Dear Amy,

On behalf of the City of Maple Valley I wish to submit our comments regarding the update to Transportation 2040. We request that PSRC please update the information to Project No. 5445, i.e. SR 169 (see attachment). Specifically this revision will revise the project termini from Witte Road to SE 290th Street as well as the project budget to $44.1 million. We understand that the funding is “unprogrammed,” however, this revision will address the full scope of improvements that are required on the SR 169 corridor within the City of Maple Valley for the next 20 years.

If you have any questions regarding this request, please do not hesitate to contact me.

Thank you for your assistance and this opportunity to provide our comments.

Stephen Clark  
Public Works & Community Development Director  
City of Maple Valley  
(425) 413-8800, Ext. 637  
Steve.clark@maplevalleywa.gov

NOTICE OF PUBLIC DISCLOSURE: This email has been generated by a public employee and may be considered public record pursuant to the Public Records Act, RCW 42.56. Accordingly, this email, in whole or in part, may be subject to public disclosure.
| MAPLE VALLEY | 5445 | SR 169 | Roadway Related - State Route | 2020 | Unprogrammed | $44.1 million | SR 169 Widening to 4 lanes, center turn lanes or left turn pockets and Bike Lanes (SE Witte Road to SE 290th) |
February 24, 2014

Puget Sound Regional Council
Attn: Amy Ho
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

Dear Ms. Ho:

I am writing to comment on the Transportation 2040 Update-Draft Report. Transportation issues are of great importance to the City of Shoreline and we recognize the importance of having a long-range plan for transportation throughout the region. We appreciate the hard work of the Puget Sound Regional Council staff, the Transportation 2040 Prioritization Working Group the Regional Staff Committee and PSRC boards in developing this draft document.

The City of Shoreline appreciates that PSRC provided the opportunity to submit new projects for consideration and inclusion in the plan. Since the adoption of Transportation 2040 in 2010, the City has completed a major update to its Transportation Master Plan, at which time we revisited Shoreline’s multi-modal transportation needs, updated our transportation Level of Service (LOS) standards and identified projects that will be needed to accommodate growth and maintain our LOS. Additionally, Sound Transit significantly advanced their planning efforts for the Lynnwood Link Light Rail extension, identifying the preferred alternative for the project which includes stations in Shoreline at NE 145th Street and NE 185th Street.

In response to the call for projects, the City of Shoreline submitted several capacity improvement projects for consideration in the update. We are pleased the following City projects are included the draft report for inclusion in the Constrained portion of the plan:

- Project 1029: N 175th Street Improvements
- Project 4435: 15th Avenue NE Corridor Improvement
- Project 4434: 145th Street Improvements

The City also agrees with inclusion of the Project 4199 (Construction of a southbound auxiliary lane on I-5 from SR 104 to NE 175th Street) and Project 3597 (Shoreline Park and Ride TOD) in the Constrained portion of the plan. The City hopes to work with WSDOT and King County Metro, respectively, to further refine these project scopes over the next few years.
The need for transportation funding is very high for all jurisdictions in the region. Many cities and counties look to grant funding agencies to provide the needed resources to help plan, design and construct improvements. As the administrator of millions of dollars from the federal government, PSRC is one of the primary resources for grant funding. In order for jurisdictions to gain an understanding of how proposed transportation improvements will be evaluated for their ability to implement VISION 2040 and inclusion in the constrained portion of the plan, it is important to have established criteria. As one tool that informs the decision making process, the proposed prioritization framework provides this guidance. The City of Shoreline supports the inclusion of the proposed prioritization framework in the update report.

The City of Shoreline is very focused on maintenance and preservation of our existing roadways as a primary capital investment and has identified it as a significant need in our Transportation Master Plan, Transportation Improvement Program and Capital Improvement Program. Funds from our existing Transportation Benefit District are allocated exclusively to our roadway maintenance and preservation program. We support PSRC’s inclusion of State of Good Repair projects and programs as a high priority in the update, including the need for additional funding and an acknowledgement of the need to address strengthened stormwater requirements and the costs necessary to operate local signals and other traffic management devices.

The City of Shoreline understands the importance of transportation alternatives for people in the region who do not own a car or choose to travel via other modes, as a mechanism to help reduce greenhouse gas emissions and to encourage more efficient use of the existing network and infrastructure. Our Transportation Master Plan was developed with a "complete streets" approach and includes pedestrian, bicycle and transit master plans for Shoreline that show the complete build out and integration of these systems. We support inclusion of the Active Transportation Plan as an appendix in the update and the network map developed with input from jurisdictions. One correction is needed for the Northwest King County map. It terminates at approximately N/NE 155th Street rather than NW/N/NE 205th Street and does not include all of the City of Shoreline and North King County. Please include an amended map in the final report.

Some minor corrections to note:

- Page 10 of the draft report states "Transit – Complete the Sound Transit Phase 2 program, which will extend Link Light Rail to Overlake, South 200th Street, and Northgate". The Sound Transit Phase 2 program will extend Link Light Rail north beyond Northgate to Lynnwood.
- Page 19 of the draft report states "North Link: University Link is under construction, and scheduled to reach the University of Washington in 2016, Northgate in 2020, and Lynnwood Transit Center in 2023." While the extension of light rail from Northgate to Lynnwood is located in the north corridor, this segment is part of the Lynnwood Link project, not North Link.
Thank you for your consideration of our comments. If you have any questions or need additional information, feel free to contact Alicia McIntire, Senior Transportation Planner at 206.801.2483.

Sincerely,

Mark J. Relph, PE
Public Works Director

cc. Debra S. Tarry, City Manager
   Rachael Markle, Director, Planning and Community Development
   Kirk McKinley, Transportation Services Manager
   Alicia McIntire, Senior Transportation Planner
February 27, 2014

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

ATTN: Amy Ho
VIA Email: Transportation2040@psrc.org
RE: PSRC Seeking Public Comment on the Draft Update to Transportation 2040

Thank you for the opportunity to submit public comments for the January 23, 2014 PSRC Executive Board released Transportation 2040 Update - Draft Report due by Monday March 10, 2014. The following are comments from the City of Normandy Park staff on the referenced document www.psrc.org/transportation/t2040/transportation-2040-update.

The City of Normandy Park is currently underway shaping the planning policies, visions, and goals for the consistency with the region that fold into the planning of the City Compressive Plan. The following comments support those goals with the PSRC 2040 update.

APPENDIX B. Projects and Programs by SMART Corridor

- Smart Planned Regional Intelligent Transportation System (ITS) Page 25/45
  - 1st Ave S/SR509 through the cities of Des Moines, Normandy Park, and Burien is currently planned as a Regional ITS Route. Please add to the discussion narrative:
    - How the lead agency with partner with the jurisdictions with the project development.
    - Timing of the planned projects.
    - Equipment and system integration to the local agencies systems.
    - Provide an Emergency Management element in the ITS plan for Uninterrupted Power Supply (UPS) system and backup generators at key intersection locations.
- There is a Park & Ride shown on the map on this route in the City of Normandy Park near SW 200th St. The map legend shows built in 2006. There is not a notation if this is public or private Regional Park & Ride. Upon a site investigation it was found that this is a church. It would be prudent to comment on that notation of the map if applicable for a Regional Park & Ride (public or private) as currently this appears to be a private church parking lot.

APPENDIX N: Transportation 2040 Regional Capacity Projects

- Within the City of Normandy Park, 1st Ave S/SR509 should be added as a multimodal project completing the current gaps from City of Des Moines to City of Burien.
- Within the City of Normandy Park, the non-motorized project of Marine View Drive: southern City limits at 1st Ave S through to northern City limits connecting to 1st Ave S (via SW 174th St, 4th Ave SW, and SW 171st St) as project for multimodal components supporting the arterial network connections to the regional connection.

APPENDIX O: Active Transportation Plan — Attachment A: Regional Bike Network Maps and Gap List

- There appears to be a viable yet missing regional link gap on 1st Ave S/SR509 from the City of Des Moines to the City of Burien (through the City of Normandy Park). Please add this gap project to the regional plan.
General Discussion:

- What was found were the Regional Centers Designations, because of the close proximity of the City of Normandy Park to the City of Burien, City of Seatac, and the City of Des Moines it would be important to note in the 2040 Plan, with in the Regional Center Designations how the supporting adjacent jurisdiction needs supports viable infrastructure links to these Regional Destination Centers of the City of Burien, City of Seatac, and the City of Federal Way.

- What was not found is the Local Centers Designation map and the supporting narrative. This document should be added to the PSRC 2040 document.

We thank you for the opportunity to provide comments and look forward to the additions to the Draft 2040 Plan in support of Regional Transportation Network and Economic Vitality of our Region.

Sincerely,

Maryanne Zukowski, P.E.

MZ/mz

Cc: Hard Copy File
    Electronic File
    Glenn Akramoff, City Manager
    Chad Tibbits, Senior Planner

Maryanne Zukowski, P.E.
City of Normandy Park
maryannez@ci.normandy-park.wa.us
206.248.8256
March 4, 2014

Ms. Amy Ho
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104-1035

Re: Transportation 2040 Update Comment

Dear Ms Ho:

Thank you for the opportunity to review and comment on the Puget Sound Regional Council’s Draft Transportation 2040 (T2040) Update. Pierce County has actively participated in the update process and appreciates the care and many hours invested by policy makers, jurisdictional staff, committees, and of course the PSRC technical staff who crafted this document.

In the course of the T2040 Update, Pierce County expressed its concern regarding the potential reclassification of the Canyon Road East Northerly Extension project to an un-programmed status. Pierce County is pleased that the Transportation Policy Board responded to the County’s concerns and chose to retain Canyon Road East Northerly Extension in the constrained project list and that this decision is reflected in the draft T2040 Update.

The discussion regarding the status of the Canyon Road East Northerly Extension, however, continues to highlight Pierce County concerns regarding the T2040 prioritization process. While we collectively believe that the prioritization is a fundamentally sound method to compare a large number of projects measured by important selective regional planning criteria, the process still has some shortcomings in how it treats various regional geographies established by VISION 2040. This became evident in how the prioritization process initially scored the Canyon Road East Northerly Extension project.

Small cities and towns, as well as unincorporated urban areas, have important transportation projects that should, at times, be recognized on a regional scale. However, the existing process appears to discount or diminish these projects.

In 2018, Transportation 2040 will again be amended. A key concern of Pierce County is how the “current” prioritization process will be used in that future planning effort. Pierce County would strongly recommend that before PSRC uses the prioritization process again, whether it is for the next T2040 Update or in the criteria for awarding of project funds, that it continue to explore ways in which the prioritization process can be improved so that it more fully captures the merits of projects using the filter of regional geography or regional significance.
March 4, 2014
Amy Ho, PSRC
Page 2

Pierce County appreciates the opportunity to provide input on the T2040 update and looks forward to working with the PSRC and others in further refining the prioritization system in the future.

