Comments on Draft Transportation 2040
Submitted by the Bicycle Alliance of Washington (BAW)

Overarching Issue and Concern in T2040 –
Absence of Conscious Strategy to Achieve Multiple Policy Objectives by Developing Regional Non-motorized System Networks

- **The problem?** – T2040 contains lots of bike-pedestrian projects, essentially “collections” of bike-pedestrian projects from some 86 jurisdictions. However, there is no specific focus or articulated strategy in T2040 that could pull them together or prioritize them for meaningful implementation. This will not result in a system of much needed and highly useable regional bicycle and pedestrian networks.

- **The point?** T2040 is missing an enormous opportunity to increase personal mobility options in a manner that will achieve multiple objectives:
  - reduce VMT (vehicle miles traveled),
  - reduce growth of congestion,
  - improve air quality, and
  - address and reduce the staggering toll of multi-billion dollar nation public health costs related to our local and national obesity epidemic (“inactive” living, evolved over past 60 years as by-product of growth/land-use patterns that have unintentionally resulted in exceedingly high auto-dependency travel with very few options).

- **The data?** There are currently (according to PSRC’s 2006 Travel Survey study) over 8 million daily trips (68% of total daily travel) being made that are less than 6 miles in length. These are relatively short trips and it is conceivable that T2040 should be seeking to shift at least 10-20% of these shorter trips from autos to biking and walking trips, making a big dent in policy objectives. Breaking down the proportion of these 68% shorter trips looks like:
  - 20.8% of daily travel (2.7 million trips) are under 1 mile;
  - 27.7% (3.6 million) are between 1-3 miles; and
  - 20.4% (2.6 million) are between 3-6 miles in length.

- **The relevant opportunity?**
  - A trip of less than one mile can be comfortably walked in 15-20 minutes and is easily covered by bike in only about 5-6 minutes, even at a leisurely “no-sweat” pace (10-12 mph) in regular work clothing (no spandex needed, just like in European cities).
  - A trip of 3 miles can even be walked in one hour (many people do now) or biked in 15-18 minutes at 10-12 mph.
  - And a trip of even 6 miles, while not likely to be walked, is a still a leisurely bike trip of about 30-36 minutes at a leisurely pace.
PSRC’s survey data shows that current averages for bike trips in our region are about 4 miles, an easy 20-minute bike trip, so it’s not an “impossible dream.”

- **Comparability to European Cities?** While admittedly the Puget Sound is not Europe, it’s characteristics in terms of demographics, topography and weather are no worse than many major European cites, where, even in harsher climates of northern Europe, we now see as high as 30% of daily travel being made by bicycles. Such high levels of non-auto travel have resulted from decades of conscious public policy and good system planning for continuous well-connected bicycle and pedestrian networks, something drastically missing in our region. Just imagine, what if our regional road network for autos was as discontinuous as one finds we have in our existing regional bicycle network... why would anyone use it? And that lack of system continuity is largely why we don’t see more people choosing to ride or walk for so many short trips – lack of safe, reliably continuous travel networks connecting our major activity areas.

**RECOMMENDATION:**

- **Executive Summary** – To enhance plan background, show and incorporate PSRC’s regional travel data (total daily travel along with breakdown of percentage of trip lengths as noted above) to raise awareness and display the opportunity to target this large travel market for alternative travel. The media’s attention to freeway congestion as the dominant focus of daily travel tends to lead to most citizens and elected officials to think that our dominant travel trips are longer distances, such as work trips, but these are less than 20% of daily trips. We need to educate the public and show the opportunities this plan could offer to address many broad regional policies if we begin to better recognize improving travel options for the 68% of the daily travel market. This can also help recognize that exploring alternative travel options by bicycle and on foot for these millions of daily travel trips is not a petty or frivolous “recreational” venture but rather a mainstream opportunity.

- **Chapters 2, 3, 4 (Strategic Approach, Sustainable Environment and Sustainable Financial Network)** – Add sections in appropriate areas to articulate conscious strategy to develop well-connected and continuous regional bicycle system network along with multiple centers-oriented pedestrian networks. The intent should be noted to more specifically address regional policies to improve air quality, increase regional mobility options, reduce VMT, improve regional travel equity, address public health obesity issues with greater focus on “active living” communities (Active Living is now recognized as special office in USDOT). Additionally, focusing on developing these networks to address the 68% shorter-trips travel market is the most cost-effective and efficient form of system construction and such systems also yield the lowest cost-per-trip of any modal travel.

- **Chapters 5 & 6 (Regional Programs and Projects and Future Planning, Programming and Implementation)** - Add discussion to describe intent to
develop regional bicycle system network and center-oriented pedestrian networks that will be used to establish priorities for financial system planning and for project implementation funding under the regional Transportation Improvement Program. The details for such implementation can logically be developed, for ease of modification, outside the plan, but the plan should establish the policy intent for such systems along with an approach for priority development. Since cities and counties are typically responsible for planning and construction of such networks, PSRC should assist local jurisdictions in planning for such networks by producing regional and sub-regional maps that display two different sized circles around all regional centers, major employment centers and major regional transit/ferry stations. These circles should be considered as priority areas for planning and development of bike and pedestrian networks. The larger 3-mile circumference circle would encompass priority areas for bicycle network planning and project funding. A smaller 1-mile circumference circle would incorporate priority planning and project funding centers-oriented pedestrian networks. Incidentally, a 3-mile radius circle around most of types of regional "centers" results in connecting links for regional centers in addition to providing access from surrounding residential and commercial areas.

- **Terminology** – Include a clear definition for the variety of potential types of bicycle facilities in the plan and use consistent terminology throughout the document whenever specific bike projects are referenced. In as much as these facilities, once formed into an effective continuous network, will increase access for bicycling as a more serious transportation option, and as they support access to other multi modal facilities, definitive terminology will at the very least remove vagueness about the varied types of bicycle projects that can be funded – all should be eligible if they contribute to system continuity. For the bigger picture, when referring to the overall system network, rather than trying to call out individual facilities along a corridor by their category of component in the bike network, it is suggested to use *“Bicycle Infrastructure”* throughout the document as a means to reference the broad variety of facilities that comprise a total system, such as: cycle tracks; dedicated multi-use paths; painted bike lanes; bike route signage; sharrows and way finding pavement markers; and storage components such as bicycle racks, lockers, and indoor secure bicycle parking facilities at transit hubs.

Respectfully submitted,

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January 30, 2010

Mr. Charlie Howard  
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Mr. Sean Ardussi  
Manager for Freight Mobility Roundtable  
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RE: Boeing Comments Regarding Freight Strategy – Transportation 2040 Plan

Dear Mr. Howard,

Thank you for the opportunity to comment on the Draft Regional Freight Strategy. As a participant in the recent Freight Mobility Round Table Meeting earlier in January of this year, it became apparent that some freight stakeholders felt the draft recommendations did not emphasize freight as a priority for the region. Boeing concurs with others that suggest a team from FAST and FMRT committees work with PSRC to provide recommendations for the strategy over the next month.

With this comment letter, Boeing would like to emphasize the importance of freight as a priority for the health of the economic vitality and the industries of this region with the following points:

**Freight Strategy Goals:** The inclusion a Freight Strategy in the regional Transportation Plan is an important component to the Transportation 2040 Plan and Boeing commends the Freight Strategy as called out in the plan and not just FAST project implementation.

1. Provide additional new capacity to reduce congestion and bottlenecks in critical corridors.
2. Recognize the importance of the Manufacturing Industrial Centers in support of the economic vibrancy of the region and prioritize infrastructure investments that support freight mobility in and between these centers.
3. Emphasize and tie the Freight Strategy to the Regional Economic Strategy, linking them in support of each other and calling out primary industry clusters to insure transportation mobility.
4. Call out the need for identifying sustained and dedicated funding sources that support freight mobility and freight projects over the life of the plan.

5. Provide recommendations that integrate all modes of transportation including intermodal facilities, corridors and connections.

6. Support the environment by supporting freight mobility investments in infrastructure that eliminate congestion and bottlenecks and the additional greenhouse gases that come from that congestion.

Since the Freight Strategy is an appendix to the Transportation 2040 plan and not written into the plan’s entirety, Boeing suggests that within the body of the plan, Freight Mobility Goals and Supportive Policies should be highlighted and called out. In addition, Recommendations and Action Plans for meeting the Goals and Objectives need to be called out in the plan.

Thank you for the opportunity to comment and be involved in the Freight Mobility Roundtable and as a Large Employer member of the Puget Sound Regional Transportation Policy board. We look forward in our continued working together to support the Transportation 2040 Plan and the Freight Strategy component of the plan.

Please feel free to contact me if you have questions or concerns.

Sincerely,

Elizabeth J. Warman

Elizabeth J. Warman
State and Local Government Relations Manager – NW Region
The Boeing Company
PSRC Transportation Policy Board Large Employer Member

Mike Turek

Mike Turek
Director, Licensed Transportation
The Boeing Company
PSRC Freight Mobility Roundtable Member

cc: David Schumacher
March 9, 2010

Marina King  
Puget Sound Regional Council  
1011 Western Ave, Suite 500  
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TRANSPORTATION 2040 - PUBLIC COMMENTS

Dear Ms. King:

Thank you for the opportunity to provide public comment on the PSRC Draft Transportation 2040 Plan. The organizations signing this letter represent tens of thousands of people from around the central Puget Sound region. Together, we work to support the health of our communities and environment, promote sustainable modes of transportation, and protect and preserve the environment for future generations.

First and foremost, we would like to recognize the PSRC staff and boards in preparing this immense body of work. We would also like to acknowledge the tremendous effort put forth in attempting to bring the most comprehensive set of transportation strategies together to fulfill a long-range vision for the region. In particular, we appreciate the commitment and flexibility that has been articulated throughout the plan to a more sustainable future, with attention to key issues that threaten our region, such as greenhouse gas emissions and poorly planned land use decisions. In addition, we commend the PSRC in their progressive approach to using tolling revenue as an integral piece of the financial strategy, which will initiate a long-term shift in how transportation improvements are funded. We also strongly support the Transit Oriented Communities proposal, the recommended development design standards, and funding priorities for walking, biking, and transit connections to light rail stations. Please see Draft Transportation 2040, pages 13, 21, and 25 – 26.

While we believe PSRC has developed an appropriate vision, objectives and framework for directing investments within Transportation 2040, we are concerned that the vision and supporting framework have not directly informed critical elements of the plan, such as project selection and prioritization. As a result, we fear the outcomes upon implementation of Transportation 2040 will significantly deviate from the desired goals of the plan, resulting in further degradation to the natural environment, increased roadway congestion and SOV trips, reduced mobility options and a diminished quality of life. Our region’s residents and businesses value and depend on our region’s high quality of life.

Prior to finalizing Transportation 2040, we strongly encourage PSRC to consider the following, in addition to previous Draft Environmental Impact Statement (DEIS) comments:
Public Support for Alternative 5: During the Transportation 2040 DEIS comment period, Alternative 5 received overwhelming public support, on its principles of promoting sustainable transportation modes, reducing Vehicle Miles Traveled (VMT) and Greenhouse Gas emissions (GHG), promoting public and environmental health, and strategically investing in roadway projects. In fact, the vast majority of public comments in support of Alternative 5 encouraged PSRC to be even more aggressive in these areas, while de-emphasizing the inclusion of additional highway capacity. Comments from major stakeholders and experts were submitted with this guidance, including: the US EPA, US Fish and Wildlife Service, US DOT Federal Transit Administration, Cascade Land Conservancy, Cascade Bicycle Club, Bicycle Alliance of Washington, Transportation Choices Coalition, Futurewise, various municipalities and counties from around the region including City of Seattle and King County, as well as over 1,000 e-mails. Similar direction was provided from various internal boards within PSRC.

Unfortunately the overwhelming public support for a more ambitious approach than Alternative 5 is not reflected in the current plan. On the contrary, the current plan includes an additional 500 miles of roadway expansion projects as compared to Alternative 5. As a result, the plan does not perform as well in terms of shifting trips to bicycling and walking, nor does it reduce VMT/GHG to the extent that Alternative 5 did. While Alternative 5 should not be used as the model alternative, it serves to illustrate the departure from what was strongly supported as the only alternative that begins to move the region toward a sustainable future.

VMT reduction/GHG reduction: The current plan fails to meet state requirements and benchmarks for VMT and GHG reductions.¹ With almost 50 percent of Washington’s GHG emissions attributable to the transportation sector, it’s not only reasonable, but imperative that a long-range regional transportation plan use the state’s requirements as a baseline. Unfortunately, under the current Transportation 2040 framework, as compared to the 2040 baseline, there will be no change in VMT in 2040 under the financially constrained portion of the plan, and a 3 percent change in VMT per capita under the full plan, with VMT ranging between 19.9 and 20.6 per capita. In order for PSRC to meet the state’s benchmarks, daily per capita VMT should be at 14.06.

The central Puget Sound region supports over half of Washington’s population and is a significant contributor to the state’s transportation sector emissions. With the best mobility options in place, it is this region’s responsibility to lead the way in reducing VMT and GHG. An 8-12 percent reduction in VMT from today’s levels is not acceptable.

The draft plan results in a range of GHG emission reductions between 5 percent and 28 percent below 2006 modeled emissions by 2040. (See Draft Transportation 2040 page 49.) This will not achieve the reductions required by RCW 70.235.020 of 25 percent below the 1990 emission levels by 2035 and 50 percent below 1990 emission levels by 2050. The plan does not even properly describe these requirements referring to them repeatedly as goals and, on page 49, cites to RCW 80.80.020 which has been repealed, not the current RCW 70.235.020 that readopted the emissions reduction goals as

¹ RCW 70.235.020 requires a statewide reduction in overall emissions by 25 percent below 1990 levels by 2035, and RCW 47.01.440 establishes benchmarks for reducing VMT per capita by 30 percent below the projected 2020 VMT by 2035.
requirements. Page 49 of Draft Transportation 2040 also incorrectly refers to RCW 70.235.020 as the source of the VMT reduction benchmarks. The VMT reduction benchmarks are in RCW 47.01.440(1) and that reference should be substituted.

The implications of not meeting the state's VMT/GHG reduction levels are significant. This will further exacerbate climate change, further degrade air and water quality, and pose increased threats to human health and productivity.

**Project Investments:** The widespread support for strategic and limited investment in roadway expansion projects (unique to DEIS Alternative 5) has not been upheld in the current plan. While we appreciate PSRC's framework for project inclusion, we fail to see how the majority of the included projects meet the established criteria, and more importantly, how these projects will meet the desired outcomes inherent to a more sustainable future. We understand and support the maintenance and preservation of our current infrastructure and support the projects that intend to do that, however many of roadway widening projects contradict the vision and goals framed by both Vision 2040 and Transportation 2040 and are in direct conflict with public desire.

With 25 percent of trips less than one mile and 40 percent of trips less than two miles, there is realistic potential to fulfill these trips through walking or bicycling. Under the Transportation 2040 framework, the region will only see a 1.6 percent increase in daily bike and walk trips, which is equivalent to the 2040 baseline numbers. Unfortunately, the investment strategies fail to outline sufficient local revenue for our core urban areas to complete their sidewalk and on-street bicycle networks. Further, the current pricing scheme is designed to maximize benefits to drivers, and thus fails to reinforce appropriate mode choices. We encourage PSRC to provide more support for the types of transportation investments that will support livable and vibrant communities 30 years from now.

**Project and Program Prioritization:** In response to widespread public and agency concerns over the transportation projects included in the plan, the PSRC has said that the project and program prioritization system will address the concerns related to VMT, GHG, and other issues. Given the central role that project prioritization is to play, the project prioritization criteria and their weighting must be included in Transportation 2040. The criteria must include meeting the GHG reduction requirements, the VMT reduction benchmarks, supporting centers and other preferred development locations identified in Vision 2040, multimodal transportation systems, freight mobility, storm water impacts and impacts on Puget Sound and its tributaries, and whether the jurisdiction in which the project is located has updated their comprehensive plan and development regulations to conform to Vision 2040 and Transportation 2040.

