

City of Bellingham Commute Trip Reduction Four-Year Plan Update: 2025–2029

DRAFT

Benefits of CTR

1. Describe the local land use and transportation context and objectives.

a) Describe the setting in the jurisdiction as it is today or will be in the near future.

The City of Bellingham, founded in 1903, is the largest city and the primary employment hub within Whatcom County. The city has a population of 97,270 residents and approximately 49,700 employees that work within the city limits. Additionally, Bellingham is home to twenty-one K-12 schools and three colleges and universities, further increasing the volume of daily commuter traffic and highlighting the need for effective multimodal transportation options for residents, students, and the workforce.

To address the growing demand for diverse transportation options, the City of Bellingham adopted the Bellingham Bicycle Master Plan and Pedestrian Master Plan in April 2024. These plans aim to enhance the safety, equity, and connectivity of the city's multimodal transportation network, encouraging more people to walk, bike, and use other non-motorized forms of transport for their daily needs. The specific objectives of these plans include expanding the bike lane network, improving pedestrian crossings, and increasing access to safe and secure bike parking facilities. Community engagement efforts have been integral to the development of these plans, with numerous public workshops and surveys conducted to gather feedback and ensure the plans meet the needs of all residents.

The Whatcom Smart Trips program, administered by the Whatcom Council of Governments (WCOG), will play a pivotal role in the City of Bellingham's CTR program. The Whatcom Smart Trips program provides an incentive for members of the community to be mindful of the trips they are making throughout the day by providing discounts at local participating retailers, milestone rewards, cash prizes and recognition. The program allows participants to enter a trip log whenever a single occupancy vehicle trip was replaced by walking, biking, utilizing transit, carpooling, or other multimodal transportation trips. Since the inception of the program, it is estimated that 32,706 tons of carbon dioxide emissions have been avoided.

In conjunction with the plans and the Smart Trips Program, the city and county collaborate closely with the regional transportation provider, Whatcom Transit Authority (WTA). WTA offers a comprehensive range of services, including fixed-route buses, paratransit, vanpool, and zone services throughout both the city and the county. Future developments include the planned expansion of bus routes and the introduction of additional electric buses to further reduce the city's carbon footprint.

By implementing these strategies, Bellingham aims to create a more sustainable, accessible, and efficient transportation network that benefits the entire community.

b) Describe features of land use and transportation facilities and services that affect commuters.

The City of Bellingham is predominantly comprised of residential single-family housing, which accounts for 42% of the land use. As the population continues to grow, this growth will be accommodated primarily through compact development within the city limits. This includes infill development in areas served by existing infrastructure and services, as well as the creation of mixed-use urban villages. Other significant land uses in Bellingham include industrial (17%), residential multifamily (14%), and public open space (11%).

To manage the increasing density, the City of Bellingham has focused on providing a safe and connected multimodal transportation network to reduce congestion. Several plans and studies support the improvement of this network. The Bicycle Master Plan and Pedestrian Master Plan lay the framework for the city's bicycle and pedestrian networks, with over 500 identified bicycle and pedestrian improvements citywide.

The current Comprehensive Plan includes goals and policies aimed at enhancing the multimodal network through capital improvements, development requirements, street standards, equity in engagement, service delivery, and investment. This plan is currently being updated to expand on and continue these initiatives.

The 2025-2030 City of Bellingham Transportation Improvement Program (TIP) outlines various projects to improve multimodal safety and connectivity. Additionally, the city has emphasized the development of mixed-use areas and dense residential zones near commercial centers to reduce commuting distances and promote walkability.

In support of these efforts, several transportation and corridor studies have been completed, including:

- Lincoln-Lakeway Multimodal Transportation Study (2020-2021)
- Meridian-Girard Multimodal Safety Improvements (2020-2022)
- Parkview Elementary Safe Route to School Improvements (2020-2022)
- Kentucky-Nevada-Texas Bike Boulevard (2021)
- West Illinois Pedestrian & Bicycle Safety Improvements (2020)
- James Street Multimodal Feasibility Study (2019)
- Meridian Street Roundabouts Feasibility Study (2019)

These studies provide analysis and design guidance for specific locations and corridors, informing the projects included in both the Bicycle Master Plan and Pedestrian Master Plan, as well as those in the 2025-2030 TIP.

In addition to city-wide plans, the city has developed plans for each urban village and subarea. These plans provide the policy framework for development within each neighborhood, often including multimodal transportation improvements such as sidewalk connections, bicycle improvements, crossing improvements, and traffic calming devices. Urban village and subarea plans include:

- Downtown Bellingham Plan (2014)

- Waterfront District Subarea Plan (2019)
- Fairhaven Neighborhood and Urban Village Plan (2012)
- Samish Way Urban Village Subarea Plan (2019)
- Fountain District Subarea Plan (2020)
- Old Town Subarea Plan (2008)

c) *Describe whether and how commuting patterns have changed in the past few years.*

- 1. Remote and Hybrid Work:** The COVID-19 pandemic has significantly shifted the way people work, with many employers adopting remote or hybrid work models. This reduction in daily commutes suggests decreased traffic congestion during traditional commute times and lower demand for parking facilities near large employment centers within the City of Bellingham.

CTR Program Implications: The increase in remote work suggests a reduction in daily commute trips, aligning with the goals of the CTR plan to reduce traffic congestion and improve air quality. This shift supports the CTR objective of minimizing the number of commute trips.
- 2. Increased Use of Bicycle and Pedestrian Networks:** There has been a rise in biking and walking as primary modes of transportation. Community interest in health and fitness, along with local initiatives and events promoting active transportation, have contributed to this trend.

CTR Program Implications: Investing in the development and maintenance of safe and connected bike lanes and pedestrian pathways supports the increased preference for active modes of transportation. Enhancing infrastructure that encourages biking and walking helps reduce car dependency and promotes sustainable commuting options, reinforcing the goals of the CTR plan.
- 3. Enhanced Public Transportation Services:** The Whatcom Transportation Authority (WTA) has expanded and improved its services, making public transportation a more viable option for many commuters. The improvement of bus routes and schedules has contributed to this positive change.

CTR Program Implications: The improved services and capacity of public transportation is in line with the CTR plan's objectives. Promoting and supporting public transit use through incentives like free bus passes and improved access to transit services help reduce single-occupancy vehicle trips, thereby supporting the goals of the CTR plan.
- 4. Compact and Infill Development:** The City of Bellingham's focus on developing mixed-use urban villages has led to more residents living closer to work, schools, and amenities. This has reduced the need for long commutes and increased the use of multimodal transportation.

