



## M E M O R A N D U M

To: City Planning Commission Ordinance Revisions Committee

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SUBJECT: Proposed Amendment to Unified Development Code (UDC) –  
Transportation Impact Analysis Requirements and Standards

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City of Ann Arbor Transportation Division staff have requested and suggested ways to clarify and improve the requirements and standards for approval for transportation impact analyses (TIA). Below are diagnosis and commentary with conceptual amendments for discussion.

### **DIAGNOSIS AND COMMENTARY #1**

*Requirements for preparation of transportation impact analyses reference the 2010 Institute of Transportation Engineer (ITE) manual, as well as 11 specific components. This requirement is outdated as the most current manual was published in 2023, which now defines and provides uniform guidance for multimodal analysis, and presents potential conflicts between the published methodology and listed specifications.*

Required information on site plans is articulated in Section 5.29.8, Chapter 55 of the Unified Development Code. Subsection E provides the requirements for when and how a transportation impact analysis (TIA) is provided. A TIA is required when a project will generate more than 50 trips per peak hour<sup>1</sup>. The TIA must use the methodology prescribed in “the 2010 Institute of Transportation Engineer’s Transportation Impact Analysis for Site Development” or latest revision thereof.” Eleven specific data points or measurements are also listed, however it is unclear if these points are in addition to or instead of the methodology provided in the ITE manual.

**Outdated Methodology** – Transportation staff have been requesting and requiring applicants to provide a multimodal transportation analysis (MTIA) for quite some time, which include analysis of things like crashes, pedestrian and bike connections, and safety. However, applicants often express frustration at unclear guidelines in the UDC or elsewhere to produce an MTIA, along with the added expense to analyze additional factors<sup>2</sup>.

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<sup>1</sup> Morning and evening peak hour depends in part on site location; in Ann Arbor they are generally weekdays 6am to 9am and 3pm to 6pm.

<sup>2</sup> An excellent, recent example is the South Town project.

As evidenced by the name, the latest revision of the Institute of Transportation Engineers manual now explicitly directs analysis to address multimodal transportation. The differences in the findings between results from the previous 2010 methodology for a TIA and the current 2023 methodology for a MTIA include:

- Sidewalk gaps analysis to determine the ability to travel to/from a site as a pedestrian;
- Transit stop and ADA accessibility to/from the site;
- Bicycle and pedestrian quality/level of service; and
- The impacts proposed development will have on the safety performance/outcomes of an intersection or corridor (especially critical at locations identified with existing safety needs by A2 Moving Together plan).

**Potential Conflicts** – By listing numerous criteria below the requirement to follow the methodology of the ITE manual, it is unclear if these data sets and points of analysis are in addition to, or instead of, the ITE methodology.

**Comments and Conceptual Amendments** – Section 5.29.8.E should be amended to reflect that a report conforming to the 2023 Institute of Transportation Engineer’s Multimodal Transportation Impact Analysis for Site Development is required. With this amendment, listing the individual components is not necessary.

#### Section 5.28.8 Required Plan Information

##### E. Transportation Impact Analysis

~~1. For proposed Special Exception Uses or Developments~~ Site plans that will propose to generate more than three trips per unit per peak hour or 50 trips per peak hour shall provide; a multimodal transportation impact analysis ~~must be provided including the following. The following the~~ methodology ~~to be employed in determining street capacities shall conform to of~~ the ~~2010-2023~~ Institute of Transportation Engineers’ Multimodal Transportation Impact Analyses for Site Development, or the latest revision thereof.

~~2. Area plans that proposed to generate more than three trips per unit per peak hour or 50 trips per peak hour shall provide information on trip generation, trip distribution, modal split, and areas of impact so that the magnitude of the rezoning or proposed development can be understood.~~

- ~~1. Existing traffic volumes passing on all streets abutting the proposed SEU or Development during the peak hour. Traffic from other new and proposed SEUs and Developments in the area should be considered.~~
- ~~2. Existing peak hour turning movements of vehicular and non-motorized traffic at all public street intersections within a minimum 200 feet of the proposed SEU or Development, or those intersections that may be impacted by the proposed SEU or Development.~~

- ~~3. Projected peak hour generation rate and peak hours of generation for the proposed SEU or Development.~~
- ~~4. Projected peak hour traffic movements as a result of the SEU or Development.~~
- ~~5. A capacity analysis for impacted intersections.~~
- ~~6. A statement of the total impact the projected generation will have on the existing level of service as determined and certified by a registered engineer.~~
- ~~7. A sketch plan showing all existing Driveways to public streets within 200 feet of the proposed SEU or Development and all on-street parking or loading areas.~~
- ~~8. Proposed Site access Driveways with a determination if a deceleration lane or taper is necessary based on current City warrant analysis standards, a determination if a left-turn by-pass lane is necessary based on a warrant analysis, and a sight distance study at the Site access Driveway.~~
- ~~9. A pedestrian circulation plan showing all possible points of conflict between motorized traffic and pedestrian/bicycle traffic on public streets and sidewalks within 200 feet of the proposed SEU or Development, or those intersections that may be impacted by the proposed SEU or Development.~~
- ~~10. A gap study for pedestrian or vehicular traffic may be required at non-signalized locations that may be impacted by the proposed SEU or Development.~~
- ~~11. The analysis shall provide a determination of the service volume and capacity of adjacent streets including the traffic from the SEU or Development.~~

## **DIAGNOSIS AND COMMENTARY #2**

*Criteria for review of a TIA is weak and does not address all modes of travel.*

Section 5.29.6.E provides two criteria for review of a transportation impact analysis. The first criterion is: “the traffic and/or parking impact analysis shall be reviewed by the Public Services Area for completeness and accuracy.”