Sincerely,

Pat McCarthy
Pierce County Executive

Dan Roach, Chair
Pierce County Council

cc: Pierce County Council
    Brian Ziegler, Director, Pierce County Public Works and Utilities
    Dennis Hanberg, Director, Planning and Land Services
March 4, 2014

Ms. Amy Ho  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104

By email to: Transportation2040@psrc.org

RE: City of Tacoma Comments on Spring 2014 Draft T2040 Update (Plan Update)

Dear Ms. Ho

Thank you for this opportunity to comment on the above referenced draft. Our comments are numbered for reference but are not a priority ranking.

1. We compliment PSRC leadership and staff for exemplary public involvement and outreach, outreach that included multiple meaningful opportunities for City staff and elected officials to participate through PSRC's well structured committee process.

2. We note that the freight element has not been updated since the 2010 Plan, but that work is already underway to update this element in the 2018 Plan. We welcome this. Port activity, protection of core port functions, and freight mobility are of critical importance to the City of Tacoma, the PSRC region, and the State as a whole, issues that are explicitly addressed in our Comprehensive Plan's Container Port Element.

3. We fully support the approach taken through, and the results produced from, using the Plan Update's 'prioritization tool' to update the Plan's financial strategy. The Plan Update contains the following key statements about prioritization:

   "Over the past two years the region has developed a prioritization framework for evaluating projects and programs in the plan. The framework contains nine evaluation measures derived from VISION 2040 ... Thus far the prioritization framework has been used for two purposes: evaluate capacity projects ... (and) help balance the financial strategy ... In the future the prioritization framework might be used for such purposes as: VISION 2040 screen for projects entering the long-range transportation plan, communicating regional priorities to the legislature, guidance for project sponsors to develop projects that better meet regional goals and priorities, long-range planning - developing and evaluating alternatives for the next (2018) update."

4. We urge further and expanded use of prioritization, including its use for the purposes listed in (3).
5. We support the inclusion of the results of the Growing Transit Communities project. In particular, we cite to the "People + Place Implementation Typology" and the need to further expand its use across PSRC initiatives and programs.

6. As to the 2014 Plan Update's pre-scoping for the 2018 Update, we are particularly supportive of the following "initial list of possible issues": (a) "address the implications of the Coal Train on the region's ports, railroad users (freight, Sound Transit, etc.), and roadways (rail crossings). This should include reviewing the findings of the regional Commodity Study to be completed in early 2014, and beginning to identify transportation investments needed to mitigate the impacts of coal trains through the region"; (b) "exploring the use of the prioritization framework to identify and evaluate plan alternatives"; and, (c) "developing a process for using prioritization to add, change, or delete projects to/from the plan."

As you know, the City of Tacoma's support for the adoption of Transportation 2040 hinged on assurances that further work would be done in subsequent T2040 updates to refocus the plan around VISION 2040. Full implementation of the Growth Management Act and VISION 2040 is so critically important to our region's future. We are very pleased that this Plan Update takes us down this path, and we encourage expedited action.

Sincerely

Peter Huffman
Director

cc: T. C. Broadnax, City Manager
    Kurtis Kinsolver, Public Works Director

747 Market Street, Suite 345 | Tacoma, Washington 98402 | Fax (253) 591-5433
Phone (253) 591-5030 | http://www.cityoftacoma.org
March 4, 2014

Amy Ho
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Sent via email

Dear Ms. Ho:

Please accept the following comments approved by the City Council for the City of Snohomish regarding the PSRC Transportation 2040 Draft Update.

Our city government has significant interest in how our region’s transportation improvements will be prioritized and funded for implementation. As Mayor, I am also the co-chair of the SR 9 Coalition, co-chair of the Eastside TRailways Alliance, and member of Snohomish County Tomorrow Steering Committee. Our City Council sees the following transportation priorities as vital in serving our City as well as our region’s communities:

- Our city and our regional organizations strongly support improvements to State Route 9, including replacing the bridge at the Snohomish River…..a congested choke point for north south traffic, especially if there is blockage on I-5, and an impediment to bus or carpool service, and to our economic viability.

- We also support the needs for safety and capacity improvements on US 2 from Everett eastbound to Stevens Pass.

- We are enthusiastic about the Eastside Rail Corridor and rail/trail development with the pending purchase of the 11 miles between the City of Snohomish and Woodinville at the Snohomish/King County line. We see huge potential for the trail and its future connections to the Burke Gilman trail in King County.

- We envision commuter rail use for the Eastside Rail Corridor from Sea Tac and Renton to Snohomish. We encourage planning and funding for track improvements that will connect eastside rail service, not only to Snohomish, but to make the westerly connection to Everett as well. This would provide a transit loop through Seattle and the eastside that can serve the whole King and
Snohomish County region, and provide a north/south connection if or when the BNSF main line may be incapacitated with landslides or earthquakes.

- Snohomish County and our city are also committed to the expansion of freight services along the Eastside Rail Corridor as a way to stimulate economic growth and jobs, and to get trucks off our roads and highways. This corridor has in the past served as a connection between the Boeing Everett and Renton plants. WSDOT needs to honor its promise to rebuild the rail/trail corridor connection lost at Wilburton with the widening of the 405 corridor.

- We understand the importance of coordination with the King County and with Sound Transit as we develop our regional vision, and see a future for Snohomish County DMU rail that could connect with Sound Transit light rail stations.

- We support Transit Oriented Development and see it as a way of the future that encourages more urban density and the potential for living/working/walking/biking near home. Our PSRC Award winning Pilchuck District Plan invites such development and will welcome rail/trail connections as well as capacity improvements on SR 9.

Thank you for this opportunity to comment on the draft update for Transportation 2040.

Sincerely,

Karen Guzak
Mayor

C: City Council
   Owen Dennison
   Steve Schuller
March 5, 2014

Ms. Amy Ho
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle WA 98104

Dear Ms. Ho:

Thank you for the opportunity to comment on the 2014 Update to the Transportation 2040 Plan document.

The Update contains and supports many of the principles that Kirkland is considering as we update the Transportation Element of the City of Kirkland’s Comprehensive Plan. Goals for Kirkland’s Transportation Master Plan include:

- Efficiently moving people through the City by a variety of modes;
- Linking transportation and land use, including a focus on our Urban Center of Totem Lake;
- Fiscal and environmental sustainability with an emphasis on maintaining existing facilities;
- Actively partnering with other agencies and the private sector; and
- Measuring progress toward these goals.

While it is satisfying to see that each of these goals is reflected in Transportation 2040, there are several clarifications that need to be made to the Update.

- In the maps associated with the Active Transportation Plan, (Appendix O, Attachment A page 12) Lake Washington Boulevard between Lake Street and the South Kirkland Park & Ride should be included on the regional bicycle network and Juanita Drive (Segment King 18) should be a Tier 1 route. Finally, that same map should be updated to reflect a recently completed project that added bike lanes on 100th Avenue between NE 124th and NE 132nd Streets.

- Other changes include making sure the maps and project lists in Appendix N are accurate and consistent; in particular, the Cross Kirkland Corridor – Project 4041 is not shown on page 4 of the Maps attachment. Project descriptions and mapping for 124th Avenue NE also need correction – a northern piece of the project (Project 2523) is in the constrained portion of the plan, and the southern section of the project is in the unconstrained part of the plan.

- It is assumed that the Sound Transit Project on the Eastside Rail Corridor (Project 5296) that includes commuter rail is only a placeholder, given that it is not shown for completion until 2040 and it is in the unprogrammed portion of the Plan, and given the fact that Sound Transit is currently studying alternatives to commuter rail modes on the same alignment.
Kirkland’s section of the Eastside Rail Corridor (ERC) is called the Cross Kirkland Corridor (project 4041 on the regional project list) and has transit in its description. The section of the Eastside Rail Corridor from Bellevue to Kirkland and the Cross Kirkland Corridor should be changed from commuter rail to “High Capacity Transit” as those two segments of the ERC link the Totem Lake Urban Center to the soon-to-be-constructed East Link Light Rail line in Bellevue. The High Capacity Transit designation is more consistent with Kirkland’s vision and growth targets for the Totem Lake Urban Center as well as Sound Transit’s evaluation of transit options for these two segments of the corridor.

Thank you once again for your work on the Update to Transportation 2040 and for your consideration of our comments.

Sincerely,

Kirkland City Council

By Amy Walen, Mayor
Kitsap Regional Coordinating Council

Ms. Amy Ho
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104

March 5, 2014

Herewith comment on the recently-released draft of the T2040 Update:

Toll Fees & Financing (page 31): Additional analyses would provide readers (both policy makers and planners) with meaningful context:

- Provide an in-depth discussion of toll fees and their uses, i.e. whether they will be used only for projects on the corridors or in the jurisdictions where they are generated, or if they will be distributed across the system. Since Kitsap includes few limited access highways (SR 3 & SR 16), our capacity to finance large projects could be impacted.

- Provide the already-completed decade-by-decade comparison of revenues (including all user fees) vs. expenditures, to demonstrate how current law revenue will adequately finance needed construction in the early decades of the plan.

- Assess the impacts of significant cost overruns from infrastructure mega-projects e.g. the long-term burden placed on available transportation funding, and constraints on local jurisdictions to meet other transportation infrastructure needs. e.g. similar to the Boston “big dig” tunnel project (1998-2007).

- Identify the legislative and/or voter actions required to approve each assumed revenue strategy.

Project Prioritization (page 25): When this self-scored measurement was deployed across the T2040 project lists, it was not clear that its results would eventually lead to the exclusion of many projects from the constrained program, as it favored projects with relatively high air quality and freight movement impacts. Scoring metrics were not clearly defined and yielded counter-intuitive results, such as high scores for transit projects but relatively lower scores for road projects ~ all within the freight category. Based on this inherently self-scored bias, many Kitsap projects were moved from the Financially Constrained to the Un-programmed section of the plan. In addition, page 26 states that “in the future, the measures may be weighted to reflect their importance”. The benchmark measurements should be re-evaluated to:

- remove the self-scoring bias
- include measures of projects’ cost-effectiveness
- identify the clusters of inter-related projects (rather than scoring projects in isolation) that will effectively deliver the desired transportation benefits.
Pavement Preservation (pages 29 & 34): The discussion of pavement preservation/asset management does not take into account the significant backlog in many jurisdictions. Include data reflecting the extent of current backlog by city/county throughout the region.

Transit Communities & Transit-Oriented Development (page 46): Although Kitsap did not participate in the Growing Transit Communities Project, TOD benefits should be extrapolated to and include ferry communities. In addition, a cost / benefit analysis of the value to transit operations vs. cost of TOD units would be useful to include, especially in light of the potential future funding of TOD projects through transit-specific funding sources.

