locally applied concurrency system described above. This regional authority could be, but does not have to be, the existing MPO/RTPO. The regional system would measure and address only the regional impacts of proposed development. It would not have the ability to deny development authority.

Instead, the regional authority would be empowered to develop a system of incentives and disincentives designed to encourage development in locations that can be most cost-effectively served by publicly supported transportation facilities and services. The specific incentive/disincentive system would be designed and implemented by each regional authority. Such a system could involve the imposition of "impact charges" on developers based on the costs of service new trips being imposed on the regional transportation system. (Those charges would be higher on developments that imposed large impacts and smaller on developments that imposed smaller impacts. For example, each development might be charged a user charge based on the number of vehicle-miles-

[3] The space availability measure could be stated as 1 unused park and ride parking space must exist within the jurisdiction (or within an identified set of park and ride facilities) for every 10 new residential trips added by a development. (The ratio of spaces to residential trips could be set based on existing park and ride usage and residential trip making.)

of-travel (VMT) that development is expected to contribute to the regional freeway system.)

However, the regional authority does not have to impose a "charge" based system. The regional authority is free to select any mechanism which provides incentives to build in areas which lower the public cost of meeting that development's travel demand while imposing disincentives for building in areas which increase the public costs of meeting travel demand. For example, transit oriented developments (TOD) built in a defined Growth and Transportation Efficiency Center (GTEC) and/or along an existing high capacity transit route might be exempted from any concurrency review (even at the local level), thus decreasing the development cost and speeding up the permitting process. Developments not built within these constraints would have to conform to local concurrency regulations.

There are two parts to a "regional concurrency" system. The first part is designating what "regionally concurrent" means. The second is what happens to a specific development proposal once that decision has been made.

"Regionally concurrent" can be defined either technically or politically.

If a technical approach is selected, key transportation and land use characteristics are defined which indicate whether a geographic area is "regionally concurrent" or not. For example, all geographic areas that are "conducive to multimodal travel" might be considered "regionally concurrent" if they also met local development regulations. Once these criteria have been determined, it is a simple matter of applying those criteria and developing a map of "regionally concurrent" and "regionally non-concurrent" areas within the region. The TELUMI model is an excellent example of a tool to develop such a system.

This technical approach is also useful in that it defines exactly what attributes constitute a "regionally concurrent" area. Thus, any jurisdiction which has subareas which are "regionally-concurrent" but wishes to have them designated as such, knows exactly what types of land use and transportation system attributes need to be changed/improved in that area in order to gain that designation.

"Regionally concurrent" can also be defined politically to correspond to where the region has planned to place regionally significant transportation services. For example, the region could define all GTEC's as being "regionally concurrent." It could also define any location within ½ mile walking distance of a major transit station as being "regionally concurrent." Changes in these designations would then be addressed through the existing regional planning process, as performed in conjunction with the designated regional concurrency authority.

What happens after the determination of whether a development proposal is determined to be regionally significant is a function of what types of incentives and disincentives each region in the state is willing to provide/impose.

The project team believes very strongly that the regional concurrency authority must control/influence some transportation funding in the region. These funds can come from new sources (e.g., regional concurrency charges imposed on "non-regionally concurrent" developments as mitigation for the increased public costs those

developments impose), or from existing sources (e.g., the regional authority could be allocated a specific percentage of regional transit funds to allocate to those areas where regional transit improvements are needed most.)

Where new funds are developed, all regional transportation facilities/modes should be eligible to receive those funds. Where existing funds are allocated based on regional concurrency priorities, those funds should be spent on the mode that would have received them had they not been allocated to the regional concurrency authority.

Recommendation Summary

The recommended two-tiered system is designed to provide a more flexible multimodal process that provides incentives for development in areas which reduce the impact of that development on the region as a whole. The result will be a reduction in cost for development in those geographic areas that can most cost-effectively be served by transportation services funded with public money. At the same time, control of local development decisions remains at the local level, ensuring that new development only occurs when that development meets local requirements.

The regional incentive system redresses limitations in the present concurrency system that provides incentives for developers to externalize transportation costs. Thus decreasing development costs, but increasing regional transportation needs. By tying the incentives/disincentives to the regional transportation system costs new development imposes on the public sector, we encourage the cost of development to more accurately reflect total costs, while still encouraging market forces and individual choices to control location decisions and travel behavior.