CTR Program Implications: Policies that promote high-density residential and commercial development near transit hubs and employment centers are important to the CTR plan. Encouraging compact and infill development reduces commuting distances, supports the use of sustainable transportation options, and enhances the effectiveness of the CTR program.

d) *List the most important land use and transportation objectives from your city or county's plans that commute trip reduction most directly affects.*

Multimodal Transportation Network Enhancement:

- **Objective:** Improve and expand the city's multimodal transportation network to ensure safe, efficient, and accessible options for all users.
- **Impact on CTR:** Enhancing the multimodal transportation network encourages residents to use alternative modes of transportation, such as biking, walking, and public transit, thereby reducing reliance on single-occupancy vehicles. This aligns with CTR goals by decreasing traffic congestion and improving air quality.

Support for Compact and Infill Development:

- **Objective:** Promote compact and infill development within the city limits to accommodate growth while utilizing existing infrastructure and services.
- **Impact on CTR:** By focusing on compact and infill development, the city can reduce the distance and need for commuting. This development strategy supports mixed-use urban villages where people can live, work, and access amenities within a short distance, promoting walking and biking.

Sustainable Land Use Practices:

- **Objective:** Implement sustainable land use practices that balance environmental, economic, and social needs.
- **Impact on CTR:** Sustainable land use practices support the development of green infrastructure and transit-oriented development, which are crucial for reducing vehicle miles traveled (VMT) and supporting a shift towards more sustainable commuting practices.

Equity in Transportation:

- **Objective:** Ensure that transportation planning and investment decisions are equitable and meet the needs of all community members, including underserved and vulnerable populations.
- **Impact on CTR:** An equitable transportation system provides accessible and affordable commuting options for all residents, which is essential for achieving the objectives of the CTR program by ensuring that everyone has viable alternatives to driving alone.

Integration with Regional Transportation Plans:

- **Objective:** Collaborate with regional transportation agencies to create a cohesive and efficient transportation network across the region.
- **Impact on CTR:** Integrating local and regional transportation plans helps to create seamless commuting options for those traveling into and out of the city, supporting the overall goals of the CTR plan by improving connectivity and reducing commuter traffic.

- e) *Describe critical aspects of land use and transportation that should be sustained and key changes that should be considered to improve commute trip reduction's contribution to the land use and transportation objectives you reference.*

Due to the continued growth within the City of Bellingham, the city will continue and expand upon all elements related to CRT in the on-going comprehensive plan update and subsequent plans.

2. Describe how the CTR program will help achieve the jurisdiction's land use and transportation objectives.

- a) *Describe how and to what extent your CTR program will help your city or county achieve the land use and transportation objectives referenced in question 1.*

The City of Bellingham's CTR plan and Whatcom Council of Governments Smart Trips Program significantly supports and encourages the city's key land use and transportation objectives outlined in the Comprehensive Plan, Pedestrian Master Plan, and Bicycle Master Plan. By promoting the use of alternative transportation modes such as biking, walking, and public transit, the CTR plan supports the continued expansion of the city's multimodal transportation network. This encouragement reduces dependency on single-occupancy vehicles, alleviating traffic congestion and improving air quality, which aligns with the city's goals of providing safe, efficient, and accessible transportation options for all users.

The CTR program also supports compact and infill development by reducing the necessity for long commutes. By encouraging compact and infill development, the program helps reduce the pressure on transportation infrastructure, encouraging the development of mixed-use urban villages where residential, commercial, and recreational facilities are in close proximity. This directly contributes to the city's efforts to utilize existing infrastructure and services efficiently, creating walkable and bike-friendly communities that enhance the quality of life.

Additionally, by ensuring that transportation planning and investments meet the needs of all community members, including underserved and vulnerable populations, the CTR program promotes transportation equity. This approach ensures that all residents, despite income levels, have practical alternatives to driving alone creating a transportation system that benefits all members of the community.

Finally, the CTR program continues collaboration with WTA to create an efficient transportation network, enhancing connectivity throughout the city and improving commuter options. By aligning local commuting initiatives with regional transit services, the program supports the city's objective of creating a seamless transportation network across the region, reducing commuter traffic, and supporting sustainable growth. Through these efforts, the CTR program advances the city's land use and transportation objectives, contributing to a more connected, livable, and environmentally friendly community.

3. Describe how the CTR program will help achieve the jurisdiction's environmental objectives.

- a) *Describe how the CTR program will support jurisdiction greenhouse gas emission reduction efforts.*

The CTR program aligns closely with the city's Climate Protection Action Plan by addressing transportation as one of the primary sources of greenhouse gas emissions. The Climate Protection Action Plan identifies transportation as a significant contributor to the city's overall emissions and outlines strategies to mitigate this impact.

The CTR program supports these efforts by encouraging alternative transportation modes such as biking, walking, carpooling, and public transit. By reducing the number of single-occupancy vehicle trips, the program helps lower the overall vehicle miles traveled (VMT), directly contributing to the reduction of transportation-related emissions.

In collaboration with the WCOG Smart Trips Program, the CTR program enhances its impact by offering incentives and resources to support sustainable commuting options. These combined efforts not only help

to meet the city's greenhouse gas emission reduction targets but also promote a culture of sustainability and environmental responsibility among residents and employees.

- b) *Describe how the CTR program will support jurisdiction environmental objectives in addition to greenhouse gas emission reductions.*

In addition to the improved air quality from the reduction of greenhouse gas emissions, the reduction in roadway demand will support the city's environmental objective to preserve greenspace. The decrease in roadway demand will allow more land to be undeveloped and left in its natural state.

4. Describe how your CTR program will help achieve regional and state objectives.

- a) *Summarize the local, regional, and state benefits that would be gained if you achieve your CTR targets.*

Local Benefits:

Reduced Traffic Congestion: By encouraging CTR affected employees to use alternative transportation modes such as public transit, biking, walking, or carpooling, the CTR program would alleviate traffic congestion on local roads and highways. This leads to smoother traffic flow, shorter commute times, and higher quality of life for residents.

Improved Air Quality: Fewer vehicles on the road means reduced emissions of pollutants such as carbon monoxide, nitrogen oxides, and particulate matter. This contributes to cleaner air and a healthier environment for residents, particularly those living near major roadways and commuting corridors.

Enhanced Public Health: Cleaner air resulting from reduced vehicle emissions can lead to improved respiratory health and a decrease in respiratory diseases such as asthma among the population. Additionally, promoting active transportation options like walking and biking supports physical activity and overall wellness.

Cost Savings for Residents: Commuting by public transit, carpooling, or biking can reduce individual transportation costs related to fuel, parking fees, and vehicle maintenance. This leaves residents with more disposable income, which can benefit the local economy through increased spending on goods and services.

Regional Benefits:

Improved Regional Mobility: The City of Bellingham is part of a larger regional transportation network. Decreasing congestion within the city can have effects throughout the region, improving overall mobility and connectivity between neighboring communities.