Focus on Ferries: Throughout the T2040 update document, the discussion of the role of and need for investment in ferry service is vague and should be expanded.

Travel Mode Share Shifts (page 60)
Despite substantial investment in alternative mode facilities and services, the predicted shift in travel mode share 2006→2040 is only 4.2% reduction in SOV travel, with increases of .3% in Shared Rides; 1.4% in Transit usage; and 2.5% in Non-motorized travel. Several additional analyses are necessary in order to understand the relative value and effectiveness of these investments:

- Data should be provided at the county level, so that each county’s unique transportation system can be evaluated: mode share forecasts and congestion/delay data, including separating arterials and limited access facilities.
- Comparison of the anticipated expenditures for each travel mode, with the benefits received from mode shift.
- Analysis of the predicted decreases in commuting/SOV use associated with an aging work force.
- Specific impacts on ferry ridership i.e. walk-on vs. SOV travel.
- Effect of sharply decreasing gas tax revenue and probable increases in the cost of gasoline.

Recognizing the importance of T2040 to the future of transportation throughout the Puget Sound Region, we appreciate the opportunity to comment on this interim update. We sincerely hope its full update and revision over the next few years will afford us all to engage in far-reaching debate and consideration of the relative merits of financing strategies and priorities.

Sincerely,

Tim Matthes
Chair, Kitsap Regional Coordinating Council
Mayor, City of Port Orchard

cc: KRCC Executive Board
    KRCC Transportation Policy Committee, including (in addition to members of the KRCC Board):
    City of Bremerton Council Member Jerry McDonald
    City of Bremerton Council Member Mike Sullivan
    City of Poulsbo Council Member Linda Berry-Maraist
    City of Bainbridge Island Council Member Val Tollefson
    Kitsap Transit Executive Director John Clauson
    KRCC Transportation Technical Advisory Committee
March 7, 2014

Josh Brown  
Executive Director  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-1035

Dear Mr. Brown:

King County would like to express its support of the Transportation 2040 Update that was released for public comment on January 23, 2014. The County appreciates the hard work and long hours that the policy boards, advisory committees and PSRC staff have put into the development of the Transportation 2040 Update. I believe it will provide the region with a solid foundation as we begin deliberations for the full update of the regional transportation plan.

We would like to express our strong support for the Transportation 2040 Update’s continued commitment on placing a high priority on maintaining and preserving the region’s existing transportation system. Maintaining our roads, bridges, trails, and buses is critical to protecting existing investments and keeping people and goods moving throughout the region. At a time when our region is facing large funding gaps, this strong policy commitment to preservation helps the region focus on providing funding for the purpose of preserving existing transportation infrastructure and services, including continuation of a 25 percent set-aside for preservation during the 2014 project selection process.

We strongly support the Transportation 2040 Update’s continued commitment to the long-term transit service levels originally contained in Transportation 2040. We appreciate the hard work of PSRC and transit agencies across the region who have used this time of uncertainty to strengthen their resolve to identify productive, cost-effective transportation solutions over the long term. We look forward to the next major update where we expect to take a closer look at how transit is represented in the PSRC model and ensure that recent productivity gains are appropriately reflected.
We are glad to see the Coordinated Transit-Human Services Transportation Plan updated as part of the Transportation 2040 update. We believe a plan that integrates the transportation needs of all residents of the region is a stronger plan. Providing cost-effective mobility services to special needs populations requires both coordination between public and non-profit providers and greater recognition of the role of non-traditional modes. This update is a step toward improving the mobility options of special needs populations.

We appreciate the inclusion of the Transportation Demand Management (TDM) Action Plan to the Transportation 2040 Update. The role of TDM in supporting our regional priorities will only grow in the future. The TDM Action Plan is measurable, multi-modal, and leverages the region’s transportation investments, improving mobility options for everyone.

We support the development of the region’s first Active Transportation Plan (ATP). It’s clear that the plan was the result of many hours of PSRC staff time as well as time and expertise from multiple jurisdictions and community-based organizations. We look forward to robust implementation of the ATP so that communities across the region can more easily plan projects and support programs that make it easier to walk, ride a bike, access transit and get to work, school, parks and other destinations.

We support the continued use of the project prioritization process developed for the plan update, as it will ensure transportation investments are made that will implement Vision 2040. King County recognizes the benefits of prioritizing our region’s transportation projects; however, because project funding circumstances may evolve rather quickly, Transportation 2040 needs to provide flexibility for programming these projects. This includes the development of an efficient means to revise project status from the un programmed portion of the plan to the constrained portion of Transportation 2040.

We support Transportation 2040 Update’s financial strategy which recognizes that transportation investments are constrained by the region’s ability to pay for them. We also support the Update’s recognition that the purchasing power from the largest current source of transportation revenue (fuel tax) is eroding due to changes in vehicle technology, reductions in vehicle miles traveled (VMT), increasing capital costs, and inflation. We agree that new sources of reliable funding must be developed and phased in over time in order to make the necessary transportation investments to support our growing region.

The Transportation 2040 Update promotes the Growing Transit Communities (GTC) approach that will assist regional and local growth centers and transit station areas to be more attractive, which in turn fosters housing growth in transit-supportive environments, and helps the region meet its goals for housing affordability and development in centers. King County supports the GTC action strategies which outline a clear vision for how our communities should develop around transit station areas and provide useful tools and strategies for making this a reality over time. The PSRC and all the project partners deserve credit for steering this effort and for striking a balance between regional and local goals. As the region grows to an expected five million people by 2040, it is important that we carefully plan how to
accommodate this growth in a way that is sustainable, transit accessible, and inclusive of health and equity considerations.

Finally, we would like to convey our interest in working closely with PSRC to further integrate the Eastside Rail Corridor (ERC) into the region’s transportation network through Transportation 2040 and other PSRC policy documents. King County’s ongoing collaboration with our fellow ERC owners Sound Transit, Puget Sound Energy, Redmond, and Kirkland, with the technical support of PSRC staff, has created an initial road map for achieving our multiple-purpose vision for the ERC (see http://www.kingcounty.gov/operations/erc-advisory-council/reports.aspx). We look forward to working with PSRC and the region to effectively develop the ERC as an integral element of the vibrant and growing eastside community, one that links multiple growth centers.

We appreciate the opportunity to provide comment to the Draft Transportation 2040 Update and look forward to participating in the upcoming full update of Transportation 2040 in 2018.

The attached comment table contains specific King County comments for the Transportation 2040 Update for your consideration. If you have any questions, please contact Bill Greene, Chief Financial Officer for the Department of Transportation, at (206) 477-3820.

Sincerely,

Dow Constantine
King County Executive

cc:  Harold S. Taniguchi, Director, King County Department of Transportation (DOT)
     Laurie Brown, Deputy Director, DOT
     Bill Greene, Chief Financial Officer, DOT
     Kevin Desrond, General Manager, Metro Transit Division, DOT
     Brenda Bauer, Director, Road Services Division, DOT
     Christie True, Director, King County Department of Natural Resources and Parks (DNRP)
     Bob Burns, Deputy Director, DNRP
     Kevin Brown, Director, Parks Division, DNRP
     Chris Arkills, Transportation Advisor, King County Executive’s Office (KCEO)
     Lauren Smith, Land Use Policy Advisor, KCEO
### Puget Sound Regional Council – DRAFT T2040 – Update Draft Report: Comment Table

<table>
<thead>
<tr>
<th>Comment Number</th>
<th>Page Numbers(1)</th>
<th>Section (or Table or Figure)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>17, 34-37</td>
<td>Current State of Transportation Finance</td>
<td>The synopsis of the transportation revenue picture should include a statement that county governments which have successfully implemented the State Growth Management Act, and the principles outlined in PSRC regional planning documents, by encouraging incorporation of areas within the Urban Growth Area, are now facing the realities of sharp property and sales tax revenue reduction for managing transportation assets.</td>
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<td>2.</td>
<td>Overall</td>
<td></td>
<td>We recognize and applaud the PSRC’s most recent efforts toward developing a more robust and unified methodology for prioritizing preservation/state of good repair projects to include drainage, safety, signalization, ITS, and overlay projects.</td>
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<td>3.</td>
<td>8, 11, 30-32, 66</td>
<td>Appendix S State of Good Repair</td>
<td>King County supports T2040’s emphasis on State of Good Repair, and suggests that through evaluation of options for managing the region’s assets, future funding programs better reflect this identified top priority. A more permanent funding source for infrastructure preservation should become part of the suite of PSRC funding programs.</td>
</tr>
<tr>
<td>4.</td>
<td>Overall</td>
<td></td>
<td>Transit and Roadways. It is important to note that successful transit service requires quality roadways. A regional plan that invests in public transportation without preserving the infrastructure used by those travel modes is unsustainable.</td>
</tr>
<tr>
<td>5.</td>
<td>66</td>
<td>Draft scope of work for next major update</td>
<td>Bullet #7 should be revised to address the implications of the Coal and Oil Train traffic on the region’s ports, railroad users (freight, Sound Transit, etc.), and roadways (rail crossings). This should include reviewing the findings of the regional Commodity Study to be completed in early 2014, and beginning to identify transportation investments needed to mitigate the impacts of coal trains through the region. Comment: Oil train traffic from the Bakken Oil fields of North Dakota is forecasted to increase substantially in the near future. This increase in oil train traffic is a safety concern to the region because of the Class I railroad running north/south through the region’s urban area.</td>
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<td>6.</td>
<td>Appendix O - 5</td>
<td>Demonstrating Need</td>
<td>King County strongly supports the recognition of the need for connectivity of the non-motorized system and the necessity of creating networks, as stated in the plan. It should be noted that completing networks will be advantageous at both the community and regional</td>
</tr>
<tr>
<td>Comment Number</td>
<td>Page Numbers</td>
<td>OPTIONAL Section (or Table or Figure)</td>
<td>Comment</td>
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<td>7.</td>
<td>Appendix O - 57</td>
<td>Regional Bicycle Network Map and Gap List</td>
<td>The Regional Bicycle Network Map is a good start toward including active transportation in T2040. It will need additional work to enhance its usefulness, however. For example, the development of the map and gap list was created through a series of planning charrettes with various stakeholders, but with limited or no follow-on discussions or more-intensive planning meetings with relevant agencies to understand local circumstances, policies, historic context, environmental constraints, or other practical development specifics. The resulting map is aspirational, but too imprecise to use for future project identification or prioritization. Future updates should close this gap between PSRC planning efforts and agencies involved in creating nonmotorized facilities.</td>
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<td>8.</td>
<td>Appendix P - 5</td>
<td>System Expansion and Project Status</td>
<td>King County Parks has listings of both constrained and unprogrammed nonmotorized projects in the plan. These projects are funded by non-transportation sources, including the 2014-2019 Parks Open Space and Trails Levy and Real Estate Excise Tax (REET) revenues. As a result, they reside largely outside traditional transportation funding envisioned by the plan. King County's nonmotorized regional trail projects bring their own, dedicated funding, and that funding cannot be used for other transportation purposes. King County recognizes the benefits to prioritizing our region's transportation improvements including nonmotorized facilities. Because nonmotorized development circumstances may evolve quickly, the plan needs to provide flexibility for programming these facilities. This includes an efficient means to revise project status from unprogrammed to candidate status in the constrained part of the plan.</td>
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<td>9.</td>
<td>Appendix P - 6</td>
<td>Prioritization Measures</td>
<td>PSRC completed a major effort to establish a fair and meaningful prioritization process, but issues remain with respect to its application. We observed an instance where the same project, sponsored by different agencies, was scored differently during the prioritization process. The next plan update should look to simplify the process and address the inconsistent application of the measures.</td>
</tr>
</tbody>
</table>
March 10, 2014

Amy Ho
Puget Sound Regional Council
1011 Western Avenue, STE 500
Seattle, Washington, 98104

Subject: Comments on the Draft Update to Transportation 2040

Dear Ms. Ho:

Thank you for providing a comment period for jurisdictions to review the Draft Update to Transportation 2040. We commend you for all the work that has gone into this update. Here are our comments.