**Pricing Revenue Allocation:** We recognize PSRC's leadership in developing a transportation plan that supports roadway pricing as a viable funding strategy and as a means for reducing private automobile travel. However, by allocating the revenue generated through roadway pricing to roadway expansion projects, it lessens the effectiveness tolling as a TDM strategy, by not reinforcing other modes of transportation. To fully realize the benefits of this type of funding strategy, the revenue should be available to all modes of transportation and to increasing transportation options. Funding options also addresses concerns that tolling may adversely impact low- and moderate-income families.
Support for Vision 2040: The purpose of Transportation 2040 is to provide the transportation facilities needed to serve Vision 2040. However the two plans continue to be incompatible. Not only do the projects work in contradiction to Vision 2040, they make it difficult to comply with Vision 2040 by placing development pressure in rural/natural resource areas through transportation investments. Most counties and cities have yet to update their comprehensive plans to comply with Vision 2040, and thus the actual land use decisions that have happened on the ground have already significantly deviated from the Vision 2040. PSRC needs to ensure that counties and cities update their plans and that there is stronger compliance with Vision 2040. PSRC also needs to re-visit both plans and projects to ensure that they are working in concert.

Leadership from the PSRC is needed at this point to adopt a plan that serves in the best interest of the current and future residents of the central Puget Sound and works to reduce our impact on the natural environment. In addition, we encourage the PSRC to approach the Final Environmental Impact Statement with a holistic evaluation of the costs and benefits (including health and equity) to fully illustrate the project outcomes.

The wealth of knowledge, research and vested interest presented to the PSRC during the DEIS comment period, supporting a stronger commitment to GHG/VMT reduction, improving mobility and transportation options, and promoting human health, is still relevant today as PSRC moves toward final adoption of Transportation 2040. Thank you again for the opportunity to provide public comment. Please contact us should you have any further questions.

Sincerely,

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March 9, 2010

Marina King  
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Ms. King,

Thank you for the opportunity to provide comment on the Draft Transportation 2040 plan. Community Transit was pleased to have been involved in the Alternatives Technical Group, Transit Operators Committee, Regional Staff Committee and other bodies that considered and helped develop the draft plan. We have been particularly encouraged by the extent to which PSRC involved local transit agencies in this update to the Metropolitan Transportation Plan.

Taken as a whole, we are very pleased with the transit-intensive approach in Transportation 2040 with its emphasis on increasing core services on key corridors in the urbanized areas of the region. Projects identified in Snohomish County are reflective of the strategy articulated in Community Transit’s 2008-2013 Transit Development Plan related to Transit Emphasis Corridors and Bus Rapid Transit. Transit elements in the constrained portion of the plan align with priorities identified in our draft Long Range Transit Plan and in discussions with our local city and county partner agencies.

We look forward to adoption of Transportation 2040, working toward securing new revenues for transportation and building and operating the new transportation system.

Specific comments on the plan and projects are provided below.

**Executive Summary**

Page 10, discusses the inadequacy of the gas tax for transportation funding. It would also be appropriate to discuss the inadequacy and instability of retail sales tax as a public transit funding strategy. This point is made very effectively in several sections of the plan and merits highlighting in the Executive Summary.

Under Programs and Projects (page 12), “Maintain, Preserve, and Operate” discusses key structure replacement, roadway preservation and operation of ferries. Should we also include the priority of maintaining existing transit services? Transit is a critical component of the MTS and maintenance of existing service levels should be prioritized with maintenance of other MTS elements.
Regarding Environmental Benefits, (page 16) indicates that T2040 will reduce regional greenhouse gases from transportation by up to 28% below 2006 levels. It would be helpful to put this in terms that are comparable to Washington State goals for greenhouse gas reduction. How close does T2040 bring the region to meeting these goals?

**Chapter 1: Toward a Sustainable Transportation System**
Community Transit supports the strong linkage T2040 makes between land use and transportation. It is especially encouraging to see the discussion of compact dense growth in centers and along transit corridors and a managed parking supply. We are likewise pleased to see an emphasis on station area planning and coordination between transit planning and local land use planning.

Figure 6: “Selected Potential Transit Station Areas” could be enhanced with the addition of all Swift BRT station locations on Hwy 99/Evergreen Way. Community Transit is currently engaged in station area planning discussions with Everett, Snohomish County, Mukilteo, Lynnwood and Edmonds regarding land use in the Swift corridor.

**Chapter 2: A Strategic Approach to Regional Mobility**
Figure 12: “Vehicle Hours Traveled, Vehicle Miles Traveled and Delay” highlights a reduction in delay for both freeways and arterials. Community Transit notes that the reduction in delay for arterials is substantially less than that for freeways. T2040’s transit strategy clearly places a greater emphasis on transit investment that will be impacted by arterial congestion (core services). Conversely, the plan provides the greatest congestion relief benefit to users of the freeway system. Why this is the case, and what tradeoffs were considered in mode share, user benefits and tolling scenarios would be a valuable discussion in this section.

Under Special Needs Transportation Services, page 40, Community Transit supports fixed-route services as the primary transportation mode for people with special needs. We agree and strongly support the statement that “Increases to frequent, all-day core transit service best aligns with special needs transportation users’ requirements.”

**Chapter 3: A Sustainable Environment**
Community Transit has been increasingly involved in local efforts to promote transit in connection with public health. We are particularly supportive of the conclusion that communities featuring a mix of land uses connected by pedestrian and bicycle facilities and transit rely less on driving and are more conducive to physical activity.

**Chapter 4: A Sustainable Financial Framework**
We are encouraged to see the priority on securing near-term revenue to maintain local transit operations (General Funding Scenario, page 61). Community Transit will be cutting service by 15% in June 2010 due to revenue shortfalls related to the economic recession. A near-term solution to this funding issue will be critical for positioning local transit to fulfill the expectations of Transportation 2040.

Regarding Figure 21: “Current Law Revenues 2010-2040”, the table indicates that figures are in 2008 constant dollars. It isn’t clear if the revenues presented in the table reflect forecasts that account for the 2007-present economic recession.
Community Transit supports the use of toll revenues to fund transit services as outlined on page 63. Transit represents a critical component of overall roadway capacity in many regional corridors. Funding transit operations through toll revenues recognizes transit’s contribution to capacity and the savings in road replacement/expansion that is realized with a multi-modal solution.

**Chapter 5: Regional Programs and Projects**

Under Public Transportation (page 80) the plan discusses the impact of land use, parking, ped/bike access and transit priority infrastructure on the success of transit. This is a well-written section, echoing some critical pieces of Community Transit’s 2008-2013 Transit Development Plan.

In Figure 33: “Selected Core Bus Transit Service Projects” the plan could clarify that the six Transit Emphasis Corridors identified in the constrained portion of the plan for Snohomish County are existing or future candidates for Swift Bus Rapid Transit service.

Community Transit agrees with the assessment on page 84 that the region’s park-and-ride strategy needs to be re-examined. Early work on park-and-ride strategies for Snohomish County is within the scope of Community Transit’s current Long Range Transit Plan project. We look forward to participating in a regional discussion of future strategies for these facilities.

Regarding the discussion of High Occupancy Toll Lanes and Individually Tolled Facilities on page 90, Community Transit supports the guidance that specific circumstances preventing toll management from providing appropriate speed and reliability for transit services may require retention of vehicle restrictions (e.g. 3+) in order to achieve this important policy objective.

**Appendix B, Program and Project List**

West Snohomish SMART Corridor map, 100th St SE/35th Ave SE and SR-104/228th St/236th St/228th St are shown as Bus Rapid Transit corridors in the Unprogrammed project category. Both corridors should be characterized as “core bus service” corridors but not Bus Rapid Transit in the 2040 time frame.

In the list of Transit Projects for the West Snohomish SMART Corridor, Project 3653 “North Snohomish Co. Park & Ride #1 (Marysville/Tulalip) (216 New Stalls)” refers to the new Cedar Grove Park & Ride in Marysville. This project was completed in December 2009 and is currently in service. It can be removed from the MTP project list.

On the East Snohomish SMART Corridor map, SR 9, US 2, SR 522, SR 528 and SR 531 are shown as Bus Rapid Transit corridors in the Unprogrammed project category. All of these corridors should be characterized as “core bus service” corridors but not Bus Rapid Transit in the 2040 time frame.

In the list of Transit Projects for the East Snohomish SMART Corridor, Project 3654 “North Snohomish Co. Park & Ride #2 (create 350 stalls) (Arlington/Smokey Point)” no longer exists in the form described. This project is now listed on the TIP as CT42B and CT42C. In general, the project provides improvements to the existing Smokey Point Transit Center and constructs 10 to 40 parking spaces. Combined cost of CT42B and CT42C is less than $5 million. The project is exempt. Project #3654 can be removed from the MTP list.
Regarding corridor-specific Transportation Demand Management Programs: The list of TDM programs for the West Snohomish SMART Corridor includes GTECs in Downtown Everett (constrained) and Canyon Park, Lynnwood and Paine Field/Boeing (unprogrammed). Community Transit and Snohomish County have partnered since 2008 on the Curb The Congestion TDM program for 164th St, 128th St and 20th St in Snohomish County. Should this groundbreaking program be included in the list of MTP projects for the West Snohomish Corridor?

Thank you again for the opportunity to provide feedback on the Draft Transportation 2040 plan. Please feel free to contact me with any questions or clarifications regarding our comments.

Sincerely,

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January 15, 2010

Mr. Sean Ardussi, Senior Planner  
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RE: Draft Regional Freight Strategy

Dear Mr. Ardussi,

The Eastside Transportation Association (ETA) is a private sector group whose membership includes concerned citizens, business representatives and transportation professionals. We support policies that encourage each mode of transportation to operate efficiently and economically to meet growing demands for both personal and freight travel.

We are concerned that there be no actions that would reduce freight mobility. With its substantially disproportionate focus on light rail, pedestrians and bicycles that provides mobility benefits to so few system users in the region, we are concerned that Transportation 2040 does not adequately address the real needs for freight mobility. Specifically, in the Draft Regional Freight Strategy, dated November 20, 2009, we find the goods movement-dependent industries represent at least one-third of our regional economy in addition to repeated platitudes about the importance of freight movement. Many suggestions are included as to how to address freight mobility in the future yet surprisingly, the Strategy does not begin with the basic “do no harm” to the system in place today. ETA suggests the Strategy should begin with a very clearly stated policy that no degradation of our freight capability will be acceptable. The potential harm to our economy and quality of life in the region is far too valuable to allow this to happen.

Thank you for the opportunity to comment.

Sincerely,

Richard Paylor, Chairman  
Eastside Transportation Association
March 9, 2010

Marina King
Puget Sound Regional Council
1011 Western Ave #500
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Dear Ms. King:

Feet First is pleased with the general direction provided by Transportation 2040 in regards to non-motorized transportation and commend the Puget Sound Regional Council (PSRC) for their approach. To continue to build on the document and promote walkable communities throughout the region, we have identified specific areas to be strengthened in the document.

We strongly support the Plan’s stated “no net loss” policy ensuring that other transportation does not reduce the supply or connectivity of existing bicycle and pedestrian networks. However, stronger language is necessary when clarifying specific actions to reduce supply or connectivity to be avoided and possible mitigation measures. For example, the widening of roadways to five lanes or more to improve vehicle capacity makes the road more difficult for walkers to cross, thereby reducing connectivity unless mitigated by specific treatments such as signalized crossings and refuge islands. To this end, PSRC should adopt strong design guidelines for road projects receiving grant funding. These guidelines would require design elements that ensure these projects are built as complete streets accommodating and facilitating bicycle and pedestrian use while integrating with adjacent land uses.

We recommend expanding and providing access to bicycle and pedestrian improvements in the constrained element of the plan to include access to the subregional centers throughout the four-county area. Examples of subregional centers would include urban clusters such as Marysville, Bothell, Greenwood, Issaquah and Parkland. These subregional centers share many of the traits defining the designated regional growth centers – population density, concentration of commercial and institutional destinations and transit service. As such, non-motorized improvements in these subregional centers would provide significant mode share shift benefits to the region.
The plan identifies non-motorized improvements within ¾ miles of “transit passenger facilities” as qualifying for inclusion in the constrained element of the plan. PSRC needs to provide a clearer definition of what exactly is meant by “transit passenger facilities”. While light rail will serve many trips, PSRC’s own numbers suggest that a large portion of regional transit trips will continue to be provided by public transit, and as such it is critical to supply quality pedestrian environments to bus passengers as well. Therefore, we urge this definition be more inclusive than just light rail stations and the “transit stations” identified in figure 34. To this end, we recommend including Bus Rapid Transit stops and major bus transfer points such as those at West Seattle Junction, Kenmore, Edmonds Community College, and South Hill Mall.

The plan needs to be a consistent with complete streets policy; sidewalks, arterials, bike lanes and transit all need to work together. To this end, the Plan should emphasize that arterials with transit must have sidewalks. While both regional and local projects have differences, local arterials are very important for the future of walkable communities. Additionally, walking for transportation should go beyond the emphasis on regional trails and more attention should be placed on how infrastructure will support walking and be more integrated into the transportation system.

Thank you in advance for your consideration of these suggestions. Should you have any questions about the comments provided please feel free to contact me by calling 206-652-2310 or emailing lisa@feetfirst.info

Sincerely yours,

Lisa Quinn
Executive Director
Dear Mr. Cummings:

The Muckleshoot Indian Tribe Fisheries Division has reviewed the Transportation 2040 plan and its appendices. From our review, we offer the following comments, in the interest of protecting and restoring the Tribe’s treaty protected fisheries resources.

1. The Transportation 2040 plan and its appendices fail to discuss culverts that block fish passage and adversely affect fish populations as a result. There are no projects identify to address blocking culverts with the planning area. The potential number of blocking culverts is substantial when considering state, local government and privately owned culverts under paved road systems that comprise the planning area. The plan should be modified to recognize that blocking culverts can adversely affect fish populations and include a plan to repair these culverts as part of this action plan.

2. As noted in the attached summary decision by Judge Martinez (U.S. v Washington, 2007, Case No. CV 9213RSM, Subproceeding No. 01-01), salmon production is adversely affected by existing state owned blocking culverts which are subsequently interfering with treaty fishing rights. As a result, transportation projects within the planning area and identified specific projects that involve culverts blocking passage for salmon may disproportionately adversely affect federally-recognized Indian Tribes and interfere with their treaty fishing rights. The Environmental Justice appendix to the plan fails to identify and discuss this issue.

We appreciate the opportunity to comment. Please let me know if you have any questions.

Thank you,

Karen Walter

Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division

39015 172nd Ave SE

Auburn, WA 98092

253-876-3116
March 9, 2010

Marina King
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104
Via email: transportation2040@psrc.org

RE: Draft Transportation 2040

Dear Ms. King:

Thank you for the opportunity to provide public comment on the Draft Transportation 2040 Plan: Toward a Sustainable Transportation System, dated January 22, 2010. This document addresses a long-term vision for financing and planning the region’s transportation system. People For Puget Sound is a nonprofit, citizens’ organization whose mission is to protect and restore Puget Sound and the Northwest Straits.

Given that by the year 2040, the region is projected to grow by roughly 1.5 million people, the impact of growth and transportation planning is of vital importance to welfare of wildlife and human health of the Puget Sound basin, both from direct impacts but also from impacts such as global climate change. People For Puget Sound is concerned that planning documents such as the Transportation 2040 support alternatives that can significantly reduce environmental impacts.

Our comments follow:

**Stormwater runoff.** The document executive summary specifically states that the strategies will ensure “that transportation projects improve the handling of stormwater runoff to protect Puget Sound and other surface waters…” On page 51, the document describes “reducing vehicle miles traveled” as critical to the reduction of stormwater pollution. It is not clear to us, though, that the plan will significantly reduce the vehicle miles traveled. Further, the document goes on to state that “Transportation 2040 supports the opportunity for the region to create an innovative, low-impact, environmentally friendly transportation infrastructure, and to address and correct the harm we have already done.” How is this shown in the document?

**Reducing vehicles.** Fewer vehicles on the road mean less pollution to Puget Sound. We support alternatives (i.e., an alternative that would be even more aggressive than that presented in the plan) that promotes the maximum amount of use of alternative modes of transportation and decreases vehicle miles traveled (VMT) to levels that are in line with state requirements.

**Project and Program Prioritization:** The plan discusses a process for prioritizing scarce transportation funding so that those projects that best meet the vision of the plan and regional needs are funded. This process should consider the impacts of transportation projects on Puget Sound and its tributaries and the quality and quantity of stormwater runoff.

Thank you for your consideration. You can reach me at (206) 382-7007 X172 if you have any questions or concerns.