Environmental Conservation: Lowering vehicle emissions not only benefits air quality locally but also contributes to larger regional environmental goals, such as reducing the region's carbon footprint and mitigating climate change impacts.

Collaborative Planning: Implementing the CTR program involves collaboration between the City of Bellingham, Whatcom Council of Governments, Whatcom County, and Whatcom Regional Transit Agency. This encourages cooperation and shared responsibility in addressing transportation challenges and achieving sustainable development goals.

State Benefits:

Compliance with State Regulations: Washington State requires cities throughout the state to implement CTR programs as part of broader efforts to reduce greenhouse gas emissions and promote sustainable

transportation solutions. Achieving CTR targets demonstrates compliance with state regulations and contributes to statewide environmental goals.

Economic Efficiency: By reducing congestion and improving transportation efficiency in the City of Bellingham, the state benefits from enhanced productivity and reduced costs associated with maintaining and expanding interstate transportation infrastructure.

b) *List adjacent CTR-affected cities and counties.*

Counties:

Whatcom County: The City of Bellingham is the county seat of Whatcom County. The CTR program within the city would also impact commuting patterns and transportation planning strategies within the broader Whatcom County area, including rural areas and smaller communities.

c) *Describe the top few cross-border and regional transportation issues that affect your jurisdiction.*

Regional Commuter Traffic: Within Whatcom County, the City of Bellingham is the largest population, employment, and service center drawing a significant amount of regional commuter traffic. Due to the city being the county's largest employment center, many individuals who live in surrounding areas, including other parts of Whatcom County and nearby cities, commute to the City of Bellingham for work, education, or other services. The influx of regional traffic places considerable strain on the city's transportation network.

Cross-Border Traffic from Canada: Located just 20 miles south of the Canadian border, the City of Bellingham experiences significant commuter traffic from Canadians visiting the city for shopping or recreational opportunities. The cross-border traffic from Canada contributes to congestion on major routes such as Interstate 5, which serves as a main thoroughfare for both regional and cross border commuters.

Regional Housing Affordability: Due to the high cost of living within the City of Bellingham compared to the surrounding areas leads to a significant number of individuals choosing to live outside of the city and commute in for work. This trend increases the number of daily commuters using the City of Bellingham transportation systems, adding pressure to the city's infrastructure, and creating challenges for transportation planning and management.

d) *Describe the strategies you, adjacent cities and counties, and your region have agreed to use to address the top issues described in the previous bullet.*

Regional Transportation and Planning Coordination: In partnership with WCOG and neighboring jurisdictions, the City of Bellingham actively participates in regional transportation planning. These regional planning efforts ensure that transportation planning is aligned across the region and addresses the needs of the commuters that travel into the City of Bellingham from surrounding areas. The comprehensive planning efforts focus on improving the connectivity of transportation networks and managing traffic flow to reduce congestion.

Whatcom Smart Trips: The Whatcom Smart Trips program provides an incentive for members of the community to be mindful of the trips they are making throughout the day by providing discounts at local participating retailers, milestone rewards, cash prizes and recognition. The program allows participants to enter a trip log whenever a single occupancy vehicle trip was replaced by walking, biking, utilizing transit, carpooling, or other multimodal transportation trips.

Performance targets

5. List your jurisdiction's CTR performance target(s).

a) List performance targets that reflect only CTR-affected worksites.

Weighted average drive-alone-rate (DAR) of 64 percent or less for CTR-affected worksites at the jurisdiction level. This target is a 15.5 percent (or greater) reduction of the jurisdiction's census performance in 2019. ¹

b) List any additional performance targets.

None

6. List the base value you'll use for each performance target.

a) For each performance target, provide the number you'll use as the baseline (or starting number). You'll measure the difference between this number and your results to report performance.

DAR during the 2023-2025 CTR survey cycle will be the base value.

7. Describe the method you used to determine the base value for each target.

a) Provide the source for each base value listed

2023-2025 CTR worksite survey results pertaining to drive-alone trip-making will be aggregated to the jurisdiction level and used as the base DAR value.

8. Describe how you'll measure progress toward each target.

a) List the method you'll use to measure progress for each target.

We will measure progress using the subsequent survey results (2025-2027)

9. List your jurisdiction's CTR-affected worksites.

a) List all your CTR-affected sites.

City of Bellingham – Civic Center

Western Washington University

City of Bellingham – Public Works

Whatcom Community College

Peace Health – St. Joseph Hospital

Whatcom Council of Governments *

Port of Bellingham

Whatcom County – Court House

S.P.I.E.

Whatcom Educational Credit Union – Holly

SilFab Solar Inc. – Bellingham Site

Street Branch

T-Mobile

Whatcom Transportation Authority

Washington Department of Ecology *

Wood Stone Corporation

Washington State DSHS

**Indicates voluntary site*

10. List a performance target for each CTR-affected worksite.

a) For any performance targets tied to the CTR survey, indicate that you'll establish performance targets during the 2023-2025 survey cycle.

Base year performance targets will be established during the 2023-2025 survey cycle.

11. List the base value you'll use for each site.

a) For any performance targets tied to the CTR survey, indicate that you'll establish a base value during the 2023-2025 survey cycle.

We will establish a base value during the 2023-2025 survey cycle.

Service and Strategies

12. Describe the services and strategies your jurisdiction will use to achieve CTR targets.

The City of Bellingham will continue to work with Whatcom Council of Governments (WCOG) to implement the Whatcom Smart Trips Program. Whatcom Smart Trips is a collection of initiatives and tools that help and encourage community members to use more efficient and sustainable transportation modes. These include:

- An online trip diary for tracking trips made by walking, bicycling, sharing rides and riding the bus (non-drive alone modes)
- Incentive distribution, which includes discount cards, gift certificates, cash prizes and recognition to motivate community members to try new forms of transportation.
- Employer partnerships to provide support to businesses and organizations that want to promote sustainable transportation to their employees (including CTR employers).
- School Smart Trips program, which provides classroom activities for middle school students and bicycle skills courses for elementary school students, as well as summer adventure camps.
- Bicycle education for children and adults.
- Community outreach activities.
- An ongoing public awareness campaign that includes advertising and public presentations to make the community aware of the benefits of participation in the Smart Trips program.

The City of Bellingham will support WCOG's partnership with Whatcom Transportation Authority (WTA) on Smart Trips programming, including:

- Advertising and community relations.
- Emergency rides home using a limited, free taxi service so bus riders and other Smart Trips participants who experience an emergency or become ill at work can get home.
- First Time Rider Pass distribution among Smart Trips employer partners.

