Thank you for the opportunity to review and comment on the draft Transportation 2040 Plan. The City of Auburn, as a designated Regional Growth Center, has always been cooperative with the region in fulfilling and providing for our fair share of regional growth. However, over the past 10-year period we have experienced substantial growth while revenues to support our transportation system have continued to decline. Auburn is located within the second largest industrial distribution center on the west coast with our arterial street system carrying the burden for a significant proportion of regional freight. Auburn has made several attempts to address our transportation revenue shortfall such as passage in 2004 by our voters of a local street property tax to pay for local streets; however, our arterial system continues to rely on state & regional funding for preservation. This year’s efforts at the Legislature to obtain authority to form a Street Utility was unsuccessful but is seen by many local cities as the best option to provide a stable source of continual funding for our arterial system.

We are encouraged by the recent policy change at PSRC to allocate at least 50% of the federal funds accruing to the region for the pending Jobs Bill to preservation projects. Our primary concern with the draft plan is that much more needs to be done by PSRC to clarify how PSRC will assist cities and counties in funding preservation of local arterials that comprise key portions of the regional system on a long term basis. Our other comments on the draft plan are attached to this letter and refer to page numbers of the plan document.

To set the perspective in how Auburn views this plan and firmly supports strong policies regarding preservation of the existing system, please keep in mind that Auburn lies within the largest industrial, warehousing and manufacturing center in the Puget Sound region. The arterials of the Valley Cities area including the Puyallup, White, and Green River Valley’s in many cases were never designed or constructed to modern freight standards like the National Highway System corridors. These Valley City arterials were constructed predominately for agricultural purposes in the 1850’s and were not designed to withstand the heavy traffic associated with industrial or distribution land uses. Yet they serve regional freight traffic from two ports and from the second largest industrial distribution center on the entire west coast.

The only reliable revenue source we have for preservation of the arterial system is the (Motor Vehicle Fuel Tax (MVFT) and a 1% utility tax our council adopted for local utilities. Cities and counties receive no other freight revenues collected by the State as evidenced by the attached letter from the State Treasurer. Without additional reliable revenue sources we will not be able to finance rebuilding our arterial system to support sustained freight traffic.

The Vision 2040 Regional Strategy recognizes that the region’s manufacturing/industrial centers fill an important role in the region’s economy, that there is limited land in the region that is
available and appropriate for industrial development and that mobility of freight in and out of these centers must be maintained for long-term sustainability. If funding is not secured to rebuild our local arterials to modern freight standards our cities will be forced to close them to freight traffic to protect the public safety of commuter traffic.

Auburn and other cities in the region will need PSRC assistance and support in convincing the Legislature to pass the Street Maintenance Utility to provide an equitable share of all freight revenues collected by the State so that we can help achieve the Plan’s preservation and freight mobility goals.

I realize and appreciate the significant efforts by PSRC staff to perform the research and studies to draft Transportation 2040 and I trust that our attached comments are found to be constructive in pointing out some inconsistencies with the plan and places where new policy and procedures may be in order once the plan is adopted.

Should you have questions concerning our comments or concerns please feel free to contact our Public Works Director, Dennis Dowdy at 253-931-3023.

Sincerely,

Pete Lewis
Mayor

Encl: State Treasurer Letter, Routes of Regional Significance Map

cc: Dennis Dowdy, Public Works Director
    Kevin Snyder, Interim Planning and Development Director
    Chris Hankins, Transportation Planner
    Elizabeth Chamberlain, Principal Planner
    Jeff Dixon, Principal Planner
CITY OF AUBURN COMMENTS ON EXECUTIVE SUMMARY

Page 5 - Maintain, Preserve, and Operate. “The plan includes all local roadway preservation needs that may be funded through transportation benefit districts of other mechanisms.”

Comment #1: This statement is of concern to us and casts some doubts as to what local arterials may be supported by the plan. Only a few cities have actually formed transportation benefit districts (TBD’s). While local jurisdictions have the legal obligation to maintain local arterials, our sources of funding continue to diminish while regional traffic continues to use city arterials. Many of Auburn’s arterials which were never designed or constructed to freight standards currently carry regional freight without commensurate revenues from the region or the state to preserve them for that purpose. Consequently, our arterial system is adversely impacted by regional traffic placing an inequitable burden on local citizens. PSRC should become more proactive in developing strategies within the regional plan to assist cities and counties in obtaining the resources needed for the local arterial street systems that comprise a portion of the regional system and just through TBDs.

Page 7 - Local Roads. “Expand local roadways to support transit and improve people and freight efficiency, especially to provide access to and within centers.”

Comment #2: While this is a laudable goal, this cannot be achieved without a new source of freight and transit revenues coming back to local jurisdictions. Auburn has found from experience that impact fees alone do not pay for system capacity improvements. Also, we find that the majority of our transit routes are heavily impacted by heavy busses without associated revenue coming back to the City to pay for the costs of rebuilding and preserving our arterials to support heavy vehicles.

Page 9 - Moving Freight & Goods. “A transportation system that provides for the efficient movement of freight and goods is critical for the region’s economic prosperity. By making investments that improve freight mobility, Transportation 2040 supports the region’s businesses and manufacturers, as well as the role of the central Puget Sound region as a gateway for international trade.”

Comment #3: Auburn agrees with the goal; however, PSRC should recognize that currently all freight related taxes and revenues that are collected by the State are consumed by the State. There are no current revenue streams coming to cities or counties to support regional freight. PSRC needs to recognize this as a key issue and develop a strategy to assist cities and counties with financing local arterials that comprise regional freight routes. A letter is attached from the State Treasurer to the City of Auburn dated March 5, 2008 referencing the status of State generated revenues for cities and counties.

Page 9 – Equity. “Transportation 2040 programs and projects are proposed to be implemented in ways that prevent or minimize negative impacts to low-income, minority, and special needs populations.”

Comment #4: Auburn is not alone as a low income community that is adversely impacted by regional freight and transit carriers. Cities within warehousing and distribution hubs carry a disproportionate share of the region’s burden without receiving compensating revenues from those that benefit. As mentioned before in our cover letter, the Street Maintenance Utility would go a long way in helping cities address this issue by giving cities the ability to charge a reasonable fee to those who use the system. In addition, PSRC should evaluate new policies that share greater portions of regional funds to communities that have arterials that should be rebuilt to freight and transit bus standards to serve regional needs.

CITY OF AUBURN COMMENTS ON DRAFT TRANSPORTATION 2040 PLAN

Page 12 - Maintain, Preserve, and Operate. “The plan’s highest priority is to maintain, preserve, and operate the region’s transportation system, and represents the largest program cost, at approximately $110 billion. This includes replacing some key vulnerable structures (such as the Alaskan Way Viaduct; the SR 520 Floating Bridge; and the I-5 Puyallup River Bridge); increased investment in local arterial preservation; and ensuring the continued operation of the Washington State Ferries. The plan includes all
local roadway preservation needs that may be funded through transportation benefit districts of other mechanisms."

**Comment #5:** Auburn strongly agrees with preservation being our highest priority; however, PSRC will need to assist the cities and counties in finding a reliable funding source and authority. This should include advocacy at the Legislature to approve the street maintenance utility; as the transportation benefit district (TBD) would likely raise insufficient funds for the City’s routine annual needs for system preservation.

**Page 13 - Local Roads.** “Expand local roadways to support transit and improve people and freight efficiency, especially to provide access to and within centers.”

**Comment #6:** At the local level, the financial challenges of implementation of this plan are daunting in the current economic climate. The plan should provide a clear, well-defined decision framework to deliver a sustained, dedicated funding source that is not reliant on sales or fuel tax. A project prioritization process needs to be provided with equitable distribution across the region in which a portion funds local arterial streets that form a part of the regional system. Every trip starts and ends on a local street.

**Page 19 – Chapter 1 Toward a Sustainable Transportation System.** “Transportation 2040 establishes three integrated strategies for addressing congestion and mobility, the environment, and transportation funding. These strategies address the need for a large and sustainable investment in the region’s transportation system to meet the needs of a growing population – more transit, more biking and walking facilities, more ferries, and more complete roadways.”

“That sustainable mobility must extend to the movement of freight, which is the circulatory system of the region’s economy. The Puget Sound region is a major North American gateway for trade with Pacific Rim countries and is the major economic engine for Washington State. A transportation system that provides for the efficient movement of freight and goods is critical for the region’s economic prosperity.”

“Transportation 2040 prioritizes investments for those parts of the region expected to accommodate the most growth, especially centers and compact urban communities. It implements the VISION 2040 Regional Growth Strategy by targeting transportation investments that provide capacity for 5 million people in 2040, ensuring that people can get to work and recreation, that freight and goods movement can supply businesses and factories, and that ports can continue to function as regional and global gateways.”

“Transportation 2040 envisions a sustainable transportation system that meets the region's diverse mobility needs. It calls for a system that is safe, secure, and efficient. Sustainable transportation involves moving people and goods in ways that supports a healthy environment and a strong economy. It recognizes the opportunity to address past harms to the natural environment, and to improve water and air quality. It includes the design of walkable cities and bikeable neighborhoods, as well as facilitation of telework and other options to reduce or eliminate trips. If transportation programs and projects are to support social and economic activity, they must also contribute to the health and vitality of human and natural environments. Sustainable transportation means relying on cleaner and renewable sources of energy. It means employing innovative design and construction methods – as seen in green streets and pervious paving materials – that can minimize environmental impacts.”

“Finally, Transportation 2040 takes steps to move the region toward a sustainable financial future, breaking with historic and increasingly unreliable funding approaches and identifying new financing strategies that will not only provide needed revenue, but will also reduce vehicle miles traveled and delay, improve reliability, and support more choices for the people who use the system to meet their daily needs.”

**Comment #7:** Until local jurisdictions have reliable and adequate revenue sources to finance the rebuilding of aging arterials that are beyond preservation and which are inadequate for carrying the heavy freight and transit loads of today, participation in the sustainable financial future that the draft plan
envisions is difficult at best. The Executive Board and Transportation Policy Board should ask PSRC staff to provide a region-wide assessment of local arterials to include the following data so that the regional council can see the true needs that are not being met in our current economic environment. Regional PSRC and RPEC staff should provide a map of regionally significant local arterials showing the jurisdiction boundaries, the current pavement condition index (PCI) of each arterial, and the current estimated deferred maintenance for each jurisdiction. Included with these comments is a map that shows Routes of Regional Significance and the PCI ratings for each. This would give elected officials a true picture of the state of the system for which new strategies and policies will be required to secure the resources needed by local jurisdictions.

Page 27 - Figure 6 Selected Potential Transit Station Areas.

Comment #8: This figure shows Auburn’s Sounder station but does not show Auburn’s designated regional growth center and should. The City requests this map be revised.

Page 42 - Freight Mobility. “Transportation 2040 is built on the principle that the movement of freight and goods is a vital function for the regional transportation system. An efficient freight transportation system helps to maintain the region’s quality of life, ensures that businesses can deliver products and services to market, strengthens our economy, and makes the most of the central Puget Sound region’s strategic position as a critical gateway for international trade. Freight and goods mobility is multifunctional, multimodal, and intermodal. In the central Puget Sound, freight and goods move primarily by truck, rail, air, and water, and require connections between modes. Transportation 2040 is designed to support three aspects of freight movement: (1) acting as a gateway for international trade, (2) meeting the freight movement needs of businesses in the region, and (3) enabling the local delivery system. Infrastructure and operational solutions will be needed to cope with significant regional and state growth and larger impacts of globalization. Projects have been identified to enable freight to move more reliably and safely, and to serve the region’s ports.”

Comment #9: Auburn agrees that the success of our economy is closely linked to the success of regional ports and the freight routes that the ports rely on. We consider the Figure 15 Map (Existing 2007 Freight and Goods Transportation System - FGTS) to be misleading and insufficient to show which local freight routes are needed to serve the region. We recommend that this map be illustrated in much larger scale for each port showing the jurisdictional boundaries of roadway maintenance responsibility by State, cities and counties, and their respective pavement condition ratings. The plan calls for ensuring that industrial and freight related land uses are supported in regional and local plans while limiting regional investments to State routes only offering local jurisdictions no incentive to accommodate land use needs of the ports. The City also requests that SR 167 be listed with the other significant highways stated in the last bullet point under "Congestion and Mobility.”

Page 55 - Growth and Transportation Funding. “The period of reliance upon fuel tax financing may be coming to a close within the next few decades. Changes in vehicle technology and inflation continue to compromise the purchasing power of fuel tax proceeds. This path is unsustainable and new sources of reliable funding must be developed and phased in over time. There is growing interest in various approaches to replacing fuel taxes, and the central Puget Sound region has been at the forefront in some of the leading research. Vehicle charging technology is already available to allow a transition to another form of direct charging for road use. But many policy and program design issues remain unaddressed at this point. The central Puget Sound region and Washington State have some specialized experience with this topic. In 2006, the PSRC conducted a pilot project, the Traffic Choices study, to see how travelers change their travel behavior in response to variable charges for road use (variable or congestion-based tolling). The project observed driving patterns, but also learned about vehicle charging technology, some key policy issues and program design. A major piece of future work must involve a comprehensive design of a structural replacement for fuel taxes.”

Comment #10: PSRC needs to develop policy and strategy that fosters a way to help local jurisdictions pay for the requested or implied infrastructure support. This information on falling gas tax
revenues is consistent with the JTC report recently approved by the Legislative JTC dated December 31, 2009, by the Cedar River Group, Berk & Associates, Fehr & Peers, & Nelson-Nygard Consulting Assoc. This issue severely impacts the transportation funding capacity of local jurisdictions. The draft plan appears to be declaring the local funding challenge a city & county challenge with no commentary, strategy, or plan for what the region will do to help fund local infrastructure. Before reliance on gas tax is gone, a separate and sustainable funding source, such as a street maintenance utility, should be established.

Page 56 - Current State of Transportation Finance. “Transportation funding in the central Puget Sound region draws mainly from a few primary tax bases. These include motor fuels sales, retail sales, motor vehicle market value, assessed property valuation, and vehicle registrations and licenses. In addition to taxes on these tax bases, transportation revenues are drawn from a combination of other sources, such as operating income and sources comprising city and county general funds.

- Cities and counties support transportation investments from a wide variety of funding sources. The state Legislature has authorized a number of local option taxes that have, in many instances, proved difficult to implement. At the same time a number of tax limiting initiatives and growing demands for general fund dollars have made local commitments to transportation a challenge to sustain.
- Local transit authorities' primary source of funding is the sales tax. With the loss of Motor Vehicle Excise Tax revenues the local transit operators are increasingly dependent upon the sales tax, which is a less stable source of revenue, rising and falling with other economic factors.”

Comment #11: Auburn concurs. Its not the case that many of the State approved options are difficult to implement. In Auburn’s case it would be more accurate to say that many of the authorized local options simply do not raise sufficient revenues to pay for a modern arterial system that can sustain the heavy loads of modern freight and transit carriers. Also, many of the existing options would tax local citizens to pay for regional infrastructure. Indeed the falling gas tax revenues have already impacted local jurisdictions which partially explain why local jurisdictions have not been able to invest heavily in preservation of existing roads and therefore have accumulated significant deferred levels of maintenance and pavement repair costs.

Page 61 - Early Action to Support State, Local, and Regional Investments. “Within the first decade of the planning period it will be necessary to identify additional transportation revenues that can address near-term requirements across a broad array of transportation programs.”

“Cities and counties will need to take action to increase transportation related taxes and will need viable new local options for transportation funding. Local actions could include road and property tax levy adjustments, impact and development fees, the implementation of taxes on parking and more coordinated parking pricing. Cities and counties also will need to work with the state Legislature to identify additional local option taxes and fees, and to secure a direct distribution of new statewide transportation taxes in a manner consistent with past practice.”

Comment #12: This statement recognizes the funding challenge for local governments and says there is a strategy to fund non MTS routes, but does not clearly identify how this is accomplished. Cities and counties will need regional officials at the table in Olympia to obtain the transportation revenues that are needed, such as approval of the Street Maintenance Utility.

Page 69- Maintenance, Preservation and Operation. “Federal and state transportation policies prioritize maintenance, management, preservation, safety, and optimization of existing transportation infrastructure and services. The region’s multi-county planning policies and Transportation 2040 respond to those mandates by emphasizing efficient maintenance, preservation, and operation of the transportation system.”

“These types of investments can often be highly cost-effective and help to ensure that current assets continue to function properly and sustain regional mobility for both people and goods into the future.
Maintenance, preservation and operations program represent approximately 60 percent of the constrained portion of the planned total costs."

“Transportation 2040 commits as a top priority to fully funding the maintenance, preservation and operation of existing infrastructure in a safe and usable state. If transportation maintenance and preservation needs are to be effectively addressed, dedicated and comprehensive funding for these purposes must be established. All agencies and jurisdictions should be encouraged to demonstrate the use of maintenance management systems and, for roadways, pavement management systems. Preservation and maintenance needs on all facilities (including non-MTS facilities) are included as part of Transportation 2040’s financial strategy. Individual preservation and maintenance projects are therefore considered to be part of the Transportation 2040 plan. See Appendix C, MPP-T-1 through MPP-T-8.”