Sincerely,

Heather Trim
Urban Bays and Toxics Program Manager

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January 15, 2010

Mr. Charlie Howard  
Director of Transportation Planning  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-3609

RE: Port of Seattle Comments on the Freight Strategy Component of Transportation 2040

Dear Mr. Howard:

Thank you for the opportunity to comment on the Draft Regional Freight Strategy (Strategy). The most recent draft Freight Strategy is much improved, however, there are still some major rewrites needed, especially in the Recommendation section. At the recent FAST and Freight Mobility Round Table meetings it was apparent that many of the freight stakeholders were not comfortable with the draft recommendations. The Port believes that it would be helpful to have a team from the FAST and FMRT committees to work with PSRC to develop recommendations over the next month. In discussion with PSRC staff, we understand that this will occur at the FAST meeting on February 10, 2010.

In this comment letter, the Port of Seattle (Port) hopes to highlight five elements which we believe will greatly improve the Strategy, and ultimately result in improved freight mobility for the region. These include:

1) Freight Strategy Goals: Narrow the focus of the freight strategy by developing a focused subset of six key goals for the region’s freight strategy.
2) Vision 2040 Freight Supportive Policies: Highlight the many regional policies from Vision 2040 that support the stated freight goals.
3) Recommendations/Actions to be included in the Strategy: Create a more focused, clear set of recommendations and action strategies.
4) Integration of the Freight Strategy into the Transportation 2040 Freight Plan (Plan): Recommend the key elements from the Freight Strategy that should be included in the Transportation 2040 Update.
5) Report Edits: Identify edits to the report which may improve the Freight Strategy’s accuracy and readability and tone.

Item 5, Report Edits, will be included as an appendix to this letter

1. Freight Strategy Goals

The inclusion of a Freight Strategy in the regional Transportation Plan represents a leap in freight planning in the Puget Sound Region from the past, and the Port applauds the PSRC in this effort. In the previous regional plan, the freight component focused on FAST project implementation.
Transportation 2040 provides an opportunity, with the guidance of adopted policy, to raise the visibility of freight and its importance to the region’s economy, for job creation and retention, and for its important role in urban place making.

In order to be effective, the Port believes that the Strategy needs to have a clear set of goals. These goals must be the cornerstone of the Strategy which identifies a simple framework. The following goals were identified by the FAST Committee following their December 9, 2009 meeting. It’s hoped that the Freight Strategy’s recommendations, or action strategies, will identify specific actions to meet the goals.

The proposed goals include:

- Set the recommendations in a freight systems context that integrates all modes, and major intermodal facilities, corridors, and connectors. Use this approach to:
  - Provide sufficient new capacity to reduce congestion and improve freight mobility in critical corridors, and
  - Ensure preservation of existing freight facilities and corridors.
- Provide a clear, well-defined path to developing a sustained, dedicated funding source and a prioritization process that advances freight projects over the Plan’s three decades.
- Tie the Freight Strategy to the Regional Economic Strategy to ensure the primary clusters have needed transportation mobility.
- Recognize that Manufacturing Industrial Centers (MIC) support the economy of the region, and ensure infrastructure investments support freight mobility in existing and developing industrial areas. (Include establishing a process for evaluating the industrial lands needs of the region, and, as necessary, designating new MICs).
- Protect the environment by adequately supporting freight mobility investments in infrastructure, technology and efficiencies, which improve environmental conditions. Good freight mobility is a necessary prerequisite of clean air; it is not in conflict with it.
- Continue to develop and improve upon the data and analytical tools required to identify gaps in the freight transportation system, and to prioritize those projects that best fill these gaps.

2. Vision 2040 Freight Supportive Policies

To achieve the stated goals, the Strategy should focus on the many supportive Metropolitan Planning Policies from Vision 2040 that promote freight infrastructure funding and development. Besides the three major transportation policies listed in the Freight Strategy (MPP T-17, MPP T-18 and MPP-T19), Transportation 2040 should follow the guidance of the following freight policies in Vision 2040, including:

- (MPP-EC-4) Leverage the region’s position as an international gateway by supporting businesses, ports and agencies involved in trade related activities.
- (MPP-T-12) Give regional funding priority to transportation improvements that serve regional growth centers and regional manufacturing and industrial centers.
- (MPP-DP-10) Give funding priority-both for transportation infrastructure and for economic development-to support designated regional manufacturing/industrial centers, consistent with the regional vision.
- (MPP-DP-53) Protect industrial lands from encroachment by incompatible uses and development on adjacent land.
3. Recommendations/Actions to be included in the Strategy

As stated earlier, the Port does not believe it would be productive to independently rewrite the recommendations in this comment letter, but would prefer to work with freight stakeholders and PSRC staff to help rewrite the recommendations. As stated earlier in the letter, PSRC staff is supportive of working with FAST and FMRT members to help revise draft recommendations and action items at the next FAST meeting on February 10, 2010. PSRC would have a chance to re-draft the recommendations based on comments received by January 15, 2010, and distribute the new information to participating committee members a week before the FAST meeting.

Below are some recommendations/action items that Port staff would propose to include in the next draft:

**Congestion and Mobility:**

1) Within one year of Plan adoption, identify all infrastructure projects and programs that exist on the Freight and Goods Transportation System (FGTS) that are included in the constrained portion of the Plan.
2) Identify infrastructure projects which are located on “last mile” facilities or port connectors.
3) Evaluate each project based on existing and future traffic congestion levels and truck volumes.
4) Validate the need for the projects in the proposed time frame of the Transportation 2040 Plan.
5) Identify roadway links on the FGTS for project gaps.
6) Increase the utilization of FAST/FMRT members in identifying needed freight projects/priorities.

**Sustainable Funding:**

6) Develop recommendations to be forwarded to freight allies supporting freight funds in the Surface Transportation Authorization.
7) Recommend strategies for increased funding for freight within state DOTs and the MPO’s.

**Economy**

8) Create stronger links between existing economic and freight programs, such as the Prosperity Partnership and Congestion Management Study.

4. Integration of the Freight Strategy into the Transportation 2040 Freight Plan
The Freight Strategy has compiled a great deal of information on freight in the Puget Sound Region. The Strategy looks at why freight is important to the region and what issues and problems exist or are emerging. The Strategy provides a thorough freight profile, and describes the transportation network and modes used to carry freight. The Strategy then goes on to describe what is needed to support freight growth in the region through 2040.

The Freight Strategy will be an appendix to the Transportation 2040 plan, but it is important to identify the important freight strategy elements that should be included in the Plan. The Port suggests some ideas below that can help highlight freight mobility in the Plan.

1) Proposed Goals
2) Vision 2040 freight supportive policies
3) Recommendations/Action Items
4) Map(s): i.e. Freight and Goods Transportation System

5. Report Edits

The list of report edits and suggestions are included in Appendix A of this letter. The major focus of the Port’s comments deal with the role of ports in the maritime industry, air cargo, the protection of industrial land (i.e. MICs), tolling, impacts on the economy and regional policy. There are some areas where we want to emphasize that certain solutions, such as PierPASS, are not workable in the Pacific Northwest, and they should not be included for discussion in the study.

As stated earlier, the remaining comments are technical edits, or suggestions to provide better readability.

Again, thank you for the opportunity to comment and to be involved in the development of the Regional Freight Plan and Transportation 2040. We will continue to advocate for effective and efficient freight mobility in the Central Puget Sound. We look forward to reviewing your next draft final when you incorporate new ideas and edits received by January 15, 2010.

If you have any questions, please feel free to contact me at 206-787-3376.

Sincerely,

Dan Burke
Project Lead Planner
Regional Transportation Planning

cc: Mike Cummings, Sean Ardussi (PSRC)

Attachment: Appendix A: Report Edits
Appendix A: Report Edits

The Report should have a Table of Contents

Executive Summary

Pg. 1: Graph on Millions of 2009 Dollars: Graph shows five bars, but has 6 categories listed (one should be removed).

Pg. 3: (Marine System and Commodity Volumes): The word “largest” needs to be added after “the third…..” This would read “In 2008, the ports of Tacoma and Seattle were, combined, the third largest international TEU….”

Pg. 5: 1st paragraph: The text says that the issues raised are identified in 4 categories: sustainable funding, congestion and mobility, environment and general. Keep these categories consistent and describe them in this same order throughout the document (see comment on page 7 below).

Pg. 5: 3rd bullet re Limited Port Connectivity: Such congestion and deterioration “may seriously impact the ability of the ports to “operate” is a better choice than “expand…”

Pg. 5: 4th bullet regarding growing congestion: SR167 is a main corridor that helps the region to connect to the national system, more so than SR520. Is SR167 also on the list of most congested infrastructure?

Pg. 5: Last bullet (Tolling). Suggested additional sentence for existing bullet: Linking revenue generation through tolls or fees to specific projects that benefit payers will increase acceptance of the funding mechanism.

Pg. 7: An example of expanded categories discussed above on pg. 5. In the page’s third paragraph, it talks about the organized categories. Instead of General, as listed previously, the listing is expanded to include Land Use, Safety and Security, Economy, Preservation and Maintenance, and Planning and Policy. Consistency is desirable in listing of the categories.

Pg. 7: Congestion and Mobility (East-west mobility) Capitalize Stampede Pass and reference rail line.

Pg. 7: General: suggested additional bullet: Congestion and Mobility on the roads, and Sustainable funding of truck transportation infrastructure are the key issues for air cargo. Limiting congestion on highways and arterials that link MICs and other areas that generate or receive air freight to the airport by truck is vital.

Pg. 7: 1st bullet under Congestion and Mobility, East-west mobility: I-90 as far east as Snoqualmie Pass is critical for East-West mobility and should be added to the list. While several
important projects are east of the Pass, and out of our region, it’s appropriate to note this is a critical corridor in this context.

Pg. 7: New bullet: Prioritize trucks on major truck routes to eliminate conflicts with bicycles, pedestrians and other modes.

Pg. 8: 3rd bullet under Land Use: “enhance safety and the mobility of freight moving in the eight MICS” should be expanded to freight moving “to, from and within” the eight designated MICs.

Pg. 9: 4th bullet under Planning and Analysis: include CAGTC here.

Section 1

Pg 2: Vision 2040 Freight Related Multicounty Planning Policies: The document list the three major freight related transportation policies. However, there are many other key Multicounty Planning Policies which support freight mobility. The additional policies are included earlier in the comment letter (pgs. 2-3 of this letter).

Pg. 3: Make the bolded lead-in of the second paragraph a complete sentence like the other lead-in sentences.

Section 2

Pg. 2: Interview included Airport (as well as Marine ports) in interviewing Port Commissioner John Creighton and staff Dan Burke.

Pg. 3: Congestion and Mobility: Increasing congestion: Please add the issue of “I-5 congestion on Southcenter Hill near Sea-Tac” to this sentence on heavily-used sections of I-5.

Pg. 4: Environment and Land Use: Dwindling industrial land supply: Please add reference to the fact that ports can only locate at deep water berth, and thus cannot be displaced (as the other industry discussed in this paragraph). Thus, ports are more strongly dependent on zoning enforcement and land use planning to protect them from gentrification.

Section 3

Pg. 1 and Pg 6: There are two “Sections 3.2.” Please re-number.

Pg. 2 (or pg.22): The paragraph on Marine and Air cargo facilities should provide details as to the kinds of facilities/uses at the Ports and Airports. Eg, “Port of Seattle Seaport includes 4 container terminals, a grain terminal (accessed by rail), fishing terminal (fish exports), rail corridor (Snohomish County), and other industrial piers and properties.” Alternatively, this information could be fleshed out in the Marine Facilities section beginning on page 22.
Role of Ports in Puget Sound

- The Ports of Seattle and Tacoma are international gateways for this region, and for our nation, which bring local benefits in the form of jobs, business revenues and taxes, including more than 300,000 jobs in Washington and more than $1 billion in state and local tax revenues.
- Last year, the combined Puget Sound’s Ports of Seattle and Tacoma together ranked in the top three US container load centers.
- Specifically, Sea-Tac International Airport (STIA) nearly 90,000 direct jobs, $2.2B direct earnings, over $400m in state and local taxes.
- It’s critical that the Transportation 2040 Plan support this gateway, or risk diversion of discretionary cargo to other gateways, eager to take away our revenue, jobs, and tax base.

Section 3.2

Pg. 6: First Bullet: Suggest changing language from “highly unlikely” to “less likely.”

Pg. 8 and Pg. 9, Figure 4 and 5: The text on page eight describes Figure 4 and Figure 5, but there are actually two Figure 4s. Both Figures show information for 2010 and 2035, but Figure 4 is by Volume and Figure 5 should be for Value.

Pg. 11: The important discussion of roadway congestion (existing and projected) is discussed as part of the Congestion Management Process (CMP). The Port believes that this is a critical tool for identifying system gaps and a way of prioritizing freight mobility projects. Table 1 identifies what appears to be existing congestion, but there is no corresponding table for future conditions. There could be some analysis here that helps match traffic congestion with needed projects, as suggested in proposed goals.

Pg. 11: Table 1: Rename the I-90 and SR 520 reference from “Cross-Lake Washington” to reflect I-90’s interstate role through east King County and eventually cross-country.

Pg. 15: Truck Movements and Impacts-Congestion and Safety Concerns: Another reason for congestion in our MICs not yet addressed here is bridge openings and rail crossings. The FAST Corridor projects are designed to reduce impacts of at-grade rail crossings (as well as ITS projects mitigating bridge openings with better information). Thus, it’s worth discussing as a safety and congestion concern.

Pg. 16: (Rail Facilities) While this is a freight plan, we should reference the interplay of passenger rail and recent and future Sounder/Amtrak investments in the corridor.

Pg. 17: Figure 11: Rail lines in the Puget Sound Region: As planned for some time now, the Eastside Rail Corridor is abandoned for freight operation. Both the segments between Gene Coulon Park and Woodinville, and from Woodinville south to Redmond are abandoned. The map should be updated as shown for the East Lake Sammamish former rail line.
Pg. 17-18: Commodities Carried by Rail: while the discussion references Tables 12 and 13, it would be useful for the text to call out the highlights of the table.

Pg. 19-20, Figures 12-13, Title should identify whether these are percentages by weight or by volume.

Pg. 20: Rail Movements/Impacts: The first paragraph, second sentence references “all of the major rail corridors that connect the region to the rest of the nation are currently operating at or near their operational capacity (see Table 2).” However, that data is for 2004, and volumes are down considerably during the existing economic recession. The sentence should remove “currently” and reference at a 2004 peak, or address current reality.

Pg. 20: Rail Movements/Impacts: The second paragraph calls out that the existing bottlenecks … and increased congestion will cause delay and may seriously diminish the ability of the ports to grow. Please add a mitigating clause to say, “without system enhancements…” As with other such references in the document (ref Exec Summary, p. 3), it’s more appropriate to say “Unless action is taken, this growing pressure …”

Pgs. 20-21: The section on rail offers little detail on the growth of passenger rail, and its related impact on the movement of freight rail. One benefit of added passenger rail is that funding is available to help improve trackage for both passenger rail and freight rail, especially in the Seattle to Vancouver, WA in the I-5 corridor.

Pg.22 (in shaded box): How much cargo moves…: 2nd bullet: Port’s shouldn’t have an apostrophe.

Pg. 23: Commodities shipped thru the Puget Sound regional ports: How much trade to Alaska through Port of Tacoma? I believe they’re bigger, yet the statistic is only provided for the Port of Seattle.

Pg. 25: Last bullet: as on pg. 20 above, please add, “without mitigation actions” and change the “will” to a “would” to indicate conditionality.

Pg. 26: Should cite 2008 STIA cargo data in the text and chart, which is available online at the Port’s website. http://www.portseattle.org/seatac/statistics/index.shtml

Pg. 27: Fig. 14: More than half of domestic volume at STIA is carried by FedEx, indicating that a large portion of the items may be business related documents and high value express shipment packages.

Pg. 27: Fig 15: The Port is surprised not to see high-value perishable agricultural products such as cherries, berries, mushrooms, etc. as a commodity category – are they contained in “other” and so less than 2%? These types of seasonal perishable exports are very susceptible to loss if delayed by congestion or mobility issues during shipment by truck to the airport.
Pg. 28: Suggested 4th bullet: “100% of products shipped by air begin, or end, their trip being conveyed by truck, to or from the airport on the regional roadway system. The air cargo mode is intrinsically linked to and totally dependent on the regional truck transportation mode.” This is the “last mile.”