13. Describe how jurisdiction services and strategies will support CTR-affected employers.

- The online trip diary will encourage employees of CTR-affected employers to be more mindful of the trips they are taking daily. The trip diary will also provide the program with the data needed to employ incentives.
- The incentive distribution will keep employees engaged in the program and will award and recognize users that replace single occupancy vehicle trips with alternative transportation modes.
- The employer partnerships offered through the program provide high quality materials and services to CTR worksites. Materials included in the partnership include but are not limited to employee recognition posters, employee transit maps, preferential parking signs and permits, smart trip brochures, and more. Services included in the partnership include but are not limited to worksite presentations to employees, bike to work and school day, first time rider passes with WTA, and more.
- Although K-12 schools are not CTR affected sites, the School Smart Trips Program provides students with the knowledge and skills to safely commute throughout the City of Bellingham.

- Many employees of CTR affected sites may not have the confidence or skills to safely commute to work by bike. The Smart Trips Program will provide bicycle education for both youth and adults.
- The program also includes community outreach activities and a public awareness campaign to inform the community about the benefits of the Smart Trips Program.

14. Describe barriers your jurisdiction must address to achieve CTR targets.

a) Describe how you'll address these barriers.

Several barriers must be addressed to meet the City of Bellingham's CTR targets. These strategies will be implemented in coordination with the Whatcom Council of Governments (WCOG) Smart Trips program, Whatcom Transportation Authority (WTA), and other regional partners.

Barrier: Personal Barriers to Using Public Transit

How addressing: One of the major barriers is the lack of familiarity or comfort with using public transportation. Many potential transit riders may face personal challenges such as not understanding bus routes, schedules, or how to integrate transit into their daily routines. Smart Trips addresses this through its education and outreach efforts, including guided rides and individualized trip planning assistance. These initiatives help remove personal barriers by making public transit more accessible and user-friendly for commuters.

Barrier: Limited Employer Engagement in Sustainable Transportation

How addressing: Engaging local employers to actively participate in CTR programs can be challenging, especially in promoting carpooling, biking, and transit use. Smart Trips addresses this by offering regular meetings with Employee Transportation Coordinators (ETCs), where best practices, tools, and resources are shared. These meetings provide a forum for employers to collaborate and learn how to successfully implement CTR strategies within their organizations, encouraging greater participation in sustainable commuting practices.

Barrier: Lack of Awareness of Transportation Options

How addressing: Many residents are unaware of the sustainable transportation options available to them, such as biking, walking, or carpooling. The Smart Trips program includes a public awareness campaign to educate the community on the benefits of walking, biking, sharing rides, and taking the bus. By raising awareness and offering incentives like gift cards and recognition for participants, Smart Trips encourages more residents to make sustainable transportation choices.

These strategies, implemented through the Smart Trips program, address key barriers to achieving CTR targets by focusing on education, employer engagement, and infrastructure support. By overcoming these barriers, the City of Bellingham and its regional partners can increase the use of sustainable transportation modes and reduce single-occupancy vehicle trips, helping to meet CTR goals.

15. Describe the transportation demand management technologies your jurisdiction plans to use to deliver CTR services and strategies.

The Whatcom Smart Trips website is used to track non-drive alone trips, facilitate employer partnerships, provide education and assistance related to bike and transit options, and incentivize non-drive alone modes.

The Whatcom Smart Trips website can be accessed at the following link:

www.whatcomsmarttrips.org/

The City of Bellingham will support WCOG's use of the state's CTR tool to conduct CTR surveys and gather program data.

16. Transcribe or link to your local CTR ordinance.

Chapter 16.24 COMMUTE TRIP REDUCTION (codepublishing.com)

17. Describe your financial plan.

The tables below show estimated costs and funding sources for the Whatcom Smart Trips program, which serves as the primary CTR strategy region-wide.

a) Describe the estimated average annual costs of your plan.

Activity	Estimated average annual cost*
Employer Engagement	\$40,000
Performance Reporting	\$5,000
Administration	\$5,000
CTR Plan**	\$3,000
School Engagement	\$269,000
Community Outreach	\$173,000
Total	\$495,000

**Annual costs are estimated based on previous years and are subject to change*

***This estimate does not include the development of the current CTR Plan*

b) Describe likely funding sources, public and private, to implement your plan.

Source of Revenue	Estimated Average Revenue *
Commute Trip Reduction Funding (state)	\$53,000
Regional Mobility Grant (state)	\$212,000
Mobility Management Grant (federal)	\$124,000
Local Government Funding**	\$106,000
Total	\$495,000

**Revenue amounts are estimated and subject to change based on available funding*

*** City of Bellingham contributes Local government funding on an annual basis to the Smart Trips Program*

18. Describe your implementation structure.

a) Describe who will conduct the activities listed in your plan

The activities listed in the plan will be conducted in collaboration between the City of Bellingham, Whatcom Council of Governments, Whatcom County, and Whatcom Transit Authority.

b) Indicate who will monitor progress on your plan. List job title, department, and name.

Dylan Casper | Transportation Planner | City of Bellingham Public Works Department

19. List your implementation schedule.

a) Provide the timeline for anticipated projects.

Smart Trips Program Implementation Schedule	1 st Biennium July 2025-June 2027	2 nd Biennium July 2027-June2029
Actions	Identify worksites and employee transportation coordinators. Train and assist employee transportation coordinators. Create and distribute informational materials about transportation options for CTR sites. Coordinate transportation focused events. Manage trip data and incentive distribution. Secure funding for incentives. Administer worksite surveys. Conduct employer program reviews.	Identify worksites and employee transportation coordinators. Train and assist employee transportation coordinators. Create and distribute informational materials about transportation options for CTR sites. Coordinate transportation focused events. Manage trip data and incentive distribution. Secure funding for incentives. Administer worksite surveys. Conduct employer program reviews. Prepare for 2029-2033 CTR plan.

20. Describe the CTR plan for jurisdiction employees.

a) Describe the services, programs, information, and other actions your city or county put in place to help its employees reduce their drive alone commute trips.

Electric Bikes: The City of Bellingham has introduced a fleet of electric bikes available for employees to use during the workday. This initiative not only promotes a healthier, more active lifestyle but also serves as a practical solution for midday meetings or errands, reducing the need for car use for short distances within the city.

Secure Bike Storage: Most city office locations are equipped with secure bike storage facilities, encouraging employees to cycle to work without worrying about the safety of their bicycles. This amenity is vital in supporting those who choose cycling over driving, making it a more convenient and safer option.

Free Bus Passes: To further support the use of public transportation, the City of Bellingham provides free bus passes to its employees. This initiative ensures that taking the bus is a financially viable option, helping to reduce the number of cars on the road during peak commuting hours and contributing to lower traffic congestion and pollution.