1. The Front Street Interchange to I-90 does not appear on any project lists. This was included in WSDOT’s plan prior to 2010, and listed in the I-90 Corridor Study so it should be listed here as well.

2. The Active Transportation Plan is a great addition, and one that we are also working on in our community. The Active Transportation Plan shows a regional East/West connection, both existing and proposed, on the NORTH side of I-90 (Map ID KING 48-a. “West Lake Sammamish”). These should both be along Newport Way, consistent with Issaquah’s Mountains to Sound route.

3. Appendix A –
   a) page A-5 Projects Completed Since Transportation 2040 Baseline (2006-2013) – The list is missing SR-900 Widening (Newport Way to South of Talus Drive)
   b) page A-6 Nonmotorized – The list is missing SR-900 Regional Trail; High Point Regional Trail; E. Lake Sammamish Regional Trail through Issaquah
   c) page A-44 – Major Highway and Transit Projects in the 10-Year Investment Program – To Complete the improvements identified in the I-90 Corridor Study.
   e) Attachment C – Projects and Programs in the Ten-Year Action Strategy (2014 – 2023) – Need to include I-90 and Front Street Interchange Improvement listed in the I-90 Corridor Study.

4. Appendix O - Environmental Justice talks about increasing services to people with disabilities and seniors but does not mention increasing services to lower income residents. This may be talked about in the Human Services Plan but seems logic to include in this appendix. The Environmental Justice Summary refers to low-income in the 3rd paragraph, page 1, 3rd paragraph and 2nd bullet on page 2. However, “low income” should be added to the 4th bullet on page 3.
5. Appendix P - Prioritization in the Section of State of Good Repair: Table 3: Arterial projects
Dated Wednesday, August 2013 – missing project for Issaquah – E. Lake Sammamish Parkway from SE 56th Street to Issaquah Fall City Road.

If you have any questions, please feel free to contact me at 425-837-3443.

Sincerely
PUBLIC WORKS ENGINEERING

[Signature]
Gary Costa, PE, PTOE
Transportation Manager

CC: Sheldon Lynne, PE, Director of Public Works Engineering
Transportation Mobility Team
Day File
March 7, 2014

Puget Sound Regional Council
Attn: Amy Ho
1011 Western Avenue
Suite 500
Seattle, WA 98104

Re: Transportation 2040 Update

Ms. Ho,

The City of Bonney Lake (the City) would like to thank the Puget Sound Regional Council (PSRC) for the opportunity to comment on the Draft Transportation 2040 Update (T2040).

The City supports PSRC's development of policies establishing that maintaining the existing transportation system is the highest priority in T2040. Preservation activities are crucial to being good stewards of the existing public investments in infrastructure: especially given that these activities are more cost-effective than reconstructing degraded facilities.

If PSRC's establishes weighted prioritization criteria in the future for transportation projects, the City would recommend that greatest priority/weight be given to preservation projects and to projects that reduce the congestion of the existing road network. The City would also recommend that projects to complete partially completed project (e.g. SR-167 Extension to I-5) be given a higher priority than new projects.

Finally, the City would request that the regional transit facility located in the City illustrated on the East Pierce Map (Pg. 5), the East Pierce Map 2 (Pg. 6), and the Southeast King County Map (Pg. 10) in Appendix O be labeled "Bonney Lake Transit Center." This regional facility is located at the intersection of projects PC-40-a, PC-40-b, and PC-33-b as shown below:
If you or your staff have any questions or need additional information from the City, please contact Jason Sullivan by email at sullivanj@ci.bonney-lake.wa.us or by phone at (253) 447-4355.

Sincerely,

[Signature]

John P. Yodopich, AICP
Community Development Director

CC: Dan Grigsby – Public Works Director – City of Bonney Lake
    Jason Sullivan – Senior Planner – City of Bonney Lake
March 10, 2014

Josh Brown
Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Brown:

The City of Renton is pleased to support the draft Transportation 2040 Update. The update to the financial strategy has responsibly responded to the effects of the economic downturn and the corresponding reduction of transportation revenues. The updates to the transportation plan have addressed critical issues such as the prioritization of projects, the environment, health and transportation finance. The update to the regional transportation plan when integrated with Vision 2040 and the Regional Economic Strategy provide a clear long-term vision to support the addition of 1.5 million residents and 1.2 million jobs to the Puget Sound region by 2040.

We concur with the updates to the projects in the plan and support the prioritization of projects that reinforces and implements Vision 2040. Given our city’s location along the congested I-405 and SR 167 regional corridors, the successful implementation of Transportation 2040 is paramount to the growth and prosperity of our city and the region as a whole. We applaud the continued inclusion of the I-405 and SR 167 corridor improvements within the constrained project list. The completion of these improvements is critical to the implementation of the bus rapid transit (BRT) along the most congested corridors in the region. The development and support of BRT for this corridor will provide the high capacity needed to support the development of our designated urban centers.

The financial challenges of implementing the regional transportation plan continue to be daunting and real. Given this, we believe PSRC needs to continue to employ the policy of focusing infrastructure investments in and between Regional Growth Centers and, more specifically, target investments in those centers that are accepting the highest proportion of growth and support employment in major industry clusters.

Although Transportation 2040 financial strategy continues to rely on the traditional funding sources in the early years, the City of Renton supports the transition to new funding structures based on user fees, such as high occupancy toll (HOT) lanes. We feel that this funding structure provides the best and earliest opportunity to make much
needed improvements along the I-405 corridor that otherwise may be delayed many years before funding becomes available through traditional sources.

We appreciate the opportunity to provide comment to the Draft Transportation 2040 Update and look forward to participating in the upcoming full 2018 update of Transportation 2040. If we can provide further assistance, please contact Public Works Administrator Gregg Zimmerman at 425-430-7311.

Sincerely,

Denis Law
Mayor

cc: Renton Legislative Delegation
    Renton City Councilmembers
    Jay Covington, Chief Administrative Officer
    Gregg Zimmerman, Public Works Administrator
    Chip Vincent, Community & Economic Development Administrator
    Jim Seltz, Transportation Planning & Programming Manager
March 7, 2014

Josh Brown
Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Brown:

The local public health agencies of King, Kitsap, Pierce and Snohomish Counties support the draft Transportation 2040 Update released for public comment in January 2014. We recognize the hard work that has gone into it, and appreciate consideration of public health impacts, especially on the growing numbers of low-income, minority, special needs and vulnerable individuals and families living in our communities.

We support the development of the region’s first Active Transportation Plan (ATP). It is clear that the plan was the result of many hours of PSRC staff time as well as time and expertise from multiple jurisdictions and community based organizations. We look forward to robust implementation of the ATP so that communities across the region can more easily plan projects and support programs that make it easier to walk, ride a bike, and access transit to get to work, school, parks and other destinations.

We support the Growing Transit Communities (GTC) approach and encourage PSRC staff to continue the important work of the Equity Network and look for new and innovative ways to integrate equity principles into the T2040 Update. We appreciate GTC’s efforts to involve the community in transit corridor planning and we look forward to exploring ways to sustain and build on these new relationships. As we promote greater density and transit-oriented development, it is important to ensure that we reduce pollution and mitigate exposure. As the region grows and changes, we must plan in a way that is sustainable, transit accessible, and inclusive of health and equity considerations.

We support including the Coordinated Transit-Human Services Transportation Plan as part of the Transportation 2040 Update. We believe a plan that integrates the transportation needs of all residents of the region is a stronger plan and an important step toward improving the health, economic opportunities, and mobility options of individuals with disabilities, older adults and youth, and individuals with limited incomes.

We support the continued use of the project prioritization process developed for the plan update, as it will ensure transportation investments are made that will implement Vision 2040. We want to encourage PSRC to look for new and innovative ways to include health-specific goals, objectives, and measures for transportation projects. To do this we suggest utilizing health benchmarks such as an increase in self-reported physical activity to monitor the success of active transportation projects, gathering data on crash and safety statistics, and recognizing cities for their efforts to integrate health into transportation planning.
We suggest strengthening the draft by emphasizing the interconnected people, planet and prosperity benefits from transportation investments. An example is how providing transit, bike and pedestrian choices can contribute to improved mobility, physical activity and air quality, resulting in reduced health care costs and improved productivity. In addition, transit, and paratransit investments improve access to health care, education, recreation, jobs, and other important resources.

Finally, we suggest including consideration of ultrafine particulates and diesel air toxics in the air quality section.

We look forward to continuing our involvement with PSRC Boards and staff on this important work. Thank you for your leadership making our communities healthier places to live, work, learn, and play.

Sincerely,

Anthony L-T Chen, MD, MPH
Director and Health Officer
Tacoma – Pierce County Health Department

Gary Goldbaum, MD, MPH
Director and Health Officer
Snohomish Health District

Dr. Scott Lindquist, MD, MPH
Director and Health Officer
Kitsap Public Health District

David Fleming, MD
Director and Health Officer
Public Health – Seattle & King County
Snohomish County Comments on Transportation 2040 Update

Snohomish County applauds PSRC and the numerous local government staff and elected officials who have developed this draft Transportation 2040 Update. It is a significant effort to which we offer the following brief comments.

The prioritization process has been a valuable exercise for determining project need, especially in producing a constrained project list for the Transportation 2040 Update. PSRC should look for opportunities to refine this process in the period leading up to the next major update in 2018. The prioritization process will be very helpful for the next update to help inform additions and/or removal of projects from the long range transportation plan. We do not agree that this process is appropriate for deciding the projects to be funded in the regional federal funding competition as is suggested in Chapter 3 of the Action Strategy. Instead PSRC should maintain the current process which requires that projects be consistent with Transportation 2040 but also considers the unique situations found at the local level.