Pg. 29: Summary: There is a good description at the end of the summary that talks about potential criteria for decisions on priority freight projects. The summary suggests that facilities that have the highest truck volumes and the highest congestion levels, plus are part of the “last mile” should be given special consideration. While this analysis really hasn’t been done to date, it should continue to be considered.

**Section 3.3**

Pg. 30: The plan should identify, tie in and reference the Prosperity Partnership’s Transportation, Trade and Logistics cluster work.

Pg. 31 and Pg. 32: Service Industries/Goods-Dependent Industries: Do package delivery services such as FedEx and UPS fit in to Service Industries or Goods-Dependent Industries? These time-sensitive users of our freight system are not discussed here.

**Section 3.4**

Pg. 35 and Pg. 36: “What are the MICs?” 2nd paragraph references” By 2040, most of the growth will focus on intensification of the use within the existing locations.” The PSRC may need to designate new MICs, such as STIA, or other highly industrial locations that are evolving.

Pg. 36: Potential Issues with the existing MICs: The first sentence is very passive: The MICs have managed to preserve some land for manufacturing and industrial uses. This should be expressed more positively. Also, the Port agrees that other areas, like STIA, should be considered for MIC designation in the future.

**Section 3.5**

Pg. 41: Regional Freight Mobility Roundtable: “the Long-Range Transportation Plan” is what?

**Section 3.6**

Pg. 45: Criteria Air Pollutants-Actions Taken to Mitigate Impacts, Marine and Locomotive sources. Discussion of The Northwest Port Clean Air Strategy should be included here as well as it presents programs to reduce emissions from ships and ground service equipment.

Pg. 46: Table 9 citation should read “2005 Puget Sound Maritime Air Emissions Inventory,” Puget Sound Maritime Air Forum, managed by the Port of Seattle.

Pg.46: Discussion can be added about the April, 2009 Herbert study that analyzed the “greenest routes” from Asia to US distribution points in the Midwest. The Pacific Northwest ports were
the greenest and accounted for the smallest carbon footprint. For more information, see
http://www.portseattle.org/seaport/cargo/GreenGateway.shtml

Pg. 46: The Northwest Ports Clean Air Strategy section should include mention of Cascade
Sierra Solutions, who help implement parts of the clean truck program by assisting owners in
updating pre-1994 trucks.

Pg. 47: last paragraph: Change wording in the last paragraph on pg. 47 should read: – “the
Clean Truck Program at the Port of Seattle is mandatory”.

Pg. 47: Table 10, NW Ports Clean Air Strategy: Should include a bullet in “short-term”
timeframe for clean truck program, which help scrap drayage trucks older than 1994, and helps
the owner replace with a newer truck.

Pg. 48: There are other actions being taken by the Port at STIA that are good examples of
projects to reduce air emissions. These include a program funded by ARRA funds which retrofit
gas powered Ground Service equipment to electricity. The Port has also worked with the FAA
and Alaska Airlines to begin implementing the Continuous Descent Approach program which
saves fuel by creating a direct descent instead of a stepped approach.

Pg. 53: Text should reference Figure 26 not Figure 25.

Pg. 52 and Pg. 53: “As noted earlier in this section, there are two types of roadway
investments…” A third type that should be included is new facilities where there’s a gap in the
system. An example of this is the SR509 Extension between S. 188th and I-5 at S. 216th Streets
to relieve congestion on Southcenter Hill.

Pg. 54: Text should reference Appdx 3c not 2E.

Section 3.9

Pg. 55: The final paragraph says that the process of looking at reasonable growth factors would
be further discussed in Section 3.4 of this strategy. However, Section 3.4 discusses MICs, not
data.

Section 4

Pg. 4: Fix reference to Section 4.5 (should be 4.4).

Section 4.3

Pg. 9: General comment: refer to “screening of passenger aircraft cargo” rather than passenger
airline cargo, to be consistent.

Pg. 11: Suggested language changes: “In essence, this mandates that TSA establish a system to
screen 100% of cargo transported on passenger aircraft by August 2010. This mandate will
enforce tremendous changes onto the air cargo industry in a relatively short time. Each day,
passenger airlines move roughly 12 million tons of air cargo. Generally, individual packages are bundled [consolidated] and wrapped into [fewer] shipments that are easier and faster to handle. By August 2010, these packages will have to be broken down to the piece level and screened, piece-by-piece [unless one or more of the approved screening methods can screen a consolidated shipment]. In addition, each piece [or consolidated shipment] will have to be screened [screened] using the approved screening methods, by someone meeting the screener requirements (Figure 4.2).

Pg. 11: First paragraph, last sentence: Statement is a bit strong. Although the conversion may, or is likely to cause significant delays, even the TSA is unable to predict what will happen.

Pg. 13: Suggested language changes: Impacts on air cargo: The 2007 IRC air cargo screening requirements represent a significant change to air cargo security. In essence, the act mandated that TSA establish a system to screen 100% of cargo transported on passenger aircraft by August 2010. Currently, TSA states that there is not sufficient [screening?] capacity at any single point in the supply chain, and that significant carrier delays, cargo backlogs, and transit time increases are expected [may occur unless screening is conducted at multiple points throughout the logistics supply chain.] If this occurs, it will likely cause [The TSA Certified Cargo Screening Program (CCSP) is designed to prevent] delays and backups at the STIA and Boeing Field air cargo facilities. In addition, it [Failure to properly institute the CCSP in the region] will likely slow the transit delivery time for all Puget Sound regional businesses that rely on [the portion of] air cargo transportation [that uses passenger aircraft].

The Port doesn’t think air cargo delays will be much of an issue at Boeing Field as they have essentially no belly-cargo in the few passenger aircraft they serve. Cargo at Boeing Field is carried chiefly on main-deck freighters, which are currently not covered by the TSA requirements.

At STIA, approximately 40% of total air cargo is transported on passenger aircraft. The majority, including most domestic FedEx volume as well as a significant portion of international volume, is shipped on freighters.

Section 4.4

Pg. 13: (Freight and Land Use Integration): Are there 9 MICs? Shouldn’t it be 8?

Pg. 13: (Freight and Land Use Integration): Should fix reference to Section 3.5, (should be Section 3.4 on page 35).

Pg. 17: “Locate access routes to avoid neighborhoods”: this discussion overlooks the need for freight deliveries to neighborhoods.

Section 4.5

Pg. 22: Potential Negative Impacts: Add an additional bullet (#5) titled “Tolling may make Pacific Northwest Ports less competitive. There should be a discussion on geographic
competitiveness (Puget Sound vs. other West Coast Ports) due to cost associated with tolls and increased cost for local travel. The bottom line cost helps decide if goods will be shipped through Puget Sound or another gateway. Discretionary container freight could move elsewhere where tolling doesn’t exist, such as the Port of Prince Rupert.

Pg. 33 and Pg. 36: “Case Study Review #5: California-PierPASS Off-Peak Program. Locate access routes to avoid neighborhoods”: this discussion needs to include discussion of the Washington State Joint Transportation Committee’s consideration of such a container freight fee for Washington State, and the Leachman analysis for Washington State showing the risk of diversion. To publish this discussion as a tool that could be considered for our region is not responsible without all the information that is publicly available.

We commented on the last draft that we wanted to engage with you in a discussion of PierPASS, and how it is problematic for NW ports. However, you have still included it here. We continue to believe that as demonstrated in the Leachman study performed for the 2008 JTC freight funding work, adding fees at a Port with 70% discretionary cargo would lead to diversion to other ports and, our terminal operators tell us that there are insufficient cargo volumes to justify added shifts and night gates. Further, Seattle’s freight routes have a lower percent of truck traffic than on 710 in LA/LB (reference Spokane St. Viaduct). If you choose to keep this in please devote description the 2008 study and our interpretation of the impacts as well.

**Section 5 Recommendations:**

See body of letter, Section 3

**Appendices**

Is there an Appendix 1?

Appendix 3B would benefit from a column with % of total.

Appendix 3C is missing some of the Port statistical data sources referenced in the body of the report.

Appendix 3C, p. 1: Typo BMSF should be BNSF.

Appendix 5A: it would be useful to update this chart with the Preferred Alternative projects.
March 9, 2010

Mr. Charlie Howard  
Director of Transportation Planning  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA  98104-3609

RE: Port of Seattle Comments on the Draft Transportation 2040 Plan Update

Dear Mr. Howard:

Thank you for the opportunity to comment on the Draft Transportation 2040 Plan Update (Update). The Update creates a framework for the Puget Sound region to implement the transportation system that will support the land use plan.

An important part of The Port of Seattle’s (Port) mission is to support economic development and job retention and creation. Our priority in the Update is to promote implementation of projects and programs to improve regional freight mobility and improve access for goods and people to through our seaport terminals and the airport. The Port has been involved in this process for several years and has provided input into both the Vision 2040 land use plan update and the ongoing Transportation 2040 Plan update.

Over the past year, the Port has supplied detailed comment letters to the PSRC on the 2040 Draft Environmental Impact Statement and the Draft Freight Strategy, an effort to create a freight strategy for the region and which is included as Appendix J of the Update. We are pleased to see many of our comments addressed. We believe these comments, along with many other submitted by freight stakeholders, have improved the Update. We would still like to see the recommendation language in the freight strategy strengthened and will continue to work with freight stakeholders in upcoming iterations.

We are now nearing the end of the update process, with adoption of the Update scheduled for May 2010, and we will only comment broadly on the Draft Transportation 2040 Plan in this letter in the following areas:

- Creating a Project Prioritization Process
- Freight Tone
- Draft Transportation 2040 Plan
- Draft Transportation 2040 Executive Summary
- Draft 2010 Action Strategy (Appendix A)
- Freight Strategy (Appendix J)
We look forward to continued participation in the following year to help PSRC staff determine key processes to help implement important infrastructure projects both in the short and long term.

The Port believes that the Update has provided a good framework for a transportation system that will help implement the 2040 Vision land use plan. The Update has included a regional freight profile, identification of existing and emerging freight issues, a list of needed infrastructure, and funding considerations. While this work has surpassed freight analysis of the past, we believe that this is not the end of the development of the region’s freight strategy, but a good starting point. There is still a great deal of work to do together.

Creating a Project Prioritization Process
Most important is the need to develop a process that will evaluate and prioritize the capacity projects necessary to addressing the most critical freight gaps and bottlenecks in the system. How do we determine the order of implementation of specific projects, what benefits do they provide and how will they be funded? This work is scheduled to be developed as part of the Action Strategy, which is included as an action item in Appendix A of the Update. It will be very important to work with PSRC staff and freight stakeholders over the next year to determine how these processes are defined.

Freight Tone
The other comment the Port would like to reiterate is the importance of the tone in how we tell the “freight story” in the region. It is important to highlight the benefits of freight in addition to negative impacts. The positive tone has been provided in the updated Freight Strategy but may need to be included in all parts of the document. Examples of positive messages include:

- Freight’s economic benefits
- Job retention/job creation
- Freight delivery needs to support dense, pedestrian oriented developments
- Strategic capacity projects which improve the transportation network
- Technology and other programs to support environmental quality

The Port believes improved freight mobility is required for both a healthy economy and good urban place-making. Existing policies must be called on to strengthen improve freight facilities, identify and protect freight routes, and help increase efficiency of freight mobility in the Puget Sound Region.

Below are a few general comments on the Draft Transportation 2040 Plan, the Executive Summary, the Draft 2010 Action Strategy (Appendix A) and the Freight Strategy (Appendix J). Attachment 1 to this letter includes our suggestions for inclusion into the Draft 2010 Action Strategy.

Draft Transportation 2040 Plan: Please review the Freight Mobility section (pgs 42-44) for consistency with the updated Freight Strategy (Appendix J). While some of the Framework Issues have been updated in the Freight Strategy, they have not been translated back to the Draft
2040 Plan. The PSRC may also consider incorporating the updated Freight Strategy recommendations into the Draft 2040 Plan Freight Mobility Section.

**Draft Transportation 2040 Executive Summary:** The Port supports the paragraph on Moving Freight and Goods (pg 13) and suggests the addition of language which says efficient freight movement supports the retention and growth of jobs.

**Draft 2010 Action Strategy (Appendix A):** Much of the work on “next steps” will be accomplished as part of the Draft 2010 Action Strategy as described in Appendix A of the Update. This is where detailed processes will be developed on project prioritization and implementation of the region’s freight strategy. We suggest additional references to the next steps for creating the prioritization process in *Short Term Action 1* and additional details on freight strategy implementation in *Short Term Action 11*.

Since this was the first time Port staff reviewed the Draft 2010 Action Strategy, we’ve made specific comments in Attachment 1 of this letter.

**Freight Strategy (Appendix J):** The document has been greatly improved in recent iterations. Consistency with the updated Strategy should be checked in relationship to the rest of the Transportation 2040 Plan. Also, the Section 5 recommendations could be stronger. Port staff would be happy to work with PSRC staff and other freight stakeholders to hone the recommendations to be more direct and action oriented.

Again, thank you very much for your responsiveness to the Port’s substantive concerns. If you have any questions, please feel free to call me at 206-787-3376.

Sincerely,

Dan Burke  
Regional Transportation Planner

enc. Attachment 1: Draft 2010 Action Strategy Comments

cc: Mike Cummings, Sean Ardussi (PSRC)
Attachment 1

Comments on Appendix A: Draft 2010 Action Strategy

The purpose of the Action Strategy is to provide a snapshot of how to provide the region’s investment approach for the coming 10 years. Action Strategies are updated every two years.

The Port has consistently asked how freight projects fit into the selection and priority process. To this point, it is not clear how projects have been selected for implementation into the different time periods of the 30-year plan. It has also not been clear how this process fits with other transportation related programs such as the Congestion Management Plan (CMP) and the region’s Economic Cluster plan.

The Action Strategy includes a set of recommended actions considered vital to advancing the region’s transportation agenda over the next ten-years. Of the 15 Short Term Action Strategies identified, two are particularly critical to improving freight mobility.

The following are recommendations that could be added to the Short Term Strategies.

Some suggestions for Short Term Actions 1 and 11 follow:

Short Term Action 1:

1) Within one year of Plan adoption, identify all infrastructure projects and programs that exist on the Freight and Goods Transportation System (FGTS) that are included in the constrained portion of the Plan.
2) Identify infrastructure projects which are located on “last mile” facilities or port connectors.
3) Evaluate each project based on existing and future traffic congestion levels and truck volumes.
4) Validate the need for the projects in the proposed time frame of the Transportation 2040 Plan.
5) Identify roadway links on the FGTS for project gaps.
6) Increase the utilization of FAST/FMRT members in identifying needed freight projects/priorities.
7) Define the existing freight system and identify gaps and bottlenecks in the system.
8) Identify the capacity projects that address the most critical gaps and bottlenecks in the system.
9) Develop a short to intermediate term (5-6 years?) list of freight priority projects.

Short Term Action 11:

1) Complete Short Term Action Strategy 1 which creates the process for determining project priorities in the Update:
a. Ensure preservation and maintenance of existing infrastructure and capacity of freight corridors;
b. Provide sufficient new system capacity to reduce travel times and maintain and improve freight mobility in critical corridors, including rail corridors that carry the bulk of international trade cargo;
c. Preserve the functionality of major freight corridors;
d. Protect access to and within existing MICs and freight intermodal facilities (“last mile” or connectors);
e. Prioritize freight movement on major freight corridors, considering separation of bikes and trucks for safety reasons.

2) Provide a clearly defined decision framework to deliver a sustained, dedicated funding source, and project prioritization process that will advance all modes of freight projects throughout the life of the plan.

3) Complete remaining FAST Corridor projects early in the Plan’s cycle to increase freight access and connect communities.

4) Ensure that the freight strategy directly supports the Regional Economic Strategy, ensure that the primary industry clusters have efficient mobility of goods and services, and keep major employers in the region and the state.

5) Continue to improve the data and analytical tools required to identify current and future deficiencies in the regional freight transportation system, and prioritize projects and operational strategies that best address these deficiencies.
March 9, 2010

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

RE: Draft Transportation 2040

Dear Mr. Drewel:

We appreciate the opportunity to comment on the Puget Sound Regional Council's Draft Transportation 2040. As you know, global climate change remains one of our most critical challenges and threatens every aspect of our Puget Sound communities. Transportation sources are the largest contributor to our regional inventory, emitting nearly half of our region's greenhouse gases (GHGs).