21. Describe how the CTR plan for jurisdiction employees contributes to the success of the overall plan.

a) Describe how the plan for jurisdiction employees reinforces the success of the jurisdiction plan?

The plan for jurisdiction employees in the City of Bellingham supports the broader jurisdiction plan by encouraging sustainable transportation behaviors within the city's employees, which aligns closely with community-wide transportation goals. By implementing measures such as providing electric bikes, secure bike storage, and free bus passes, the city not only promotes sustainable practices but also models them internally. This approach helps to show the practical benefits of alternative commuting methods. This reduction in parking demand and encouragement of public transit use not only reduces overall traffic congestion but also increases the utilization of public transportation services.

Alignment with Plans

22. List the transit agencies that provide service in your jurisdiction.

Whatcom Transit Authority (WTA)

23. List the transit plans you reviewed while developing this plan.

WTA 2040 Long Range Transit Plan

24. Describe how this CTR plan supports the transit plans.

The City of Bellingham's CTR plan supports the transit objectives of the Whatcom Transportation Authority (WTA) by promoting multimodal transportation options that complement and enhance public transit usage. By encouraging a shift from single-occupancy vehicle use to more sustainable commuting options like biking or walking, the CTR plan helps increase ridership levels for WTA services by providing first and last mile connections. This support is vital in achieving WTA's goals of expanding and optimizing transit services throughout the region. Additionally, this CTR program promotes the improvement of the safety and accessibility of transit access points such as enhancing pedestrian routes and bicycle facilities near bus stops directly align with WTA's initiatives to make transit more appealing and accessible. These coordinated efforts contribute to a more integrated transportation network, reducing congestion and environmental impact while supporting WTA's mission to provide efficient and reliable transportation.

25. Describe any comprehensive plan updates that are needed and when they will be made.

The City of Bellingham is currently engaged in a significant update of its Comprehensive Plan, known as The Bellingham Plan, which is projected to be completed in 2025. This update is part of a two-year project aimed at guiding the city's growth and development over the next 20 years, ensuring it aligns with the community's vision for a sustainable and equitable future. The Bellingham Plan will address several key areas including housing, transportation, and climate resilience, and will establish high-level goals and policies that will shape the city's development, capital investments, and various city programs. This comprehensive update process includes opportunities for public input to ensure that the plan reflects the community's needs and preferences.

In terms of the CTR program, any updates needed in the Comprehensive Plan related to land use and transportation objectives will directly influence the effectiveness and focus of the CTR initiatives. Adjustments to zoning regulations and the development of new policies can help optimize the CTR program by ensuring that it supports and is integrated with broader urban planning goals. The ongoing public engagement and planning processes provide an ideal opportunity to align the CTR program with

these evolving city objectives, which are critical for enhancing the city's transportation infrastructure and promoting sustainable commuting options. This alignment is essential for meeting the city's long-term goals of reducing traffic congestion, lowering environmental impacts, and improving the overall quality of life.

Engagement

26. Describe stakeholder engagement.

- a) *Who did you talk to? When did you talk to them? What did they have to say? How did what they said influence the plan?*

The existing Whatcom Smart Trips program is informed by a comprehensive survey effort that took place from 2004-2009 and reached over 14,000 local residents. This resulted in the 2012 Mobility Report, which can be accessed at the following link:

https://www.whatcomsmarttrips.org/news/mobility_report

The City of Bellingham and WCOG recognize that the region has grown and changed since this initial engagement effort and plan to incorporate more recent and upcoming engagement results into the 2025-2029 Regional CTR Plan. The City of Bellingham will support and utilize WCOG engagement efforts will include 1) a review of existing engagement results, 2) public surveys, and 3) public review of the Draft CTR Plan.

Review of Existing & Relevant Engagement Results:

The City of Bellingham will first consult recent community engagement results from city efforts related to the updated Pedestrian and Bicycle Master Plans. This engagement effort took place primarily in 2022 and 2023. The results of the outreach contain relevant information and feedback from the public which can also be used to inform this CTR Plan. This engagement effort is particularly relevant to this CTR Plan because our regional CTR strategy, the Whatcom Smart Trips program, goes beyond commute trips and aims to promote non-drive alone trips of all kinds, whether for work, leisure, errands or other purposes. Given the breadth of the Smart Trips program, we can utilize a wide variety of public feedback about non-drive alone modes and trips, whether they are commute trips or not.

Relevant findings from the City of Bellingham's Pedestrian and Bicycle Master Plan community engagement effort are summarized below:

Over 500 people interacted with the Pedestrian Master Plan survey and webmap, and over 1,000 people interacted with the Bicycle Master Plan survey and webmap. Engagement also included in-person events, direct emails, comments received, and technical review committee meetings. Some of the survey questions show that driving is still the most selected form of transportation for getting around Bellingham, but significant numbers of people are also choosing non-driving modes like walking, rolling, or biking.

Survey questions also showed that the most popular reasons people ride bicycles in Bellingham are for exercise, running errands/shopping, and various forms of recreation or leisure rides (on paved trails, on city streets, and on dirt trails). Commuting to work was the 6th most popular answer. This supports the broader approach that Whatcom Smart Trips takes by going beyond commute trips to encourage non-drive alone trips of all types, particularly those taken for errands or leisure.



Image description: A screenshot of a bar chart from the Bellingham Bicycle Master Plan showing survey responses when participants were asked “The main reason I ride a bicycle is for _____. “

In another survey question, people selected options that would improve their experience and/or lead them to choose to ride a bike more in Bellingham. The most popular responses were “a connected network of bike lanes”, “streets that feel safer for biking”, and “secure places to park a bike at your destination”. Overall, participants seemed to prioritize infrastructure-based responses to this question.

When asked about other ways bicycling can be supported in Bellingham, survey respondents ranked “providing commuter benefit or employer wellness programs” an average of 4.51/5 in importance (sixth overall). In contrast, the highest ranked option overall was “enforcing traffic safety laws with the greatest impacts (e.g., driving under the influence, speeding)”, and some other highly ranked options were “mandating bike-friendly development (e.g., installation of bike racks)” and “installing automated speed safety cameras (school zones, red light running, speeding)”. These top three responses emphasized infrastructure improvements and safety. Additionally, respondents ranked “educating people around safe biking” an average of 3.97/5 in importance and fourth overall. As part of existing programming, Whatcom Smart Trips offers bicycle education classes and facilitates commuter benefit programs.

Other overall themes that emerged from the City of Bellingham’s engagement effort are:

- The importance of a connected pedestrian network for people to access their daily needs and recreation.
- A need for a connected network of higher comfort bikeways (such as separated or protected bike lanes, bike boulevards, and trails).
- A desire to feel safer at intersections and crossings, for both pedestrians and bicyclists
- Concerns about driver behavior, speeding, and safety.

