Puget Sound Regional Council

# Transportation 2040



## Appendix N

March 19, 2010

# Appendix N Public Outreach, Comment, and Response

The PSRC follows its *Public Participation Plan for the Puget Sound Regional Council* as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in this appendix. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

The comments and responses have been coded and are included in the following order:

## Federal Agency

F-001 US EPA
F-002 Interior-Fish & Wildlife
F-003 Federal Transit Administration

## State Agency

S-001 Washington DFW
S-002 Ecology
S-003 Department Fish & Wildlife
S-004 WSDOT

## Regional Agency

R-001 Port of Tacoma
R-002 Regional Staff Committee

R-003 Tacoma Pierce Chamber
R-004 Community Transit
R-005 Port of Edmonds
R-006 Pierce Transit
R-007 Port of Seattle
R-008 Port of Seattle Addendum
R-009 Puget Sound Clean Air Agency
R-010 Regional Traffic Operations Committee
R-011 Special Needs Transportation Committee
R-012 Pierce County Coordinated Transportation Coalition
R-013 Kitsap Regional Coordinating Council
R-014 Kitsap Transit

## County

Y-001 King County
Y-002 Snohomish County
Y-003 Tacoma/Pierce County Health Department
Y-004 Julia Patterson - King County Council
Y-005 Kitsap County
Y-007 Pierce County Executive

## City

C-001 City of Shoreline
C-002 City of Redmond
C-003 Snohomish, Monroe, Sultan
C-004 City of Snohomish
C-005 City of Mukilteo
C-006 City of Issaquah
C-007 City of Edmonds
C-008 City of Bainbridge
C-009 City of Kent
C-010 City of Tukwila
C-011 City of Everett
C-012 City of Tacoma
C-013 City of Renton
C-014 City of Bellevue
C-015 City of Des Moines
C-016 City of Lake Stevens
C-017 City of Lakewood
C-018 City of Lynnwood
C-019 City of Maple Valley
C-020 City of Seattle
C-021 City of Sea Tac
C-022 City of University Place
C-023 Seattle Freight Mobility Advisory Committee
C-024 City of SeaTac, Public Works

C-025 City of Kirkland

## Business

B-001 Baker, David
B-002 AAA Washington
B-003 Kemper Development Company

## Community Organization

O-001 Benze, Bob
O-002 Bicycle Alliance of Washington
O-003 Cascade Land Conservancy
O-004 Ravenna Bryant Community Association
O-005 Conservation Northwest
O-006 Seattle Chamber
O-007 Seattle Municipal League
O-008 Kitsap Alliance Property Owners
O-009 Futurewise
O-010 Bellevue Chamber
O-011 Bellevue Downtown Association
O-012 Cascade Bicycle Club
O-013 Eastside Transportation Association
O-014 Hopelink
O-015 Quality Growth Alliance
O-016 Save Our Communities
O-017 Sierra Club
O-019 Transportation Choices
O-020 North Seattle Industrial Association
O-021 Cascadia Discovery Institute

## Individual

I-001 Myrick, Bob
I-002 Foritano, Lou
I-003 McDonough, Sally
I-005 Wall, Kay
I-006 Padelford, Donald
I-007 Hintze, Michael
I-008 Bardwell, Mark
I-009 Callender, Alex
I-010 Clark, Dennis
I-011 Ewing, James R.
I-012 Anonymous 1
I-013 Finley, L.R.
I-014 Guzak, Karen
I-015 Wiatr, Diane
I-016 Newton, Chad
I-017 King, Colleen