Page 69 - Local Streets, Roads, and Pathways. “The central Puget Sound region has an extensive network of local streets and roads, bridges, sidewalks, and bike paths that provide mobility for a wide variety of users. Much of this network was originally built decades ago. Like any type of infrastructure, these local arterials, collectors, neighborhood streets and bridges have aged over the years and are now in need of significant investment to preserve and maintain them in a safe and useable condition. These local streets, roads and bridges often serve as critical truck routes in the system that brings goods to market and to customers. Furthermore, numerous local streets and roads were built to different standards and lack bicycle and pedestrian facilities, or cannot adequately accommodate the needs of current or future transit service. Improvements to non-MTS facilities are included as part of Transportation 2040’s financial strategy. Individual projects on these local facilities will not be listed explicitly as projects in Transportation 2040, but will be found consistent with the plan once reviewed against VISION 2040 policies. These types of investments will impose significant additional costs as local roads are maintained and preserved. It is estimated that the pavement and non-pavement maintenance needs for the central Puget Sound region’s local streets and roads — including bikeways and pedestrian paths — total approximately $21 billion through the year 2040.”

Comment #13: Auburn concurs with the stated need to invest in local infrastructure but would appreciate more clarity on how our local arterials will be found consistent with the plan if they are not identified now, mapped and included in the document. If the projects for local infrastructure are not explicitly stated in the plan it is unclear if these projects are eligible for funding.

APPENDIX J - FREIGHT MOBILITY COMMENTS

Page 7/5 - Congestion and Mobility

"• Increasing congestion on the roads means more wasted truck time, growing transportation costs, and increased emissions from idling on congested facilities. In 2006, congestion resulted in 280,000 hours of daily delay on freeways and 560,000 hours of daily delay on arterials, and average delay of 14 minutes a trip. 16 Considering by 2040 the average daily number of trips is projected to increase by 40 % for all vehicle types, there will be a corresponding increase in time wasted to congestion for passenger and freight vehicles alike.
• Congestion creates more congestion. As unpredictability and congestion rise, companies are forced to send more trucks on the roads to make the same number of deliveries, further adding to the region’s problems with congestion.
• Limited Port Connectivity. There are limited arterials and rail lines by which to access the ports, and many of the access facilities are congested or deteriorating. This may seriously impact the ability of the ports to expand, or adversely affect the movement of vital regional goods into or out of the port facilities.
• Growing congestion on key freight corridors. Many of the main corridors that help the region to connect to the national system, such as I-5, I-90, and SR 520, are on the list of most congested infrastructure as per the region’s Metropolitan Transportation System definition.
• Challenging “Last Mile” Connectivity. In some places, the region’s arterial system that serves to connect businesses and homes to the national freight system is deteriorating or congested with passenger vehicles. The ability to access the region’s interstates and highways from local facilities that make up the supply chain is an important link that needs to be considered."
Sustainable Funding

- Tolling and freight considerations. In general, private-sector freight transportation stakeholders have concerns about tolling. One of these concerns is that, if a toll is to be collected, there needs to be a demonstrable benefit to the freight providers. For example, tolls collected on a particular facility should be used to pay for improvements on that facility, rather than being used on other investments that provide less direct benefit to freight movement.
- Most freight stakeholders interviewed are concerned with the lack of dedicated freight funding for infrastructure improvement. There was some frustration expressed that the level of investment in transportation projects that benefit freight does not seem to be commensurate with the importance of freight as an essential function of the transportation system.

Comment #14: A map of Routes of Regional Significance showing which local routes are maintained by local jurisdictions requiring regional financial support would be helpful to illustrate the region’s commitment. As mentioned previously, an electronic copy of the map of the Routes of Regional Significance prepared by Valley Cities will be forwarded to you for reference.

Page 13 - What are the Recommendations from the Regional Freight Strategy?

Comment #15: Auburn concurs that within cities there are many minor and collector arterials that are freight routes that form the "Last Mile". The report’s recommendation to fund these key local routes is critical to meeting regional freight needs. Again, we highly recommend that a map of local arterials that qualify for federal funds within each jurisdiction should be added to promote plan consistency. It should be noted that the State LAG Manual states that within local jurisdiction’s any street classified as a collector, minor or principal arterial is eligible for federal funds.

Page 14 - Sustainable Funding. “Ensure that transportation funding opportunities are pursued in relation to freight and goods movement. Also, ensuring that methods for collecting revenue take freight into consideration, both in terms of how it is collected, as well as in where it is invested.”

Comment #16: Currently the majority of freight related taxes & fees that are collected by the State and are expended by the State and are not distributed down to cities and counties. The only reliable revenue source local jurisdictions have for preservation of the arterial system is the (Motor Vehicle Fuel Tax (MVFT) and in Auburn’s case, a 1% utility tax the City Council adopted for local utilities. Local jurisdictions receive no other freight revenues collected by the State as evidenced by the attached letter from the State Treasurer. Without additional reliable revenue sources local jurisdictions will not be able to finance rebuilding the arterial system to support sustained freight traffic. Therefore it is not possible for local jurisdictions to help direct investments where they are needed most on local arterials. This is an issue that will require the Legislature’s commitment to redistribute resources or identify other sustainable sources of funding. Auburn and other cities in the region will need PSRC assistance and support in convincing the Legislature to pass the Street Maintenance Utility to provide an equitable share of all freight revenues collected by the State so that we can help achieve the Plan’s freight mobility goals.

Page 33 - Arterial preservation and maintenance is increasingly being mentioned as the number one priority for many local governments who are looking for assistance in maintaining a level of service that supports the various demands placed on them. In many instances, these local arterial facilities play a vital transportation function in supply chains that have regional, state, and even national benefits. The ability of local governments to adequately support these arterial facilities to a level of service beyond what would be necessary to serve the local population is increasingly limited.

Comment #17: Auburn strongly concurs with this statement

Page 139 - Case Study Review #1: Ohio Turnpike

“The Ohio Turnpike is profiled here as a case study of trucks diverting from a tolled facility and onto parallel routes, and the strategies used to draw truck traffic back onto the tolled facility. In this case, the diversion occurred after tolled fees were raised. At this point, truck traffic measurably decreased on the turnpike, while simultaneously increasing on the parallel route. For the Puget Sound region, this suggests
that tolls, if set too high in the presence of a parallel facility, may cause measurable truck diversion. However, it also suggests that a set of simple strategies, such as increasing law enforcement on parallel routes, may help to recapture truck traffic onto the tolled facility.”

Comment #15: This case study clearly illustrates the present dilemma of most Valley Cities along SR 167 which at current level of congestion causes a large amount of freight traffic to use parallel city arterials as pass through traffic. If the region were to begin tolling trucks on SR 167, the revenues from these tolls should be shared among all cities that keep the parallel corridors at an appropriate level of maintenance.
February 23, 2010

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

Dear Ms. King,

Thank you for the opportunity to comment on the Puget Sound Regional Council’s draft Transportation 2040 Plan. These comments supplement the enclosed comments submitted by the City on July 24, 2009 regarding the Draft Environmental Impact Statement for the Transportation 2040 Plan.

**Climate Change**
The City of Bainbridge Island, like many cities in the state, has begun to take steps to reduce its greenhouse gas emissions and address climate change. With Transportation 2040 setting forth the transportation plan for the next thirty years, it should include aggressive policies and actions to reduce greenhouse gas emissions and vehicle miles travelled (VMT). The Plan takes positive steps forward in combining a number of elements in several of the alternatives to move the region further ahead in meeting greenhouse gas emission reduction requirements. The City encourages PSRC to adopt a plan that incorporates the best greenhouse gas and VMT reduction strategies. Given RCW 70.235.020's required target reductions in total greenhouse gas emissions and given the Central Puget Sound Region probably has the greatest ability to reduce VMT given its land use patterns and alternative modes of travel, any long range transportation plan for the Puget Sound must show how it will meet and ideally exceed the state's greenhouse gas emission targets and VMT benchmarks.

**Sound to Olympics Trail**
The City supports the importance of non-motorized transportation, especially regional trail systems, in the overall transportation system to increase travel options and reduce VMT and greenhouse gas emissions. A key trail system for Kitsap County and the region is the **Sound to Olympics Trail**. The Transportation 2040 document has several projects in Kitsap County. The City had submitted a project, previously dubbed the Sound to Hood Canal trail that began at the Bainbridge Island ferry terminal through Poulsbo, Port Gamble and to the Hood Canal Bridge. That idea is now titled "The Sound to Olympics Trail"- connecting the Olympic Discovery Trail in Jefferson County to the Mtn. to Sound Greenway in King County. This is the missing link to complete the cross-state trail. The City would like its portion of the "Sound to Olympics" trail, along State Route 305 from
the Bainbridge Island ferry terminal across the Island to the Agate Pass Bridge to be clearly shown on the Transportation 2040 Plan.

Sincerely,

[Signature]

Lee Walton
Interim City Manager

CC: City Council
    Kathy Cook, Director, Planning and Community Development
    Chris Wierzbicki, PE, Deputy Director, Planning and Community Development

Enclosures
March 9, 2010

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035
Attention: Marina King

Dear Ms. King:

Thank you for the opportunity to provide comments on the draft Transportation 2040 regional transportation plan. The proposed final Transportation 2040 plan has incorporated much of the feedback the PSRC received in comments on the DEIS. For example, removing full arterial system tolling, promoting new user-based fees to support funding of the necessary transportation system improvements, and allowing for strategic capacity improvements are important plan concepts that have been included in the final plan.

The City of Everett has reviewed the draft plan and offers the following comments for consideration in adoption of the final Transportation 2040 plan:

1. The draft Transportation 2040 plan is comprehensive in its scope and thorough in addressing the vast needs of the regional transportation system. It supports the Vision 2040 regional growth strategy, at least in policy. Based upon modeling data we have recently received from PSRC staff, it appears the plan will support the growth levels for Everett called for by Vision 2040. We ask that the FEIS include this type of detailed data to allow readers to understand how Transportation 2040 will support the Vision 2040 growth strategy throughout the region, especially in designated regional growth centers and Manufacturing and Industrial centers.

2. The draft alternatives contained in the DEIS included a notation on the maps for Snohomish County indicating that the alignment for light rail would be determined in a future planning process. We note that there is no such notation on the final Transportation 2040 plan. The maps (Figure 6, page 27; Figure 27, page 68; Figure 34, page 85) all indicate that light rail to Everett is on the Interstate 5 alignment. We do not see any corresponding text in Transportation 2040 that states the alignment for light rail north of Lynnwood has not yet been decided. That decision will be made as part of the planning work leading up to Phase 3 of Sound Transit. It is critical that the final version of Transportation 2040 not display any suggested preference for an alignment north of Lynnwood. If we are mistaken and have not located text in Transportation 2040 that clearly states the alignment decision will be decided in the future, we would be happy to have you indicate the citation in the plan. The final version of the plan

Paul Roberts, Council President, Arlan Hatloe, Vice President, Jeff Moore, Ron Gipson, Drew Nielsen, Brenda Stonecipher, Shannon Affholter
CITY OF EVERETT 2930 Wetmore Ave., Suite 9A Everett, WA 98201 (425) 257-8703 Fax (425) 257-8691
should clearly state that the light rail alignment north of Lynnwood has not been determined. At a minimum, the map notation included in the draft EIS should be reinserted on the maps in the final version of the plan.

3. It is important that projects not specifically included in the plan text, in Appendix A, Appendix B, or Appendix D, remain eligible for federal and state grants provided they meet the selection criteria based on the Multi-County Planning Policies. This needs to be stated more clearly in the final version of Transportation 2040 so such projects can be included in the regional TIP.

4. We reiterate that in order for Everett to accommodate the job and housing density expectations of Vision 2040, it is critical that light rail to downtown Everett be completed as soon as possible. Transportation 2040 does not state any timeline, which is a change from the DEIS alternatives, which had a target year of 2040. While the timing of light rail in Phase 3 of Sound Transit cannot be determined in Transportation 2040, it is a significant component of the regional transportation system that must be in place far enough in advance of 2040 to allow the regional economy to respond with developments that will support the growth levels called for in Vision 2040. Everett remains doubtful that, despite whatever changes we may make to our plans and development regulations, that the high growth figures proposed by Vision 2040 can be realized without significant regional investments in the transportation system serving our growth centers well in advance of 2040.

Sincerely,

Paul Roberts

Paul Roberts, City Council President

Cc: City Council
    Mayor Stephanson
    Debra Bryant, CAA
    Pat McClain, Executive Director
    Allan Giffen, Planning Director
    Tom Hingson, Transportation Services Director
    Dave Davis, Public Works Director
    Ryan Sass, City Engineer
March 3, 2010

Ms. Marina King, PSRC,  
1011 Western Ave #500,  
Seattle, WA 98104

Dear Ms. King:

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

The City of Kirkland has been closely following development of Transportation 2040. PSRC staff has briefed our Transportation Commission on two occasions and last summer the City submitted comments on the Draft EIS. We appreciate the fact that most of our comments were addressed in the draft document.

To restate some of our interests, moving to new funding mechanisms for our transportation system, in keeping with the City of Kirkland’s adopted policies on pricing is particularly important to us. Other interests include increasing local transit in the short term and providing bicycle and pedestrian facilities throughout the region. It’s also important that the constrained plan include a balanced set of improvements from I-405 to Intelligent Transportation Systems and to Demand Management Programs. Specifically, high capacity transit linking the Urban Center of Totem Lake and Bellevue should be shown in the constrained portion of the plan. Such a link is shown on the Sound Transit master plan and is a likely component of the next Sound Transit vote, which will probably take place during the life of the plan.

As you finalize the Plan, we hope that you will consider the issue of limiting greenhouse gas (GHG) emissions more aggressively. This is important because the transportation sector contributes approximately 50% of the greenhouse gas emissions in our region. Although the draft Plan includes a GHG reduction goal, many cities, including Kirkland, have adopted more rigorous goals calling for GHG levels 80% below 2005 levels by 2050. Kirkland has worked with the International Council for Local Environmental Initiatives (ICLEI) and the Puget Sound Clean Air Agency to develop our targets. The City of Kirkland would be pleased to work with the PSRC on this issue. Exploring all aspects of energy conservation are important, including smarter design and engineering of highways in order to reduce the resources vehicles need to operate on them.
Finally, because the City of Kirkland has received Congestion Mitigation and Air Quality funding for development of programs in our Totem Lake Growth and Transportation Efficiency Center, maintenance and development of the GTEC should be shown in the constrained portion of the plan (appendix B, page 48).

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

Sincerely,

Kirkland City Council

By Joan McBride, Mayor
December 23, 2009

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

Dear Mr. Drewel,

The King County Department of Transportation appreciates the hard work and long hours you and your staff, the policy boards, and advisory committees have put in to the development of the Preferred Alternative for Transportation 2040, which will be used to develop a Draft Plan. I believe that the Preferred Alternative provides a basis for a regional transportation plan that will enable the region to meet the challenges of improving mobility for our citizens while moving toward a fair and sustainable financing program to pay for and maintain our region’s transportation system. The plan also includes a strategy to support our state’s greenhouse gas emission goals, which over time will be further developed.

As the PSRC prepares the Draft Plan for Transportation 2040, I would like to take the opportunity to express our support for including clarifying language in the plan to fully fund maintenance and preservation projects on local and regional arterials and bridges. King County’s Bridge Priority Replacement program, including the South Park Bridge, is a good example of these types of preservation projects. We recommend that the plan language clearly state that bridge replacement, preservation, and maintenance projects on local and regional arterials are contained in the constrained portion of the regional plan. This will recognize that the project cost and reasonably available funding for the projects are in balance, and are eligible to receive federal money for project implementation.

This type of clarifying language will also support local jurisdictions in their efforts to fund projects on local arterials through mechanisms such as a Transportation Benefit District (TBD). This type of clarifying language in the plan will allow local jurisdictions to develop the most effective TBD packages for consideration by elected officials and the public.
If you have any questions, please contact Ron Posthuma, Assistant Director, Department of Transportation, at 206-684-1007.

Sincerely,

[Signature]

Harold S. Taniguchi, Director,
King County Department of Transportation

cc:  Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
     Ron Posthuma, Assistant Director, KCDOT
     Linda Dougherty, Division Director, Road Services Division, KCDOT
January 15, 2010

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

Dear Mr. Drewel:

On behalf of King County Department of Transportation, I would like to express our general support for the Draft Regional Freight Strategy’s recommendations that will be incorporated into the Puget Sound Regional Council’s (PSRC) Draft Transportation 2040 Plan (T2040). I believe the freight strategy recommendations will provide the basis for a transportation plan that will help improve freight mobility for our region. To maintain the region’s competitive edge, our transportation infrastructure must provide for the efficient movement of freight and goods between our ports and manufacturing and industrial areas, balanced with the needs of general purpose and high occupancy traffic.

King County and the Puget Sound region have consistently supported projects that improve the mobility of regional freight and goods traffic. These freight mobility projects include FAST Corridor projects such as Kent’s railroad grade separation projects, the Port of Seattle’s East Marginal Way grade separation project, Seattle’s Spokane Street Viaduct project, Fife’s 70th and Valley Corridor project, the Port of Tacoma’s Lincoln Avenue grade separation project, and Puyallup’s Shaw Road extension project. King County supports the development of a regional transportation plan that continues to place a high priority on projects that improve freight mobility as well as general purpose and HOV traffic on our freeways and arterials.