In response to this challenge, both Governor Gregoire and the Washington State Legislature have set GHG reduction goals that also promote economic growth and provide energy security benefits. Similarly, the regional transportation plan must comply with environmental requirements, including climate protection, in both the State Environmental Policy Act as well as the National Environmental Policy Act. We urge PSRC to develop a plan that sets the region on a path to successfully achieve these goals.

As stated in our previous letters,1 we also encourage PSRC to develop a plan that:

- **Shows all analyses.** Transparency is a key principle in our transportation planning process. We encourage PSRC to fully describe the models and assumptions used to calculate results so that stakeholders and reviewers can clearly understand how PSRC arrived at the proposed estimates for the plan.

- **Includes flexibility.** With a new federal administration and increased focus on climate protection and energy security, the re-authorization of SAFETE-LU is likely to reward regions that focus on efficient transportation systems, particularly around transit and walkable communities. The plan must be able to respond to potential changes, and position the region for success in a new funding paradigm.

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Page 2
Mr. Bob Drewel
March 9, 2010

We look forward to working with PSRC and our partners to develop a sustainable transportation plan for the Puget Sound region. If you have questions, please contact Paul Carr of my staff at (206) 689-4085 or paulc@pscleanair.org.

Sincerely,

Jim Nolan

Cc: Paul Roberts, PSCAA Board Chair
    Jake Fey, PSCAA, Board of Directors
    Mike Cummings, PSRC

jwc
January 26, 2010

Attn: Mayor Ray Stephanson, President, Puget Sound Regional Council; Mayor, City of Everett
     Bob Drewel, Executive Director, Puget Sound Regional Council
     Ben Bakkenta, Principal Planner, Puget Sound Regional Council
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98101

Re: Transportation 2040/Transit Oriented Communities

Dear Ladies and Gentlemen:

The Quality Growth Alliance (QGA) has previously commented on the Transportation 2040 Plan. We are writing to provide further comments on the draft of the Transportation 2040 Plan. As you know, the QGA grew out of ULI’s Reality Check program and is a unique partnership of ULI Seattle, PSRC, Cascade Land Conservancy, University of Washington College of Built Environments, NAIOP – Commercial Real Estate Development Association, Futurewise, Master Builders of King and Snohomish Counties, and Enterprise Community Partners. The QGA is focused on encouraging sustainable, compact communities that include all types of housing and employment opportunities, including affordable housing, sustainable transportation systems, and reductions in carbon emissions.

This letter comments on part of Chapter 1 of Transportation 2040, specifically the section related to Transit-Oriented Communities. We agree with the statements in this section relating to the opportunities for, and the benefits from, well-designed transit-oriented communities. Mixed-use development with amenities and public spaces around the region’s high-capacity transit facilities can help the region achieve many goals including accommodating growth in a sustainable manner by connecting land use and transportation and reducing carbon emissions.

Our concern about this section of Transportation 2040 is that the recommendations in the section are too limited. We appreciate the recommendation that local jurisdictions, in collaboration with regional transit agencies and the PSRC, do comprehensive station-area planning. In our view, more must be done to take advantage of the opportunities presented by our new and planned high-capacity transit facilities.
Puget Sound Regional Council  
January 26, 2010  
Page 2

We believe that achieving the goals of the Plan will take unprecedented, concerted, and committed effort between all stakeholders. Therefore, we suggest that the region pursue a type of “compact” to facilitate transit-oriented communities throughout the region. Such a “compact” would include all local jurisdictions, PSRC, regional transit agencies, the State, HUD, DOT and EPA, the agencies in the new federal Partnership for Sustainable Communities, NGOs such as the QGA, and those in the private sector that will build and help finance the transit-oriented development or TOD. We also believe that major employers should be part of this type of “compact.” This type of “compact” could help the region overcome the barriers to successful TOD, and directly respond to several of the highlighted needs to address "placemaking," access to jobs, proactive regulation, and regional consistency identified in our September 2009 report, From Barriers to Solutions and Best Practices: Urban Centers and TOD in Washington, prepared on our behalf by the University of Washington.

PSRC should be the agency that helps the region develop a compact to facilitate transit-oriented communities. QGA will commit to helping PSRC and the region form a compact. The form and detail of the compact should be determined by those involved, and QGA can provide assistance in developing a list of broad, multidisciplined ideas for consideration by those involved.

Very truly yours,

Patrick Callahan, Chair, Quality Growth Alliance and its Partner, ULI Seattle  
CEO, Urban Renaissance Group LLC

John Hempelmann, Vice Chair & TOD Co-Chair, Quality Growth Alliance  
Attorney, Cairnross & Hempelmann, P.S

Tom Fitzsimmons, TOD Co-Chair, Quality Growth Alliance  
Chief Operating Officer, Lorig Associates

Chuck Wolfe, TOD Co-Chair Quality Growth Alliance  
Principal, Charles R. Wolfe, Attorney at Law
March 9, 2010

Mr. Charlie Howard  
Director of Transportation Planning  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-3609

Mr. Sean Ardussi  
Manager for Freight Mobility Roundtable  
Puget Sound Regional Council  
1011 Western Avenue, Suite 500  
Seattle, WA 98104-3609

Dear Mr. Howard and Mr. Ardussi,

Thank you for your continued engagement with the Greater Seattle Chamber of Commerce and its Transportation Committee. We appreciate the multiple presentations that you and your colleagues have provided over the past year as the Transportation 2040 plan moves toward approval.

The Chamber fully supports and commends the decision of Puget Sound Regional Council to include a regional freight strategy in this long-range plan. As noted multiple times in the draft plan, maintaining freight mobility is a key component of maintaining and promoting a thriving economy. We also appreciate the specific references to the strategy in the plan, which complements FAST project implementation.

However, we would recommend more closely integrating the major elements of the freight strategy into the Transportation 2040 plan itself. In particular, specifying the freight mobility goals and supportive policies, as well as the recommendations and action plans for meeting these goals and objectives, would make the plan’s commitment to facilitating freight mobility clearer.

Once again, we appreciate the work that PSRC and its staff have done in making Transportation 2040 a more balanced regional strategy, including the outreach you have conducted to the Chamber and other members of the business community.

Sincerely,

Charles Knutson  
Senior Vice President, Operations & Policy Development
9 March 2010

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

Dear Ms. King:

We appreciate this opportunity to comment on the PSRC Draft Transportation 2040 (T-2040) Plan. Its new vision for sustainability is greatly welcomed given the overriding need to ambitiously mitigate the emissions of greenhouse gases (GHGs) and develop adaptation strategies to deal with the regional consequences of global climate change. Sierra Club approves of elements of this more sustainable future, such as regional tolling to support 90% more transit, the emphasis on complete streets, and transit oriented development in regional growth centers and connecting corridors.

**Better Integration of Land Use and Transportation Needed**

The T-2040 and corresponding land use Vision 2040 plans continue to be incompatible. The long list of road expansion projects ($23 billion out of $61 billion over the first 10 years) does not support the pattern of development consistent with Vision 2040. An additional approximately 500 miles of roadway expansion projects relative to Alternative 5 will not allow the region to meet VMT reduction goals nor associated GHG emission reduction goals. An 8 – 12 percent reduction in VMT from levels prevalent today is neither sufficient nor appropriate for a future that seriously considers climate change.

The projected 28% reduction of transportation GHG emissions by 2040 is much too low to meet climate change goals, but it illustrates problems from continued use of past trends projected into the future. Little of the projected GHG emission reduction stems from less vehicle travel since mode splits do not sufficiently acknowledge the potential for short trips to be made by non-motorized modes. Projected increase in transit from 3% to only 5% of trips in the region is a further symptom of inadequate integration of land use patterns with transportation investments.
Scenario Analysis for Challenging Assumptions

The best metric for selection of methods should be whether or not that collection of methodologies has helped lead to desirable outcomes, or at least has not contributed to bad decisions, when applied to similar analyses in the past. Transportation 2040 needs to include projections, regardless of whether they use orthodox methods or not, based on scenarios for no-growth and for reductions in traffic by 2040. Changes in employment patterns and workforce composition with an emphasis on local production could substantially alter work-related travel patterns. A future marked by depleted fossil fuels, accompanied by very high oil prices, will lead to much different demand for transit and non-motorized travel than a scenario that assumes extrapolation of past trends with continued growth.

An emphasis on major transit investments along with local improvements such as completion of sidewalk networks in urban areas should be the project investment focus in a severely financially constrained scenario.

Toll Finance and Revenue Allocation

We applaud the emphasis PSRC has placed on congestion pricing as a preferred strategy to raise revenue and manage the supply of road space. However, the use of this revenue for roadway expansion projects reduces the effectiveness of tolling for system demand management. Instead, the revenue should be available for all modes of transportation, and in particular increase available options while addressing crucial equity concerns. We have a moral imperative to provide quality transit service in those corridors where variable toll congestion pricing may place a significant economic hardship on low-income commuters. The fair and effective way to fund such options is with the tolling revenue.

The formulas used for computing tolls do not include any “externalities” associated with car travel, nor does 14.4 cents per mile for auto operating costs even capture the full costs as conventionally measured. While tolling of limited access highways and bridges will manage demand and raise revenue for upkeep of the system, other funding mechanisms should be considered as well. A carbon tax levied on fuels could be combined with a standard per capita rebate to yield a revenue system that provides equity to users and strong incentives to reduce GHG emissions. It would also best be applied to a myriad of local and regional transportation options.

Rail Network Emphasis

T-2040 needs to support a regional, state, and national plan for a much expanded rail network, powered by renewable electricity, for both freight service and regional passenger service. We can expect the costs of both freight trucking and air travel to rise substantially as conventional fuels become scarcer. The energy efficiency of rail transport will attract more usage for inter-city distances and put greater demands on the rail network in the Puget Sound region.
Summary

The T-2040 plan can place the region on a path to reduced GHG emissions and a more sustainable transportation future. We implore PSRC to implement bold policies that will position our region to be a leader in climate change mitigation and adaptation, and respond effectively to changes in energy markets that affect our region. The health and well being of the region depend on a sustainable vision of transportation.

Sincerely,

Morgan Ahouse, Chapter Chair
Sierra Club Cascade Chapter

Tim Gould, Transportation & Land Use Chair
Sierra Club Cascade Chapter
March 10, 2010

Puget Sound Regional Council Transportation Policy Board
Puget Sound Regional Council (PSRC)
110 Western Ave., Suite 500
Seattle, WA 98104-1035

RE: Public Comment concerning the Draft Transportation 2040 Plan.

Dear Transportation Policy Board Members:

The South Sound Chambers of Commerce Legislative Coalition (SSCCLC) is thankful for the opportunity to share our comments regarding the Draft Transportation 2040 Plan. First, the SSCCLC wants to thank PSRC staff and the Transportation Policy Board for its dedication in developing this detailed and very important document. This plan is a vital component in addressing how this region will handle our challenging transportation needs over the next 30 years.

The SSCCLC is comprised of nine Chambers of Commerce, in Pierce and King counties, represent the employers and workers that contribute to the $65 billion dollar economic engine in the cities of Algona, Auburn, Bonney Lake, Burien, Covington, Des Moines, Edgewood, Enumclaw, Federal Way, Fife, Kent, Milton, Pacific, Puyallup, SeaTac, Sumner and Tukwila. Our common mission, to enhance the competitiveness of the businesses in our region, has forged our partnership that seeks proactive solutions to our region’s challenges. The SSCCLC’s top priority is supporting a comprehensive regional transportation system capable of efficiently and safely moving people, goods, and services.

The SSCCLC supports the Draft 2040 Transportation Plan because it is focused on a balanced comprehensive regional transportation system which includes our top tier transportation projects within the plan and the accompanying 10-year action strategy. The SSCCLC’s top tier transportation projects are necessary to eliminate congestion and improve mobility to strengthen the South Sound’s economy given our connection between the Ports of Tacoma and Seattle. We request the Draft 2040 Transportation Plan continue its inclusion of the following critical state highway projects that will greatly improve congestion and mobility in the South Sound:

SR167 Extension/Expansion (SR405 to I-5) • SR509 Extension (West of SeaTac) • I-5/SR18/SR161 (“Federal Way Triangle”) • SR704 (“Cross-Base Highway”) • SR516 (Kent-Kangley Road) Expansion • SR164 (Auburn-Enumclaw) Expansion

Regarding the funding element of the plan, the SSCCLC strongly supports the PSRC’s completion of the Cambridge Systematic Freight Study. We feel that the completion of this study will prepare the region to competitively compete for federal freight/mobility funds under future federal Transportation Re-authorization. Given our regions role in the extremely competitive global economy, through our many Ports, it’s vital that our region qualify itself to compete for every federal dollar available to aid the timely completion of key freight mobility projects.
The SSCCLC again wants to thank the PSRC staff and Transportation Policy Board for this opportunity to lend our support and comments towards the Draft 2040 Transportation Plan. If you have any questions regarding our comments, please contact Terry Davis, the SSCCLC’s Issues Chair at 253-288-7496.

Sincerely,

Shaunta Hyde _______________________
Shaunta Hyde
SSCCLC Chair, Board of Directors

Terry Davis _______________________
SSCCLC Issues Chair

March 10, 2010
Dear Puget Sound Regional Council,

Tahoma Audubon Society, in collaboration with the Cross Base Highway Coalition, has worked for over a decade to address serious environmental issues presented by the proposed construction of the "Cross Base Hwy" in Pierce County.

I am writing you today to reaffirm that we are still opposed to the current alignment of this proposed new road through sensitive habitats that are home to numerous endangered and threatened species and are listed on WDFW's Priority Habitats and Species list, including extremely rare and fragmented Garry Oak woodlands and glacial prairies of the south Puget Sound region.

Tahoma Audubon Society, representing over 1,700 members in Pierce County, expresses deep concern with the future of transportation and quality of life in our region. I urge you to remove the Cross-Base Highway from all preferred alternatives on your project list, particularly alternative 5, which is the most transit friendly.

As a brand-new limited access general purpose highway, the Cross-Base Highway has no place in our region's plans for responsible transportation. Its almost half a billion dollar construction cost for less than six miles of new pavement would likely increase, not minimize, greenhouse gas emissions.

There are many good reasons to remove the Cross-Base Highway project:

* We should fix existing roads and bridges and invest in new modes of mass transportation before building any new highways.

* People don't want it! In a 2003 public poll on regional transportation planning and projects contracted by the Regional Transportation Investment District, the Cross-Base Highway ranked last of all proposed Pierce County projects. Only 10% of those polled stated it was a project of importance to the region.

* Construction of the Cross-Base highway would harm prime habitat for 19 plants and animals facing extinction on the joint Ft. Lewis-McChord military base, including streaked horned lark, water howellia, Mazama pocket gopher, and Taylor's checkerspot butterfly.

* Only 3% of our state's oak woodland prairies remain, and the Cross-Base Highway would flatten 162 acres and fragment 1,600 acres of habitat that Pierce County considers "the most biologically and ecologically rich areas remaining in the lower elevations of Pierce County."

* The proposed highway, through encroachment, risks closure of the airstrip at the joint Ft. Lewis-McChord military base. It puts a highway barrier between Pierce County's two largest employers, while not reducing traffic on I-5.

* The Cross-Base Highway conflicts with new Washington Department of Transportation policies to analyze and reduce our transportation system's contributions to climate change and to protect and restore biodiversity.

As a council, you are deciding on the future of transportation for our region. Thank you for looking ahead to promote cost-effective and sustainable transportation options and to protect rare wildlife and habitat in the Puget Sound region.

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

March 9, 2010  

Dear Ms. King:  

Thank you for the opportunity to comment on the draft Transportation 2040 plan. The Tacoma-Pierce County Chamber represents the business interests of over 1,200 member firms in the South Puget Sound. The Chamber consistently advocates for equitable geographic distribution of transportation dollars and transportation investments that aid the growth of economic opportunities in Pierce County.  

The Chamber recognizes the hard work of the PSRC in developing this draft report and offers the following comments:  

**Freight Mobility**  
The Pierce County economy is largely dependant on warehousing and manufacturing activities related to the movement of goods through the Port of Tacoma. The Chamber generally applauds the PSRC’s recognition of the value, limitations and threats to industrial lands. Similarly, The Chamber supports the PSRC’s commitment to completing State Route 167 and State Route 509 and building SR 704, as South Puget Sound is one of the few communities in the country with an incomplete highway system. These highways are crucial to the efficient movement of people and goods that enable Pierce County’s economic growth.  