I-018 Hesterberg, Tim
I-019 Knox, Matt
I-020 Rimbos, Peter and Naomi
I-021 Ptasnik, David
I-022 Rose, Anita
I-023 Larsen, Sarah
I-024 Siroky, Evan
I-025 Ryan, Matt
I-026 Lance, Avalon (This identical letter was submitted by the following 668 commenters: Peter Abrahamsen, Breck Adams, Rolf Agather, Katherine Alesandrini, Judith Alexander, Scott Alexander, Eric Althoff, Jennifer Anderson, Heidi Angel, Tristan Ansell, Laura Appleby, Christina Arcidy, Mary Armstrong, Ralph Armstrong, Perry Atterberry, Keith Bachman, Dave Bachman, Becky Backstrom, Lauren Bael, Mark Bailey, Robert Bailey, Marlin Baker, Carson Baker, David Balas, Amy Ball, Andy Ball, Dana-Lynn Ballou, Chuff Barden, John Barker, Wesley Barkley, John Barnes, Martin Barr, David Baty, Lynn Baugher, John Bay, Arman Bedrosvan, Douglas Beeman, Karen Behm, Andrew Behnke, Steven Behrend, Thomas Beirne, Christian Bennignus, Connie Benson, Bronson Berg, Gregg Bergstrom, Dave Billings, Richard Binder, Joanna Bisset, Bruce Blaser, Steve Bleifuhs, Miranda Bodfish, John Boone, Laura Bourmatnov, Bruce Bowman, Maureen Boyd, Ed Breen, Drew Britten, Erik Brooks, Jason Brouwer, Matthew Brown, Tom Broznowski, Don Brubeck, Betsy Bruemmer, Alan Bunin, Jack Burg, Andrew Burkhalter, Nancy Burns, Nora Burton, Roger Burton, Louis Burwell, Gina Buscarello, Margaret Bustion, Anthony Byrd, Allegra Calder, Glenn Cannon, Anthony Carbary, David Carpenter, Douglas Carpenter, Shane Carr, Philippa Carson, Andrew Carter, Bill Carver, Italo Castellanos, David Castor, Alden Chace, Matt Chadsey, Robert Chaffeur, Srijan Chakraborty, Kelly Champoux, Justin Chan, Damien Chapman, Yong Chen, Yu-Chin Chen, James Chesko, Ian Ching, Clifford Chirls, Dave Chitty, May Lee Chung, Ivan Cintron, Ken Claflin, Luke St. Clair, Kristen Clark, Barbra Clary, Nathan Clement, Hunter Close, Tami Cobb, Richard Cochrane, Barbara Cole, Nate Cole-Daum, Melvin Coleman, Lee Colleton, Bryce Colvill, Thyce Colyn, Andrew Concordia, Angela Conway, Carl Cook, James Cooke, Mel Cooke, Brad Cowles, Bob Coyne, Zelda Crain, Eric Cramer, Bruce Crawford, Rick Creekmore, Kari Crial, Rob Crichton, Amanda Cronin, Wendy Crozier, Aaron Cruz, Beth Cuffel, Arden Cuise, Scott Culberson, Kate Cunningham, Richard Daifuku, Wendy Darcy, Sherry Dariotes, Mary Davies, Mike Davis, Rex Davis, Patricia Dawson, Lanham Deal, Steven Degroot, Eric Dejulio, Chris Deleon, Bill Dempsey, Mary Dettrich, Brian Dew, Lisa Digiorgio, Jeremy Dinsel, Kevin Dix, Steven Doman, John Doody, Tim Dorman, Mary Dorn, Dru Druzianich, John Duggan, Jeffrey Dunn, Daniel Dunne, Andre Durudas, Andre Dusablon, Deina Duval, John Earhart, Douglas Edwards, Paul Edwardsen, Joe Ehle, Jeff Ellerbrook, Jennifer Ellestad, Jp Emery, Erika Enright, Radka Enriquez, Mohammed Esseddiqi, Olivier Fabris, Sherry Fadely, Lawrence Falk, Christopher Fast, Brian Felber, Zach Felsenstein, Jeff Fernandes, Sean Fernandez, Charles Field, Rebecca Finkel, Alicia Finn, Olivia Finney, David Fisher, Kathrina Fisher, Patrick Fitzgerald, Aaron Fjelstad, Bill Flanagan, Erik Flink, Mark Flora, Francine Florance, Michael Flory, Andrea Foegler, Brian Foley, Dellanie Fragnoli, Max Frieda, Debi Friese, Jamie Froebe, Tom Gaines, Joseph Gannon, Simon Garrod, Steven Gaub, Vince Gayman, Judy Gayne, John Gebhart, Jennifer Gentry,