In particular, we are pleased with the Regional Freight Strategy’s Preservation and Maintenance recommendation that the “region should work to protect and preserve existing infrastructure—including local access within the designated Manufacturing and Industrial Centers.” One of King County’s highest priority preservation projects is the replacement of the South Park Bridge. The South Park Bridge serves the largest industrial and shipyard complex in the state and is used to move freight to King County International Airport, Port of Seattle facilities, the Duwamish waterfront, rail facilities, and the industrial and warehousing areas of Kent and Auburn. This recommendation recognizes that local facilities, such as the South Park Bridge, are key links in the regional freight system. These considerations should be taken into account when prioritizing regional investments in our freight transportation system.
I would like to take this opportunity to restate King County’s position on critical elements of T2040 such as sustainable transportation funding, the use of toll revenues, and greenhouse gas emission reduction as they relate to freight mobility. These elements include the following:

- **Financial Stability:** The region should move toward a fair and sustainable financing program to pay for and maintain our region’s transportation system. Tolling is an equitable way to raise transportation revenues — all users should pay for the transportation system they use.

- **Use of Toll Revenues:** Toll revenues should be used to pay for maintenance, capital, transit investments, and facility improvements that result in greater public mobility. These investments should provide systemwide transportation benefits to improve the movement of people, freight and goods.

- **Greenhouse Gas Emissions:** T2040 should include aggressive policies and actions to reduce greenhouse gas emissions consistent with the State’s greenhouse gas emission reduction goals. King County also encourages efforts to increase the use of fuel-efficient vehicles as well as legislation setting higher fuel-efficiency standards for all vehicles, and supports the continued use of clean fuels in the region’s public and private vehicles, including passenger vehicles, light trucks and freight trucks.

We appreciate the opportunity to provide additional input to T2040 and look forward to participating in further discussions to develop a better transportation plan for the region. If you have any questions, please contact Ron Posthuma, Assistant Director, King County Department of Transportation, at 206-684-1007.

Sincerely,

Harold S. Taniguchi, Director
King County Department of Transportation

cc: Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Ron Posthuma, Assistant Director, KCDOT
Linda Dougherty, Division Director, Road Services Division KCDOT
Kevin Desmond, General Manager, Metro Transit Division KCDOT
March 9, 2010

Marina King, PSRC
1011 Western Ave #500
Seattle, WA 98104

RE: T2040 comments – Kitsap County Department of Public Works (KCDPW)

Thank you for the opportunity to comment on the PSRC’s Transportation 2040 (T2040) document. While there remains a tremendous body of work to implement the plan, this document represents a good framework for accomplishing the tasks ahead. The following comments represent Kitsap County Public Works concerns regarding T2040.

Transit Ridership and Investment
KCDPW is concerned about the extremely low growth of transit ridership through the life of the plan; 3% in 2006 to 4.9% by 2040 for daily trips and 10% in 2006 to 11.4% in 2040 for work trips. We would expect much higher mode share for the investment in transit that the region is making. Pg 15.

Employment in Manufacturing and Industrial Centers
KCDPW is concerned that employment growth in Manufacturing and Industrial Centers (MICs) is negligible. We would expect more employment to go to these centers as opposed to Regional Growth Centers, especially considering that the county’s South Kitsap Industrial Area (SKIA) is expected to employ up to 7,000 workers according to its Sub-area plan. Pg 24 Figure 4.

Tolling Revenues
KCDPW is concerned about the statement that the ‘use of revenues be limited to the corridor or geography from which the revenues are generated. This is a 4 county consortium of governments. Previous in this document it was stated that geographic equity benefits all transportation throughout the region. If revenues are only used in the corridor generated, it will greatly limit Kitsap County’s ability to construct major transportation facilities, as tolls in the county will most likely not be sufficient to fund multi-million dollar projects. Pg 63 First bullet
Graphics
The graphics that show percentage increases are somewhat deceptive, ie. Figure 18, page 52; Increase in Bike and Walk Activity. While a significant increase in the bar height for walk, bike, and walk to transit occurs above the 40% population growth line, the actual numbers are negligible compared to the number of commuter trips in the region.

Non-motorized project list and graphics.
Several non-motorized submissions through the past years are reflected in the non-motorized list of projects. Of the projects list, the Mosquito Fleet Trail should be fully illustrated in the non-motorized section.

The Cities of Poulsbo and Bainbridge Island will submit a trail concept called the “Sound to Olympics Trail”. The non-motorized graphics should reflect a corridor from the Bainbridge Island Ferry through Poulsbo to the Hood Canal Bridge as well as a Kingston to Hood Canal Bridge corridor.

Staff will work with PSRC to illustrate these trail alignments.

Thank you.

Greg Cioc, Transportation Planning Manager, Kitsap County

cc:  Commissioner Josh Brown, District 3
     Commissioner Steve Bauer, District 1
     Commissioner Charlotte Garrido, District 2
     Nancy Grennan, County Administrator
     Randy Casteel, PE, Director of Public Works
     Jon Brand, PE, Assistant Director of Public Works
     Jeff Shea, PE, County Traffic Engineer
     Eric Baker, Special Projects Manager
March 8, 2010

Marina King
Puget Sound Regional Council
1011 Western Ave., Ste. 500
Seattle, WA 98104-1035

Dear Ms. King:

Thank you for the opportunity to submit comments on PSRC’s the Transportation 2040 plan (review draft dated January 22, 2010; draft plan map dated February 25, 2010; and associated appendices, some of which have other dates). We offer the following comments:

Technical corrections. P. 3, Fig. 1. This map makes it appear that Steilacoom is north of Lakewood. Steilacoom is actually west of the central portion of Lakewood. Of course at this scale the map is imprecise, but perhaps the two labels could be switched or Steilacoom adjusted southwesterly a bit.

P. 77, Transit Operations. “Single-occupancy” should be “single-occupant.”


Substantive comments. Financing mechanisms (generally). We remarked upon, but avoided an in-depth analysis of, tolling proposals in our comments on the DEIS. Again, we would observe that the concept of tolling in this region is controversial; there is not unanimity of political and public opinion on this issue. While we consider funding choices to be strictly within the purview of voters and elected decisionmakers, we are also concerned that there are some broader implications of tolling that have not been considered:

1. Environmental justice. We appreciate PSRC’s attention to its environmental justice responsibilities. Unfortunately, only six pages of the environmental justice document (Appendix G) are printable due to some unspecified error that does not appear to be at our end. There are numerous blank pages within the document that is posted on PSRC’s Web site; there is obviously some kind of problem with the .pdf document. We note that additional work is to be completed on the environmental justice analysis (which is expected to be issued after the public comment period is already closed). It is, therefore, impossible to discern whether our concerns will be addressed, so we are including full environmental justice comments here.
To reiterate our comments on the DEIS, “if tolling and particularly the use of HOT lanes is implemented…this creates an unavoidable adverse transportation impact in terms of environmental justice, in the sense that it enables those who have more means (i.e., are financially able to pay tolls) to have greater access to public transportation systems. This approach creates a disparity based on economic means – in other words, an economic bias – in how public transportation systems accommodate users.” The resulting economic inequity has not been addressed. The plan even asks (but does not answer) a parallel question “Does congestion tolling create opportunities that the rich but the poor cannot, and, if it does, is that fair?” (Appendix A, p. 23) as well as stating that the equity question may arise (Appendix F, p. 23) The question remains: How will low-income users be assured equal access to public roadways?

Appendix G includes some discussion of whether tolling would disproportionately impact low-income persons. However, this appears to focus merely on positive or negative time vs. money analysis, as opposed to an analysis of systematic discriminatory effect or, again, equal access. We recognize that in some cases this merely may be the perception of inaccessibility (or, in other words, a decision point related to cost), but that is sufficient in itself to result in inaccessibility in terms of behavioral response. Would, for example, low-income persons be less likely to use tolled segments merely because of the presence of tolls? Would their employment, health care, child care, or other opportunities change as a result of this inaccessibility? Would they disproportionately feel pressured to use transit? (We recognize this last question is particularly difficult, because part of the goal is to get more people to use transit – but again proportionality and equity are the issue.)

From the discussion on p. 39, it appears that low-income persons are being lumped into the “special needs” category and that it is assumed they do not, for the most part, own or drive private vehicles. At that same time, it appears there is an assumption that low-income persons’ transportation will occur primarily or wholly via transit (including private providers). If this is the case, these assumptions are flawed. While recognizing that low-income persons may be disproportionately reliant on transit, particularly in certain geographies or, as the draft plan points out, when layered with other characteristics such as age or disability; we have observed that low-income persons may be more likely to own more vehicles. At the same time, these vehicles are likely to be older, more polluting, and less fuel efficient. Assuming that this population will be reliant on transit discounts their interests as users of the public roadways.

We would be interested to see additional analysis of environmental justice issues as this work proceeds. In order to accommodate opportunity for added review and comment, we encourage PSRC to extend the public comment period and withhold FEIS issuance until this work is complete.

2. Contravention of tourism industry cluster. Metropolitan performing arts programs (theater, music, dance, etc.) have been reaching further and further for season subscribers and individual performance ticket sales. Metro area arts patrons and “staycationers” (for example, central Washington residents who visit Seattle for the weekend) may live well outside the PSRC region. This, in turn, relates directly to the continued viability of metropolitan-area hospitality industry (restaurants, bars, hotels, etc.) and tourist attractions (Pike Place Market, Seattle Center, museums, festivals, and other such facilities/events throughout the region). Consideration does not appear to have been given to the dampening effect central Puget Sound area tolling would have upon this specific industry cluster, particularly given the incongruity of this financing mechanism with the rest of the state (unfamiliarity coupled with cost). The most telling statement of this is found in Appendix A (p. 23) and Appendix F (p. 15): “Making users pay, directly and immediately, for costs their use engenders encourages them to economize on costly activity.” If implemented, tolling appears likely to significantly redirect arts, hospitality, and tourist attraction patronage away from the central Puget Sound region to other areas where road tolls do not exist. (This
would seem to relate to “external travel” in Appendix H [p. 13] but is not fully accounted for in “special generators” [p. 12], and the outcome of any analysis conducted does not appear to be included.)

3. Spin-off impacts to local jurisdictions. In areas where alternate routes exist, tolling on major highway facilities may not necessarily result in congestion savings but rather an offset of the congestion (and impact) onto local facilities. Using South King County as an example, such facilities as old Hwy. 99 (recognizing that renaming of various segments has occurred over time), Military Road, and other such bypass routes may become even more congested if drivers seek to avoid tolled segments of I-5. We note this is mentioned in Appendix A (p. 23) and Appendix F (p. 15), and it appears that local jurisdictions would be pressed into tolling local arterials merely to disincentivize their use as alternate routes; while at the same time cut-through traffic in neighborhoods adjacent to arterials in order to avoid arterial tolling is raised as an environmental justice issue in Appendix G (p. 50).

We note that the state and regional tolling history is included in Appendix F. Particularly with regard to the statement on p. 15 that once initial constructions were paid off, tolls were removed: Wasn’t there a legal decision about this with regard to the (current) Hood Canal bridge? It would be helpful to expand this discussion to include any key legal decision(s) that may have shaped direction over time.

Cross-Base Highway (generally). We are aware that there was discussion in policy groups about removal of the planned Cross-Base Highway (SR 704) from the plan. We appreciate its continued inclusion as its associated improvements strongly relate to some of our own planning goals for portions of Lakewood.

P. 26, Transit Oriented Communities, Station Area Planning. While we agree that fine-grained planning should occur in conjunction with station areas, we are mindful of the previous and ongoing legislative efforts (last and this year’s legislative session) to require that high-density housing be placed within 1/2 mile of all transit stations. As we observed in our previous comments on the DEIS, “In many cases, transit stations have been placed for optimal relationship to the transportation system – a selection that likely did not consider the same factors that might make for an appropriate or optimal housing location, such as adjacency to services or a positive living environment. While this may be appropriate in some areas, we oppose this as a ‘one-size-fits-all’ policy or practice.” We appreciate your attention to this concern.

P. 70, Transit. This section notes the relationship between transit funding and sales tax. However, the draft plan does not examine how current transit cuts occurring in relation to dramatic sales tax revenue reductions will affect future system planning. Particularly in light of the astonishingly high 90 percent local transit service increase (constrained plan; or 120 percent under the full plan, as referenced on p. 13 of Appendix A), it seemed to us there should be some recognition that even as this plan is being considered, contractions in the transit baseline may create a deficit in servicing even current demand. We did find that addressed later in Appendix A (p. 24) but this is an emergent enough situation that it probably bears up-front discussion in the main plan document, perhaps in the section beginning on p. 80.

P. 75, Transportation Demand Management, Parking pricing and management. The statement about “…all jurisdictions…implementing market-based pricing of all on- and off-street facilities within regional growth centers…as their growth achieves densities and activity patterns that would make a priced market viable” may or may not be achievable within the planning period. For metropolitan areas with traditional downtowns, already constrained parking, and a share of commercial parking as a standalone land use (i.e., Diamond lots) perhaps this would be workable. For jurisdictions like Lakewood which grew up as a suburb and do not have a traditional downtown or commercial parking, this seems like an unrealistic possibility by 2040.
Further, when examining parking management theories or practices, we find that proponents seldom take into account the emphasis placed upon parking availability in lender financing. It has been our experience that intentional constraints upon parking facilities can deter economic development in this sense. There does not appear to be a ready answer to this dilemma; consideration and analysis in the context of the regional plan would be appropriate.

P. 98, Additional Passenger-Only Ferry System Improvements (also pp. 50-51, Appendix B). While Lakewood does not have an interest in ferries, it seems to us that some of the suggested routes may be contradicted by jobs-housing balance goals within the regional plan, by increasing the viability of the Seattle job market for residents of areas that are not proximate. This isn’t necessarily a bad thing, but it does seem to have bearing on jobs-housing numbers for the individual communities, and it may make it more likely that downtown Seattle businesses will employ a disproportionately high number of non-residents versus residents. Is this an issue?

Aviation component (Pp. 13, 101-105; & generally (including appendices). We have just recently (February 19) submitted comments on the draft consultant’s Airport Compatible Land Use Program Update report. In that this work is not yet complete, how does it relate to the air transportation-related provisions of the Transportation 2040 plan?

As we have previously advised PSRC, the American Lake Seaplane Base in Lakewood is considered to be a “landing strip” and not a general aviation airport under prior negotiation between the City and WSDOT Aviation Division and interpretation by WSDOT Aviation Division. It remains on pilot charts for the area, but there is no “base” there. As the City’s American Lake Park was redeveloped, it included a dock for seaplanes as “vessels” (equivalent with boats) upon the lake, but all other seaplane services and facilities have been discontinued. Transient air usage of the lake is expected to continue, but not as a formal “airport.” Consistent with this, WSDOT’s LATS shows a modest 50 operations a year, with no growth planned (this is reflective of a cap imposed years ago by the Pierce Co. Hearing Examiner, when the base was under private operation). Lakewood does not conduct airport planning relative to this location. Fig. 39 takes this inaccuracy one step further by showing commercial aviation at American Lake. Any transit seaplane usage is by private vessel.

Fort Lewis and McChord AFB have recently been merged as Joint Base Lewis-McChord (JBLM). Formal subarea names include “JBLM North” (the portion of former Ft. Lewis located north of I-5), “JBLM McChord Field” (the former McChord AFB), and “JBLM Main” (the portion of former Ft. Lewis generally SE of I-5). References throughout the plan should be adjusted accordingly.

At the same time, please note the following comment provided in our aforementioned February 19 letter: “…although [Lakewood] conducts airport planning relative to the north end of McChord, neither this nor Gray is a general aviation airport, which is the topic of this report. Planning relative to these facilities is addressed through the adopted Joint Land Use Study (JLUS) and Air Installation Compatible Use Zone (AICUZ) report. Following a currently underway major planning initiative relative to base growth, Lakewood expects to engage in an updated JLUS planning process that may spawn a new AICUZ report as well. However, planning related to these facilities is unrelated to and surpasses the PSRC’s MPO authority specific to transportation element certification. Local plan transportation elements include only general aviation and not military facilities (RCW 36.70A.070(6)(a)(iii)(A)).” We then requested that references to these facilities be removed; concurrently, they should be removed in the context of aviation planning from the Transportation 2040 plan.
On a related topic, please keep in mind that Lakewood is leading major planning work related to military base growth that will include many of the topical areas represented in the Transportation 2040 and VISION 2040 plans, but which focuses on Pierce/Thurston counties (notably, outside the PSRC region). As PSRC has been a participant in this process, it might be advisable to include reference to this work in progress through the Transportation 2040 plan (although not specific to the aviation component).

Intercity Passenger Rail component (pp. 13, 106-107; Appendix A, p. 29). We reiterate our previous comment related to the Transportation 2040 DEIS: “If the referenced WSDOT/Amtrak plans encompass the Pt. Defiance Bypass project, the City of Lakewood does not agree that ‘no significant negative impacts are anticipated to result from these improvements.’ ” The City of Lakewood remains opposed to the Pt. Defiance Bypass project and enhanced Amtrak rail service as currently proposed, as reflected in the Lakewood City Council’s Resolution No. 2010-13 adopted January 19, 2010. Local concerns include the adequacy of environmental review specifically with regard to environmental justice considerations, as further related to an extremely poor area within Lakewood that would be impacted by WSDOT’s planned projects. We note that the draft plan mentions grade separations in relation to improving safety for roadway crossings (p.71). Lakewood is particularly affected by the proposed Pt. Defiance Bypass project in this regard, yet no additional grade separations have been identified. It appears that PSRC has relied upon WSDOT’s Documented Categorical Exclusion in incorporating this project into the regional plan. Please be aware that this could potentially pose legal liability to PSRC in the case of an environmental justice action.