The Rural Transportation Study is a good start in identifying important issues with rural transportation. The report describes rapidly increasing bridge and roadway needs and significant revenues declines as well as other transportation challenges unique to our rural areas and small cities. A more detailed examination of these issues is necessary as part of the 2018 Transportation 2040 update. As we prioritize our most urban areas to implement the Regional Growth Strategy (RGS), we can’t ignore the very real transportation needs of our less urban and rural areas. The breadth of these challenges may make the case for a more balanced approach to transportation financing to support the RGS as a whole.

Before a 2018 update to Transportation 2040, with a plan horizon possibly extended to 2050, there should be an opportunity to review and possibly update the RGS in VISION 2040. In 2018, the VISION 2040 RGS will have been in existence for 10 years. It would seem that check-in on the status of RGS implementation, as well as any warranted adjustments and refinements to the RGS after local plan updates, would be good planning practice.

We agree with the suggestion on page 67 to further develop a future transit network to be used in an update of the regional model. As we complete the transportation modeling for the 2015 update to the Snohomish County Comprehensive Plan we continue to look for methods to make our level of service and concurrency system more sensitive to multiple modes. PSRC refinements to the regional model that includes a more developed future transit network and as well as expected benefits of pedestrian and bicycle improvements and transportation demand management techniques would be very useful for informing our next comprehensive plan update in 2023.
Errata
On page 10 under Critical Investments for Transit, it should read extend Link Light Rail to Lynnwood Transit Center instead of Northgate.
The last sentence in the second paragraph of page 37 should refer to appendix N, not appendix M.

Thank you for the consideration of our comments.

Bobann
Bobann Fogard, PE | Division Director
Transportation & Environmental Services Division

Snohomish County
Department of Public Works
3000 Rockefeller Avenue M/S 607
Everett, Washington 98201

Phone (425) 388-6405
FAX (425) 388-6449
email bobann.fogard@snoco.org
WEB www.snoco.org

NOTICE: All emails, and attachments, sent to and from Snohomish County are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56)
Good afternoon—

Thank you for the opportunity to review and comment on the Transportation 2040 Update.

Throughout the Transportation 2040 Update, tolling is discussed as a critical component of the financial strategy for the plan. In discussing the results of the current tolling of the 520 bridge, Appendix A on p. A30 states both that traffic on SR-522 has decreased as a result of tolling, and in another section that “minor increases in traffic” have been seen (2-5%).

This data does not match actual traffic count information for our jurisdiction which shows that SR 520 tolling has increased traffic on SR 522 and arterials in south Kenmore by 10%.

Kenmore vehemently objects to the assumption that tolling can be the financial strategy of the future without acknowledging the corollary impacts of tolling. The new 520 bridge traffic pattern resulting from tolling should not become the new baseline by which future tolling is evaluated. That change has had significant negative impacts on our community including problems related to air quality, noise, impact to structures, and north/south traffic movement.

If the impacts of future tolling (for example of I-5 and I-405) are not adequately evaluated and mitigation needs are not studied, traffic may continue to be pushed from one location to another without a true assessment of how this directly affects communities. This evaluation will be even more critical if transit service is reduced in our region.

Kenmore insists that cumulative impacts of tolling (beginning with SR 520 tolling) be evaluated.

Sincerely,

Lauri Anderson, AICP
Senior Planner | City of Kenmore, WA
18120 68th Ave NE | Kenmore, WA 98028
Tel: 425.398.8900 | Fax: 425-481-3236
landerson@kenmorewa.gov | www.kenmorewa.gov

Kris Overleese, P.E.
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March 10, 2014

Ms. Amy Ho
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: Transportation 2040 Update

Dear Ms. Ho:

The City of Kent is pleased to comment on the Transportation 2040 Update Draft Report. We also appreciate the many hours of discussion all of us contributed to the final product. We offer the following comments:

• Staff supports and appreciates the highest priority placed on "State of Good Repair" and the work to better estimate costs in this regard. It will be important as we move to the 2018 planning that we emphasize consistency in methods used to determine repair costs, as well as include costs for upgrades for ADA as well as staffing costs for maintaining traffic signals.

• As a Manufacturing and Industrial Center, Kent is supportive of the regional freight strategy which is a critical component of our economy. Consistent with that strategy, we appreciate and support retaining the S. 212th Street (MTP 1563) and SR 509 Extension (MTP 4429) and the other Kent projects in the constrained portion of the plan.

• We believe allowing sponsor-justified projects to be retained in the fiscally "Constrained" part of the plan and WSDOT’s right sizing of their projects represented a significant and appropriate strategy for supporting VISION 2040 and balancing the financial strategy. We recognize this right-sizing may affect local jurisdictional roadway levels of service as we move forward in accommodating growth targets.

• Although not perfect, the prioritization measures used to evaluate system improvements are a great tool for providing information to decision-makers and aiding project proponents in considering elements in their proposals to make them more consistent with VISION 2040. Staff supports the use of this tool and the other methods used to balance the financial strategy for the plan.

• We appreciate the work of transit agencies in finding cost reduction measures and service efficiencies as they move forward to provide needed services. We also recognize that without a sustainable source of funding, the targets set forth in the 2040 planning horizon will be unreachable. Increased mobility, specifically transit, is a top priority for the City and we will be actively engaged in the development of the future transit network in the 2018 update.
All in all, we believe the plan is well written and headed in a direction consistent with VISION 2040. We look forward to working with PSRC to enable a multimodal transportation system supportive of VISION 2040.

Sincerely,

Fred N. Satterstrom, AICP
Planning Director
March 6, 2014

Ms. Amy Ho
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104

Re: DRAFT Transportation 2040 Updates

Dear Ms. Ho:

Community Transit appreciates the opportunity to provide comments on the Puget Sound Regional Council’s draft Transportation 2040 Update. Our staff has provided substantial input into the update through participation in many PSRC forums and committees. After reviewing the draft report we have comments in several areas.

The plan assumes local transit agencies that cut service during the recession will be able to restore service to pre-recession levels by 2020 without additional revenue authority. Our financial projections do not support this forecast. Many sources indicate that economic fundamentals are different in this recovery and a return to pre-recession purchasing power may be significantly delayed. Community Transit’s long range planning calls for a new revenue source in order to return to previous service levels and continue growing to meet demand.

The Transportation 2040 plan places significant emphasis on mode shift to transit and a commensurate increase in bus service levels. That said, details on mode shift by corridor are few and there is little discussion of transit capacity requirements, transit priority infrastructure or funding. As this T2040 update was developed, there was recognition by PSRC that the 2018 update would more fully address transit modeling and financial requirements. However, the 2018 pre-scoping section does not seem to prioritize this work, listing it in the “potential plan elements” area rather than among “core plan elements.” We would propose a higher priority for this work.

Lastly, in the overview of how Community Transit has responded to the changing economic climate, in both the Draft Report and Appendix A, it should be noted that we raised fares three times since the recession began. As a result of the fare increases in 2008, 2010 and 2013, the average fare per customer has increased by 36 percent. Riders are paying more to help sustain service.

Community Transit looks forward to continued collaboration with the Puget Sound Regional Council as we implement the regional vision for transportation.

Sincerely,

Joyce Eleanor, Chief Executive Officer
March 10, 2014

Puget Sound Regional Council
1011 Western Ave #500
Seattle, WA 98104

Ladies and Gentlemen:

Thank you for the opportunity to comment on the 2014 update of Transportation 2040. Redmond’s comments are intended to help PSRC create a plan that is as useful as possible for local jurisdictions and advances regional goals to achieve the adopted vision for the Puget Sound region. While this letter contains some suggested changes, overall the City of Redmond is pleased with the direction of the plan and thanks PSRC staff for their work in preparing this update.

Our comments fall into two categories: broad themes and issues discussed with our elected officials and a longer list of detailed, section-specific comments. Below are our comments related to broad themes and issues.

- **Support for “State of Good Repair”**
  Given growing maintenance needs in the region, Redmond supports the plan’s emphasis on a “State of Good Repair” (i.e. maintenance and preservation). Preservation activities are highly cost-effective when compared to reconstructing degraded facilities.

- **Support for a Multimodal Approach to Accommodating Travel Demand**
  The region cannot solve its congestion problems by building and widening roads alone. Travel demand must be accommodated through a mix of capacity investments, including facilities for automobiles, transit, and active transportation modes, as well as policies that help reduce demand and improve system efficiency. Redmond recognizes and supports Transportation 2040’s focus on multimodal solutions.

- **Support for Safe and Comfortable Facilities for Pedestrians and Bicyclists**
  The City of Redmond Transportation Master Plan emphasizes the importance of providing safe and comfortable facilities for active transportation users (such as cycle tracks and wide sidewalks), ensuring both safety and comfort encourages people of all ages and ability to choose to walk and bicycle. Redmond supports the sections of T2040 that call for these.
- **Encourage the Legislature to Adopt a Statewide Transportation Package that Includes Local Options for Transportation Funding**
  Funding for transportation infrastructure and frequent, quality transit service are critical to sustain economic growth in the region. The City supports PSRC’s call to the legislature to provide jurisdictions with local transportation funding options and believes it is equally important to adopt a statewide transportation package.

- **Develop a Regional Tolling Implementation Strategy**
  Regional tolling is a key strategy for the Transportation 2040 plan. The City of Redmond supports tolling of regional corridors to improve and balance traffic flows and to generate revenues. The next regional transportation plan update needs to include a strategy for implementing the regional tolling network outlined in T2040.

- **Further the Implementation of the Growing Transit Communities Initiative**
  Growing and supporting designated regional urban centers is a key strategy for the Transportation 2040 plan. Emphasize implementation of Growing Transit Communities in the 2018 plan update and include strategies to help cities partner with other entities to finance infrastructure. Review the effectiveness of Growing Transit Communities efforts to date and identify any changes that may be needed to improve effectiveness.

Additional detailed section-specific comments are provided in Attachment A.

Thank you again for the opportunity to comment on Transportation 2040. Following the adoption of the 2014 update, Redmond looks forward to being an active partner in the 2018 update that is currently in its early stages.

Best regards,

Linda De Boldt, Director, Department of Public Works

Rob Odle, Director, Department of Planning and Community Development

Enclosure: Section-Specific Comments
SECTION-SPECIFIC COMMENTS

Chapter 4 – Statutory and Ongoing Plan Elements

- Introduction, p38
  - In this plan and other related documents, ensure that when the term “Active Transportation” is used in this context it refers only to nonmotorized trips to and from transit stops, not the transit ride itself.

- “Active Transportation for People of All Ages and Abilities”, p38
  - Walking and bicycling environments must be both safe and comfortable for people of all ages and abilities to embrace them. Comfort is not currently mentioned in this paragraph and we suggest specifically including this in the section.