The City of Tacoma Comprehensive Plan designated the South Tacoma area as a Manufacturing Industrial Center (MIC). This new MIC will soon be identified in the (Pierce) Countywide Planning Policies. The Regional Freight Strategy of Transportation 2040 should not limit policies to the eight existing MICs, but instead include language to incorporate newly designated MICs into Transportation 2040.  

**Air Quality**  
Draft Transportation 2040 fails to address the full extent of air quality issues in the South Puget Sound, namely the impact of PM 2.5 and ozone. Green house gas emissions, which the report adequately speaks to, are not the only air quality threat in Pierce County or the region. Already, most of the Tacoma metropolitan area is designated as a non-attainment area for PM 2.5, making Pierce County subject to the U.S. Environmental Protection Agency’s Transportation Conformity, which effects access to federal funding.
When the EPA publishes new standards for ozone, Puget Sound’s current ozone levels will likely be out of acceptable attainment levels as well. The PSRC must define a process to prioritize transportation projects that fully addresses all of Pierce County’s air quality challenges.

**Transportation Funding**
The Chamber supports tolling to fund critical capital transportation projects and operating and maintenance expenses. However, tolling must be implemented in a geographically equitable manner and revenue collected from tolls must remain within the geographic area where it is collected. For example, tolls should not be increased or set for one project in order to enhance the financial worthiness of other projects.

**Pierce County Project List**

*State Highways*
The Chamber applauds the PSRC’s commitment to complete State Route 167 and State Route 509 and build SR 704. These routes are crucial to the efficient movement of people and goods to promote economic growth and jobs in Pierce County.

*HOV Lanes*
The Chamber supports the extension of I-5 HOV lanes through Pierce County. The project list of draft Transportation 2040 plans for HOV lanes from the King/Pierce County line to SR 512. The Chamber urges the PSRC to include plans in Transportation 2040 for extending HOV lanes on I-5 from SR 512 to the Pierce/Thurston County line.

*Transit Projects*
The Chamber supports the PSRC’s transit goals in Pierce County. Extending Sounder Commuter Rail, Tacoma LINK, LINK Light Rail and building Pierce Transit bus rapid transit will help Pierce County increase our economic competitiveness by deferring traffic congestion, addressing air quality issues and improving the quality of life for Pierce County residents.

*Corridor-Specific Transportation Demand Management*
The Chamber views demand management as a critical component to Pierce County’s future transportation system. The Chamber has partnered with the City of Tacoma and Pierce Transit to create Downtown: On the Go! a resource for downtown Tacoma employees to reduce their drive alone commute trips. The goal of Downtown: On the Go! is to eventually provide transportation management association-like services for downtown Tacoma employers and employees.

Sincerely,

Chelsea Levy  
Metropolitan Development Manager

Gary Brackett  
Business & Trade Development Manager
March 9, 2010

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

Ms. King:

The Economic Development Board for Tacoma-Pierce County (EDB) meets with hundreds of Pierce County companies each year and works with them on a variety of business retention and recruitment issues, including transportation. The vitality of the regional transportation system is critical to South Sound businesses who rely on freight mobility as well as local residents who commute to their jobs daily. Additionally, as plans are developed for regional transportation funding resources in the years ahead, clear precedents need to be established regarding funding equity to ensure that transportation dollars generated in our community are used for projects in our community.

As Pierce County expects significant growth in the decades ahead, we need to plan strategically to accommodate that growth by growing our local employment centers. A central element of this planning effort is our transportation infrastructure. The following projects are crucial to South Sound businesses moving forward:

- **State Route 167 extension to the Port of Tacoma**  
  This is a critical corridor for much of the South Sound and will significantly improve the timing of goods moving in and out of the Port of Tacoma

- **State Route 704 – Cross Base Highway**  
  Frederickson is a major employment center in Pierce County and creation of this new highway will create much needed access to businesses like Boeing, Toray Composites and more. SR-704 will also reduce a great deal of congestion on I-5 near Joint Base Lewis McChord

- **HOV improvements on I-5 and State Route 16**  
  Freight mobility is a high priority for Pierce County businesses and HOV and other improvements on these major highways will be crucial to efforts to remain competitive in the timely delivery of goods
• **Sounder Commuter Rail improvements**  
  Businesses will increasingly rely on alternative commuting options for employees in the years ahead and to best serve future employee populations there needs to be increased commuter rail service between Seattle and Tacoma, as well as the fulfillment of the extension of Sounder commuter rail to Lakewood and DuPont.

• **Light Rail extension to Tacoma Dome**  
  The Sound Transit light rail network needs to be extended to the Tacoma Dome to provide a rail connection from Tacoma-Pierce County – a major Puget Sound population center – to Sea-Tac International Airport and to King and Snohomish Counties

These are all projects that will need to be completed for Pierce County to keep up with the pace of population growth and the increased demand for jobs in our area in the next three decades.

Finally, as the Puget Sound Regional Council continues to deliberate on this document and considers the options for generating transportation revenue dollars through user fees, tolls, gas taxes and other options, it is important to maintain a policy of equitable funding distribution based on the geographic locations where the revenue is generated. Moving forward, projected revenue dollar amounts will change from year to year and specific funding sources may change from year to year. As this occurs, and tough choices are made on the prioritization of projects, it is of utmost importance to follow a balanced plan that ensures dollars generated in one community are not exported to another area of Puget Sound.

The EDB is grateful to the Puget Sound Regional Council and the Prosperity Partnership for all of its efforts on behalf of our region and the work we are doing together to plan strategically for the transportation needs of the future. If you have any questions, please feel free to contact me at (253) 383-4726.

Sincerely,

Bruce Kendall  
President and CEO
Attention: PSRC Transportation 2040 Comments  
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 Transportation 2040 Final Environmental Impact Statement.

First, we at Transportation Choices Coalition want to commend PSRC staff for their work on the whole of the Transportation 2040 update process. The level of analysis and innovation staff has brought to the plan is unmatched with past transportation plans, or at any other MPO in the country. This is especially true when it comes to the Council staff’s development of pricing policies and modeling climate impacts. PSRC boards also deserve credit for moving forward on tolling and adopting a climate framework that can lead to real reductions in greenhouse gas emissions.

**Transformation and Pricing Breakthrough**

Our regional transportation plan update should be a vision of where we go next in accommodating growth while improving mobility for people and goods. In that vein this preferred alternative is a mixed bag. The preferred alternative is forward looking in the way that it adopts pricing, or tolling, as the path forward in transportation finance. Though the plan falls short compared to DEIS Alternative 5 in how aggressively it pursues pricing of roadway, setting a goal of pricing of the entire freeway system within two decades will require drivers and policymakers to think about the cost of driving while raising the driver’s consciousness of the cost of transportation infrastructure.

PSRC staff also deserves much credit for modeling transportation-related climate emissions, allowing policymakers to better understand how making it easier to drive while ignoring other modes is detrimental to the climate. We applaud the inclusion of more transit infrastructure and service than any previous plan, along with the inclusion of a more aggressive non-motorized component, while avoiding what has in the past been a temptation to come up with a long list of new roadway projects. While the plan deserves criticism for including long-talked about road projects without adequately questioning whether those projects are really any longer necessary, the list has only a small number of brand new roadway proposals.
Reducing Transportation Greenhouse Gas Emissions

As far-reaching as the preferred alternative is in moving toward a different model of transportation finance, it seemingly fails to address the climate crisis as now required by state law. A need to meet the state’s greenhouse gas reduction goals should underlie every aspect of the plan. Yet, staff’s assessment of the plan – both constrained and non-constrained – shows that it does not. We believe this may be a legal failing of the plan, and it is certainly a moral one. In a region where over 50 percent of greenhouse gas emissions originate from transportation, a plan addressing the next 30 years of transportation planning in a region more equipped than any other in the state to reduce emissions, should make reducing GHGs in the transportation sector a number one priority. State law says we need to reduce emissions by 25% below 1990 GHG emissions by 2035 (equal to roughly 40% below current levels), the science says we need to do even better.

The plan does provide a framework that can help achieve the necessary GHG reductions in the transportation sector. The Greenhouse Gas Strategy’s multi-faceted approach of reducing transportation emissions through land use improvements, user fees, more transportation choices and improved technology is the right one. Vision 2040 and a more aggressive approach on connecting centers should allow for significant reduction of GHGs by reducing the number of commute and discretionary solo drives, though it should be noted that the Vision 2040 relies on relatively weak enforcement of existing growth management policies which are in most cases insufficient to guarantee the mix of housing and jobs/housing balance necessary to realize the regional land use plan.

While improved land use practices and pricing, along with better transportation choices will have the effect of reducing per capita vehicle miles travelled, the preferred alternative sidesteps the state’s VMT reduction requirements. And while it may be in dispute whether the state’s Vehicle Miles Reduction targets are a mandate or only a planning goal, the legislature and governor have clearly established VMT reduction in urban regions as a priority. The Governor’s Executive Order on Climate Change could not be clearer on this point. PSRC staff and most Executive Committee members have publicly acknowledged that you cannot meet

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1 RCW 70.235.020
2 Draft Transportation 2040: Review Draft, January 22, 2010, Figure 17, p. 50.
3 See, for example, the British Government’s, Stern Review Report on the Economics of Climate Change, http://webarchive.nationalarchives.gov.uk/+/http://www.hm-treasury.gov.uk/independent_reviews/stern_review_economics_climate_change/stern_review_report.cfm, which estimates that inaction on climate change may cause lead to economic losses of between 5-20% of global GDP, or University of Washington researcher, David Battisti’s, work on the impacts of climate change on worldwide food production: http://seattletimes.nwsource.com/html/localnews/2008604722_webwarming09m.html
our GHG reduction targets without reducing VMT even beyond what’s called for in RCW 70.235.020. The EIS shows that even a radical transformation of vehicle fleets is not enough to allow us to meet the state's GHG reduction requirements.6

Furthermore, it is not enough, as the EIS infers, for the PSRC region to meet VMT reduction proportionate to its share of the state’s population. Legislative history speaks to lawmakers' intent for urban regions, where existing land use and transit availability make significant mode shift more likely, to take a higher than proportionate share of VMT reduction.7 This intent is also echoed in the Governor’s Executive Order. 8 However, PSRC’s preferred alternative accepts meeting a proportionate share as adequate. While WSDOT has failed to show much guidance on this issue, we do not accept the current plan as adequate in terms of PSRC’s need to meet the VMT reduction requirements of HB 2815.

Given the climate action required at the state level, PSRC needs to rethink its approach. First, while we do believe that the preferred alternative’s approach on tolling will make a profound difference over time in reducing emissions, possibly with more significant outcomes than recognized by the Council’s modeling, the need to reduce GHGs should be a more explicit goal of regional pricing schemes. This is both an issue of the price and how collected revenue is spent. As currently drafted, the pricing scheme’s primary objective is to produce revenue for a project list mostly skewed to increasing vehicle throughput. This project list, in turn, has the perverse effect of building in significantly more long-term vehicle emissions, overwhelming the savings that come from the 4-part GHG strategy. Instead, pricing should be more aggressively used to incent people to make choices other than single-occupancy vehicle trips.

To avoid building in new sources of emissions and to actually reduce emissions, a much higher proportion of revenue should be invested in the kind of transit that we know can get people out of their cars while also promoting the kind of transit-oriented communities that allow more people to make more trips on foot, by bike and by transit.9 This means a more aggressive rail transit plan – building out ST2 more quickly, by dedicating more toll revenue and leveraging new federal tools such as a potential National Infrastructure Bank to accelerate delivery of the plan (given that more than $60 billion in the constrained plan is not yet identified, banking on

6 See, Draft Transportation 2040: Review Draft, January 22, 2010, Figure 17, p. 50. The Review Draft promises more detail in Appendix L. However, Appendix L is not available as of the March 9, 2010 due date for public comment on the preferred alternative.

7 See, for example, House debate on passage of ESHB 2815, Feb. 19, 2008, 2pm , starting of 46:00 of video recording: http://www.tvw.org/media/mediaplayer.cfm?evid=2008020152B&TYPE=V&CFTID=8799895&CFTOKEN=91ba76a5e9d344ff-DFAF6484-304B-349E-4E8A199998CF093B&bhcp=1


yet to be enacted federal funding sources is no more far-fetched than other financial elements of the plan). It also means a more aggressive ST3 plan than envisioned in the preferred alternative, with rail networks reaching to more of our communities with existing street grid networks. Finally, intra-city rail—both streetcar and in-city, grade-separated light rail—will prompt development of more transit-oriented communities while also providing the choices that more people need to get out of their car for more local trips, making it easier for families to forgo a second car, or possibly any car at all.10

There are several other climate strategies that are either ignored or underdeveloped by the draft document that, in conjunction with more aggressive pricing, better land use policies and more transit choices, could have a significant impact on reducing VMT. One of these is a better developed and more aggressive approach on parking management and parking pricing. The plan in its current form only touches on the potential of parking policy and pricing as a TDM strategy, while also discussing the possibility of a 5% regional surcharge on parking as a TDM tool and, presumably, as a revenue tool. We believe the council should adopt parking pricing strategies in the first 10 years of the plan as a means for reducing VMT. We also encourage PSRC to incorporate shared parking and elimination of most public subsidies for construction of parking lots by city and county governments.

We also encourage PSRC to adopt a preferred alternative that encourages more shared parking and elimination of most public subsidies for construction of parking lots by city and county governments, while also encouraging cooperative parking arrangements by private owners of parking facilities to reduce the parking footprint and allow more residential and commercial development in transit nodes and corridors.

Other strategies that should be better incorporated into the plan to reduce VMT include public subsidy and regional deployment of car sharing to all station areas and centers; more movement of freight by rail along with strategic improvements to the Ports of Tacoma and Seattle’s and the state’s freight rail infrastructure; focusing growth in station areas and centers beyond what’s recommended in Vision 2040; use of sales tax, carbon taxes or upstream taxes on fuel to reduce solo driving and fund more transit and TOD infrastructure investments; and improvements to existing PSRC modeling capabilities to better identify VMT savings in both the existing plan and updates to future plans.

10 See, "Portland Streetcar Economic Impacts – First Phase Carbon Footprint Benefits Modeling," Feb. 4, 2008, by Eric Hoovee of E.D. Hoovee & Co., indicates potential for a 60% overall savings in carbon footprint with high density urban development compared to a suburban alternative. "This reflects a 76% savings in transportation and 46% in development footprint. When viewed relative to type of development, the savings amounts to a 65% reduction in residential carbon footprint—covering both the transportation and development components of the residential use. With employment, a 45% reduction in carbon footprint is identified."

http://reconnectingamerica.org/public/display_asset/carbonbenefitsmemo?docid=308
Finally, while the draft plan offers an “aggressive” technology scenario for transforming existing vehicle fleets to electricity and other cleaner technologies, the draft document offers no plan for ensuring that our region is more likely to achieve the aggressive rather than “likely” scenario. While Transportation Choices is focused on reducing the need for solo vehicle trips, we recognize that even the most aggressive demand side strategies and transit investments are not enough to meet our region’s share of needed GHG reductions in the transportation sector. Achieving the aggressive technology scenario is a must. Therefore, we believe that the plan must lay out a set of strategies, including incentives, but possibly also including some mandates, to get us to the kind of vehicle fleet turnover that will be necessary to significantly reduce emissions from the transportation sector.

**Project Prioritization**

What is already an oft-repeated statement in the halls of PSRC is that the project prioritization process is the piece that could make or break the plan. As might be expected in a political process, nearly every transportation project envisioned over the last 30 by a city or county elected official has been added to either the constrained or unconstrained project list, including projects that undermine the realistic funding constraints our region is likely to see over the next 30 years, not to mention the projects’ long term environmental impacts. The project prioritization process is a welcome attempt to subject each project to a set of performance criteria, including criteria reflected in state climate protection law.

Transportation Choices Coalition believes the process should weigh projects against each other in order to recommend to the region which projects are most worthy of being funded because they actually advance the goals stated in this section of the plan. And with the state having declared reducing GHGs and preserving Puget Sound as priorities, any project that would undermine these priorities should be dropped off the list or, at the very least, project proponents should be able offer a funded plan to mitigate those water or air impacts.