Pp. 118-119, Policy and Plan Review. In discussions with the (Pierce Co.) Growth Management Coordinating Committee, a broader question has been raised related to PSRC’s local plan review/certification function in light of the fact that the statutory requirement for 2011 updates are being shifted (assuming final adoption of pending legislation). This relates not just to Lakewood or Pierce Co. but to every jurisdiction within the PSRC region. Considerable, unfunded work may be required at the local plan level to incorporate or implement policy imperatives stemming either from this work or the VISION 2040 plan. It was assumed this would occur in conjunction with the 2011 updates. Since that work is (probably) being pushed out, at what point will PSRC demand full compliance with VISION 2040/Transportation 2040 in order to grant transportation element certification? This is a crucial question and significant funding issue to all.

2010 Action Strategy Projects and Programs (begins on p. 34 of Appendix A). Adding geographic location by county would enable easier interpretation.

Baseline vs. Planned Projects (untitled fig., pp. 17-18, Appendix B). The first figure shows existing park-and-ride facilities (2006) but does not reflect transit stations, which are included in the second figure. The Lakewood Sounder station is already built and contains a park and ride but is shown as “constrained” in the second figure and listed as a “constrained” project in the table that follows on p. 20. Meanwhile, the existing transit station at Lakewood Towne Center is not accounted for, evidently because it does not contain a park and ride. Also, DuPont appears to have either an “unprogrammed” transit station or park and ride in the second figure. The DuPont park and ride is existing; meanwhile, we do not believe Sounder service extension to DuPont was included in the approved Sound Transit 2 program. (It is shown as “unprogrammed” on the p. 20 table.)

Missing Pieces. In addition to the environmental justice work (Appendix G), we note that Appendix E, Regional Air Quality Conformity Analysis; Appendix K, Coordinated Transit-Human Services Transportation Plan; and Appendix L, Climate Change Background are not included with the draft document and are evidently intended to be included at the point of adoption. While some of this work is
Transportation 2040 Comments
March 8, 2010
Page 6

highly technical and less likely to be of interest to the average person or even jurisdictions having an
interest in the plan, it is inappropriate to close the public comment period, issue a FEIS or take the plan
through to adoption lacking public disclosure of the entirety of the plan. We encourage you to rethink
this approach.

This completes the City's comments. We look forward to continuing to work with you as Transportation
2040 plan development proceeds. If you have any questions or need additional information about any of
our comments, please contact Senior Planner Deborah Johnson at 253.983.7770 or e-mail
<djohnson@cityoflakewood.us>.

Sincerely,

/s/ M. David Bugher
M. David Bugher
Assistant City Manager for Development/
Community Development Director
March 3, 2010

Marina King
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, Washington  98104

SUBJECT: Draft Transportation 2040

Dear Ms. King:

Thank you for the opportunity to comment on the Draft of Transportation 2040. Planning the transportation/mobility system for the Puget Sound region for the next 30 years means resolve two key challenges: support the goals of VISION 2040, and finding the funding that will be required to achieve them. The breadth and depth of the discussion of transportation/mobility issues and challenges speaks to the time and expertise that has gone into preparing this document.

According to VISION 2040, up to 1.7 million new residents and 1.2 million new jobs will locate in the region by 2040; and VISION 2040 calls for directing this new development into regional growth centers. This “centers” strategy is intended to accommodate new development in a cost-efficient manner as well as to promote creation of lively, vibrant and successful city and community centers. Providing access into and out of the region’s urban centers is critical to the success of these centers. Successful urban centers are built on a range of transportation alternatives – for both goods and people – so that individuals and businesses can choose the alternative mode for their needs.

Accommodating this new development in the designated centers will require substantially expanding our transportation infrastructure. However, the Draft Plan shows that current-law revenues will not provide the funding to provide the necessary transportation infrastructure.

Lynnwood contains a major regional growth center and will become the major city center located between Seattle and Everett. For these efforts to be successful it is imperative that LRT be extended to Lynnwood in a timely manner, there be an expansion of other transit services as well as significant improvements to the highway and arterial street system. Lynnwood’s plans demonstrate our willingness to support Vision 2040 goals.
The Draft Plan responds to this challenge with a financial program that, if fully implemented, is projected to provide funding for the key transportation facilities in the region. Consistent with VISION 2040, the Draft Plan calls for giving priority for transportation grant funding to projects that improve access to/from designated urban centers such as Lynnwood's. This priority-approach will be critical to the success of VISION 2040 and the centers growth strategy, as funding for transportation projects is limited and PSRC will need to target those funds to projects that provide the best “bang for the buck” for the region. The Draft Plan states that the system for setting priorities for transportation project funding will be established after the Plan is adopted. Making access to/from designated regional centers a major component of these funding priorities will be a key action for PSRC and the region to support realization of the goals of VISION 2040.

Again, thank you for the opportunity to review the Draft Plan. The comprehensive survey of transportation programs, the thoughtful evaluation of transportation systems that support VISION 2040 and the realistic evaluation of our region’s financial capability all provide a solid basis for improving our transportation infrastructure.

Sincerely,

[Signature]

Paul Krauss, AICP
Community Development Director
March 8, 2010

Ms. Marina King  
Puget Sound Regional Council  
1011 Western Ave #500  
Seattle, WA 98104

RE: Comment on the Draft Transportation 2040 Plan

Dear Ms. King:

The City of Maple Valley supports the Puget Sound Regional Council’s efforts to develop a comprehensive transportation strategy for the region. To this end, the City of Maple Valley offers the following comments on the Draft Transportation 2040 Plan (T2040).

First, I wish to reiterate the agreed points from Steve Clark, Maple Valley Public Works Director, during the February 11, 2010 meeting with Kimberly Scrivner. The comments focus on corrections to the City of Maple Valley’s projects included in the draft plan Appendix “B”:

- The project description for Maple Valley’s T2040 project No. 5445 included in the Corridor Summary table for Southeast King SMART Corridor will be corrected to read, “SR 169 Widening to 4 lanes, center turn lanes or left turn pockets and Bike Lanes (SE 270th to SE 290th).”

- Maple Valley’s SR 516 project will be added to summary table of Southeast King SMART Corridors. This project description shall read as, “SR 516 Widening from 2 to 4 lanes, center turn lane /left turn pockets, bike lanes and sidewalks (from 213th SE to SR 169).”

In addition to the above, please consider the following:

- The T2040 project list and modeling are based on the definition of a “regionally significant” facility or project. Regionally significant in the region for roadway facilities is defined as principal arterial and above. Our understanding is that local facilities at minor arterial and below are contained in the financial strategy of the long-range plan, but are not required to be listed explicitly as projects.

We want to be sure a project on a minor arterial or collector, which is on the federal functional classification system, will be eligible to compete for federal funds in one of
PSRC’s funding competitions. Such projects would be exempt from the Candidate/Approved process and would not require an MTP ID number and can proceed to the competition and receive funding in the TIP.

- Please consider providing a clear process for moving “un-programmed” investments to the “constrained” portion of the plan.

- The T2040 strategy calls for the creation of Growth and Transportation Efficiency Centers (GTEC). We request that the strategy does not overlook the realities and unique transportation needs of cities, like Maple Valley, that are on the outer edges of the urban growth area. Our communities will continue to remain automobile dependent unless the regional transit system makes strategic investments to extend and improve service in the entire urban growth boundary. If not, the plan must be a hybrid that supports transit options and highway and arterial capacity improvements to serve urban fringe communities.

- The draft T2040 plan recognizes the challenges of securing the funds needed to implement the regional transportation strategy. Current funding options, such as federal and state grants, gas tax and other existing revenue sources are becoming uncertain. However, we believe the plan unrealistically places too much emphasis on the use of tolls as a source of project funding. Tolls may be beneficial for some specific projects; however, they are not practical or appropriate for all freeway and arterial projects.

- The draft plan does not consider other alternative high capacity systems, including diesel multiple unit (DMU) commuter rail on existing freight rail lines, which are used successfully in the Portland Tri-MET area and other regions in the country. The cities of Black Diamond, Covington, Auburn and Maple Valley are presently evaluating the feasibility of DMU on the Burlington Northern - Sante Fe Stampede Pass Line.

Thank you for providing this opportunity to comment on the draft T2040 Plan. We look forward to the completion of the plan and are committed to being involved in the process.

If you have any questions regarding our comments, please contact Steve Clark, Public Works Director at (425) 413-8800, Extension 637.

Sincerely,

David W. Johnston
City Manager

cc: Mayor Noel Gerken and City Council
    Steve Clark, Public Works Director
March 8, 2010

Mr. Charlie Howard, Director of Transportation Planning
Puget Sound Regional Council
1011 Western Avenue
Suite 500
Seattle, WA 98104-1035

Re: Transportation 2040

Dear Mr. Howard:

Thank you for the opportunity to review and comment on the Puget Sound Regional Council’s Draft Transportation 2040 (T2040) Plan. Pierce County supports the development of this plan as one tool to cooperatively shape our region’s transportation future. Pierce County supports the concepts and policies forwarded in Vision 2040 and Transportation 2040 that are built on the framework of protecting and improving transportation mobility, minimizing environmental impacts, and developing sustainable funding solutions. We continue to strongly advocate, however, that these concepts and policies must be balanced and equitable and must give equal weight to economic prosperity.

Pierce County previously commented on the Draft Environmental Impact Statement (DEIS) for T2040 through our letter dated July 31, 2009. We note that a number of the issues highlighted in that letter have been addressed in the draft T2040 plan. There are, however, a number of issues that were raised in our DEIS comment letter that have not yet been completely addressed within the context of the plan document. We believe these issues must be addressed in future plan documentation, processes, and implementation. A general summary of key issues are outlined below.

1. Achieving Vision 2040 and T2040

Our DEIS comment letter contained the following:

We are concerned that V2040 and T2040 do not afford the unincorporated urban areas of Pierce County the ability to attain a critical mass and mix of population and employment that would promote the core concepts and strategies of these two plans. These core concepts and strategies are one means by which the Pierce County could focus its development to promote more modal choices. Focusing future development in specific centers and connecting the regional and subregional centers could be the means by which the county focuses its transportation investment in services and infrastructure (Pierce County’s Comment Letter on the T2040 DEIS, July 31, 2010, p. 2, 3)
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Mr. Charlie Howard, Director of Transportation Planning
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Vision 2020 promoted a hierarchy of centers and in 1994 Pierce County adopted a Comprehensive Land Use Plan that was based on that hierarchy of centers. Vision 2040 looks toward putting major funding toward regional centers and subregional centers. Transportation 2040 does not include or mention funding for subregional centers. It is imperative for Pierce County and other jurisdictions to be able to realize mixed use centers as envisioned in Vision 2020 and our Comprehensive Plan in order to remove local trips off the roads to achieve greater efficiency from our existing system and reduce air quality impacts. Transportation 2040 needs to include actions and funding for subregional centers and the Preferred Alternative must provide funding for and prioritization of subregional centers. (Pierce County’s Comment Letter on the T2040 DEIS, July 31, 2010, p. 6)

V2040 and T2040 strongly focus upon the regional centers but appear to provide minimal support for subregional centers. It is unclear as to how the subregional centers within Pierce County would be able to participate in achieving the regional vision and T2040 appears to lack an explicit strategy that will assure that all jurisdictions play more than a support role to the densest urban area. Vision 2040, the T2040 DEIS and this T2040 Plan neither individually nor collectively address how Pierce County can achieve transportation efficiencies promoted in the plan within the constraints of the proposed regional land use, population, and geography targets. We believe this reality may exist for other jurisdictions as well. We continue to be concerned that the regional growth strategy articulated within V2040 and supported by T2040 may not reflect the growth realities and existing development patterns that are present in Pierce County today as a direct result of the implementation of the prior regional plan, Vision 2020.

Pierce County recognizes that a plan is only as good as its implementation. Appendix A: Draft 2010 Action Strategy introduces the approaches by which the broader planning goals relate to financing and implementing projects. Chapter 6 of the Draft T2040 Plan outlines the development of a monitoring program that would look at such issues as congestion relief, accessibility, environmental factors, finance and “land use and regional development patterns”. We support the development of this monitoring program and believe that this program must include the planning and implementation mechanisms necessary to “bend the trends” related to population, employment, and development in a realistic and feasible manner. This program must be sufficiently flexible to enable Pierce County to address its needs and realities and should provide tools and financial support for local actions at the subregional level. We look forward to further examining the growth realities through our local comprehensive plan update and future updates to V2040 and to working with PSRC on these issues in the future.

2. Tolling
Our DEIS comment letter contained the following:

How a tolling program would be implemented and how its potentially regressive impacts would be mitigated must be detailed in the preferred alternative should tolling move forward....We also want to make very sure that tolls collected within subregions of the Puget Sound area remain and are spent within those same subregions of the Puget Sound area and that they are not
used to fund projects outside of those subregions. The preferred alternative should reflect this concept of expending the toll revenues within the areas collected. (Pierce County’s Comment Letter on the T2040 DEIS, July 31, 2010, p. 3,4)

We acknowledge that PSRC has held many meetings highlighting the concept of tolling and user fees. Pierce County participated in the Pricing Task Force and Transportation 2040 Working Group discussions that focused on some of the fundamental principles and assumptions by which tolls may be implemented in the T2040 future. While these conversations are certainly important, our key questions about how and where the tolls would be applied remain unanswered. Our county still holds that funds collected from tolls should be spent only in the local area from which they are collected and that the tolls should not spent on projects outside of the collection areas. Our county also continues to have concerns regarding the use of toll revenues for purposes other than physical improvements, and roadway operation, preservation, and maintenance. Pierce County’s position on tolling is set forth in Resolution No. R2009-101s which indicates our opinion that T2040 must ensure toll equity by:

• Tolling for capacity improvements but limiting the scope of tolling to limited access highways only;
• Including tolling as a demand management tool but only after the state highway network in each sub-region has been completed;
• Establishing a uniform toll funding to project cost ratio for significant state projects throughout the region. This ratio should ensure that fairness is applied in the tolling of state facilities and that the users of tolled state facilities throughout the region have a similar toll burden as a percentage of total project cost regardless of the geographic location of the project;
• Retaining toll proceeds in the sub-region in which they are collected.

3. Prioritization Process

While the project prioritization process is to be developed and implemented after the adoption of T2040, it is unclear as to rationale and the implications of this process. This prioritization process has the potential to significantly influence the implementation of T2040 and is of great concern to Pierce County. We are concerned the adoption of T2040 prior to the creation of this prioritization process introduces uncertainty into the regional transportation planning process and could work to undermine the considerable time and effort spent by the PSRC member jurisdictions in developing the regional transportation project lists. Absent more information, the prioritization process has the appearance of tool that could be used to rank and perhaps eliminate regional transportation projects from funding consideration and appears to differ significantly from the region’s traditional policy-based competitive grant funding processes. While our preference would be that the concept of a prioritization process be eliminated, if it is to occur, we would recommend that either the prioritization process be developed prior to the adoption of T2040 or that it be deferred until the next substantive update of the regional transportation plan. In either event, we strongly believe it is in the interest of all of the jurisdictions in the region to develop this process in a very open, collaborative and transparent manner and that the Transportation Policy Board and other policy boards should be utilized extensively for this purpose to ensure that this process is appropriately balanced and equitable.
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**Conclusion**

We believe the draft T2040 plan addresses many of the concerns we identified in past comments. There are, however, a number of significant concerns regarding T2040’s effect on Pierce County’s development patterns, the quality of movement of people and goods within our county, and our overall economic vitality which require further attention. In addition to our comments above, these concerns are also well documented in our prior comments to the Draft EIS for T2040.

We look forward to continuing to work with the members of PSRC to address our concerns and further refine the plan in the coming months. We appreciate the opportunity to comment on the draft T2040 plan and would like to congratulate the PSRC membership and staff for their efforts and hard work to date in developing the plan.

Sincerely,

[Signature]

Pat McCarthy
Pierce County Executive

[Signature]

Roger Bush
Chair, Pierce County Council

**cc:** Pierce County Council
Kevin Phelps, Deputy Pierce County Executive
Brian Ziegler, Director, Public Works and Utilities
George Walk, Director, Government Relations
Denise Dyer, Manager, Economic Development
Chuck Kleeberg, Director, Planning and Land Services
March 8, 2010

Bob Drewel, Executive Director
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

RE: Transportation 2040 Comments

Dear Mr. Drewel:

The City of Renton is pleased to support the draft Transportation 2040 document, a new transportation plan for the region that will address critical issues such as congestion and mobility, the environment, and transportation finance. The new regional transportation plan when integrated with Vision 2040 and the Regional Economic Strategy will 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.

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 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 a new regional transportation plan will of course 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.

Although Transportation 2040 financial strategy relies on the traditional funding sources of 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 PSRC has provided to participate in the development of the Transportation 2040 Plan. We look forward to its final adoption this spring. If we can provide further assistance, please contact Gregg Zimmerman, Public Works Administrator, 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
    Alex Pletsch, Community & Economic Development Administrator
    Chip Vincent, Planning Director
    Jim Seltz, Transportation Planning & Programming Manager
March 9, 2010

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

Dear Mr. Drewel:

I truly appreciate the immense amount of work the Puget Sound Regional Council’s (PSRC) staff, policy boards and advisory committees did to create the Transportation 2040 (T2040) plan. I also value this opportunity to comment on the draft.