- “Regional Bicycle Network and Local Connectivity”, p38-39
  - A short explanation of how connectivity benefits nonmotorized users would be helpful here. There is such a discussion in the Redmond Transportation Master Plan (Chapter 3 page 40: http://www.redmond.gov/tmp).

- “Coordinated Transit – Human Services Transportation Plan”, p43
  - “Fixed Route Services”: To address spatial gaps and temporal gaps without relying on more costly paratransit services, fixed-route service must be maintained for both Core Transit service and Community Connector services. Currently the paragraph only identifies increases in Core Transit service as aligning with special needs transportation users.

- “Coordinated Transit – Human Services Transportation Plan”, p46
  - Page 10 of Appendix K has a good discussion of the plan’s approach to improved coordination and efforts to reduce duplication – a brief summary in Chapter 4 would help tell this story. The last paragraph on page 46 gives the impression that the federal landscape prevents coordination.

- “Growing Transit Communities”, p49
  - To second paragraph, add “local plans.”

Chapter 6 – Next Steps

- p66: What is the “Regional Transportation Futures Study?” We suggest defining this.

- “Draft Scope of Work”, p66
- Strive to capture data in such a way that it can be queried by jurisdiction (i.e. cities & counties can isolate the data that relates to them).
- Include an update of bicycle and pedestrian best practices, which are rapidly changing.
- Include parking and its relationship to land use.
- Include access to transit, including a transit access needs assessment as well as parking and its relationship to transit access.
- Incorporate updates and lessons learned from Sound Transit’s Access pilot projects and King County Metro’s Access to Transit Study.
- Expand types of transit service to include lower cost alternatives to regular fixed route transit, including lessons learned from King County Metro’s 5-Year Alternative Service Delivery Implementation Plan.
- Integrate lessons from the Metro and Sound Transit access and alternatives to regular fixed route studies with the Coordinated Transit – Human Services Transportation Plan.
- Include a discussion on the current and potential future roles of Transportation Network Companies (i.e. ridesharing services) in the region’s transportation system.
- “Other Potential Plan Elements and Issues” bullet 3: The future transit network must be developed in close coordination with more than just transportation operators. Jurisdictions and other stakeholders must be involved in the development of the future transit network.

Appendix K – Coordinated Transit-Human Services Transportation Plan

- “Planning for Emergencies”, p13
  - Include how emergency management offices communicate with limited English speaking populations.

- “Transportation Costs”, p30 fourth paragraph
  - This section should address a broader range of lower-cost alternatives to traditional transit.

- “Special Needs Transportation Programmatic Cross-Check”, p31
  - Include a description of the types of programs counted in the ‘cost’ side of the equation and the overall utility of this measure.

- “Awareness Gaps”, p36
  - Either cut or provide evidence for the statements that social service agencies “may be adverse to referring clients to fixed-route transit” and “may advocate for less efficient transportation modes.”

- “Duplications”, p36
  - Another duplication to include is the multiple efforts to provide information on transportation options online, e.g. Eastside Easy Rider Collaborative, King County
Mobility Coalition, Findaride.org.

- “Goal #2 – Move People Efficiently” or “Goal #3 -Move More People”, p44
  - Include a strategy to work with transportation providers to improve the ability of traditional fixed route service to meet the needs of special needs transportation users, via access improvements, information, and/or other measures.

Appendix N – Transportation 2040 Regional Capacity Projects

- Project description for MTP ID 4115
  - Delete all text after “132nd Avenue NE”

Appendix T – Transportation Demand Management Implementation Plan

- Action item #2, page 16
  - Add an action item to develop model policies and best practices for Transportation Network Companies, peer-to-peer car sharing, and other upcoming, innovative tools that support lower car ownership.
  - Add a discussion of user fees and/or parking pricing as a TDM strategy.

- Incorporate TDM as a corridor implementation strategy (in addition to corridor based TDM strategies discussed on page 8). This should include methods to integrate with the SMART corridors approach.

- Commute Trip Reduction section
  - Explain what the program is and what it includes ("the program has not changed dramatically").
  - It would be helpful to have one or two data-based examples of how CTR has been able to reduce congestion and meet its goals.
  - Identify any changes that should be considered and why.
March 10, 2014

Ms. Amy Ho  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104

RE: Comments Concerning PSRC’s Draft Update to Transportation 2040

Dear Ms. Ho:

Thank you for the opportunity to provide comments concerning the Draft Update of the Transportation 2040 (T2040) Plan. Bellevue has been an active regional partner in development of the Draft Plan Update over the last few years and is pleased with the rigor of this Plan and the continued commitment of our region to divine a clearer nexus between our land use strategy and the required transportation investments necessary to achieving VISION 2040. To this end, the Plan articulates a new path for prioritization of projects and in doing so has created a solid basis for refinement of this new process that should strengthen the value of the Major Update due in 2018. The Plan, as it stands now, does a good job of balancing our region’s financial reality and underscoring the need to be highly strategic in how we bring projects into the constrained and unprogrammed portions of the Plan. Looking forward to the future work of the 2018 update commencing this year, there are several important issues identified below that begin in earnest these last two years that should be refined by PSRC going forward.

(1) **Initiation of a Regional Tolling Implementation Plan.** There has been considerable work over the last decade to develop a regional policy foundation for implementation of various pricing and tolling solutions. The result should be to improve system reliability and generate funding for improving corridors using toll revenue given the continued devaluation of gas tax revenue and significant changes in trip demand. PSRC, working with its members, did an admirable job of updating the T2040 Financial Plan to ensure that the Plan is financially constrained and adequately balances revenues and costs over time. A critical component of that work is tied to assumptions that pricing solutions will be among the prevailing funding sources to replace gas tax revenue and the preferred method for better managing our transportation system. What’s lacking is a clear path on implementation of pricing solutions that is system-wide, phased and informed by system needs and a well-articulated public outreach process. We urge PSRC to commence what is being referred to as the “Transportation Futures” work that would, among other things, provide a very public expert review of the financial and pricing options necessary to keep our region competitive and functional with an implementation plan provided ultimately to the state legislature and the Governor.

(2) **Improved Traffic Modeling.** Bellevue staff has been working closely with PSRC over the last few years to ensure that the integrity of the regional model is upheld even as PSRC experienced considerable turnover in modeling staff and delays in providing adequate transportation modeling outputs. Specifically, we look forward to receiving a significant new update to the 4-step transportation modeling work. Much of PSRC’s modeling work for transportation dates back to 2006; therefore, is not as sensitive to changing markets and conditions. We are pleased that on a
related note, the household survey is re-emerging and Bellevue is partnering with PSRC to add additional households into the mix which will enhance the quality and strength of the forthcoming data. Going forward, the work to provide a Major Update of T2040 by 2018 must be informed by a solid modeling foundation – for transportation and land use. We strongly encourage PSRC to prioritize this work.

(3) **Prioritization: Development of Administrative Rules.** There was considerable effort made to use the new nine measures of the PSRC Prioritization to inform how projects in the Plan are arrayed. Going forward, it will be critical to create very clear guidance for new projects as they emerge and are considered for inclusion in the plan and to refresh and evaluate existing projects. We urge PSRC to work closely with the Regional Staff Committee as a clearing house for development of the emerging administration rules.

(4) **Transit Estimating.** The estimation and assumptions for regional transit growth, as developed for this minor update, T2040 lacked rigor. That said, we are pleased that the Transit Operators Committee is committed to developing a new data-driven approach to estimating future transit demand that we believe will be of great value for the 2018 update. We urge PSRC to work with volunteers from the Regional Staff Committee as this new work commences. Transit estimation is of critical importance to Bellevue and the entire region. Bellevue has developed a fairly sophisticated model for transit and we are eager to be part of the forthcoming discussions and decision-making.

(5) **VISION 2040 Coordination.** Cities are currently updating their Comprehensive Plans with a deadline of June 2015. The T2040 Plan is to be updated by 2018. Given that the VISION 2040 regional growth strategy was adopted in 2008 and there have been significant events (e.g. great recession) and decisions regarding infrastructure (e.g. SR-520 bridge replacement, SR-99 viaduct replacement, ST2 voter approval), it may be fortuitous to update the VISION work in concert with the major update of T2040 in 2018. This could present opportunities for efficiency in updating these plans, but most importantly, provide an opportunity to strengthen the nexus between land use and prioritization of transportation investments.

Thank you for your time and consideration. If you have questions and wish to discuss any of these items further, please don’t hesitate to call us.

Sincerely,

David B. Berg, PE
Director, Transportation Department

Chris Salomone
Director, Planning and Community Development

cc: Joyce Nichols, Intergovernmental Relations Director
Kim Becklund, Transportation Policy Advisor
Paul Inghram, Comprehensive Planning Manager
March 6, 2014

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Attention: Amy Ho

Dear PSRC:

Thank you for the opportunity to comment on the update for Transportation 2040.

City of Everett staff have reviewed the materials on-line related to Transportation 2040 and offer the following comments.

1. It appears that the most significant piece of work was the prioritization process for projects in the regional plan. It also appears that a lot of the financial assumptions have been updated from the original 2010 T-2040 plan document.

2. The Regional Growth Strategy has not been updated yet to account for the same economic factors caused by the recession that have caused a re-evaluation of the financial assumptions for Transportation 2040. The extremely large growth figures suggested for Everett by the PSRC’s “guidance” were adopted in 2008, long before the full effects of the recession could have been anticipated. I understand that Vision 2040 will be re-evaluated at some point, and this update to Transportation 2040 is not intended to address changes to the growth guidance of the Vision 2040. Since regional transportation investment directly influences the location of growth in the region, the growth assumptions in Vision 2040 should be re-calibrated as the transportation investments and their timing have changed with the proposed update to T-2040.

3. It appears that the financial model assumes that Sound Transit will not begin collecting revenues for ST phase 3 until 2021, and that the model assumes $6.6 billion in revenues over the succeeding 2 decades. Do these assumptions match the assumptions Sound Transit is using for revenues?

4. Appendix B shows on maps the assumed major investments for the region, and shows the Link light rail to Everett following Interstate 5 all the way to Everett station, with what appears to be an extension west from Everett Station into downtown. The map should
show a dashed line from Lynnwood to Everett with a notation on the map and additional text in the narrative indicating that the alignment has not been determined and may follow a different course than Interstate 5. In fact, if the regional transportation strategy intends to connect the Vision 2040 regionally designated centers with the high capacity transit system (light rail), the I-5 alignment clearly misses the largest employment center in Snohomish county by not serving the SW Everett / Boeing / Paine Field MIC. The map and text in Appendix B do not indicate that there are other potential routes for light rail, and that the decision for alignment and station locations will be made in a separate process from T-2040. The City of Everett respectfully requests a revision to the map and accompanying text that makes this point clear to the reader.