Public Surveys:

The City of Bellingham will also rely on the results of WCOG’s public survey engagement efforts. Based on the review of existing engagement results, WCOG designed public survey questions to fill in knowledge gaps and build on the existing engagement information available. WCOG utilized the following two public surveys to inform this CTR Plan and our regional CTR strategy:

- The CTR worksite survey and

- The Regional Safety Action Plan public survey ('The Whatcom Crash Test')

The CTR worksite survey tool provided by WSDOT was distributed to all CTR work-sites in May of 2024. This survey reached employees at CTR work sites and included questions about commuters' daily modes of transportation and their motivations and considerations in choosing that mode. A total of 3,275 employees completed the survey. The results show that the majority of CTR worksite employees currently commute by driving alone (58% of commutes) although a significant portion make smart trips (22% of commutes when combining walk, bus, bike and carpool trips) or work from home (19%). Employees' top travel considerations were 'Time/duration' (80%), 'Flexibility/convenience' (67%), and 'Weather' (33%). Additionally, this survey showed that the majority of CTR worksite employees were either unaware of any incentives or subsidies their employer offered surrounding commute trip reduction or confused about any offerings (56%). This lack of awareness will be addressed by the educational aspects of the Smart Trips program as well as the employer partnerships.

The Whatcom Crash Test survey was part of a broader engagement effort focused on roadway safety and funded by the Safe Streets For All federal grant program. The Whatcom Crash Test survey will primarily inform WCOG's Regional Safety Action Plan, but the survey also included questions about peoples' trip choices. The Whatcom Crash Test survey was available online during July, August and September of 2024. It was promoted via local newspaper ads, WTA bus boards, social media, an in-person booth at the Northwest Washington Fair, and most prominently, a mailed postcard.

The Whatcom Crash Test survey was taken by 3,560 Whatcom County residents aged 16 or older. The results of the survey are stated below:

- Most popular mode: The majority of Whatcom County residents selected drive alone as the form of transportation they use most often (88%), although 43% selected walk/roll, 25% selected carpool/rideshare, 23% selected bike and 10% selected bus/paratransit (up to three selections were allowed).
- Gauging interest in other modes: When asked if they had considered using any other modes more often, 35% of drive alone respondents said that they were not interested in any other modes. Those who were interested in trying out a new mode were most interested in bus/paratransit (24%), biking (19%), and carpooling (10%).
- Preventative factors: When asked what prevented them from using the non-drive alone mode they were interested in, the top reasons were summarized as accessibility/availability, time, and danger/safety.
- The people who already don't drive alone: Non-drive alone respondents said that 'Travel time' (52%), 'Environmental Impact' (50%), and Health/fitness (47%) were their most influential factors in choosing a non-drive alone mode (multiple selections allowed).

The Whatcom Crash Test showed that significantly more Whatcom County residents drive alone as compared to CTR worksite employees. While the structure of the questions was different, this suggests some relative success for the CTR program and any worksite incentives/subsidies provided. The survey also shows that Whatcom County residents have limited interest in new modes and value their time highly. Accessibility/availability concerns will be partially addressed through Smart Trips' educational programs and First Time Rider Pass distribution among Smart Trips employer partners.

Public Review of the Draft CTR Plan:

After WSDOT review, WCOG will solicit feedback on the Draft Regional CTR Plan through:

- public notice advertised in the local paper,
- email distribution lists, and
- online at www.wcog.org.

The City of Bellingham will also make this City of Bellingham Draft CTR Plan available for public review and comment.

27. Describe vulnerable populations considered.

WCOG collected optional demographic information as part of both the CTR worksite survey (May 2024) and the Whatcom Crash Test survey (July, August, September 2024) in order to identify vulnerable populations who engaged with each survey. Low income populations and people of color were the primary vulnerable populations considered when filtering the survey results. These populations were highlighted based on their presence in WCOG's newly developed Social Vulnerability Index (SVI), which includes three factors: low income, people of color and limited English proficiency populations. Unfortunately, both surveys resulted in lower responses from non-white racial and ethnic groups than would be considered representative of Whatcom County as a whole. Response rates for Native American/Alaska Native and Hispanic/Latino populations were particularly low relative to Whatcom County populations.

The respondents of the CTR worksite survey were 78% White, 5% Multiracial/ethnic, 4% Asian, 2% Hispanic/Latino, 0.75% Black/African American, and 0.72% American Indian/Alaska Native, with an additional 8% preferring not to answer. In raw numbers, the survey reached 414 people of color (non-white alone). The CTR survey respondents were mostly higher income earners, although approximately 20% of respondents reported less than \$60,000 in annual household income (less than the Whatcom County median household income of approximately \$70,000 in 2021).

In order to promote the Whatcom Crash Test and maximize responses, WCOG mailed postcards to all Whatcom County addresses. The respondents of the Whatcom Crash Test survey were 87% White, 6% Multiracial/ethnic, 2% Asian, 2% Hispanic/Latino, 1% Black/African American, and 0.5% American Indian/Alaska Native. In raw numbers, the survey reached 343 people of color (non-white alone). The distribution of annual household income among survey respondents was fairly equal, and approximately half of all survey respondents fell into one of the three following groups: 11.3% reported earning less than \$25,000, 16.9% reported earning \$25,000-\$49,999, and 19.7% reported earning \$50,000-\$74,999 in annual household income.

28. Describe engagement focused on vulnerable populations.

- a) *Who did you talk to? When did you talk to them? What did they have to say? How did what they said influence the plan?*

Engagement efforts reached the demographics and vulnerable populations described in question #27. Based on a filtering of free response questions on the CTR Worksite Survey (May 2024), people of color submitted various comments about the accessibility of bus routes/schedules, the need to commute from longer distances, international border travel, and disability considerations.

Based on another filtering of free response questions on the CTR Worksite Survey, lower income earners (less than \$60,000) submitted various comments about interest in flexible work schedules and remote work, the accessibility of bus routes/schedules, and weather considerations.

Based on a filtering of free response questions on the Whatcom Crash Test Survey (July, August, and September 2024), people of color submitted various comments about lack of pedestrian/biking infrastructure, the accessibility of bus routes/schedules, and safety concerns.

Based on another filtering of free response questions on the Whatcom Crash Test Survey, lower income earners (less than \$50,000) submitted various comments about the cost barrier of getting a bike, the accessibility of bus routes/schedules, lack of non-drive alone options and infrastructure in rural areas, time and scheduling considerations.

These comments will help to inform future Smart Trips programming and employer partnerships. Comments about flexible schedules and remote work will be communicated to CTR employers through Smart Trips' employer partnership program. Bus accessibility will be partially addressed through Smart Trips' bus education classes, ongoing public outreach campaigns, and First Time Rider Pass distribution among Smart Trips employer partners.