In response to the late addition of “congestion relief” to list of prioritization criteria, it should be noted that this phrase should in no way be taken as a synonym for expansion of general purpose road capacity. Congestion relief should be seen from the perspective of the commuter willing to utilize any convenient means of conveyance, not as something to be realized by a driver determined to travel via single-occupancy vehicle. So, this means high-capacity transit that can by-pass congested auto traffic, as well as more center-based development, car-sharing, TDM strategies and pricing of roadway to reduce the need for people to make as many solo vehicle trips, should all be considered forms of potential congestion relief.

**Public Health and Complete Streets**

We appreciate the Council’s embrace of public health as a key value in Transportation 2040. Many of the same approaches to our transportation future

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that will reduce GHGs also promote more active lifestyles. Re-orienting our transportation priorities around centers encourage people to make more trips by foot and bike, as well as transit, reducing the risks and costs of obesity, diabetes, osteoporosis, pulmonary and cardiac diseases and even depression.\textsuperscript{12} A whole array of air contaminants related to driving, including fine particulate matter, are principle causes of asthma and other pulmonary and cardio-vascular disease.\textsuperscript{13} To address such issues, the draft plan increases the investment in non-motorized modes more than any previous plan. The plan would also adopt Complete Streets as a guiding principle for programming rights of way. However, as with GHG reduction, public health should be a threshold screen by which any project is measured and the plan should call for health impact assessments on all projects over $500 million.

**Recommendations**

1. **Pricing/Tolling**
   - Move forward more aggressively on pricing all limited access roadway in the Puget Sound area as a means for funding transportation improvements and managing congestion while also reducing demand for roadway capacity to reduce VMT.

2. **Reducing GHG**
   - Work within recommended framework of land use improvement, user fees, transportation choices and technology to reduce transportation emissions to the levels called for in state law.
   - Meeting state climate targets should be a threshold factor in programming transportation funding.
   - Use tolling as a tool to incent drivers to switch to carpool, transit, bicycle, pedestrian and telecommute alternatives.
   - Use tolling revenue to fund transit improvements.
   - Move more aggressively through incentives and mandates to target most residential and employment growth into centers and station areas.
   - Reorient investment strategies to prioritize high capacity and other fixed guideway transit service that will serve centers while encouraging transit-oriented development in centers and station areas.
   - Utilize parking management and pricing, along with carsharing and other TDM measures to pursue state GHG reduction targets.
   - Utilize both mandates and incentives to more aggressively turn over vehicle fleets to meet aggressive vehicle technology targets.

3. **Project Prioritization**

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\textsuperscript{12} See, Center for Disease Control and Prevention resources on built environment: [http://www.cdc.gov/healthyplaces/](http://www.cdc.gov/healthyplaces/)

Use recommended prioritization criteria to score all projects and weigh them against each other in determining the programming of transportation projects throughout the region.

Congestion relief is not a synonym for SOV capacity. Addressing congestion relief means funding projects and strategies that will allow commuters to avoid being stuck in traffic for excessive periods of time.

4. Public Health and Complete Streets

- Adopt draft plan recommendations for dramatically increasing non-motorized transportation options while also ensuring future rights of way are designed according to complete streets principles.
- Require Health Impact Assessments for all projects over $500 million.
- Make health impacts a bottom line threshold for deciding whether to program funds for a project.

Transportation Choices is excited about the long range vision outlined by PSRC in the draft Transportation 2040 document. The draft plan does set out a path forward for how we better internalize the externalities of our transportation system through pricing mechanisms while subjecting projects and the plan as a whole to the kind of analysis that can help us move forward in a more sustainable manner. However, climate and public health considerations, not to mention impacts on Puget Sound water quality, must be elevated to threshold factors in determining whether projects are worthy of funding and whether they advance our region’s environmental, economic and growth goals.

We thank the PSRC staff, boards member governments for all of their efforts developing this plan. We look forward to working with PSRC and its member jurisdictions to help improve this vision and to implement it with criteria that allow us to prioritize the best projects while leaving others behind so that we may build a more livable and sustainable economic future for the region.

Sincerely,

Bill LaBorde
Policy Director
Transportation Choices Coalition
March 8, 2010

RE: PSRC Concurrency Listing Request
West Snohomish County SMART Corridor

On behalf of the Tulalip Tribes of Washington, and in conjunction with Federal Highway Administration (FHWA), the Bureau of Indian Affairs (BIA), Washington State Department of Transportation (WSDOT), Snohomish County and City of Marysville, we respectfully request that the I-5/116th St NE Interchange Improvement project and I-5/88th St NE Interchange Improvement projects remain on PSRC’s 2040 list of projects (TIP) for the West Snohomish County SMART Corridor.

These interchanges were constructed decades ago, when surrounding communities were lightly populated and rural in character. Today, the region is an emerging urban area, with major commercial centers at the Tulalip’s Quil Ceda Village and the Gateway Shopping Center, and many new residential neighborhoods that are home to workers for major employers in the region (such as the Boeing Everett plant and the Everett Naval Station). As a result, the interchanges are at capacity and impacting economic development in the surrounding areas and hindering traffic along I-5. Elements of the current problems with the interchanges include:

- Traffic volumes and interchange configurations cause back-ups onto I-5 travel lanes.
- Unnecessary congestion increases idling and greenhouse gas emissions.
- Economic development opportunities are stifled by access problems off I-5.
- Pedestrian and bicycle users must contend with a narrow unsafe option for crossing I-5.

These two projects are important to the Tulalip-Marysville-Northern Snohomish County region. These two interchanges along I-5 on the Tulalip Indian Reservation are 2 of 3 linkages and access to and from the reservation and I-5 for tribal and non-tribal members. Congestion at these two interchanges often produces gridlock east and west across I-5 causing extreme delays during peak hours. Often, traffic exiting I-5 cannot get thru the interchanges to the local road network and cause traffic queuing to back up on to the I-5 mainline. This is not only a negative impact to traffic movement, but it causes idling and increases in greenhouse gas emissions. Additionally, the congestion at these two interchanges slows down and stifles economic development in the area. Making
improvements at these ‘bottleneck’ interchanges are the number 1 and 2 transportation projects of the Tulalip Tribes and have been for over a decade.

The Tulalip Tribes have been actively leading the efforts on both of these projects for many years. For the 116th ST NE Interchange, the Tribes have worked closely with WSDOT and other agencies to develop the full build-out plan for the interchange and have led the completion of the EA/FONSI, Preliminary Design, Final Design, PS&E, and construction for 3 early phases of the project. PS&E of the final phase is under way and will be ready for a 2011 ad date. The Tribes have been the primary funder and obtained additional funds from other sources towards completion of the project. For the 88th ST NE Interchange, the Tribes have worked closely with WSDOT and other stakeholders to make small interim improvements to improve interchange operation in the short term, and are planning to lead the full build-out plan with WSDOT and other agencies. The Tribes plan is to begin the formal planning efforts for 88th ST NE Interchange as 116th ST NE Interchange is nearing completion. These projects are necessary for safety, mobility and continued economic development for the Tribes.

With major increases in area population, and traffic volumes on I-5 and over and through 116th Street NE and 88th ST NE, the existing 116th Interchanges are now operating above design capacity, causing congestion and lengthy delays during peak traffic hours. The combination of traffic volumes and the inefficiencies caused by closely spaced dual signals at these interchange cause back-ups at the I-5 off-ramps, increasing traffic delays and posing safety risks on both the interchange and the I-5 main line. On-ramps release vehicles onto I-5 in a sporadic and unmetered manner, which causes additional congestion. The current configuration of the interchanges also has little or no infrastructure accommodating carpooling or public transit, nor does it adequately support east-west pedestrian and bicycle use. **These deficiencies create negative impacts to local, regional, and international economies** by disrupting both the international and regional flow of goods and services, increasing greenhouse gas emissions as vehicles idle, and generating safety risks. Project briefs for both interchange projects are attached for reference.

If you need additional information or assistance, please feel free to call Debbie Bray at 360-654-2608, dbray@tulaliptribes-nsn.gov.

Sincerely,

Mel Sheldon
Tribal Chairman
Tulalip Tribes
I-5/88th Street NE Interchange Project
Project Update – March 2010

Description
The existing interchange at 88th St NE was constructed over 20 years ago to serve the regional traffic demands at Tulalip, City of Marysville and Snohomish County. The added interchange relieved congestion at the NE 4th Interchange to the south and 116th St NE interchange to the north. Rapid growth throughout the north Snohomish County area and increased traffic on I-5 since that project was completed have increased traffic at the 88th St NE Interchange and the adjacent interchanges. Currently, this interchange experiences significant backups at the ramps due to traffic entering and leaving I-5 to and from destinations east of the interchange. The Tulalip Tribes with stakeholders at FHWA, BIA, WSDOT, Snohomish County and the City of Marysville are again stepping forward to lead efforts to reduce the congestion impacting the region.

In the last 5 years, both the Tulalip Tribes and WSDOT have collaborated and completed interim improvements to relieve congestion in the near term. WSDOT led interim improvements at the interchange to improve peak hour operations. Those improvements included extending the northbound off ramp right turn lane and adding a peak hour reversible lane designation on 88th St NE over I-5. The Tulalip Tribes led interim improvements at the interchange by adding a second left turn lane to the northbound off-ramp from I-5 to 88th St NE, add a sixth lane to 88th over I-5 to allow for a second wetsbound thru lane over I-5. These improvements have improved the movement of traffic between I-5 and areas east of I-5.

Project Description
The 88th St NE Interchange project will design and construct interchange improvements to reduce congestion and improve mobility to and from I-5 and 88th St NE. Key project elements will include 88th St NE bridge improvements, ramp widening, accommodate HOV ramp bypass and metering, provide planning efforts and coordination with WSDOT, Snohomish County, City of Marysville have identified potential elements of the needed improvements. Those improvements include, reconfiguring the 88th St NE Diamond Interchange to a Single Point Urban Interchange with dual lane left turns, improvements to 88th St NE east of the interchange, auxiliary lanes on I-5 northbound and southbound, and improvements at the NE 4th St Interchange.

Benefits
- Reduces northbound off-ramp queue lengths by almost 600 feet, thus eliminating queues from backing up onto the I-5 mainline and improving safety.
- Reduces average vehicle delay at interchange ramp signals reduced from 605 seconds to 29 seconds in 2030
- Reduces in congestion idling and greenhouse gas emissions.
- Increases economic development opportunities stifled by access problems off I-5.
- Increases pedestrian and bicycle mobility east-west across I-5.

Progress & Schedule
The project schedule is dependent upon funding availability. The Tulalip Tribes have planned to start the project planning traffic analysis in 2010 and it will take 4 years to complete the environmental assessment, selection of the preferred alternative, design and permitting prior to advertising for construction in 2014. Assuming a SPU1 will be the preferred alternative, construction will last 2 to 3 years.
Funding

The total cost of this project is programmed at $63.9M. To date, no funding has been secured. The Tulalip Tribes are pursuing a multi-agency funding package thru BIA, FHWA, WSDOT, Snohomish Coutny and the City of Marysville (as well as Tulalip Tribes funding).

Benefits

These interchanges were constructed decades ago, when surrounding communities were lightly populated and rural in character. Today, the region is an emerging urban area, with major commercial centers at the Tulalip’s Quil Ceda Village and the Gateway Shopping Center, and many new residential neighborhoods that are home to workers for major employers in the region (such as the Boeing Everett plant and the Everett Naval Station). As a result, the interchanges are at capacity and impacting economic development in the surrounding areas and hindering traffic along I-5. Elements of the current problems with the interchanges include:

- Traffic volumes and interchange configurations cause back-ups onto I-5 travel lanes.
- Unnecessary congestion increases idling and greenhouse gas emissions.
- Economic development opportunities are stifled by access problems off I-5.
- Pedestrian and bicycle users must contend with a narrow unsafe option for crossing I-5.

Magnifying these local needs and concerns associated with the 116th Interchange, I-5 is the only north-south Interstate on the West Coast, and the major north-south international trade corridor connecting Washington with Canada, Oregon, California, and Mexico. The portion of I-5 passing through the City of Marysville, Snohomish County, and the Tulalip Indian Reservation is a crucial freight link between the major ports of Seattle and Tacoma, and the Canadian market. Approximately 76 miles south of the U.S.-Canada border, and 36 miles north of downtown Seattle, the 88th ST NE Interchange provides access to significant traveler and employment centers, and invites Canadian dollars into the regional and local economy. Problems with the existing 88th ST NE Interchange thus harm the larger Puget Sound region as well as local communities and businesses.
Figure 1
I-5/88th St. NE
Interchange Improvements
Tulalip Tribes
I-5/116th Street NE Interchange Project
Project Update - January 2010

Description

The I-5 / 116th Street NE Interchange project will replace the existing diamond interchange with a Single-Point Urban Interchange (SPUI) facility to reduce congestion, increase safety, and support economic development in the area of the Tulalip Tribes and the City of Marysville. Key project elements include widening of all interchange ramps, HOV bypass lanes, ramp metering, replacement of the existing overpass with a wider bridge, bike lanes and sidewalks across I-5, and local road improvements to improve interchange operations.

The Tulalip Tribes, along with WSDOT, Snohomish County and the City of Marysville, have for over the last decade recognized the pressing need to replace the existing 116th Interchange with an option that provides improved safety, more capacity, less congestion, and pollution, and better “transportation” options (for people AND fish). The selected SPUI design and interchange construction program has been shown to have the best combination of lower cost, increased speed of construction, improved long-term safety and level of service, environmental impact avoidance and mitigation, and enhancements to local community livability.

Benefits

The aging interchange that serves these communities at the crossing of I-5 and 116th Street NE was constructed in 1971. Nearly 40 years ago, these Puget Sound Washington communities were lightly populated and the surrounding region was decidedly rural in character. Today, the region is an emerging urban area, with major destinations such as the commercial centers at the Tulalip’s Quil Ceda Village and the Gateway Shopping Center along with expanding aero/industrial developments at the Arlington Municipal Airport. Many new residential neighborhoods have sprung up, and house, for instance, workers for the largest aircraft manufacturing facility in the world (Boeing Everett plant) and the Everett Naval Station. As a result, the interchange is simply dysfunctional and outdated. Elements of the current problems with the 116th Interchange include:

- Traffic volumes and interchange configurations cause back-ups onto I-5 travel lanes.
- Unnecessary congestion increases idling and greenhouse gas emissions.
- Economic development opportunities are stifled by access problems off I-5.
- More efficient and effective interchange designs are available.
- Interchange structures impede fish passage and shed polluted stormwater into adjacent stream areas.
- Pedestrian and bicycle users must contend with a narrow unsafe option for crossing I-5.
Magnifying these local needs and concerns associated with the 116th Interchange, I-5 is the only north-south Interstate on the West Coast, and the major north-south international trade corridor connecting Washington with Canada, Oregon, California, and Mexico. The portion of I-5 passing through the City of Marysville, Snohomish County, and the Tulalip Indian Reservation is a crucial freight link between the major ports of Seattle and Tacoma, and the Canadian market. Approximately 76 miles south of the U.S.-Canada border, and 36 miles north of downtown Seattle, the 116th Interchange provides access to significant traveler and employment centers, and invites Canadian dollars into the regional and local economy. Problems with the existing 116th Interchange thus harm the larger Puget Sound region as well as local communities and businesses.

The analysis recently conducted for the new interchange shows that for every dollar invested in the project, $29 will be generated in direct benefits:

- $1.7 billion in direct economic output
- $62.8 million in societal cost reductions due to reduced number of accidents
- $68.5 million in user delay savings
- $1.7 million in reduced greenhouse gas emissions

**Status**

Earlier phases of the project have been designed and constructed. Phase 1 realigned 34th Avenue NE to connect with Quil Ceda Boulevard further west from the interchange, removed a signal too close to the interchange, added one westbound through lane on 116th St. NE and constructed a roundabout at the new Quil Ceda Blvd and 34th Ave NE intersection.

Phase 2 widened 116th Street NE between the southbound ramp terminals and Quil Ceda Boulevard and installed a fish passage culvert under 116th Street NE. Phase 2B replaced the existing culvert under 34th Ave NE with a fish passage culvert and realigned the stream to fully open it for fish passage.