Regrettably, I cannot support T2040. I believe the plan should be redesigned with a much stronger focus on making the shift to transit and walkable communities to meet greenhouse gas emission targets. Such a focus would also have significantly positive effects on our economy, public health, and social equity. The letter sent by the City of Seattle’s elected officials last fall indicated clearly our concerns and I do not feel that this draft has resolved those points. The reputation of the Puget Sound region for sustainability is rightly earned; we can create a better plan for our communities, our economy, and our future.

Courageous steps are being taken across the globe to combat climate change, steps that in most cases improve a community’s economy and quality of life. With that understanding, I am troubled to see T2040 adding 347 new lane-miles of highway construction, while building only 66 new miles of light rail. Additionally, T2040 appears out of step with PSRC’s Vision 2040 goal of focusing growth in designated regional centers and metropolitan cities. Finally, it is not reflective of the values of a region that voted for Sound Transit expansion and against the RTID plan.

Also, we have all heard clearly from our federal officials that we need to focus our planning on efforts that create sustainable and livable communities. I fear the focus of T2040 moves in the opposite direction and could put us regionally in a less competitive position for future federal funds.

I believe strongly in the mission of PSRC and its staff and leadership. I hope to work within the organization in the coming years in a constructive fashion to ensure this region remains a national leader in sustainable economic growth.

Sincerely,

Michael McGinn
Mayor
Seattle City Hall, 7th Floor
600 Fourth Avenue
PO Box 94749
Seattle, WA 98124-4749

Tel (206) 684-4000
Fax (206) 684-5360
mike.mcginn@seattle.gov
March 9, 2010

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

Re: Draft Transportation 2040 Plan Review

Dear Mr. Drewel,

Thank you for the opportunity to provide comments on the draft Transportation 2040 (T2040) plan. The City of Seattle appreciates the work that Puget Sound Regional Council’s (PSRC) staff, policy boards and advisory committees have put in to create a new metropolitan transportation plan for the Puget Sound region. These efforts have resulted in a plan that is a significant improvement over the Destination 2030 plan.

You may recall that former Mayor Nickels sent a letter on July 29, 2009 articulating key concerns and issues about the T2040 plan. The City of Seattle also submitted a letter signed by the Mayor and all City Councilmembers on November 10, 2009 alerting the PSRC to our concerns that the T2040 plan does not adequately reduce Vehicle Miles Traveled (VMT) and Greenhouse Gas (GHG) emissions. However, several of the primary issues raised during selection of the preferred alternative and Draft Environmental Impact Statement have still not been resolved, and therefore we cannot support the current Draft Plan.

The complex issues of climate change, sustainability and equity require a bold course of action. The federal government has begun taking these actions by changing policies at the federal level to encourage the development of sustainable and livable communities. Over time it is expected that these changes will raise the bar for metropolitan planning and transportation programming. At the state level, the Legislature and the Governor have enacted greenhouse gas reduction targets in recognition of the threat that climate change poses to our state.

These actions do not occur in isolation. Citizens are also taking action in unprecedented numbers, both through their daily actions and at the ballot box. Voters in the Puget Sound region
overwhelmingly approved expansion of the Sound Transit light rail system, while turning away a funding package that included highway capacity projects, RTID. It is clear that citizens recognize that we need to change our region’s transportation system.

Unfortunately, T2040 misses this opportunity for the region to lead in planning a transportation system that will reduce VMT and meet GHG emission reduction targets. T2040 does not meet state targets to reduce overall GHG emission. At a minimum, the draft plan should include a policy commitment to meet all state and federal benchmarks for GHG and VMT reduction. In addition, the plan should include an action strategy to begin examination of how the region can achieve the adopted state targets.

During development of the preferred alternative, a number of new roadway construction projects were added to the plan. The result is a plan and financial strategy that dedicates more new revenues to state highway system improvements than to improvements by Sound Transit and local transit agencies. These investments build 347 new highway lane-miles, while building only 66 new miles of light rail. The result is a plan that has a negligible effect on the share of commuters using transit, an increase of less than 1/10 of 1% per year, from 10% to 11.4%. Again, PSRC should strive to lead the way in planning for transit investments that could increase transit ridership and improve air quality; instead, T2040 relies on existing plans to address the next 30 years of growth.

During the DEIS review, PSRC evaluated alternatives that included a higher level of new roads, new highways, and significant expansions of existing roads funded through tolling on the freeway system. This analysis showed that alternatives such as the T2040 preferred alternative will reduce job growth in the City of Seattle’s designated urban centers compared to areas outside those centers. Similarly, region-wide data showed a decrease in jobs in regionally-designated manufacturing and industrial centers. During plan development, a number of jurisdictions asked for additional data to evaluate how alternatives and this draft plan would support and encourage directing growth to designated regional growth centers, metropolitan and core cities, consistent with Vision 2040. The high-level region-wide data provided in the draft plan does not allow us as local officials to feel confident that the plan’s transportation strategies will encourage growth in those centers that Vision 2040 and the region have determined are the most appropriate locations for that growth.

We take very seriously our decision not to support the draft T2040 plan as it is now written. It is critical that the region have a shared vision for our transportation system and Seattle wants to be a strong partner in creating one. However, we feel strongly that the environmental and economic realities of failed transportation approaches of the past require a marked departure from the region’s accustomed ways of transportation planning and project funding. In adopting Vision 2040 the region committed itself to just such a change in direction. We are disappointed that as the first major regional planning effort since the adoption of Vision 2040, T2040 falls far short of that commitment and that it does not contribute to Vision 2040’s stated need to “bend the trend.”
Attached are some specific recommendations for changes to T2040 that address some of these concerns. If these recommendations are adopted as amendments to the Draft Plan, we will be able to support the Draft Plan. We believe that the specific recommendations contained in the attachment are likely to move the region closer to reaching the state’s GHG and VMT reduction targets. However, additional analysis by PSRC is needed to determine if these recommendations will achieve the state targets. We recognize that regional transportation planning is not a static exercise, and we fully expect to remain engaged with our partners at PSRC on the plan’s evolution, prioritization, and implementation.

We continue to look forward to opportunities to work with you, your staff and the members of PSRC’s boards and advisory committees. If you have any questions, please contact Dan Eder, Council Central Staff Analyst (206.684.8147). Thank you for your consideration.

Sincerely,

[Signatures]

Council President Richard Conlin

Councilmember Tim Burgess

Councilmember Sally Clark

Councilmember Bruce Harrell

Councilmember Tom Rasmussen
Chair, Transportation Committee

Councilmember Nick Licata

Councilmember Mike O’Brien

Councilmember Sally Bagshaw
Cc: Tracy Burrows, SDOT
    Linda Cannon, OIR
    Dori Costa, SDOT
    Tracy Krawczyk, SDOT
    Marco Lowe, OIR
    Dan Eder, Council Central Staff
    Ben Noble, Council Central Staff
    Norm Schwab, Council Central Staff
• Greenhouse Gas Emission Reductions:

Comment and Request for Action: T2040 does not include a clear commitment to meet State or Federal greenhouse gas reduction targets. The limited data presented by PSRC in the draft plan (page 50) shows that transportation strategies included in the plan only reduce overall greenhouse gas emissions slightly by 2040 from the baseline – an increase in emissions from 2006. Even assuming adoption of clean vehicle technologies, the draft plan results in less than a 6% decrease in overall emissions from the 2006 level, in contrast to the state law target of 25% by 2035 (outlined on page 48). T2040 needs to include a policy commitment to meet all state and federal targets for greenhouse gas and VMT reduction, at minimum. It should also include an aspirational goal, and supporting strategy in the 2010 Action Strategy, to strive for full carbon neutrality in the transportation sector for the region.

Page 9 – Executive Summary – Environmental Benefits section, paragraph 3
Specific Language Changes: “The Puget Sound region is committed to meeting all state and federal targets for greenhouse gas emissions reductions. Transportation 2040’s four-part greenhouse gas reduction strategy is flexible, and is designed to incorporate anticipated guidance specific to the region and the transportation sector. Analysis shows that with aggressive implementation of technology solutions, the strategy has the potential to reduce regional greenhouse gases from transportation by up to 28% below 2006 levels. These results show that Transportation 2040 is on the right track toward reducing greenhouse gas emissions associated with transportation, but do not meet targets set by the state. PSRC will work with WSDOT and local jurisdictions to improve analysis methodologies and identify additional strategies to reduce greenhouse gas emissions reductions by December 2011, when WSDOT is required to report to the Governor on the status of regional transportation plans.”

Page 49 – Chapter 3 – Outcomes section
Specific Language Changes: “The results of the investments and strategies contained in Transportation 2040 are illustrated in Figure 17 below. The combination of the four-part strategy results in a range of emissions reductions between 5 percent likely technology scenario and 28 percent aggressive technology scenario below 2006 modeled emissions. As compared to the 2040 Baseline trend, the preferred alternative results in emissions reductions between 31 percent and 48 percent. The likely technology scenario does not meet the state’s greenhouse gas reduction target of 25% reduction from 1990 levels in 2035, however, the Puget Sound region is committed to meeting this goal. PSRC’s 2010 Action Strategy will include a strategy to work with WSDOT and local jurisdictions to improve analysis methodologies and identify additional strategies to reduce greenhouse gas emissions reductions by December 2011, when WSDOT is required to report to the Governor on the status of regional transportation plans.”

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• Mode Shift:

**Comment and Request for Action:** Vision 2040 emphasizes transportation investments that provide and encourage alternatives to single-occupancy vehicle travel and increase travel options. The draft plan provides limited data; however, it appears that T2040 proposed investments will have a negligible effect (less than 1/10 % per year) on the share of commuters using transit. Bus service increases are significant overall, however, represent a "keep-up" rather than "build-up" strategy, primarily keeping pace with population growth and increased congestion on arterial streets. The draft plan does recognize the need for improving transit service on Core routes, including the City’s Urban Village Transit Network, however, it could go even further to improve transit service and mode shift. Radius of non-motorized improvements should be increased to be consistent with FTA’s revised guidance. The region should commit to implement “Complete Streets.”

**Page 6 – Executive Summary – Programs and Projects, 4th Heading:**

**Specific Language Changes:** “Public Transportation (regional and local transit). Implement an aggressive transit strategy. Complete Sound Transit 2 projects and extend high capacity transit service to fulfill Sound Transit’s adopted Long-Range Vision Plan as part of the constrained plan. Additional Link light rail extensions to Everett, Tacoma and Redmond. Increase local transit service by approximately 200% 90% while to offset increases in arterial delay and population growth, achieving. Achieve operational efficiencies to reduce costs and emphasize provide additional all-day service with high frequencies (generally every 15 minutes for 18 hours per day).”

**Page 7 – Executive Summary – 2nd Bullet:**

**Specific Language Changes:** “Nonmotorized transportation. Focus Provide bike and pedestrian/walking improvements in regional growth centers, facilities with one terminus in a center, or within ½ mile of transit passenger facilities, and build facilities that complete a missing link or within one mile of existing and planned transit station areas for pedestrians and within three miles for bicyclists and in general realize implement “Complete Streets” practice in all the region’s urban areas.”

**Page 81 – Public Transportation, bulleted items:**

**Specific Language Changes:**

• “Continue to implement a high capacity transit system along logical corridors that connect regional growth centers. Identified in Sound Transit’s adopted Long-Range Vision Plan as part of the constrained plan.”
• “Promote Build local transit services that capacity to serve meet local needs and feed the high capacity system”
• “Promote convenient transfers between transit and other travel modes, including walking, biking, and ferries by improving transit centers and intermodal stations associated with major regional transit investments”

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Specific Language Changes: "The Constrained element of the plan focuses provides designated bike and pedestrian improvements facilities in designated regional growth centers, along facilities with one terminus in a center, or within ¼ mile of transit passenger facilities or within one mile of existing and planned transit station areas for pedestrians and within three miles for bicyclists. It also prioritizes locations that overcome a barrier (such as crossing a freeway or major arterial, or that remedy a missing link in the existing nonmotorized network. Transportation 2040 completes approximately 382 miles of new regional off-road walk and bike trails."

Financial Strategy:

Comment and Request for Action: T2040 should result in a shift in the “playing field” in the allocation of new revenues between highway and transit investments. Instead, T2040 continues past practice, allocating a larger percentage of new revenues to state highways ($22.4 billion) than to Sound Transit and local transit agencies ($20.3 billion). Page 89 of the draft plan states that “The region’s multicounty planning policies call for efficient use of the existing transportation facilities before investing in capacity investments.” However, only $2.9 billion of the funding in the constrained plan is used for traffic management and transportation demand management strategies to make the best use of existing facilities vs. over $36 billion on improvements to State highways. Only $300 million is allocated to regional non-motorized improvements.

Adding investments for transit and non-motorized improvements consistent with the edits in the section above should address shifting the “playing field.”

Sections of the financial strategy discuss conflicting methodologies for setting transportation fees and tolls, sometimes saying they should relate to user benefits, other times saying they should relate to costs and impacts of system use. The financial strategy should clearly state that transportation fees and tolls should relate to both the benefits the users receive and the costs that the users impose on the system.

Specific Language Changes: “In the central Puget Sound region, decision makers have been deliberately examining an approach to fund transportation through fees and tolls that apply to users of the transportation systems and services. Transportation 2040 sets out broad direction that moves the region toward a sustainable future in which investments can be made when they are needed, in a predictable manner, with revenues generated from those who benefit from the investments or those who create impacts on the overall transportation system and the environment. This change cannot occur overnight, but rather will only be the result of many individual steps, including legislative actions at the state and federal level. The specific path to a more sustainable approach to transportation finance cannot be known in advance with certainty..."
Comment and Request for Action: Transit revenue needs assumptions do not take into account recent changes in the funding situation of local transit agencies due to the “Great Recession” since work on T2040 began in 2007. Information regarding the current crisis in funding local and regional transit operations should be discussed under the “Current State of Transportation Finance” section.

Page 56 – Chapter 4 – Current State of Transportation Finance section

Specific Language Changes: “Local transit authorities’ primary source of funding is the sales tax. With the loss of Motor Vehicle Excise Tax revenues the local transit operators are increasingly dependent upon the sales tax, which is a less stable source of revenue, rising and falling with other economic factors. Due to the recession that began in 2008, local and regional transit agencies have experienced significant reductions in sales tax revenues, causing many agencies to increase fares and cut transit service. Because the base year of Transportation 2040 is 2006, these impacts are not included as part of the base financial assumptions in the plan.”

Comment and Request for Action: T2040 should be stronger regarding the long-term use of tolling revenues or user fees for transit, non-motorized system improvements and transportation demand activities.

Page 63 – Chapter 4 – Guidance on the Use of Tolling Revenues section- paragraph 2

Specific Language Changes: “Transportation 2040 advances the notion that road tolling must come with a strong commitment to dedicate revenues to the purpose of improving mobility, in the form of direct investments in transportation systems, or offsetting other existing transportation taxes and fees. Beyond this basic commitment, there are likely to be other specific constraints that get placed on the use of revenues from road pricing. Possibilities include at least the following:

- Limit the use of revenues to the corridor, or geography from which the revenues are generated
- Constrain revenues to only road investments
- Allow revenues to be used to support multi-modal investments, including transit, or other high occupancy vehicle services, pedestrian and bicycle improvements and transportation demand strategies
- Remit some, or all, revenues to users of the transportation system through a reduction in, or elimination of, other transportation related taxes and fees”

Page 63 – Chapter 4 – Guidance on the Use of Tolling Revenues section- paragraph 4

Specific Language Changes: “In the near-term, tolling will take the form of high-occupancy toll lanes, and individual facility toll financing. In these instances toll revenues are essentially dedicated to making the investments in these corridors possible, and supporting the operations of these corridors directly, or indirectly. Supporting investments might include transit services, non-motorized transportation improvements, or transportation demand strategies within the corridor that provide an alternative mobility option.”
• Re-evaluation of Projects in Constrained and Fully-Programmed Plans:

Comment and Request for Action: During the approval process for the Preferred Alternative it was recognized by both the Regional Staff Committee (RSC) and the Transportation Policy Board (TPB) that projects admitted to the Preferred Alternative had undergone a limited amount of screening for consistency with V2040. As a result, the RSC and TPB recommended, and the Executive Board approved, a recommendation that a re-evaluation, or re-screening, process be developed that explicitly assesses key V2040 policy areas. It is critical that this rescreening include quantifiable measures for each criteria and that this process lead to revision of the project list included in the plan, as opposed to simply prioritizing projects for federal fund distribution.

Page 17 – Executive Summary – Next Steps, item #5

Specific Language Changes: “5. Following adoption of the plan a project and program prioritization process for reevaluating and prioritizing projects included in the plan to insure support for implementation of Vision 2040 will be developed. The project rescreening based on consistency with Vision 2040 plan implementation will be completed in approximately two years, starting in summer of 2010.”

Page 116 – Chapter 7 – Plan Amendment and Prioritization

Specific Language Changes: “Implementation of Transportation 2040 will evolve, having a mechanism based on adopted regional policy for:
• Admitting future actions, projects, and investments to the plan and determining their status upon admission
• Removing existing actions and investments from the plan if appropriate
• Changing the status of actions and investments within the plan
• Assigning priorities to actions and investments. This would introduce more rigor/due diligence to more closely align regional policy with investments.