5. As Sound Transit makes decisions in the future on the alignment, station locations, extensions, and future expansion of the district, Transportation 2040 should be amended as necessary to incorporate updated plans. As the backbone of the regional transportation system, light rail decision will have a tremendous influence on the location of future growth and the need for complementary transportation facilities in the region.

6. On the same map, the Edmonds ferry terminal is mislabeled as the “Mukilteo Multimodal Terminal Expansion.”

7. On the same map, the arrow indicating the Evergreen Way BAT Lanes should be extended a little farther to the east. The arrow stops on Mukilteo Speedway (SR 525).

8. The report includes an extensive section on Growing Transit Communities, which is longer than the section on the Financial Strategy, and includes the following statement:

   **Transportation 2040** recognizes the importance of transit-oriented communities in conjunction with implementation of the region’s transit system, and calls for local jurisdictions, in collaboration with regional transit agencies and PSRC, to conduct comprehensive sub-area planning for high-capacity transit station areas.

GTC was memorialized in the regional compact which was represented as a non-binding agreement between signatories to the regional compact. It appears by the highlighted portions of the excerpt from the Transportation 2040 report, that the PSRC is amending Transportation 2040 by incorporating GTC and what was represented as non-binding is now another regional expectation on local jurisdictions. GTC was supposed to be a “playbook.” It now appears to be part of a T-2040 mandate. We do not disagree that station area planning is important, and would probably do it without a PSRC mandate. It just appears that GTC has become a mandate through the Transportation 2040 update. Am I reading this wrong? The last sentence in the section on GTC says that the 2018 update to Transportation 2040 “will offer an opportunity to consider Growing Transit Communities recommendations more fully.” In the context of the Transportation 2040 report, a clearer statement should be made at the outset of the GTC section to make it more obvious that the 2014 Transportation 2040 update is not mandating GTC policy and actions on local jurisdictions.
9. It appears that the only Everett sponsored projects in the constrained regional project list are the Everett Station parking garage and the Hardeson Road Interchange. The unprogrammed project list includes the South Broadway corridor improvement, and the Everett I-5 downtown interchange improvements.

Sincerely,

Allan Giffen, Director
Planning and Community Development

Cc: Mayor Stephanson
    Everett City Council
    Tom Hingson, Transportation Services Director
    Ryan Sass, City Engineer
March 10, 2014

Amy Ho
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104
Transportation2040@psrc.org

SUBJECT: Transportation 2040 Update-Draft Report

Dear Ms. Ho:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to review the draft Transportation 2040 Update. We have prepared some comments for your consideration.

The Transportation 2040 Update contains very little discussion regarding environmental issues aside from air quality requirements. Perhaps it is not the foremost purpose of Transportation 2040 or the Update to cover issues of the environment, but WDFW would like to point out that the cost of transportation projects may be significantly affected if environmental impacts are not addressed directly and efficiently. Transportation planning and infrastructure are absolutely essential to the central Puget Sound region. The region’s natural resources also play a leading role. These resources are vulnerable to transportation-associated impacts that may be exacerbated if environmental considerations are not addressed throughout the planning process. Impacts can be expensive to correct or mitigate, and paying for avoidable impacts will decrease the effectiveness of the transportation budget. We hope that there is a process in place for evaluating impacts to habitat at a variety of scales. For example, riparian habitat protection is important at the project level, while habitat connectivity is an important issue at the county and regional levels.

We would like to remind the Puget Sound Regional Council of last year’s culvert decision in the United States v. Washington case related to the 1974 Boldt decision. The court injunction applies to state-owned culverts under roads in anadromous salmonid streams and their associated structures. Kitsap, Snohomish, King and Pierce counties are all included in the case area. The court injunction requires that all fish passage barriers be corrected. The deadline for WSDOT structures is in 2030, and the deadline for WDFW, State Parks and WDNR is in 2016. It may be appropriate to consider the effects of the injunction in the Transportation 2040 Update.
We have reviewed the prioritization process described in Appendix P and Attachments D and E. We are particularly interested in the Puget Sound Land and Water measure and pleased to see it included on the scorecard. We agree with the conclusions described under the subtitle *What Did We Learn From Transportation 2040 Prioritization?*, particularly regarding the need to improve content and performance. WDFW encourages follow-through with the suggested next step for the Puget Sound Land and Water measure, which involves convening a group of staff from regional agencies to review and provide recommendations to the Transportation Policy Board. WDFW would like to be included in the group. We think we can help provide recommendations that will make the questions more effective and reflect the most important ecological issues.

Attachment D of Appendix P provides a link to a prioritization web map to assist project sponsors in completing project scorecards. This is a very helpful tool to keep the process streamlined. We would just like to point out that the WDFW Priority Habitats and Species database does not include mapped riparian habitat or updated wetlands. We would expect that the counties have fairly accurate wetland information shown in their critical area data. However, riparian habitat is often not mapped. Protection of riparian habitat is a high priority for WDFW, and we strongly recommend including riparian habitat in the online map application.

WDFW thanks you for considering our comments. We are available to answer questions and provide technical resources to help with optimizing the prioritization process. Please feel free to follow up with any questions or clarifications.

Sincerely,

[Signature]

Theresa Nation
Habitat Biologist
Washington Department of Fish and Wildlife
600 Capitol Way North
Olympia, WA 98501-1091
Phone: (360) 902-2562
E-mail: Theresa.nation@dfw.wa.gov

cc: Bob Burkle, WDFW Region 6 Habitat Program Assistant Manager (emailed)
Stephen Kalinowski, WDFW Region 6 Habitat Program Manager (emailed)
March 7, 2014

Josh Brown  
Executive Director  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-1035

Dear Mr. Brown:

The South King County Area Transportation Board (SCATBd) provides its general support of the Transportation 2040 Update. The SCATBd consists of local elected officials, the Muckleshoot Indian Tribe, and agencies that are committed to improving the region’s transportation system. This Board includes representatives from 15 South King County cities with over 690,000 residents and 300,000 jobs. The PSRC Transportation 2040 Update will provide the region with a reasonable transportation plan. SCATBd appreciates the work done by PSRC, other boards and committees who have contributed to the Transportation 2040 Update.

We believe that a continued commitment in placing a high priority on roads, bridges and buses will preserve the region’s existing transportation system. These transportation needs are critical to protect existing investments and keep people and goods moving throughout the region.

The south county area’s diverse population has made our city leaders mindful of our residents’ transportation and housing challenges. Our member cities are keenly aware of the need for transit service and affordable housing opportunities, and suggest the following concerns be considered in the update of Transportation 2040 that will occur in 2018:

- The need to provide an equitable distribution of transit service to South King County residents must provide a more equitable funding source to maintain transit service. While Metro’s Service Guidelines consider the importance of service for areas with high populations of low income households, the plan’s baseline seems to begin with an unbalanced distribution of transit service as compared to taxes collected and the need for transit to equitably match growth as anticipated in the Growth Management Act.
- Transportation strategies in the Plan may not be realistic as compared to population growth patterns. Both Vision 2040 and Transportation 2040 assume a regional growth strategy involving significant infill of dense housing options in the regional centers. However, this has not been supported by actual patterns to date, and we are concerned that inadequate infrastructure planning will occur for suburban cities. Households with children do not choose dense urban housing as proven by the rate of 70-80% households with children for many suburban areas while Seattle ranges below 20%.
• Land use strategies should support the development of new and affordable housing choices for families within the region. The high cost of urban housing will force lower and middle income households into suburban cities or other counties causing more congestion because of lack of transit services. While current goals are visionary, realistic changes to existing patterns typically require a longer timeline than anticipated in the Plan.

• A thorough review of Transportation 2040’s goal to leverage highway capacity investments by using HOT lanes and tolling is recommended. Implementation timelines anticipated in the Plan do not seem to be commensurate with acceptance by voters.

We appreciate the opportunity to provide comment to the Draft Transportation 2040 Update and look forward to participating in the up-coming full 2018 update of Transportation 2040.

Sincerely,

Marcie Palmer, Councilmember, City of Renton
Chair
South County Area Transportation Board

Bill Peloya, Councilmember, City of Auburn
Vice Chair
South County Area Transportation Board
Hi:

To follow-up on our meeting yesterday, below are some general comments for you to consider as you update the 2040 Transportation Plan. Please let me know if you have any questions.

Karen

**Comments on PRSC’S Transportation 2040 Plan Update**

**General Comments**

**Page 6:**

- “Similarly, the Sound Transit Board made difficult decisions as part of the Sound Transit 2 Program Realignment for delivery of Sound Transit 2 investments over a slightly longer timeframe, and an assumption that allows the planned build-out of Link Light Rail to Tacoma, Everett and Redmond.”
  - **Comment:** The ST2 Program Realignment identified projects and services that will be completed based on the ST2 funding reductions that occurred due to the Great Recession. There needs to be clarification with the last part of the sentence above. It makes it sound like the planned build-out of ST2 could mean the spine is built. This is included in the Transportation 2040, but not in ST2.

- Discussion of user-fees potentially being more equitable:
  - **Comment:** It should be noted that this is more equitable if there are transit alternatives available to those that have less resources.

**Page 7:**

- “The plan’s financial strategy includes a gradual shift in revenue sources, away from gas taxes and toward user fee-based approaches, such as High Occupancy Toll (HOT) lanes, facility and system tolls, and mileage fees. This updated financial strategy recognizes that: (1) the historic gas tax is unsustainable as a long term revenue source; and (2) user fees may be a more equitable match between system use and system funding.”
  - **Comment:** The shift towards user-fee based approaches in the plan highlights the important elements for the provision of transit services:
    - Transit services will become even more vital for special populations in the Puget Sound, especially low-income individuals.
Due to the vital nature of the services provided, transit operations should be exempt from tolls and other fees for accessing the roadway system.

Transit agencies should be eligible to receive a portion of revenues collected from user-fees.

As ST seeks to adopt an updated LRP this year, we are using the 2040 PSRC as our modeling year. The lack of specifics and unknown elements of how user-fees could be applied and implemented over all major facilities over the planning horizon of this plan poses challenges for transit agencies, especially in regards to ridership forecasting and determining speed and reliability of potential services.

What will enable WSDOT to be able to have the lanes flow at 45 mph at 90% of the time?

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**Page 8:**

- **Comment** on PRSC prioritization process: Should it be noted that as ST projects are funded by separate sources, the PSRC prioritization process does not determine if ST projects are funded or move forward?

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**Page 9:**

- “Over the coming years, Sound Transit will invest $30 billion in regional rapid transit.”
  - **Question:** What funds are assumed in this number? Is it a combination of Sound Move and ST2?