**Phase 3, the final phase of the project, will replace the existing 3-lane bridge over I-5 with an 8-lane bridge including bike lanes and sidewalks. The new structure will realign most of the existing ramps from a diamond interchange layout with two signals into a SPUI layout with one signal. The expanded off-ramps will include ramp metering and HOV bypass lanes.**

**Schedule**

- Final Design and PS&E - February 2010 thru March 2011
- Advertisement for Construction - April 2011
- Construction - April 2011 thru October 2013 (funding dependent)
Before and after pictures of the culverts and salmon bearing stream
Jobs

The ARRA funded phase of the project created or retained an estimated 50 construction jobs over the last 9 months. Construction jobs created or retained on prior construction phases of the project are estimated at 300 jobs over the past four years. The next phase of construction of this project is planned for 2011-13 and will create or retain over 1,100 jobs. This project, once completed, will provide infrastructure to support an additional 7,000 new permanent jobs in the northern Snohomish County area (including the City of Marysville and the Tulalip Indian Reservation). December 2009 unemployment figures for Snohomish County are at 10.3% and rising.

**Project Website**  [http://projects.tulaliptribes-nsn.gov/116th-interchange/Index.aspx](http://projects.tulaliptribes-nsn.gov/116th-interchange/Index.aspx)

**2009 Stimulus Funds (34th Culvert Replacement)**

We graciously applied for and graciously received $2,000,000 from the American Recovery and Reinvestment Act for fiscal year 2009. The funds were used to replace an aging culvert under the 116th Street/34th Avenue Roadways, complete 600 feet of stream restoration, and construct wetland and stream mitigation for the interchange reconstruction impacts. Two 9-foot diameter culverts were conveying the West Fork of Quill Ceda Creek flows under 34th Avenue NE and under 116th Street NE. A partial fish passage barrier existed due to high stream velocities in conjunction with the combined length of the two culverts. The new 18-foot diameter culverts and restored stream now provide a healthy open channel, enhanced streambed gravel, a floodplain bench, and native riparian plantings. We have already seen the life come back into the creek and continue to monitor it monthly and sometimes daily. The project was advertised in summer 2009 and bids were very favorable. This allowed the project to turn back $596,777 of the ARRA funds to be re-allocated to other important projects. Construction has been successfully completed on time and under budget.

**Total Project Funding Sources**

![Pie chart showing funding sources]

**Total Project Costs**

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**Project Funds to Complete the final Phase**

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<td>$2,193,240</td>
<td>$1,656,760</td>
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<tr>
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<td><strong>TOTAL</strong></td>
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<td>$42,806,760</td>
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I am sending this email on behalf of Whidbey Environmental Action Network, a nonprofit organization dedicated to the preservation and restoration of the native biological diversity of the Pacific Northwest. I am a restoration ecologist with extensive experience over the last 20 years in the floristics and restoration of prairies in Western Washington and Oregon.

The proposed Cross-Base highway is probably the most environmentally destructive road project proposed in Washington in the last 40 decades. It would seriously impact numerous rare species. The mitigation proposed is both "voluntary" and completely inadequate. The Environmental Protection Agency has now twice issued a formal finding that the environmental studies used in attempted justification of this project are "inadequate." I have attached my previous comments on one of those studies.

We urge the Puget Sound Regional Council to drop the Cross-Base Highway completely from Transportation 2040. We simply cannot continue to destroy the ecosystem that ultimately keeps us alive.

-Steve Erickson
Frosty Hollow Ecological Restoration
for Whidbey Environmental Action Network

Whidbey Environmental Action Network
Preservation  Education  Restoration
Box 53, Langley, WA 98260
(360) 579-4202
wean@whidbey.net
www.whidbeyenvironment.org
March 8, 2010

Mr. Mike Cummings
Puget Sound Regional Council
1011 Western Ave, #500
Seattle, WA 98104

Dear Mr. Cummings,

The Washington State Department of Transportation appreciates the opportunity to review and comment on the PSRC’s draft Transportation 2040 plan. This is clearly an ambitious effort that goes well beyond the scope of prior regional transportation plans.

The direction for the region set forth in the draft plan is consistent with the state’s Moving Washington philosophy that employs a three-pronged approach to managing congestion: better managing demand, improving highway efficiency, and strategically adding capacity to the highway system. The draft plan includes many other beneficial elements that are in alignment with WSDOT plans and priorities. These include establishing maintenance and preservation of the existing system as top regional priorities. The emphasis on tolling, sustainability, the treatment of climate change issues and incorporating the “Target Zero” goal from the Washington State Strategic Highway Safety Plan are also commendable additions.

Long-range plans that are broad in scope inevitably raise many issues, some of which are not easily resolved. When the usual uncertainty about the future is magnified by the emergence of new environmental issues and current economic turmoil, the challenge of seeing thirty years into the future is exacerbated. It is with an awareness of that difficulty that WSDOT offers the following comments on specific elements of the draft plan.

**Tolling**

Roadway tolling features prominently in the draft plan. The draft PSRC plan correctly notes that tolling has the potential to more effectively manage demand and raise revenue, both of which are important regional and state objectives. The draft plan’s emphasis on incrementally moving toward a tolled highway system is consistent with WSDOT’s thinking. While it has tremendous potential, tolling also raises several issues, which will need to be resolved over time.
These include:

- The technology for electronic toll collection is still evolving. The speed at which a fully tolled freeway system can be implemented in this region will become clearer as additional experience is gained through the tolling of individual facilities such as SR 520.
- The public’s future response to more broadly applied tolling is not known with certainty. When faced with higher costs for peak period travel we can expect people to adjust their behavior, but how much and in what ways is difficult to predict.

Freight
The draft plan emphasizes the importance of accommodating freight movement as a key to encouraging regional economic growth. The graphs on pages 29 and 30 are especially useful in showing benefits from the plan, but there is more that should be said. This includes:

- Tolling has the potential to produce substantial travel time savings for freight (as indicated on page 43), but the benefits to freight from a more modest implementation of tolling, such as implementation of the HOT lanes network during the first decade of the plan would be far less. It would also be helpful to describe the assumptions used to arrive at the estimated benefit of over $2 billion per year used in several places in the text, and to clarify whether that is the benefit net of the tolls paid.
- Because most freight is moved by trucks using general purpose highway lanes it follows that strategically increasing highway capacity in key freight corridors will be needed to accommodate the large increases in freight volume anticipated in the draft plan. Improvements in roadway capacity may also be needed at ports and freight terminals.
- A substantial private sector investment will be needed to produce the level of freight mobility required to support regional economic growth. This will include large capital expenditures for ships, barges, trucks, aircraft, and railroad rolling stock, as well as warehouses, terminal facilities and railroads. Because these will be market-driven investments made by private entities they are largely beyond the reach of the PSRC’s policies, but they are none-the-less vital to achieving the outcomes described in the draft plan. This circumstance adds another source of uncertainty that should be acknowledged in the draft plan.

The overall framework for freight planning in the draft plan is consistent with WSDOT’s planning for freight but at some point it would be helpful to develop a list of the transportation system improvements that are most beneficial for freight. Perhaps that will be part of the prioritization process mentioned in the “Next Steps” section of the plan.

The short list of highways on page 42 may be for illustrative purposes but the facilities listed are not necessarily those that are most “intensively” used for freight movement.

Climate Change
The draft plan’s extensive discussion of air quality and climate change issues is timely and consistent with State efforts to comply with legislative directives and the Governor’s Executive Order regarding reducing greenhouse gas (GHG) emissions from transportation. The draft plan includes a four part strategy for reducing GHG emissions.
This strategy builds upon the recommendations of the state’s Climate Action Team and the Transportation Implementation Working Group. PSRC has directly and aggressively addressed climate change issues, working with experts at the forefront of developing necessary strategies and using the most sophisticated tools to estimate the effectiveness of GHG reduction strategies. The plan makes significant progress in reducing transportation GHGs, and meeting regional mobility needs when the triple bottom line measures of sustainability - environment, equity and economy-- are considered.

**Transportation to Rural Areas and Urban Islands**
The Puget Sound region has more than a dozen smaller towns and cities that are, in essence, urban islands surrounded by rural and resource lands. Over the last decade these communities and the rural areas around them have experienced some of the fastest growth in the region. The draft PSRC plan does not include a specific strategy for meeting the transportation needs of these areas. As these jurisdictions have been quick to point out, they are obligated by the Growth Management Act to plan for the expected growth within their boundaries, and they look to State and regional bodies to adopt plans that provide connections to urban centers and other areas within the urban growth boundary. The corridors that link these communities are also vital for commerce and maintaining economic vitality throughout the region.

**Financial Framework**
The plan astutely observes that the current system of transportation funding is not sustainable. As noted above, WSDOT agrees that new methods of funding are needed, and that variable tolls have the potential to help to offset possible declines in fuel tax revenues while simultaneously helping manage demand. The draft plan does a good job of highlighting those benefits. However, the discussion in the draft plan misses several important aspects of current and future transportation funding. These include:

- The bullet points on pages 56 and 57 fail to mention several sources of funding that are very important. Federal grants through earmarks and formula programs will provide billions of dollars for transportation projects in the Puget Sound region. Borrowing through the issuance of bonds will be another major source of financing for capital projects. Though there is uncertainty associated with both these sources of funding, they should be included within the discussion of the region’s financial framework. Operating income in the form or farebox revenue, parking charges, interest income and advertising revenue should also be acknowledged as important sources of funding. The plan’s focus on toll revenue is understandable but the potential for other sources should not be overlooked.

- The text on page 56 mentions, “the state legislature has authorized a number of local option taxes that have, in many instances, proven difficult to implement.” If indeed the region is facing a transportation funding crises so severe that a major overhaul is needed, it would be useful to include a list of the sources that are allowed under current law along with an explanation of why they have not proven suitable (as well as identifying those that are currently levied).
• Impact fees are a source of transportation funding used by numerous jurisdictions throughout the region. There appears to be untapped potential from this source, which has the added advantage of being tied directly to new development that creates demands on the system. The plan would be improved by discussing how impact fees could be used to help alleviate the region’s transportation funding problems and how they complement other funding sources.

• The graphs on pages 54 and 57 should be updated to include data through 2008. The revenue picture has changed in important ways over the last five years.

In closing WSDOT would like to express appreciation for the PSRC’s extensive coordination over the last two years. We know that PSRC staff spent countless hours travelling around the region to inform local jurisdiction staff, elected officials and the public. The draft plan that has resulted from that long process reflects input from a wide range of constituent agencies and stakeholders. We look forward to working with PSRC on performance monitoring and the prioritization process called for in the draft plan. Those are vital steps to ensure the region takes the actions that are necessary to realize the benefits identified in the plan, or to modify the plan to fit new challenges and changing circumstances.

Sincerely,

Chris R. Picard, Manager
WSDOT Urban Planning Office

cc: Brian Smith
    Lorena Eng
    Craig Stone
    Paula Hammond
    Dave Dye
    Kevin Dayton
    Charles Prest Rud
    Shuming Yan
    Katy Taylor
    Ray Deardorf, WSF
    Reema Griffith, WSTC Administrator
    Dan Mathis, FHWA
March 9, 2010

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

RE: Draft Transportation 2040 and Coordinated Transit-Human Services Transportation Plans  

Dear Ms. King:

I appreciate this opportunity to provide public comment on the draft Transportation 2040 and Coordinated Transit-Human Services Transportation plans.

Since 1971, Hopelink has served homeless and low-income families, individuals, children, seniors and people with disabilities in North and East King County. Hopelink's mission is to promote self-sufficiency for all members of our community; we help people make lasting change.

Hopelink services include transportation, as well as food, shelter, transitional and permanent housing for homeless families, case management, employment services, and adult education. Hopelink provides more than two million trips a year as part of our King County Metro DART program and in our role as King County Medicaid Broker for Special Needs Transportation. In addition, Hopelink helps more than 50,000 people every year at our five service centers and food banks and by providing more than 40 different programs.

Given Hopelink’s extensive history of working with special needs populations, I am focusing Hopelink’s comments on how Transportation 2040 will impact those groups.

Appreciation for Integrating Special Needs into T2040  
I appreciate that PSRC has integrated Transportation 2040 and the Coordinated Transit-Human Services Transportation Plan, and commend you for your efforts to consider special needs populations more fully and prominently in Transportation 2040. I am also pleased to see that Transportation 2040 specifically calls for providing additional funding for special needs transportation services proportional to the growth of these populations.

Support for Strategic Investments  
I support Transportation 2040’s approach for strategic investments in fixed-route, rideshare and demand-response systems and services. At Hopelink, I have seen the demand for our transportation services continually increase, alerting me to the need for expanded fixed-route and demand-response services for special needs populations,
particularly during the off-peak hours when the majority of travel in the region takes place and many low-income people must travel to work. I am also pleased to see investments in pedestrian facilities which would make transit facilities more accessible. In addition, I support the inclusion of a vehicle reservation system for auto ferries, as this could make it easier for medically fragile individuals to ensure their passage on the earliest ferry possible, reducing their overall travel time. I am pleased to note that Transportation 2040 recommends vehicle reservations be provided at no extra fee.

Concerns about the Impact of Tolling
Transportation 2040’s new financing plan represents a major shift in how transportation improvements will be funded, promoting transit fare increases in the short-term and tolling in the long-term. These policies will negatively impact the mobility of people with special transportation needs, and run counter to both Transportation 2040’s goal of increasing mobility for these populations and VISION 2040’s policy to “implement transportation programs and projects in ways that prevent or minimize negative impacts to low income, minority and special needs populations” (MPP-T-22).

During the DEIS and Environmental Justice processes, PSRC received numerous public comments from seniors, people with disabilities and low-income people testifying that tolling would limit their ability to travel to work, medical appointments and other places needed to satisfy their basic needs. Hopelink’s comments on the DEIS enumerated these concerns, and pointed out that tolling will also drive up costs for social service organizations.

Still, Transportation 2040 fails to adequately explain how these concerns are being addressed. For example, Transportation 2040’s “Guidance on the Use of Tolling Revenues” includes two strategies that could mitigate the harmful impacts of tolling on special needs populations: (1) funding transit and (2) eliminating regressive taxes such as the gas tax. I support these strategies and encourage PSRC to reference MPP-T-22 explicitly in its guidance on tolling and recommend specific strategies to minimize negative impacts on the one-third of central Puget Sound residents who have special transportation needs. These recommendations should include:

- Expanding transit services for special needs populations in tolled corridors, especially those that meet the needs of the bus-dependent low-income commuter
- Increasing the quantity and quality of low-cost transportation alternatives
- Providing toll exemptions for low-income travelers, seniors, people with disabilities, carpools and human service agencies
- Offering toll payment methods which address the concerns of low-income people

Monitoring & Performance Measures
Transportation 2040 notes the importance of developing a comprehensive monitoring system to evaluate the impact of future transportation investments and policies. Hopelink would like to be involved in the development of this system and recommends that concrete measures and benchmarks for the following items be developed:
- The impacts of tolling, especially on low- and fixed-income populations, human service agencies and the medically fragile.

- The region’s success in providing “greater options and better mobility.” Indicators could include expanded transit access to major medical facilities and senior centers, increases to evening and weekend fixed-route transit service, shorter wait times or trip lengths for transit and paratransit trips, and a higher percentage of the region’s population living within a ½ mile of a transit stop.

Special Needs Population Maps

We are pleased by the addition of demographic maps in the Coordinated Plan, as these provide relevant and highly useful information for our work. In addition to understanding how the special needs population relates to the overall population, it is important to identify how many people with special transportation needs live in various parts of the region. We request that PSRC include maps that show the absolute number of people with special transportation needs. If it is not possible to include both maps that display the data as an absolute number (total number of people) and as a relative figure (percentage of total population), we would prefer to see maps based on absolute numbers. This 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. In addition, we would appreciate larger maps (at least a full size page each) to increase readability.

Thank you for this opportunity to comment on Transportation 2040 and the Coordinated Transit-Human Services Transportation Plan. Thank you also for working toward a comprehensive transportation plan that addresses the long-term transportation needs of all in our community. We hope you will take our comments under advisement and refine these plans to better address the needs of the approximately 1,000,000 people living in the central Puget Sound region who have a greater need for transportation services due to income status, age or disability.

We look forward to our continued work together to expand transportation options for all people living in the central Puget Sound region.

Sincerely,

Marilyn Mason-Plunkett
Chief Executive Officer

cc: Lynn Moody
   Director of Transportation
   Hopelink