These mechanisms will be developed and will include a process for re-evaluating and prioritizing projects included in the plan to insure support for implementation of Vision 2040. These mechanisms will include the development of objective and measurable criteria. Following development of this mechanism, PSRC staff and advisory committees will conduct the re-evaluation of projects and develop a major amendment to Transportation 2040 within two years.

Each of these steps constitutes an amendment to Transportation 2040. Minor amendments that demonstrably have no negative impact on the regional air quality conformity determination and do not require additional environmental review under the State Environmental Policy Act (SEPA) will be processed by action of the Executive Board. Major amendments (such as the admission of major new investments) that require additional SEPA review or potentially have a large impact on the regional air quality conformity determination will preferably be completed at the regular plan update intervals specified by federal and state law. Major amendments can be processed on an as-needed basis by the General Assembly in cases where the Executive Board finds sufficient need to

March 9, 2010
do so. Figure 41 shows the structure of Transportation 2040 and the plan amendment and prioritization process.

PSRC will develop and implement administrative procedures that enable these processes to occur consistently, fairly, and in accordance with VISION 2040. The Executive Board will adopt such procedures with appropriate assistance from its supporting staff and committees. The procedures developed should utilize a common evaluation framework where possible, and should explicitly assess key VISION 2040 policy areas including but not limited to:

- Support for the regional growth strategy, including focusing growth in regionally designated centers
- Reducing greenhouse gases
- Reducing vehicle miles traveled
- Freight mobility
- Sustainable funding
- Equity and environmental justice
- Reducing impacts on Puget Sound water quality

Note: At its meeting on 1/14/10 the Transportation Policy Board recommended that “Addressing Congestion and Mobility” be added to above the bulleted list of VISION 2040 policy areas to be addressed in the prioritization process.

The evaluation framework will be consistently applied at all stages of the regional transportation planning process, including the evaluation of projects for federal Transportation Improvement Program (TIP) funds, monitoring the Transportation 2040 Plan, and monitoring of the transportation system. In addition, the procedures must address all pertinent federal and state laws and planning requirements, including the principle of fiscal constraint.”

- Growth in Centers:
  **Comment and Request for Action:** City staff have raised concerns that there is not enough quantitative information from PSRC’s analysis of the preferred alternative for the draft Plan to evaluate whether it supports growth in designated regional growth centers and within metropolitan and core cities. Information provided in the Draft EIS indicated that most of the alternatives reviewed at that time resulted in a shift in of employment away from Seattle’s designated centers. Directing future growth toward the region’s existing urban centers is one of the foundational elements of Vision 2040 and the Federal government’s new Livable Communities Initiative, which links transportation, land-use and sustainability.

We ask that PSRC provide additional data, graphics and analysis on the growth impacts of the transportation network included in the draft T2040 plan. This data should be categorized by regional geography types (center type, city type, location within UGA) consistent with Vision 2040, including both percentage change and absolute numbers. These categories should also be broken further broken out by county, subarea and SMART corridor.

March 9, 2010
Social Equity (Environmental Justice):

Comment and Request for Action: During the DEIS review, the City of Seattle raised concerns about social equity when reviewing plan alternatives. The draft plan only included 4 sentences about equity in the Executive Summary. There is no section or information about equity in the body of the plan. The Environmental Justice appendix was released less than a week before comments were due, therefore City of Seattle staff have been unable to conduct a detailed review.

PSRC should add a section about social equity with supporting data and graphics to the body of the draft plan.
March 9, 2010

Ms. Marina King
PSRC
1011 Western Avenue, Suite 500
Seattle, WA 98104

RE: DRAFT TRANSPORTATION 2040 PLAN (DRAFT PLAN)

Dear Ms. King:

The City of Tacoma is pleased to submit these comments on the above referenced Draft Plan.

We appreciate that the Draft Plan does explicitly address the comments we set forth in our letter of July 27, 2009 on the Draft EIS (associated with this Draft Plan). We also appreciate that the Draft Plan moves the region forward on many of the issues that we consider most important. Specifically, the Draft Plan: (1) identifies capacity improvements that strategically expands not just roadways but also transit and nonmotorized facilities; (2) explicitly addresses improving air quality and stormwater runoff; (3) includes a specific strategy to address State greenhouse gas (GHS) goals and vehicle miles travelled (VMT) reduction benchmarks; and, (4) focuses on incrementally building community support for the expanded use of tolling to address projected funding shortfalls.

However, it is our considered opinion that in the very near term: (1) the proposed roadway capacity improvements need additional scrutiny, particularly given the limited funding available; and, (2) the proposed GHG and VMT strategy needs to be fully developed and incorporated into TRANSPORTATION 2040. The Draft Plan does contain "Plan Amendment and Prioritization" language that is explicitly designed to provide the mechanism to address these issues but currently does not include an explicit implementation timeline.

We recognize that we cannot give conditional support to adoption of the Draft Plan. So, we will support adoption of the Draft Plan as currently drafted; it does move the region forward in the right direction. However, we will continue to advocate that the "Plan Amendment and Prioritization" process called for in the Draft Plan be fully implemented by 2013.

Thank you for considering these comments.

Sincerely,

Marilyn Strickland
Mayor

Cc: City Council and City Manager
March 5, 2010

Robert J. Drewel, Executive Director
Puget Sound Regional Council (PSRC)
1011 Western Avenue, #500
Seattle, WA 98104-1035

RE: Draft Transportation 2040 Plan

Dear Mr. Drewel:

Thank you for the opportunity to provide comments on PSRC’s Draft Transportation 2040 Plan. In this letter are stated a set of policy-related preferences for implementation of the Plan and guidance on how to evaluate these preferences relative to local and regional policy. In addition, within the Attachment, you will find more detailed comments related to the actual Draft Transportation 2040 Plan document.

Regional Growth Strategy

We applaud the development of a plan that strives to support the Vision 2040 Regional Growth Strategy. That strategy calls for nearly all of the region’s population and employment growth to occur in the Urban Growth Areas. The criteria for prioritizing projects that are included in, added to, or removed from the Transportation 2040 Plan should reflect the Regional Growth Strategy as a whole, including but not limited to regional growth centers. In addition, those criteria should strengthen support for Vision 2040 policies to encourage shifts to mass transportation and reductions in vehicle-miles-of-travel and green house gas emissions.

The shares and pattern of growth in the Regional Growth Strategy differ for the counties within the region. However, it is difficult to discern the projected level of transportation service created at any particular location by implementing the Plan, given that the
discussion of plan impacts is at the regional scale. The Transportation 2040 Plan, and supporting technical documentation in the final environmental impact statement, needs to make it clear how the Transportation 2040 package aligns with and delivers the Regional Growth Strategy and the growth anticipated within Snohomish County. The Transportation 2040 Plan and implementation of the Vision 2040 Regional Growth Strategy must recognize that the unincorporated parts of Snohomish County's Southwest Urban Growth Area are unique in the region in that they are anticipated to receive high levels of growth. Much of this growth is expected to occur along transit corridors. We continue to feel that Transportation 2040 and underlying technical work are not fully capturing this unique "geography." In addition, some jurisdictions in Snohomish County may face challenges with the adoption of updated growth targets in response to the Regional Growth Strategy. As we strive to implement the provisions of Vision 2040 and Transportation 2040, flexibility will be the watchword as acknowledged by this draft plan.

**Congestion Management**

The Plan's approach to congestion management appears to be a solid multi-pronged approach that looks to land use planning, demand management and operational efficiencies – as well as strategic infrastructure capacity expansion for all travel modes. The Plan appropriately recognizes the linkage between transportation and land use – and the importance of land use in reducing travel demand and influencing mode choice. Improving transit service is a key element of this plan, as indicated by the projected investment level in transit service and road improvements where transit is or will be provided. Despite the substantial effort, the projected regional increase in transit share of commuter trips and change in per capita VMT is disappointingly low. Corridor-specific improvements could be hidden by regional figures; however, if the figures are correct, the projections may need revisiting.

Local trips can, and do, contribute to congestion on regional roadways. Therefore, it would benefit the regional system to reduce local auto trips and replace them with walking or biking trips. In addition, the majority of transit trips begin and end with a pedestrian or bike trip. While the regional trail system in Transportation 2040 will provide a valuable non-motorized spine, its traffic-carrying capacity will not be realized until good pedestrian/bike connections with neighborhoods and destinations are created. A regional grants program to local governments for pedestrian and bike facilities designed to develop these connections and support transit, and also removing auto trips from regional roads, could help bring this about. Such a program could be a very cost-effective regional strategy to reduce congestion and greenhouse gas emissions, and to promote public health.
Greenhouse Gas Reduction Goals

Land use policy is characterized as a foundation of the Plan’s greenhouse gas reduction strategy, although changes in development patterns are projected to produce only a 6% reduction in greenhouse gas emissions over the life of this plan. We understand how the slow pace of land use change in a mature urbanized region like ours makes it difficult to alter transportation trends quickly. While the plan is a good start for reducing greenhouse gas emissions, it should acknowledge that additional changes will be needed in the future to align the plan with adopted goals for greenhouse gas emissions and for vehicle miles traveled.

PSRC recognizes improvements in transportation technology will likely reduce emissions of greenhouse gases throughout the region even though the plan’s projected reduction in per capita vehicle miles traveled does not reduce the total vehicle miles traveled in the region. While technology will not provide a complete “fix” for our pollution and climate change problems, benefits through technological innovation should not be discounted and, in fact, should be encouraged.

Snohomish County formed a Green Ribbon Climate Task Force during 2008 to study and make recommendations related to sustainable climate and energy initiatives that local governments should pursue. The Task Force published its report in January of 2009 with recommendations and strategies regarding buildings, transportation, solid waste, and natural resource management to help Snohomish County reach its climate change goals and reduce overall energy consumption. The Task Force found that 63 percent of the county’s greenhouse gas emissions are related to transportation and that proactive solutions will be necessary. The Task Force transportation recommendations deal with climate change and energy consumption through education, technology, land use, transit, and non-motorized strategies. We highly recommend that PSRC refer to the Green Ribbon Climate Task Force’s report and recommendations as a guide in implementing the regional provisions of Vision 2040 and Transportation 2040.

State, regional, and local agencies need to scientifically study, establish, and then adopt specific standards for reducing greenhouse gas emissions. Reductions would be achieved by pursuing Vision 2040/Transportation 2040 strategies as well as by implementing local control measures adopted by cities, Snohomish County, and special districts. Importantly, state, local, and special districts should assume leadership in employing new technologies that reduce greenhouse gas emissions and vehicle-miles-of-travel.

Transportation Financing / Direct User Fees for Transportation / Highway System Tolling

Snohomish County understands and supports the principle of direct user fees as the basis of funding transportation improvements and programs. Road tolling as part of a
strategy to finance regional transportation will be essential towards the year 2040. The studied and incremental implementation of road tolling should be accomplished in a manner that will ensure effectiveness, fairness, protection of privacy, and not aggravate congestion on arterial roads where transit service is largely delivered. In addition, we encourage PSRC to continue identifying and analyzing other types of direct user fees to supplement tolling.

The phasing-in of tolls will be critical to studying their effectiveness and achieving public support. Implementation of tolling on high-occupancy toll (HOT) lanes and individual facilities (i.e., heavy-use bridges and freeways) should be proven effective and fair before moving towards a “comprehensive approach” to road tolling. Implementation of tolls can and should vary in terms of timing and degree depending on the financial needs and level of service experienced by an individual county.

We are currently witnessing significant cuts in transit service, driven in large part by drops in traditional revenue (sales tax) related to the economic slump. Until the funding structure for transit is more reliable, it seems unlikely that we will see significant service expansions in the near term, potentially frustrating the Plan’s important transit elements.

The task of redesigning the present system of transportation financing will fall primarily to local, state, and federal government. It is essential that PSRC continue to be a partner with the state and local governments in supporting efforts in researching financing options and formulating sustainable regional and local multimodal transportation funding.

**Monitoring and Evaluation of Plan Achievement**

The general approach for monitoring performance in achieving the goals and principles with respect to Vision 2040 and Transportation 2040 is the beginnings of a good idea. We must devise an effective and accurate method for monitoring the performance of the Transportation 2040 Plan in achieving goals related to development density and patterns, efficient transportation levels of service, effective transportation financing and reductions in greenhouse gas emissions. Important to transportation will be monitoring the effectiveness of transportation projects and programs to serve planned land use consistent with the public’s willingness to contribute revenues. While land use patterns change slowly, it would be worthwhile to revisit travel forecasts regularly to monitor travel behavior and trends. Regular monitoring could detect more reductions in per capita VMT than the Plan currently projects, and which seem entirely possible under reasonable fuel price and development scenarios, with important potential consequences for the Plan. Likewise, potential changes in federal EPA designations and ground-level ozone standards (as anticipated on page 47) can be better responded to with such regular monitoring and as new technology is developed and implemented.

Monitoring should extend beyond a regional analysis and should look at sub regional performance. The sub regional analysis could occur at a scale consistent with SMART corridors, PSRC’s small areas, combinations of UGAs within counties or groupings of
census tracts. Snohomish County city and county growth targets will need to be a central consideration in monitoring performance of local plans relative to Vision 2040 and Transportation 2040.

**Regional Transportation Improvement Programming and Grant Eligibility**

The relationship of the Transportation 2040 Plan and the availability of federal and some state funds is of critical importance to Snohomish County and it is appreciated that PSRC has also recognized this. Transportation 2040 states the importance of the Regional Transportation Improvement Program (TIP) in programming regionally significant projects that are part of the metropolitan transportation system (MTS). The Transportation 2040 Plan further recognizes that local and state improvement projects not specifically listed on the MTS are also consistent with the Plan by including programmatic investments for these projects in the financially constrained portion of the plan. Importantly, these non-MTS improvement projects that meet the selection criteria based on the multi-county planning policies are eligible for federal and state grants and if found to be consistent with the policies of Vision 2040 and Transportation 2040, can be included within the Regional TIP.

We appreciate your thoughtful and continued leadership in our efforts to adopt an effective transportation plan that will serve the Central Puget Sound Region towards the year 2040. If you have any questions or need additional information, please feel free to contact me at your convenience.

Sincerely,

Aaron Reardon  
Snohomish County Executive

Dave Gossett  
Snohomish County Council Chair

Attachment (1)
ATTACHMENT

TECHNICAL REVIEW OF PSRC’S DRAFT TRANSPORTATION 2040 PLAN

Included here are Snohomish County staff comments that address the technical contents of the PSRC Draft Transportation 2040 Plan.

Chapter 1: Toward a Sustainable Transportation System

Page 27, Station Area Planning, Figure 6 – Potential Transit Station Areas for light-rail transit should be recognized at I-5/164th Street SW and I-5/128th Street SE at least in terms of the Full-Unconstrained Transportation 2040. Both of these proposed station locations are within urban areas designated by Snohomish County’s GMA Comprehensive Plan and Transportation Element.

Additionally, bus-rapid-transit (BRT) stations along State Route 99 should also be documented within Snohomish County (e.g., Edmonds Community College station).

Chapter 2: A Strategic Approach to Regional Mobility

Page 37, Congestion Management: Outcomes, Figure 12 – The massive reduction in freeway delay hours seems unrealistic and may be relying on travel model forecasts that have been questioned by Snohomish County as to their relevance at the county- and subarea-level.

Page 38, Growth in Trips by Travel Mode, Figure 14 – The percentage growth in trips by mode of transportation should be accompanied by an adjacent figure showing the absolute amount of growth in vehicle and person trips. This figure also shows “Shared ride” growing less than population – even less than SOV trips – contrary to the assertion in the text cited above.

Page 42, Freight Mobility – The “urban core” may not always be the best/most efficient location for “freight-intensive” land uses – policies and strategies should recognize that industrial lands are important to the regional economy and are appropriately located within UGAs, but that the optimal location for freight-intensive uses depends on many considerations and may not be within the “urban core” (if that means the central portions of the UGA). None of the cited MPPs addressing freight (in footnote 2 on page 42) state or suggest that freight-intensive land uses should be located within the urban core.

Chapter 3: A Sustainable Environment

Page 47, Reduce Greenhouse Gas Emissions – The discussion of reducing greenhouse gas emissions would be more helpful if it explained the specific legal and compliance requirements of RCW 80.80.020 and RCW 70.235.020. The discussion as currently presented leaves the reader with the impression that all levels of government have to comply with some firm goals and benchmarks. Unfortunately, the state code cited above doesn’t seem to have universal applicability. At minimum this issue needs clarification.

The RCW citations on pages 47 and 48 appear to be wrong. The correct citation for the state’s VMT reduction goals is RCW 47.01.440.

Page 49, Reduce Greenhouse Gas Emissions, paragraph 3 – The section on Pricing and Choices is a bit confusing in regard to the expected reduction in regional greenhouse gas emissions due to full, T-2040
investments. Is the 9% reduction relative to all transportation and stationary source emissions or just transportation? Some clarification is needed, particularly since a 9 percent reduction of only transportation emissions, after 200+ billion dollars is expended, would be disappointing.