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**Page 19:**

- “In 2013, Sound Transit is also actively advancing corridor planning studies in anticipation of an update of the Sound Transit long-range plan in 2014.”
  - **Comment:** The language above should be removed and replaced with the following:
    
    In 2013, Sound Transit began a process to update the Long-Range Plan for regional transit. This is an unconstrained plan that sets identifies proposed transit service technologies in major corridors throughout the region and will serve as a guide for future phases of voter-approved transit projects. The plan is anticipated to be completed in 2014.
  
    - **Comment:** If and when directed by our Board, once the ST Long-Range Plan is adopted, ST may begin planning for the next phase of regional HCT system and for a possible ballot measure. If these steps occur, then PRSC’s Transportation 2040 plan would need to be updated.

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**Page 32:**

- “Next steps for the program include working with transit agencies to implement new MAP-21 requirements related to transit asset management, developing specific estimates of transit ITS maintenance and operations costs…”
  - **Question:** What will the new requirements require of transit agencies that would be important to be aware of during long-range planning?
GTC: Please make sure the descriptions and characterizations of the GTC process and results are the same as the documents that have been agreed to and signed by the various partners. Please be sure that no new concepts are introduced here that have been agreed to by the partners agencies.

Page 48:
- **Comment:** HCT description is used here in discussion of GTC. It is important to note that “hct” can have different means based on the agency using the service. This is particularly important as ST’s is legislatively defined.

Page 53: People + Place Implementation Typology I

“Working with stakeholders from each of three major light rail corridors, the Growing Transit Communities Partnership analyzed conditions in 74 potential study areas as a basis for a set of locally tailored recommendations. Based on indicators of the physical, economic, and social conditions in each transit community, the results of this typology analysis suggest eight Implementation Approaches. Key strategies and investments address the needs and opportunities in different communities, while also advancing regional and corridor-wide goals. The Implementation Approaches and typology analysis are intended to complement and inform existing regional and, especially, local plans as they are implemented, evaluated, and refined in the coming years.

While the Growing Transit Communities work program focused on these 74 potential station areas, the approach to analyzing local conditions and identifying key implementation steps is broadly applicable to a wide variety of transit nodes, including ferry terminal areas, local transit centers, streetcar lines, and other transit corridors. Detailed profiles of the 74 potential station areas, as well information on how to apply the typology are available as a resource for local jurisdictions: [http://www.psrc.org/growth/growing-transit-communities/growing-communities-strategy/]“

**Service Description Changes:** We tried to make sure the various descriptions of ST service in the update document are correct. Please feel free to contact us with questions of other descriptions that may need to be corrected as well.

Page 10:
Transit – Complete the Sound Transit Phase 2 program, which will extend Link Light Rail to Overlake Transit Center, Angle Lake South 200th Street, and Northgate, Lynnwood, and Kent/Des
Moines.
Page 19:

- “Sound Transit is continuing its development program, but has made some adjustments to the ST2 Plan implementation schedule. Sounder Commuter Rail reached Lakewood Station in 2012. The planned Sounder extension to DuPont will not occur until after 2023. The Link Light Rail program has been adjusted as follows:
  - North Link: University Link is under construction, and scheduled to reach the University of Washington in 2016, Northgate in 2021, and Lynnwood Transit Center in 2023. Link is scheduled to reach the University of Washington in 2016, Northgate in 2021 and Lynnwood Transit Center in 2023.
  - East Link: Service to Overlake Transit Center is planned for 2023. Agreements have been reached on the route and stations for East Link through Bellevue.
  - South Link: Service to Highline Community College Kent/Des Moines is planned by 2023. ST is pursuing funds to completing environmental work on an extension to 5-272nd Street (Redondo/Star Lake) Federal Way. Ground breaking for the Sea-Tac Airport to South 200th Street Angle Lake segment was in April 2013, and construction is underway, and is scheduled to be completed in 2016.
  - Tacoma Link: Future extensions of the existing Tacoma Link would serve Tacoma Community College and the city of Fife. The current Sound Transit 2 budget will fund an alternatives analysis, preliminary engineering, environmental review. Preliminary engineering is projected to be completed in the first quarter of 2014. The ST2 program includes funding for a possible extension of Tacoma Link. The alternatives analysis process was completed in 2013 and a preferred alignment was selected by the Sound Transit Board of Directors in February 2014. Preliminary engineering is scheduled for 2014. Construction of the extension will require success in obtaining an FTA grant and funding from a partner agency.

- “Sound Transit took over peak-period bus service connecting the Sumner Sounder Station and the Bonney Lake Park & Ride lot within a part of Pierce County that is outside the new smaller Pierce Transit PTBA but within the Sound Transit borders.”

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April 10, 2014

The Honorable Claudia Balducci  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA  98104-1035

Dear Chair Balducci:

The City of Seattle commends the substantial initiatives included in the Transportation 2040 Update process, including preservation and maintenance, active transportation, project prioritization and growing transit communities. Seattle believes that the 2014 Update represents great progress toward addressing issues impacting our region’s future and supports its adoption by the General Assembly in May.

Our focus now is toward the substantial work that needs to be done for the next major effort, Transportation 2050. The 2014 Update acknowledges many topics that will need further development, and the City of Seattle concurs. However, there are additional needs that must be prioritized to better position the region for the future:

- **Climate Change:** The new plan horizon year of 2050 is also the benchmark year for goals and forecasts around climate change in current science and public policy. Transportation remains the single largest source of greenhouse gas emissions in our region, and the next long-range transportation plan must include proactive, region-specific approaches to overall GHG reduction. The 2018 plan must also expand our system preservation discussion to include resiliency and adaptation to the consequences of climate change that are already in evidence, such as sea-level rise that will impact our seaport-based economic sectors. PSRC’s near term work program must include substantial resourcing to develop climate change policy and strategies.

- **Regional Transportation Pricing:** The region must also look to the 2018 plan to further develop regional sources of transportation revenue. Central Puget Sound is experiencing a combination of push-and-pull dynamics that make a systematized pricing approach for regional transportation a priority. Federal and state funding is reduced or unresponsive to regional needs, while potential tools such as trip-based pricing or carbon tax charges can positively influence travel behavior toward more sustainable systems. Transportation 2050 can specifically build on work of the new Transportation Futures study to consider a regional pricing implementation plan.
• Regional Freight Plan: Another imperative is to develop a robust long-range regional freight plan as part of the 2018 update. The City of Seattle urges a comprehensive treatment of existing and emerging issues around freight transportation, including long-recognized facility deficiencies, commodity movement impacts and opportunities to optimize private/public system operations. Freight is essential to the region’s economic health; its transportation needs to be better integrated into the region’s transportation strategy.

Lastly, the City of Seattle believes that the prioritization tool developed for the 2014 Update should be further developed and expanded for use as part of Transportation 2050. While any prioritization method necessarily includes some adjustments, it is essential that we recognize that any fundamental inconsistency between the Region’s adopted policy priorities and how funding decisions are made reflects on the credibility of PSRC and its member agencies to responsibly address our most important transportation needs.

In order to support all of these needs for 2018, PSRC will need to invest in additional planning and decision-making tools. First, PSRC as an agency must improve its abilities to provide transportation system data and forecasts that its members can use for practical planning needs. Second, PSRC should go beyond its own internal purposes to actively support local agency capacity to develop transportation plans and integrate local and regional investment strategies.

Sincerely,

Tom Rasmussen
Seattle City Council

Mike O’Brien
Seattle City Council

Cc: PSRC Executive Officers
   PSRC Staff
April 23, 2014

Mr. Josh Brown
Executive Director
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Dear Mr. Brown,

The Puget Sound Region Council is nearing the completion of the Transportation 2040 Update to your long range plan. PSRC asserts that the plan meets federal financial requirements. We thought it would be appropriate to review our expectations as you consider adoption of the plan and anticipate those actions needed to actually finance and build the transportation investments envisioned for this region.

The Transportation 2040 Update forecasts a decline in gas tax revenues and notes that the two recent state gas tax increases have been fully bonded to pay for current capital highway improvements. Sales tax revenues have also significantly decreased since the original adoption of Transportation 2040 in 2010, forcing most transit agencies to cut service, raise fares and reduce staff. Your plan then makes a major long-term fiscal growth assumption to be able to state that “current-law revenues—generally existing sources of funds at current tax rates—were found to be sufficient to fund the ongoing needs of the current system, but inadequate for adding new capacity needed to address existing deficiencies and population and employment growth.” (Appendix F page 4).

So in order to pay for needed new capacity and overcome the decline in traditional transportation revenue sources cited above, the plan update “includes a gradual shift in revenue sources, away from gas taxes and towards user fee-based approaches such as High Occupancy Toll (HOT) lanes, facility and system tolls and mileage fees.” Finally, the plan update concludes that revenues and costs have been “balanced” since the “constrained portion of the Transportation 2040 has been reduced by over $15.5 billion to a total investment level of $173.6 billion which is supported by the updated financial strategy.” (Update Draft Report page 6). Figure 14 in Appendix F “displays a representation of the general strategy for new transportation
revenue” but the plan goes on to add a critical caveat that “a very large number of individual revenue actions will be required to implement Transportation 2040. The timing and exact nature of each action can only be defined in strategic terms given the inherent uncertainty involved.” It is understandable that there will be significant uncertainty over the long term as new finance options are phased-in to include system tolling and other user-based fees. Near term, however, firm state and local support to increase traditional finance options will be needed to demonstrate support for necessary investments during this decade.

A financial plan is a comprehensive document that reflects revenues and costs of a transportation plan or program and provides a reasonable assurance that there will be sufficient financial resources available to implement and complete all the elements in the plan or program. The plan identifies funding shortfalls, and, according to 23 CFR 450.322(b)(11) and 324(e), these shortfalls “shall be highlighted, along with proposed resource solutions.” The regulation further calls for a financial plan that “(I) demonstrates how the adopted plan can be implemented (II) indicates resources from public and private sources that are reasonably expected to be made available to carry out the plan; and (III) recommends any additional financing strategies for needed projects and programs.”

At this stage in your update process, our role is not to find fault with the documented need for the robust investments in transportation improvements or your plan’s development of innovative revenue sources.

Our fundamental concern is that without further near term actions, the aggregate revenue to support the cost of your ambitious series of transportation investments may not be reasonably expected to be made available to cover the vital system improvements and projects programmed in your plan. As you prepare for your adoption and work plan for the next update, you may need to significantly shift projects into the category of unprogrammed investments unless the regional jurisdictions within PSRC’s planning influence and the State of Washington demonstrate tangible progress toward committing resources to pay for your transportation solutions.

We look forward to working with you to better understand the financial issues PSRC faces with the long-range plan and assure that we work together to continue to meet the goals of federal requirements.

Sincerely,

R. F. Krochalis
FTA Regional Administrator

Daniel M. Mathis
FHWA Division Administrator

Copy to: Secretary Lynn Peterson, WSDOT