We have recently studied the entire draft report. We thank you for the work you've put into it, and we think the main thrust of the Plan, and particularly the values of equity and climate mitigation that are espoused by the Plan, are right on target. We do have concerns over whether the Plan as currently laid out completely lives up to these values.

Greenhouse Gas Reductions

The Plan is the first one I've seen that has done the modeling and projections to support the goal of 83% reduction in greenhouse gas emissions (GHG) by 2050. This is a huge step forward. However, it does nothing to suggest or confirm that we will meet our more immediate target of 50% reduction by 2030, which is less than 8 years away. The Plan is laid out so that the major GHG reductions come towards the end of the period through a combination of reducing demand via a road usage change (RUC) and conversion to electric vehicles (EV). At the same time, the road widening changes outlined in Appendix G are likely to come more towards the beginning of the time period, before there has been much EV adoption. So it looks like we are continuing to increase VMT over the short term, and we are more or less hoping that over the longer term we will adopt changes that will somehow make up for it. This seems like magical thinking, and **the Plan should include an analysis that shows how we can meet our 2030 goal as well as our 2050 goal**. A wedge diagram similar to the one on p. 54 of the [King County Climate Action Plan](#) would be very helpful.

The Plan outlines two main mechanisms for how it will make an 83% reduction in GHG by 2050: first, a reduction in VMT, and second, electric vehicle (EV) adoption. EV adoption has begun, but it will be a long time before they are a substantial portion of the cars on the road, and quite likely even longer before high-mileage vehicles are converted. We see EV adoption as being necessary but not sufficient, not least because although EVs do not release emissions in operation, they cause substantial emissions in production. A continued reliance on cars as the primary method of transportation in suburbia leads to sprawl, which is very expensive to maintain. Reduction in VMT is critical, as is clearly called out in the King County Climate Action Plan. However, the only policy we see in the plan that would reduce VMT is the possible adoption of a RUC, sometime after about 2035. This is too late. There needs to be a near term focus on state advocacy to put a plan in place that allows both flexible funding and local revenue options. We see RUC as being a pivotal change we would like to see as soon as possible, ideally by 2025, but we also believe that **more effort needs to be paid to other ways of reducing VMT, in addition to RUC**, to increase the odds of success.

We believe that the Plan should call for a regular review, more frequent than the 4-year Regional Transportation Plan update cycle, of transportation-related GHG emission levels. **We need to be reviewing the emission levels, and comparing them against progress to our reduction goals every six months** so we can adopt course corrections as needed.

Roads

The road widening projects are another source of concern. The widening is part of an effort to reduce congestion, but we know from induced demand that the extra capacity will lead to increased traffic, and thus this effort will not be successful – as Roger Millar, WSDOT director,

so eloquently explained in his State of Transportation presentation. However, one thing we know it will do is increase GHG, since it will enable more single occupancy vehicles through these bottlenecks. A 5% increase in these lane miles will lead to more than a 5% increase in GHG as it enables trips that extend well beyond the bottlenecks. **We should be looking to get the most we can out of the existing roads by offering more high capacity bus service along dedicated lanes on routes with congestion**. That would move many more people while decreasing GHG; the current plan looks like the business as usual path that will make it impossible to meet our GHG reduction goal.

We think there should be a faster timeline for adoption of road usage charges. This is critical, because it is the only major strategy in the plan that will reduce VMT, and one of only two strategies to reduce greenhouse gas emissions. We are happy that you are supportive of RUC, as we agree that it will be critical both for demand management and for transportation funding. We are glad that the Plan calls for the flexible use of these funds for transportation, unlike the limitations on our current gas tax. We agree that local jurisdictions, like PSRC and our counties and cities, should be able to levy their own RUC surcharges to pay for their own transportation needs. We think that addressing equity concerns will be key to gaining adoption of RUC. **The PSRC should be lobbying the state for a more aggressive timeline on RUC that includes flexible spending and local options**.

Road maintenance continues to be underfunded, a problem that the Plan clearly calls out, but does not address. It would be helpful for the Plan to specify how much spending is required for road maintenance. We should use this as the baseline for spending on roads, and **only fund new road projects once the basic maintenance needs of our existing roads have been taken care of**.