Chapter 4: A Sustainable Financial Framework

Page 56, Emerging Issues in Transportation Finance – overall, a good summary in box

“Cost Burden across User Groups.” “Commuters on busy roadways during the peak travel period impose delays on other users.” This is played off the opposing “heavy vehicle” user for the pay structure. Policies should be created without “either/or” oppositions. The wording could be improved to make it less inflammatory to those who may be asked for tolls or fees, whether they are driving a heavy vehicle or a motorcycle (households may have multiple types of users or individuals may fit in more than one category). Can workers truly vary work hours:

- Without mass acceptance by employers?
- Without employer contributing to cost of congestion tolling?
- If workers are not allowed to vary schedule, work off-site?
- Without Sounder trains, etc. running at different hours and more often?
- Without local work sites equipped with computers so that workers can vary with trips to work site?
- Without safety guaranteed at bus stops, buses, trains?

Page 61, Early Action to Support State, Local, and Regional Investments – Early action of road and property tax levy adjustments, impact and development fees, and coordinated parking pricing – is this possible unless poor economy improves? (Current work with legislature is one good sign – Transportation Benefit District changes have encouraged more agencies to implement a vehicle license fee).

Chapter 5: Regional Programs and Projects

Page 78, Transportation System Management and Operations, Figure 29 – Paine Field/Boeing should be recognized as a Traffic Management Center. Paine Field is a designated Manufacturing Center within Snohomish Counts GMA Comprehensive Plan and PSRC’s Vision 2040. The Boeing Plant is one of Snohomish County’s largest employers.

Chapter 7: Future Planning, Programming, and Implementation

Page 112, Monitoring and the Congestion Management Process – Mentions SMART Corridor baseline reports published in January (??) – this may need updating.

Page 116, Plan Amendment and Prioritization – The discussion of the “common evaluation framework” and the bulleted list of “criteria” on this page is somewhat unclear concerning their relative importance. Clarifying language should indicate that all designated urban growth areas will be considered in these evaluations according to their position within the overall regional growth strategy, and not just areas within regionally designated growth centers.

General Comment - The priority given in the plan to maintenance and preservation of the existing system is appropriate. Safety programs, such as “Target Zero” and efficiency and demand management programs are also good elements of the plan. Since “9/11” security has also become an important issue requiring vigilance
and investment. Preparedness and recovery are two important elements of security planning. These are good additions to the plan.

Appendix B: Program and Project List

Please number the pages within this Appendix. Comments provided here are based on the “electronic” page numbering.

Tables showing project lists - should include project cost estimate data that is sub-totaled by “corridor” and county, as well as by project type and by “constrained” and “unprogrammed” categories.

Page 9, West Snohomish SMART Corridor, Arterial Projects table – Please contact the City of Everett regarding the cost and description of the 112th Street SW/Beverly Park Road Project (ID 792 and 1956). The County portion of this project is complete and this brings into question the $74 million cost estimate. The description and cost estimate will likely need to be updated.

Page 13, East Snohomish SMART Corridor map – Meridian Yachts is no longer a major employer in Arlington.

Page 14, East Snohomish SMART Corridor Transportation 2040 Projects map – Segments of Centennial Trail are not shown (between 152nd St NE and Arlington City Line). The major segment from North Arlington to the Skagit County line is currently under construction. This will place great importance on completing the “missing link” through the city of Arlington within the near future, thereby creating a continuous trail of over 20 miles between the city Snohomish and Skagit County.

Page 15, Arterial Projects Table – Please note that the Granite Falls Alternative Route Project (ID 1950), in the Eastern Snohomish SMART Corridor, is currently under construction with all funding obligated. The project should be removed from the table.

Appendix H: Analysis Tool Documentation

The description of the new models and how they are expected to improve forecasting is spotty – fairly clear in some instances, not so clear in others. The last section on travel characteristics includes a lot of data and assumptions, but little explanation of how it used beyond simply as input to the economic forecasting model.

The text acknowledges that the new modeling tools under development have not yet reached full capabilities – and may not be fully developed for three more years. When that happens, it would be reasonable to expect the PSRC to revisit the analytical results from the incomplete modeling that are imbedded in T2040, but there is no indication that will occur. We would strongly encourage the plan to include a formal commitment to such a revisit.

Appendix J: Regional Freight Strategy

The “urban core” may not always be the best/most efficient location for “freight-intensive” land uses (page 8) – policies and strategies should recognize that industrial lands are important to the regional economy and are appropriately located within UGAs, but that the optimal location for freight-intensive uses depends on many considerations and may not be within the “urban core” (if that means the central portions of the UGA). None of the cited MPPs addressing freight (in footnote 2 on page 42) state or suggest that freight-intensive land uses should be located within the urban core.
Mr. Gulbranson,

Attached is the City of Port Orchard's response to PSRC 2040 Transportation Plan.

Please let me know if you need anything further or if you have any questions.

Thank you,

Patti Kirkpatrick, CMC
City Clerk/Asst to the Mayor
Administrative Services Director
City of Port Orchard
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360-895-9029 (fax)

2010 Census "It's in our hands - Let's all do our part"

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All e-mail correspondence to and from this address is subject to the Washington State Public Records Act, which may result in monitoring and archiving, as well as disclosure to third parties upon request.
Response To The PSRC Vision 2040 Transportation Plan

The City of Port Orchard has reviewed the Puget Sound Regional Council’s (PSRC) Vision 2040 Transportation Plan, and offers the following comments:

While we agree that the amount of new residents the state will experience between now and 2040 will increase significantly, and plans to move these people between venues will require significant planning and investment, we disagree with many of the basic assumptions outlined in the plan. Many of the ideas being advanced in the Vision 2040 plan may be acceptable, and actually pragmatic, for parts of King County and its highly-populated environs, but we strongly question the validity of what amounts to little more than a “King County Solution” being forced upon other parts of the state. Due to geography, topography, and existing population distribution, what works for Seattle, King County and other portions of the I-5 Corridor, clearly doesn’t even begin to work elsewhere — especially here on the Kitsap and Key Peninsulas.

We also see many of the proposed “solutions” as highly punitive, punishing people for “doing the right thing” where the environment is concerned. One example would be switching from gas-guzzling SUV’s to hybrid vehicles — and in many cases paying a premium price for those vehicles — and then being punished with the proposed Vehicle Miles Driven (VMD) Tax, because they now consume less fossil fuel, generating less gas tax revenue.

We view this as a fundamentally unjust financial outcome, especially for people whose original goal was to try and protect our environment, consume fewer natural resources, and who were originally willing to step up and “walk their talk,” by paying the increased purchase price of a hybrid vehicle to do so. We believe a VMD Tax will discourage these people from making that same mistake in the future.

On Page 53, the report states, “…decision makers have been deliberately examining an approach to fund transportation through fees and tolls that apply to users of transportation systems and services.” We are not at all convinced this is a good idea, and believe it will actually be a severe detriment to long-term economic development.

States experiencing the greatest amount of economic development before the nationwide recession — places like Texas, Nevada, Idaho, North and South Carolina, Georgia, Tennessee, Mississippi and more — are all states with excellent and ample roads — and no tolls. The states with the greatest amount of toll roads — New Jersey, Florida, and Ohio for example, are all states in spiraling economic decline with deteriorating infrastructure. They are also all states with environmental issues related to
air pollution, much of which can be directly attributed to the sheer number of cars spewing toxic gases into the environment while waiting at toll booths — in spite of the advances made in electronic collection of tolls

With these issues in mind, we dispute the statement on Page 53, that, “…the broader goals and outcomes represent a shared vision.” We obviously do not share this so-called “vision.”

On Page 54, there is a notation concerning the increased transportation infrastructure costs over the past few decades, and the “…costs of mitigating environmental impacts and increased urban land values.

We believe this is an unintended consequence of the Growth Management Act (GMA), which as it’s been interpreted and implemented completely ignores the basic law of supply and demand, and is a major contributor this problem. The City of Port Orchard recommends that the PSRC explore advocating for a complete overhaul of the GMA, with the express purpose of lessening its unintended consequences, and restoring private property rights as the primary outcomes.

On Page 55, there is a section concerning the movement of freight during peak travel times, and how that will be “…compromised by growth if we fail to address the underlying demand for business-related movement of people and goods.”

It goes on to state that managing peak demand will require a broad range of approaches, including “…strategic investments in new infrastructure, high-occupancy services, time of day tolling, land use and development coordination and other innovative strategies.” It later goes on about how changes in technology will erode the purchasing power of fuel tax proceeds.

What we read into that, as well as this entire document, is a series of “one-size-fits-all” strategies that basically can be reduced to tolling every available thoroughfare on which cars travel, as outlined on Page 60, and investing the majority of revenue generated from those tolls on mass-transit boondoggles, rather than improving and upgrading the roads themselves so cars, people and freight can move unimpeded by congestion.

This approach fails to take into account the reaction of the taxpayers who already fund local transportation maintenance through their ever-rising property taxes. The political fallout of the approach as proposed can’t be calculated, but will reach a point of citizen pushback, as we are already beginning to experience as the legislature heaps more taxes upon our citizens.

Should such a level of tolling as outlined here eventually be implemented, business will also reach a point of rethinking the benefits of continuing to be located in this region and explore other options, such as relocating to more business-friendly locales, and taking the jobs they create with them. The majority of jobs in not only this state, but in our
entire nation are created by small business. Small businesses usually locate in the area where the entrepreneur lives, often, but not always filling a local niche. However, it is the technologically innovative jobs of the future that will be the highest paying, and an overly taxed transportation infrastructure will eventually chase those jobs away, and/or eliminate our region from consideration for expansion by local companies already here, as well as severely handicap our recruitment of high-tech companies from other states.

While this may disagree with the thinking that users of the infrastructure should pay for it, the economic reality is that entrepreneurs — who we need to retain to create and provide the jobs for the future population we anticipate — are highly mobile. They won’t stay married economically to an area where the cost of doing business reduces their profitability. Entrepreneurs also pay the most in property taxes, which at the local level fund transportation infrastructure.

The same holds true for big business. For example, Boeing warned the state for years that its failure to address transportation issues was a major detriment to its continued presence in this area, and as we witnessed, helped drive the decision to locate the second 787 production line in South Carolina — a state with good transportation infrastructure and no toll roads.

The condition of our state’s current transportation infrastructure makes it difficult to conduct business regionally. Time is money, and it’s very costly to move people and equipment between plants located from Everett to Renton. Meanwhile the Vision 2040 plan suggests increasing the cost of doing business through tolling as the answer. How many more ways can we find to shoot ourselves in the foot, and help states like South Carolina steal our major employers?

It has been a long, slow process, but if you look closely, you’ll find Boeing is reducing its corporate footprint in Washington, albeit slowly but steadily, and has been for years. The large new shopping center sitting just South of Boeing Renton is physically located on top of what once was a major Boeing facility.

Moving its headquarters to Chicago, should have been a 2x4 to the side of the head of the legislature and Governor. Our state’s response? A loss of 900 jobs will not matter that much. That kind of arrogance, and the long-held philosophy that business is an adversary instead of an asset, is clearly reflected in this plan.

The document arrogantly summarizes that “…congestion provides a misleading signal as to which facilities or routes need more capacity. We believe this is not a misleading signal. Congestion demonstrates exactly which roads demand increased capacity. Additionally, there is absolutely nothing “innovative” about tolling. It is a regressive, restrictive, and proven economically defeating strategy.

We also question how the tolls collected will be allocated. Will tolls collected in Port Orchard be spent directly in Port Orchard and Kitsap County, or will they be aggregated
into prioritized projects covering the entire region? If so, those areas with the densest population will benefit most, and first, and be unfairly subsidized by the lower prioritized areas such as ours, which are already getting the short end of the stick as far as addressing our existing transportation needs.

Washington is not Europe where light rail solutions work because the geography is much more compact, with things much closer together than they are here. In fact, the distances between a number of European countries are shorter than those between several of our major population centers. The bottom line is, European topography lends itself to mass-transit much more cost effectively than ours does.

We strongly support telecommuting, and telework, and we believe as a region, we need to make substantial regional infrastructure investments that support that as part of a coordinated solution for reducing traffic congestion, and the need to travel great distances for work.

We also strongly support economically stabilizing the ferry system for the long term. Port Orchard considers the ferries as the “original toll road,” but the ever-increasing costs of ridership is a detriment to its continued viability, and a threat that will prove to increase highway use because even if we toll the highways as suggested here, they will be cheaper tolls than riding the ferries.

We believe a complete economic overhaul of the Washington State Ferry System is in order, but question whether or not the state has the political will necessary to take this task on, and challenge the ferry system unions, which we see as a major impediment to any progress being made on this front.

Also, passenger only ferries are a requirement for our region’s economic viability, and politically acceptable solutions for funding their construction and operation must be explored and found.

Conclusion:
In our view, this entire document is a little more than an arrogant, exceptionally poorly crafted, “politically correct” interpretation that obviously began with a pre-determined expectation of the eventual outcome, rather than an innovative, realistic approach of how to deal with the onslaught of population we will experience between now and 2040.

The so-called “solutions” offered in the plan will have their own set of unintended consequences, including severe, long-term economic decline, because job-creators are not going to make substantial investments in Washington if all we have to offer them are mass-transit and congested toll roads as the primary means of moving people and freight. If there aren’t enough jobs to support the increased population, because job creators choose to invest in more business-friendly places where they can move their goods to market efficiently and cost-effectively, the workforce will follow the economic opportunity those job creators offer in other, more forward-thinking locales. If that
happens, the projected population increases won’t materialize, and this entire document will become moot.

We have given some examples of what we believe is the problematic thinking that governs the projected outcomes contained in the Vision 2040 Transportation Plan. However, rather than invest the time to refute each and every point contained in this document, which would make these comments nearly as long as the document itself, it is the considered opinion of the City of Port Orchard that the Vision 2040 Transportation Plan is basically an ill-advised, fatally flawed, blueprint for economic failure.

And while we strongly detest what we consider a colossal waste of a monumental amount of taxpayer dollars, our recommendation would be to scrap the entire plan, start anew with a realistic set of assumptions, and an open mind that includes the full spectrum of possible coordinated solutions that address the unique and individual transportation needs of each sub-area of the Puget Sound region, as opposed to the closed-minded, politically correct, one-size fits-all, socially engineered King County solution this plan arrogantly brings forward as the “answer” to the serious challenges our region faces.
City of Poulsbo Comments on Transportation 2040

The following comments are provided, which primarily apply to Chapter 7: Future Planning, Programming, and Implementation:

1. We recommend expanding on the implementation language to include a policy statement that commits to developing phasing plans to maintain the overall balance in the county-wide and regional transportation network, and supporting/promoting local growth targets.

2. We appreciate the plan’s implementation language that commits to allowing the plan to evolve in the future. However, we request clarification of the wording “Minor amendments ... do not require additional environmental review under the State Environmental Policy Act (SEPA).” to show that this requirement means triggering SEPA review of the overall T-2040 Plan, as all projects would be subject to some form of SEPA review. We have an expectation that individual projects will change over time as our communities grow.

3. We recommend the plan provide for additional study of capacity needs and alternative solutions for the SR 305 (Poulsbo to Bainbridge) and SR 307/104 Poulsbo to Kingston.

4. We request the plan provide for additional study of the intersection of Noll Rd./Johnson on hwy. 305 which will need to be improved. That road serves 3 schools, a regional event center and most of the pending development on the east side of Poulsbo.

5. We request inclusion of a policy statement committing to a future study that will evaluate public preference/acceptance for using tolling versus a larger vehicle miles travel tax (VMT) or other funding alternatives. The tolling concept or VMT may be very hard for the public to accept.

6. The T-2040 trail projects for North Kitsap do not accurately reflect the current vision of a cross-jurisdictional, shared-use path, the Sound to Olympics Trail, linking our north end ferries, bridges, Bainbridge Island, Poulsbo, Kingston and Port Gamble. We need to complete the missing link between the cross state trail corridor and the Olympic Discovery Trail. A sketch is attached.

7. We recommend recognizing and emphasizing the Transportation Demand Management tool of telecommuting in the constrained element of the Preferred Alternative Transportation 2040 plan, in part as mitigation for proposed VMT and toll impacts on the commuting population of the four-county area.

Respectfully submitted by the City Council of Poulsbo.

Rebecca Erickson, Mayor
North Kitsap Study Area Exhibit

Map Legend
- OPG Properties
- N Kitsap Heritage Park
- Existing Logging Roads or County Trails

Sound to Olympics Trail

Hood Canal

Puget Sound

Puget Sound
March 9, 2010

Bob Drewel
Executive Director, Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-035

Dear Mr. Drewel:

Thank you for the opportunity to comment on the Puget Sound Regional Council’s (PSRC) Draft Transportation 2040 plan. This plan clarifies how crucial this juncture is for transportation planning in this region. Never before has our region faced the combined challenges of congestion, climate change, aging transportation infrastructure and declining transportation funding sources. The actions we take to address these challenges during the next three decades will be the most important legacy of our generation. It is critical that we take actions that will result in a future that is environmentally sustainable and encourages the type of growth that promotes transit use and healthy lifestyles. As a member of PSRC, King County welcomes the opportunity to help shape our future by contributing to the creation and implementation of Transportation 2040.

The Draft Transportation 2040 plan is consistent with the Vision 2040 plan in proposing a regional transportation strategy intended to protect and expand mobility through strategic transportation investments financed by a more sustainable funding structure. Through more concentrated land use, transportation demand management (TDM), pursuit of cleaner technologies, and more focus on non-motorized transportation, the plan also rises to the unprecedented environmental challenges facing our rapidly growing region. However, we do have three main policy areas of concern about the plan:

- **Land Use Strategies:** Under Vision 2040, many of our projected 1.5 million future residents will reside in center cities. In order to improve the environmental and cost efficiency of the region’s transportation system we should be focusing on development that supports transit corridors served by bus rapid transit and light rail. Our land use planning should have a close relationship with our transportation investments to ensure we can reach our goals.