29. List employers' suggestions to make CTR more effective.

Employers expressed interest and/or support for the following:

- Increased promotional material and ad campaigns to promote non-drive alone modes
- Continued upgrades to bicycle and pedestrian infrastructure
- A more effectively connected bike network
- Subsidies/support for free WTA bus passes for employees

30. Describe results of engagement focused on vulnerable populations that will be provided for use in comprehensive plan and transit plan updates.

The City of Bellingham engagement results related to infrastructure (desires for connected bike/pedestrian pathways) from the Bicycle and Pedestrian Master Plans will be considered in the next Comprehensive Plan update.

Concerns about driver behavior, speeding, and general roadway safety, particularly as it affects active transportation modes, will be considered by WCOG in the upcoming Regional Safety Action Plan.

Regional transportation planning organization CTR plan review

RTPO comments

The City of Bellingham Draft CTR Plan was reviewed by WCOG and is consistent with the regional CTR plan.

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ATTACHMENT to CTR PLAN

Section 1 CTR PLAN INTRODUCTION

Legislative Framework

The Washington State Legislature passed the Commute Trip Reduction (CTR) Law in 1991 as part of the Washington Clean Air Act and in response to the federal Clean Air Act. The law requires CTR-affected cities and county governments to adopt a CTR plan and ordinances that define commute trip reduction (CTR) requirements for affected employers within their jurisdictions. The law also requires affected regional transportation planning organizations (RTPO) to develop and implement a CTR plan.

The Commute Trip Reduction Plan has been prepared in conformance with the requirements of the CTR Law (RCW 70A.15.4000-4110) and the CTR Guidelines.

Section 2 CTR PLAN ADMINISTRATION

Introduction

The CTR Plan was developed by Whatcom Council of Governments (WCOG) and the City of Bellingham. WCOG will continue this approach by implementing and administering the CTR Plan in a cooperative and flexible manner to allow employers to design programs that work for their employees and situations while, at the same time, ensuring consistency and fairness.

WCOG will be able to offer assistance in identifying potentially effective alternate travel mode strategies to affected employers as they begin to develop their programs through its own Smart Trips program. To ensure coordination and compatibility between an employer's CTR strategies and the CTR Plan, employers should contact WCOG to review their programs at an early stage of development.

In addition, WCOG will provide on-going support to employers to assist them in maintaining and enhancing their CTR programs.

Notification

Affected Employers

1. WCOG will make efforts to identify employers that meet the definition of an affected employer within 180 days of the employer either moving into the boundaries of the incorporated Cities or unincorporated Whatcom County, or growing in employment to qualify as an affected employer.
2. Affected employers who, for whatever reason, do not receive notification within thirty (30) days of becoming affected shall identify themselves to WCOG within ninety (90) days of becoming affected.
3. Affected employers will be granted 180 days from the official notification by WCOG or self-identification date to develop and submit a CTR program or enroll in the Smart Trips program

Change in Status - Any of the following changes in an employer's status will change the employer's CTR program requirements:

If an employer initially designated as an affected employer no longer employs 100 or more affected employees and expects not to employ 100 or more employees for the next 12 months, that employer will no longer be considered an affected employer. It is the responsibility of the employer to notify WCOG that it is no longer affected. It is also the responsibility of the employer to notify WCOG if they return to the level of 100 or more affected employees, returning them to affected employer status.

Section 3 EMPLOYER REQUIREMENTS

Introduction

The requirements of the CTR Plan for the City of Bellingham apply to any affected employer at a single worksite within the Cities of Bellingham.

An affected employer is required to:

1. Develop and implement a CTR program that will encourage its employees to reduce drive alone commute trips. Participation in the Smart Trips program fulfills this requirement.

2. The CTR program must include the mandatory elements specified in the CTR Law, which are necessary to achieve the goals of the CTR Plan. The Smart Trips program includes the mandatory elements.
3. The employer must maintain a set of records to assist in the evaluation of its program or participate in the Smart Trips program requiring employees to keep an online trip diary to assist in the evaluation of its program.
4. Employers are required to make a good faith effort per RCW 70A.15.4040(5) and this plan to develop and implement a CTR program or participate in Smart Trips encouraging its employees to reduce drive alone commute trips.

WCOG will provide technical assistance and training to affected employers in developing and implementing their programs and meeting the above requirements. Employers should begin to implement the program as soon as practical upon submittal of the initial program description or enrollment in Whatcom Smart Trips.

Mandatory Program Elements

Each employer's CTR program must include the following mandatory program elements:

Transportation Coordinator - The employer must designate an employee transportation coordinator (ETC) to administer the CTR program. The coordinator's name, location and telephone number must be prominently displayed at each of the employer's participating work sites. An employer with multiple worksites in Whatcom County is not required to have an ETC at each worksite. The ETC is responsible for implementing the CTR program. The ETC is the primary CTR program contact person for employees and WCOG. An employer may designate more than one ETC.

Information Distribution - Information about alternatives to driving to work alone must be provided to employees at least once a year. The distribution of information should be coordinated as closely as possible with WCOG to ensure that the information is up to date and accurate.

Program Assessment Survey - Affected employers are required to participate in a biennial survey reporting on onsite outreach efforts, available resources, and company policies that encourage the reduction of drive alone commute trips.

Employee Survey - Affected employers are required to conduct a biennial employee survey using a survey tool provided by WSDOT. Survey results will be used to measure progress toward meeting the CTR Plan performance targets.

Additional Program Elements

Affected employers will need to implement specific strategies that will lead to meeting the CTR goals. The specific combination of strategies to be implemented is optional and may depend on type of workforce, geographic location, and transportation system at the worksite. To help identify these strategies, WCOG staff will meet with affected employers at their request. These meetings will review and discuss various combinations of strategies that have been found to be effective. Additional program elements which may be considered include:

1. Provision of preferential parking or reduced parking charges, or both, for rideshare participants.
2. Instituting or increasing parking charges for single occupant vehicles.
3. Provision of commuter ridematching services to facilitate employee ridesharing for commute trips.
4. Provision of subsidies for those using transit, vanpools, carpools, or other alternatives to driving alone.
5. Permitting the use of the employer vehicles for rideshare.
6. Permitting flexible work schedules to facilitate employees' use of alternatives to commuting alone.
7. Provision of bicycle parking facilities, lockers, changing areas, and showers for employees who bicycle or walk to work.
8. Provision of parking incentive program such as a rebate for employees who do not use the parking facilities.
9. Establishment of a program to permit employees to work part- or full-time at home or at an alternative worksite closer to their home.
10. Permitting alternative work schedules that reduce commute trips during peak hours.
11. Establishing other measures designed to facilitate the use of high occupancy vehicles, such as on-site daycare facilities and transportation home in the event of an emergency.