There is a lot of reliance on EV adoption in order to meet the 83% reduction goals. The Plan should **clarify its assumptions about EV adoption, with graphs showing new vehicle adoption rates and fleet level rates of adoption over time**. Both the level of adoption, and the timing are critical points that we need to understand and monitor with respect to our climate goals.

Personal vehicle electrification and infrastructure should be targeted to those who live in more rural areas who will not have other options. A recent report from Coltura can serve as a guide for identifying "superusers" of gasoline and developing policies which will transition them to EV as quickly as possible (https://www.coltura.org/gasoline-superusers). If the top 20% of gasoline uses switched to EV we could meet our 2030 transportation climate goals.

Transit
The Plan details a major expansion in transit service. This is exactly what we need for the climate, since it will reduce pollution from automobiles. And it is what we need for better equity too. As the Plan makes clear, 26% of people in the State cannot drive, and these numbers will go up as the population ages, and as fewer young people want to drive. Moving people by

transit is much more efficient and cost effective than maintaining a road system that is continually growing and yet remains completely congested. **The Plan should identify highly congested roads as a target for high capacity bus service on dedicated bus lanes**.

We recommend that **all counties should have a base level of funding for transit operations**. This is critical for equity. Under the current system, some of the areas that should have the highest transit ridership have some of the lowest levels of actual transit service, simply because there are fewer tax dollars in their county. The region should be lobbying the state for this. The region could also investigate the possibility of raising funds within its own area for this redistribution.

Aviation

We support the fact that the Plan does not call for a new airport in the region. However, we do not believe that the region should, as the report says, support the State in its goal to establish new airports elsewhere. This is an area where we do not think that we should scale the supply to meet increasing demand. Air traffic is very carbon intensive, and we should not do more of it until we are able to fly without harming the climate.

Rail

We believe that expanding Amtrak Cascades is a key strategy for reducing both GHG and congestion, and could as well play an important role in reducing airport congestion. **The PSRC could be a strong advocate with the State for increasing and improving the Amtrak Cascades service and routes**. We would like to see assurance that the "high growth scenario" from the August 2020 WSDOT Rail plan is being pursued (https://wsdot.wa.gov/sites/default/files/2021-10/2019-2040-State-Rail-Plan.pdf p46-49). It shows that Amtrak can deliver about 2.4 million passenger trips by 2032, 2.5 million by 2040. Developing an up to date reliable intercity high speed rail which serves many communities is the type of common sense investment which can help reduce VMT in the near term (by 2030's) and beyond. Having a modern intercity rail service connected with transit at all stops creates a viable mobility option that is attractive for a growing region.

We would like to see a goal (and steps to achieve it) such that **freight is increasingly moved by rail in preference to road**. Rail is easier to electrify, and even when this is not possible, it takes less energy to move goods by rail. Moving freight to rail will also improve safety and air quality as well as reducing maintenance costs, since heavy trucks cause a lot of the damage to roads and bridges. The Plan should include a discussion of some of these tradeoffs.

Intelligent Transportation Systems

Intelligent Transportation Systems are important for helping the transportation system operate more efficiently and effectively. We have a few suggestions for additions to those sections.

For "Communication Tools" (page 94) note that traveler information tools also help travelers to plan trips.

For this sentence on p 101 "Within the current landscape, the bulk of investment in the research and development of emerging technologies is occurring in the private sector ..." The OneBusAway transit information system (which was presented with the Vision 2040 Award from PSRC some years ago) is an important exception; OneBusAway is currently managed by a nonprofit foundation.

For What's Ahead, the bullet item "PSRC should consider developing a guidance document for these jurisdictions that includes examples of best practices" could also include a recommendation that the guidance document include considerations of what is best left to the private sector and what should be supported more directly by local government and nonprofits, and that highlights the benefits of various ITS deployments. As an example of the tradeoffs that arise here, leaving trip planning entirely to for-profit corporations may allow these services to be provided at no monetary cost to the users, but that may also result in intensive collection of personal data, and that may emphasize more profitable travel modes, or that may omit support for riders with disabilities (since they are a less-profitable and smaller market segment).