- **Mode Shift to Transit:** Despite the plan’s impressive array of TDM practices, the transit mode share is expected to increase from 3% in 2006 to 4.9% in 2040. While this is a significant increase, the plan should also include additional strategies to improve the increase. The nine-county Bay Area has a transit mode share of 9.4% according to the 2000 Census which suggests we should set our goals higher.
• **GHG Emissions Goals:** King County emits approximately 50% of the Puget Sound region’s greenhouse gas (GHG) emissions. King County’s policy is to reduce GHG emissions by at least 80% below 2007 levels by 2050. By contrast, *Transportation 2040* would only reduce this region’s GHG emissions between 31% and 48% compared to 2006 levels by the year 2040. To be more consistent with the region’s largest county, we would like to see this plan consider setting more aggressive GHG reduction goals and additional strategies for achieving those goals. The Puget Sound region has the most mobility options in place and the most potential to reduce VMT and GHG emissions and should be leading the way.

In keeping with these three main concerns, King County urges the PSRC to address the following issues as part of the final plan:

• **Transit investments need to support growth center strategies:** Public transit best supports regional growth centers when transit services are prioritized where they can be most effective and productive. Language in the plan should emphasize service investments which prioritize frequent, fast and reliable transit service to growth centers that have supportive land use over geographic distribution.

• **Consider Equity and Social Justice:** Our regional transportation plan must also address communities with transit dependent populations to ensure that our investments serve those most in need.

• **Redefine Transit services of Regional Significance:** *Transportation 2040* specifies Bus Rapid Transit (BRT) as the primary example of fixed route bus transit of regional significance. Regional significance of transit service should instead be defined by core service with high ridership as identified by transit agencies to better reflect our transit system.

• **Arterial performance is critical to regionally significant transit services:** Implementation of highway tolling, congestion management practices and transit priority need to be implemented in a way that protects the arterial performance of regionally significant transit corridors. Our tolling strategy should also address arterial performance.

• **Meet GHG Reduction Mandates:** The plan should be as aggressive as possible in its efforts to combat GHG emissions with a goal of meeting or exceeding state and local GHG reduction mandates by pursuing policy, pricing, and technological solutions. Increasing reliance on public transportation, especially electrically powered trains, buses, and streetcars is a prime example of a practical technology-based GHG reduction strategy. The Puget Sound region has the greatest potential in the state to affect GHG emissions through transportation and land use policies.

• **Better analysis of health impacts:** The plan needs to provide more analysis of the health impacts of transportation decisions to better inform the choices we make as a region. Transit investments can help address our environmental quality and can create communities that encourage active lifestyles and more walking and biking.

• **Improved modeling can better draw connections between transportation and land use:** More understanding of the effects of high-capacity transit and expansion of
Mr. Bob Drewel  
March 9, 2010  
Page 3

our fixed-guideway system on land use patterns can better help us reach the goals of the plan.

- **Aggressive Tolling Timeline**: King County recommends aggressively implementing the schedule for tolling as outlined in the draft plan to ensure the initial steps are taken in the first decade. The plan should include strategies that make it clear to the public the timeline for implementation to provide certainty in planning as soon as possible. This will expedite our region’s move toward a more fair and sustainable financing program to pay for and manage our region’s transportation system.

- **Toll revenues should benefit corridors**: Toll revenues should be shared among state and local governments for multiple purposes, including transit and non-motorized improvements and used to finance or partially finance multiple modes within broadly defined transportation corridors. This will allow the transportation system the flexibility to respond to changes in travel demand and support other desired goals of the plan.

- **Include local projects within Transportation 2040**: Transportation 2040 includes projects identified as part of the Metropolitan Transportation System (MTS). The plan also includes, by reference, all local non-MTS arterial projects and a programmatic cost estimate for these facilities in the financial strategy. For jurisdictions pursuing Transportation Benefit Districts (TBDs), it would be helpful if the plan harmonized the plan in such a way that proposed TBD projects are considered eligible and consistent with the regional plan.

- **Consider a project prioritization process**: Investments on the project list should be evaluated by criteria that measure how they meet the goals of the Transportation 2040 plan. The criteria must include meeting GHG reduction requirements and the VMT reduction benchmarks. It should also support centers and other preferred development locations indentified in Vision 2040 by considering multimodal transportation systems and freight mobility. Developing a process to help assess projects can help attain the stated goals of the plan and reduce political friction.

King County appreciates PSRC’s responsiveness to our earlier comments on the DEIS, and we hope these comments prove equally helpful to PSRC as you refine the plan. We have attached additional technical comments regarding various sections of the plan for your consideration.

If you have further questions about the recommendations presented in this letter, please contact Chris Arkills, Executive Transportation Policy Advisor, at (206) 263-9648. Thank you for your consideration.

Sincerely,

Dow Constantine  
King County Executive
cc: Fred Jarrett, Deputy County Executive, Executive Office (EO)
Harold Taniguchi, Director, Department of Transportation (DOT)
Bob Burns, Acting Director, Department of Natural Resources and Parks
David Fleming, Director, Department of Public Health
Ron Posthuma, Assistant Director, DOT
Chris Arkills, Transportation Policy Advisor, EO

Attachment: KCDOT Technical Comments on Draft Transportation 2040
Comments on Appendix B, Program and Project List

Eastside SMART Corridor Bicycle/Pedestrian Projects lists
Project ID #s 4040 and 4041, Eastside BNSF, (Segment A and D – Renton to Snohomish).
This should be revised to include Eastside BNSF Segments A, B & D. Map should also reflect
all three segments – A, B, and D. The BNSF plan is comprised of four “segments” – Segment A
(Renton – SR522), Segment B (SR522 – Sammamish River Trail in Woodinville), Segment C
(Woodinville to Snohomish), and Segment D (Woodinville to Redmond). The BNSF Trail
presently is planned for Segments A, B, and D, that is, from Renton to Woodinville and south to
Redmond. The listing omits Segment B. Map is not quite readable.

Northeast King SMART Corridor, Arterial Project List
Project ID # 4555, Issaquah Fall City/Duthie Hill Road
We request that this project be moved from the Unprogrammed portion of T 2040 to the
Constrained portion of the Plan. The project is located in the urban growth area, it will support
non-motorized travel, and it is financially feasible, it is on King County’s Transportation Benefit
District project list. Please revise the project limits to from the Cascade Middle School to
Klahanie Drive SE, the new project cost estimate is $18 million.

Southeast King SMART Corridor, Arterial Project List
Project ID# 4551, 140th/a32nd Ave SE
We request that this project be moved from the Unprogrammed portion of T 2040 to the
Constrained portion of the Plan. The project is located in the urban growth area, it is on a T2
freight facility, and it is financially feasible (this project is on King County’s Transportation
Benefit District project list). Please revise the project description, project limits and project cost
estimate. This project will construct ITS improvements in this corridor from SE 240th Street to
SR 169, the estimated project cost is $5 million.

South King SMART Corridor, Arterial Project List
New Project, Renton Ave South ITS from S 112th St to Rainier Ave S
We request that this project be added to the constrained portion of the South King SMART
Corridor arterial project list. This project is located in the urban growth area, connects centers,
supports transit, and is financially feasible (this project is on King County’s Transportation
Benefit District project list). The estimated cost of this project is $4.5 million.

New Project, Peasley Canyon ITS from Military Road South to West Valley Highway.
We request that this project be added to the constrained portion of the South King SMART
Corridor arterial project list. This project is located in the urban growth area, connects centers,
and is financially feasible (this project is on King County’s Transportation Benefit District
project list). The estimated cost of this project is $2 million.

Airport Division Review Comments

We have numbered each paragraph/entry in the Regional Aviation System section from 1 to 33.
1. The paragraph beginning – The existing regional airport – Please refer to the Airport as
King County International Airport/Boeing Field not Boeing Field
a. Please add a better description of the different types of airports beyond the
simple general aviation or reliever airport. For example: King County
International Airport is Class II primary non-hub commercial service airport with nearly 300,000 annual aircraft operations.

4. Paragraph beginning – System improvements -- 4th line spelling “fore”

5. Paragraph beginning – The airport improvement – Again better definition of the airport types beyond general aviation. This would provide improved explanation and understanding

6. Paragraph beginning – General aviation – ADD some examples of improvements that airports are making to give the public an improved understanding of the nature of capital projects and there impact on service and capacity.

7. Paragraph beginning – Commercial Passenger – This paragraph continues to address the 3rd runway as a planned capital project instead of one that is in operation – see line 4 and continue onto page 102
   a. Reference the LATS work in the last sentence in the paragraph on page 102

8. Paragraph beginning – The Port of Seattle – What plans is the document referencing and are they not in operation, i.e. terminal, parking and runway.
   a. Is the KCIA (not Boeing Field) reference to our main runway and taxiway work completed over the past three years? KCIA is in a redevelopment process to add cargo land use space.

9. Paragraph beginnings – Implementation by – move this up to the earlier location in the document.

10. Paragraph beginning – Implementation of air cargo – this repeats the generalization in a paragraph 8. Be more specific and provide an indicator of importance, such as SeaTac is 18th and KCIA is 31st in national cargo operations.

11. Paragraph beginning – The third runway – is this another repeat or a reference to longer term facility improvements – it is unclear.

14 Paragraph beginning – Meeting Long Term – 5th line is again a reference to the “planned” 3rd runway. Remove and update.

   a. The PSRC should determine which of the LATS recommendations it agrees with or add others for inclusion into the Plan regardless of the Legislature’s action or inaction.

Transit Division Review Comments

Comments on: Congestion Management Process: Sustainable Mobility Section

Page 38: It appears that the reference to carpool growth in the sentence “Single occupant vehicle trips are expected to grow less than population while carpool, transit and walk trips are expected to grow considerably faster” is out of sync with Figure 14.

Comments on: Public Transportation Section:

Page 80: Use of the word “access” may not be appropriate. Access can be interpreted to mean extent of transit or geographic coverage. Transit that will support the region’s growth centers,
add to its economic vitality and have positive environmental impacts is transit that is attractive and competitive with automobile travel and accessibility is only one of the factors that impact the attractiveness of transit. Alternative adjectives might include “competitive”, “attractive”, or “productive”.

Page 80: Description of Core: The emphasis in this description should be on the service element rather than the land use. An alternative description might be: Light rail, bus rapid transit and high frequency local routes are considered core transit services. Core services are generally routed to and through areas with higher density population and/or employment. By providing frequent and efficient service to areas with higher densities and mixed uses, core services are expected to draw high ridership. Typically running all day, core service is intended to operate at high frequency and at higher speeds to the extent practical.

Page 80: Community Connector: The sentence that begins “Because of the land use pattern” confuses the service and productivity. In aggregate, community connector services provide access to transit for a large number of people. They differ from core services, however in their productivity potential. Suggest rewriting the sentence to read “Because of the land use pattern it serves, it is not likely to be very productive.” The sentence that begins, “Community Connector routes may evolve” could be rewritten to say “...may evolve into core services when transit demand and land use changes warrant it.”

Page 80: Specialized: The sentence that begins “Running only at specific times, it can be...” should be edited to read “…is generally high speed and express.” The ability to carry high volumes of passengers is dependent on the size of the transit vehicle and therefore not a very good descriptor of how the service differs from other service types.

Page 81: Bullet point that begins “Promote local transit.” In this bullet, and throughout the document, please consider how local and regional designations are used. High Capacity Transit will certainly facilitate many “localized” trips and those operators termed here “local” currently provide many “regional” trips. A more descriptive moniker is needed.

Page 81: Bullet point that begins “Develop complete...” should finish “…including complete network of lane restrictions and facility management...”

Page 83: Figure 33 lists Seattle’s UVTN as core bus transit service projects but Seattle will not operate those services.

Page 84: Additional Public Transit Investments: This section explicitly calls out Sound Transit and how changes to it’s long range plan will create opportunities for amendments to Transportation 2040 but there is no mention of how/whether such opportunities exist for other operators making changes to regionally significant services or facilities.

Comments on: Regional Roadway Systems:

Page 80: High Occupancy Toll Lanes and Individually Tolled Facilities: Thank you for including the last sentence in the fourth paragraph. The importance of the HOV network remaining true to the original transit speed and reliability purposes cannot be stressed enough.
Comments on Appendix D Metropolitan Transportation System

Transit Systems:
The description of regionally significant transit service is unclear. Designation of Regional significance should reflect use and relative importance of the transit service. It should be clear that regionally significant fixed route transit should include more than rail, ferry, express bus and Bus Rapid Transit. Transit operators, along with PSRC should be involved in designating regionally significant transit services so that definitions can be precise and appropriately represented in any MTS mapping or description.

Map D-3: MTS Regional Transit Component:
The map needs to show the F Line Burien-Renton BRT service as part of the constrained investments. The map also needs to show the Delridge RapidRide as an un-programmed investment.

Map D-3: MTS Regional Transit Component:
The only fixed route bus transit that is shown on this map is BRT service. This should be expanded to include additional services as suggested in our “Redefine Transit Services of Regional Significance” comment.
March 17, 2010

Puget Sound Regional Council  
Attn: Marina King  
1011 Western Ave, Suite 500  
Seattle, WA 98104-1035

Dear Ms. King:

King County appreciates the opportunity to provide public comment on the Coordinated Transit-Human Services Transportation plan. The PSRC is to be commended for integrating the Coordinated Transit-Human Services Transportation Plan into the Transportation 2040 Plan. The plan correctly highlights the mobility concerns of people in the central Puget Sound region who have a greater need for transportation services due to their income status, age or disability. It is critical that Transportation 2040 and the Coordinated Transit-Human Services Transportation Plan lay the groundwork for the policies, funding, and implementation of services that will meet the special needs of this population.

Strategic Investments
We support the region’s approach for strategic investments in fixed-route, rideshare and demand-response services, which will increase mobility for people with special transportation needs. We support the planned investments in pedestrian facilities, which increase access to transit facilities. We support the vehicle reservation system for auto ferries, as this makes it easier for people with disabilities and reduces their overall travel time.

Special Needs Population Maps
The use of demographic maps in the plan is very helpful but the plan also needs maps that show the absolute number of people with special transportation needs. Adding maps that show the absolute number (total number of people) will help us better evaluate the relative demand for specialized services and more strategically target our limited resources to the areas with the highest number of people in need. We also suggest larger maps (at least a full size page each) to increase readability.

SMART Corridors
The SMART Corridor analysis is very useful but we are confused by some of the naming conventions used for the SMART Corridors. We would like to see the North Seattle Corridor...
renamed Northwest King County, as it includes the cities of Shoreline and Lake Forest Park in addition to the northern portion of Seattle. We would like to see the South King County Corridor renamed Southwest King County, as the southern area of King County is split between this corridor and the Southeast King County Corridor.

**Executive Summary**

In the executive summary, under public transportation, ADA requirements should be described as curb-to-curb, not door-to-door. Door-to-door service is not required under the Americans with Disabilities Act.

**Jobs Access Reverse Commute Program**

King County Metro Transit manages the Job Access Reverse Commute Program (JARC) for the county. Within the context of the programs offered, please consider the following comments to the Coordinated Transit-Human Services Transportation Plan.

1. **The plan should include individuals with limited English proficiency as a group that is often in need of special transportation consideration.** Language barriers often prevent people from accessing available services or efficiently using the services they are able to access. The result is that the travel needs of these individuals are often best met by local agencies who reside within their community. Yet transit agencies, social service providers and community-based organizations have limited resources to address language and cultural barriers. Moreover, the ethnic diversity of our region is growing, and along with it the need for travel services that accommodate people with language and cultural differences. The plan should include opportunities to expand travel services to these populations through partnerships with local agencies.

2. **Access to travel options and information continues to be a critical need for individuals with special transportation needs.** More and more, the channels for delivering that information are in the communities as well as through employment centers. The JARC program supports efforts at the worksite, with employment training centers, and within the communities where people live by partnering with ethnic and civic groups.

3. **The plan should emphasize the role of technology in matching individuals with special transportation needs with the appropriate mode.** In the future, access to technology and access to transportation will become more critical. More individuals will be looking for online tools to assist in making the right travel choice and the region needs to make sure that these tools are available to individuals with special needs.

4. **The plan calls out employment training facilities as a major destination and it is critical to emphasize the role that social service agencies, employment agencies and educational institutions provide in delivering and connecting people to a mobility option.** Often a key element of job training is providing transportation to the training site. Transportation is also essential for maintaining a job. These transportation services are often provided by the training partner with funding support from the Jobs Access Reverse Commute Program.
5. The Appendix A Glossary includes a number of programs, classifications and categories that call out certain groups with special needs. The list might be expanded to include individuals who have limited English proficiency, displaced workers or people on a low-income as those populations often have more difficulty getting where they need to go.

We look forward to the next update of the plan and the opportunity to make significant substantive changes in the coordinated plan, including evaluating progress towards the plan’s goals and revisiting its strategies.

Thank you for this opportunity to comment on the Coordinated Transit-Human Services Transportation Plan. If you have any questions, please contact me at 206-205-6577 or bobsahm@kingcounty.gov.

Sincerely,

[Signature]

Robert F. Sahm, Supervisor
Accessible Services

cc: Park Woodworth, Manager, Paratransit/Rideshare Operations, Metro Transit Division, Department of Transportation