The second criterion is solely focused on vehicular traffic: projects “that will contribute traffic to streets or intersections that are or will be ... at a level of service D, E, or F may be denied ....”

**Weak and Vehicle-Focused** – The criterion that a TIA shall be reviewed for completeness and accuracy is unhelpful as a review measure. It lacks a tangible threshold of compliance and is also unnecessary if the analysis conforms to the methodology of the ITE manual as required.

Vehicle level of service is no longer the sole measure of a successful and safe transportation network. The significant resources and engagement devoted to transportation planning in Ann Arbor are yet not reflected in our codified standards for review.

**Conceptual Amendments** – Transportation staff suggest modest amendments to improve Section 5.29.6.E:

**Section 5.29.6 Site Plans**

**E. Criteria for Review of a Traffic Impact Analysis**

1. The ~~traffic and/or parking~~multimodal transportation impact analysis shall be reviewed by the Public Services Area for completeness and accuracy.
2. Proposed plans that will ~~contribute traffic to streets or intersections that are or will be as a result of this proposed plan at~~in a multimodal level of service D, E, or F ~~as defined in the Highway Capacity Manual~~ may be denied by the Planning Commission or City Council until such time as necessary ~~street or~~ traffic~~transportation~~ improvements are scheduled for construction.

**Comments** – Planning staff find the conceptual amendments inadequate to address how multimodal transportation impact analyses should be reviewed. For example, compared to the robust and comprehensive criteria for review of natural feature plans (see Section 5.29.6.F), neither the current nor the proposed criteria for review offer meaningful measures to assess a MTIA. Ideally, the review criteria should outline how to determine the effects of a proposed development on the transportation system, along with requesting and evaluating adequacy of mitigation measures.

The criteria for multimodal transportation impact analysis review should address each mode of transportation and factors such as safety and accessibility. The criteria should be based on, and support, the goals and objectives of A2 Moving Together. For example, and for discussion purposes only, the review criteria could be re-written to resemble something like the following:

1. How the proposal addresses safety. (*Example: The effects of the proposed development and recommended improvements to the safety of the transportation system to reduce or eliminate serious injuries and fatalities.*)
2. How the proposal addresses mobility.
3. How the proposal addresses accessibility for all.
4. How the proposal addresses healthy people and sustainable places.
5. How the proposal addresses regional connectivity.

While considering a more robust set of review criteria, it will be important to outline fairness in assigning responsibility for mitigation measures, so that developers do not disproportionately bear the cost for public improvements. Doing so could disincentivize some development and work against other city goals.

Planning staff recommend working with the Transportation Division to improve the criteria for review, and returning to the Ordinance Revisions Committee and Planning Commission with a proposed amendment.

### **DIAGNOSIS AND COMMENTARY #3**

*Standards for site plan approval do not address transportation.*

#### **Section 5.29.6 Site Plans**

##### **C. Criteria for Site Plan Approval**

1. The City Council, Planning Commission, or Planning Manager shall make its decision on the site plan based on the following criteria:
  - a. The contemplated Development shall comply with all applicable local, state, and federal law, ordinances, standards, and regulations.
  - b. The Development shall limit the disturbance of Natural Features to the minimum necessary to allow a reasonable use of the land, applying criteria for reviewing a Natural Features Plan as provided in Section 5.29.6F below.

**Comments** – Planning staff again suggest that the conceptual amendments do not adequately address what to do with the results of a multimodal transportation impact analysis. There is currently no standard for approval in the criteria for site plan approval provided in Section 5.29.6.C – although there is mention that proposed plans contributing (vehicle only) traffic to intersections with levels of service D, E, or F may be denied in the criteria for *review* of a TIA in Section 5.29.6.E.

If transportation impacts resulting from a proposed site plan are as important as protection and mitigation of natural features, a standard for approval should be provided.

Planning staff recommend working with the Transportation Division to craft a new criterion for site plan approval and returning to the Ordinance Revisions Committee and Planning Commission with a proposed amendment. The standard could be formatted similarly to the current standard for disturbance to natural features, and might read as follows:

*The Development shall maintain or improve the safety of the transportation system and maintain or reduce vehicle miles traveled, applying the criteria for reviewing a multimodal transportation impact analysis as provided in Section \_\_\_\_\_.*