Section 4

MODIFICATIONS AND EXEMPTIONS

Modification of CTR Program Elements

Conditions for Modification - Any affected employer may request a modification of CTR program elements, other than the mandatory elements, specified in the CTR Plan and CTR Ordinance. Such a request may be granted if one of the following conditions exists:

1. The employer can demonstrate that it is unable to comply with certain CTR program elements for reasons beyond the control of the employer.
2. The employer can demonstrate that compliance with the CTR program would constitute an undue hardship.

CTR Program Exemptions

An affected employer may submit a request to grant an exemption from all CTR program requirements or penalties for a particular worksite. The employer must demonstrate that it would experience undue hardship in complying with the requirements of this plan as a result of the characteristics of its business, its work force, or its location(s). An exemption may be granted if and only if the affected employer demonstrates that it faces extraordinary circumstances, such as bankruptcy, and is unable to implement any measures that could reduce the drive alone commute trips per employee. Exemptions may be granted at any time based on written notice provided by the affected employer. The notice should clearly explain the conditions for which the affected employer is seeking an exemption from the requirements of the CTR program. Employers receiving exemptions shall be reviewed annually to determine whether the exemption will be in effect during the following program year.

Specific employees or groups of employees who are required to drive alone to work as a condition of employment may be exempted from a worksite's CTR program. Exemptions may also be granted for employees who work variable shifts throughout the year and who do not rotate as a group to identical shifts. Assessment of the validity of employee exemption requests will be made by WCOG. Employee exemption requests shall be reviewed annually to determine whether the exemption will be in effect during the following program year.

Section 5 COMPLIANCE AND ENFORCEMENT

Program Review Criteria

Affected employers must submit an initial program description to WCOG or enroll in the Smart Trips program within 180 days of becoming affected. The employer's program assessment survey and employee survey dates will be established by WCOG based on guidelines set forth by WSDOT. Participation in program development and surveys will be conducted in the spirit of cooperation between WCOG and affected employers with WCOG offering to provide technical assistance to the employer in developing or modifying a program until it meets the requirements.

WCOG will apply the following criteria for achieving goals related to CTR plan performance targets in determining whether to require modifications of an employer's CTR program:

1. If an employer makes a good faith effort, per RCW 70A.15.4040(5) and this plan, and meets the CTR plan performance targets, this employer has satisfied the objectives of the CTR plan and will not be required to modify its CTR program.
2. If an employer makes a good faith effort, per RCW 70A.15.4040(5) and this plan, but has not met or is not likely to meet the CTR plan performance targets, the WCOG shall work collaboratively with the employer to make modifications to its CTR program.
3. If an employer fails to make a good faith effort, per RCW 70A.15.4040(5) and this plan, and fails to meet the CTR plan performance targets, the WCOG shall work collaboratively with the employer to identify modifications to the CTR program and shall direct the employer to revise its program within 30 days to incorporate the modifications. In response to the recommended modifications, the employer shall submit a revised CTR program description, including the requested modifications or equivalent measures, within 30 days of receiving written notice to revise its program. The WCOG shall review the revisions and notify the employer of acceptance or rejection of the revised program. If a revised program is not accepted, WCOG will send written notice to that effect to the employer within 30 days and, if necessary, require the employer to attend a conference with program review staff for the purpose of reaching a consensus on the required program. A final decision on the required program will be issued in writing by the county within ten working days of the conference.

Violations

Any one of the following constitutes a violation by an affected employer:

1. Failure to develop a complete CTR program and/or to submit a complete CTR program description on time.
2. Failure to implement an approved CTR program within 180 days of submitting its CTR Program Description.
3. Failure to participate in biennial program assessment survey on time.
4. Failure to participate in biennial employee survey.
6. Intentional submission of fraudulent or false bogus information, data and/or survey results
7. Failure to make a good faith effort per RCW 70A.15.4040(5) and this plan.

Penalties

The local jurisdictions may impose civil penalties in the event of violations in the manner provided in RCW 7.80. The intent of the CTR Plan is to bring about the implementation of effective CTR programs. Penalties will be imposed only after exhaustive efforts to gain cooperation have failed. Employers may appeal the imposition of penalties to the CTR AppealsBoard (see Section 6).

1. Whenever WCOG makes a determination that an affected employer is in violation of the CTR Ordinance, WCOG shall issue a written notice by certified mail or delivery, return receipt requested, to the employer. A copy of the notice will be sent to the City or County Council in the jurisdiction which the employer is located and shall contain:
 - a. The name and address of the affected employer;
 - b. A statement that the affected employer has been found to be in violation of the Ordinance, with a brief and concise description of the conditions found to be in violation;
 - c. A statement of the corrective action required to be taken and a date when such corrective action should be completed;
 - d. A statement specifying the range of any civil penalty that could be assessed on account of the violation;

- e. A statement advising that a civil penalty may be levied by the jurisdiction's council 30 days after notification of the violation, unless the employer requests, in writing, an appeal.
 - f. A description of the appeals process and how the employer may initiate an appeal.
3. Each infraction shall constitute a separate violation.
4. Each day that an employer is in violation shall constitute a separate violation.
5. Penalties will begin to accrue 30 days following the formal notification of violation. In the event that an affected employer appeals the imposition of penalties, the penalties will not accrue during the appeals process. Should the appeal be decided in favor of the appellant, all of the monetary penalties will be dismissed.
6. No affected employer with an approved and implemented good faith effort CTR program may be held liable for failure to reach the applicable SOV or VMT goals.

Schedule of Penalties

The penalty for a violation will be set by the CTR Ordinance adopted by each affected jurisdiction.

Section 6 APPEALS PROCESS

Appeals Process

The appeals process for affected employers is consistent with the CTR Law. The CTR Law provides employers with a framework within which to develop their own CTR programs in response to the circumstances of their employees. When WCOG reviews employer programs, it will be guided by the principle that flexibility and attention to employer concerns are essential to the success of a program. WCOG will be receptive to employer concerns and may allow for modifications based on unique circumstances. In this way, the first stage of an appeal is for WCOG to respond to employer concerns and, when necessary, negotiate mutually satisfactory solutions.

Any affected employer may appeal administrative decisions regarding exemptions, goal modifications, program element modifications, and violations to an appeals board. In the event

of a violation, the affected employer will be notified of the intent to impose penalties and the manner in which penalties may be appealed. If an employer elects to appeal, the time from the receipt of the application to appeal to the resolution of the appeal will not be counted in the imposition of penalties.

Appeals Board

The governing body (City or County Council) of the jurisdiction where the employer is located will serve as the CTR Appeals Board. The WCOG will provide technical support as needed by the Council to fulfill this duty.