Christine George, Maria Luisa Germani, Philip Giammarino, Stephanie Gilbert, Mike Gladfelter, Shelly Glenn, Mark Glidden, Vanja Glisic, William Gobie, Eli Goldberg, Joseph Goldberg, Roman Golouin, Greg Gottlieb, Paul Gotz, Elizabeth Gould, Fabio Governato, Doug Graham, Gabriel Grant, Andrew Gravano, Steven Gray, Margaret Graybill, Heather Green, Alan Greenbaum, Sarah Greene, Annika Greenig, Jennifer Greenough, Tom Greenwood, Paul Grekin, Paul Griffin, Susan Griffith, Gabe Grijalva, Brian Groth, Dorothy Jean Guth, Pablo Guzman, Brie Gyncild, Casey Hagen, Walker Hagius, Stefanie Hale, John Hall, Nathan Hamilton, Deborah Hammond, Daniel Hanlon, Blake Hansen, Marilyn Harnden, Tammy Hathaway, Mark Haught, Ken Havekost, Peggy Hawkins, Nataly Hawthorn, Colleen Hedeen, Julie K Heine, Patricia Heller, Thayrn Henderson, Tim Hennings, Timothy Hensley, Linda Hester, Ross Hill, Russell Hill, Stephen Hitch, Carrie Hite, Matthew Hixson, Kuno Hollnegel, Sonia Honeydew, Aubree Hoover, Brian Horman, Kris Horrocks, Megan Horst, Ryan Howell, Vicki Hsueh, Mark Hubbard, Andrew Hughes, Drew Hunt, Stephen Hurley, Andreea Hutu, Connie Ireland, Dayle Iverson, Connie Ivey-Pasche, Peter Jack, Dwight Jacobson, David Jang, Sara-Beth Jeffrey, Stephen Jensen, Rosalyn Jinkens, Juanpablo Jofre, David Johansen, Karl Johnson, Martin Johnson, Wesley Johnson, Carl Jones, Denise Jones, Philip Jones, Heather Jordan, Angela Judkins, Joe Julian, Mark Kadlec, Brian Kaku, Evan Kalstad, Vemcatesh Kandallu, Ron Kaplan, David Karnes, Troy Kasper, Kathleen Keegan, Caitlin Kehoe, Mark Keithly, Jonathan Kellenberg, Joseph Kelley, Tyler Kellogg, Seamus Kelly, M.J. Kelly, John Kerher, John Kerr, Diane Kerstein, Daniel King, Sean King, Daniel Kinney, Terri Kinney, Maxwell Knauss, Artsiom Kokhan, Marybeth Koreman, Germaine Kornegay, Pravomil Kral, Cynthia Krass, Michael Krause, Kekoa Kuhia, Branko Kukolja, Sandra Lafontaine, Edward Lammi, Avalon Lance, Eric Langlais, Maria Langlais, Dorothy Lautman, Hilary Law, Wytold Lebing, Adam Leblanc, Judith Lee, Kris Lee, Serena Lehman, Stephen Leidel, Claudia Levi, Cynthia Levine, David Levinger, Bill Leyrer, Martha Lindley, Andrea Little, Jim Lloyd, John Loney, Margaret Longeway, David Longmuir, Nubia Lopez, Ray Lou, Marcia Lupton, Robert Lusby, Andrea Lynch, Dong Ma, Kenneth Mackenzie, Ian Mackie, Bob Macmillan, Simon Macpherson, Mildred Magner, Mike Mahanay, Kelly Main, Ruel Malig, Steve Malone, Ilana Mantell, Vance Maples, Tomislav Maric, Richard Marshall, Georgene Marshman, Chuck Martin, John Martin, Cecilia Martin, Denis Martynowych, Cody Mast, Ignacio Fernandez Mata, Scott Mccall, Paul Mccollum, Michelle Mccully, Patrice Mcdermott, Mark Mcdermott, Sean Mcdonough, Ray Mcfall, Pam Mcgaffin, Dan Mcgrady, Gram Mcgregor, Sara Mcmahon, Kathleen Mcmonigal, Heather Mcmullen, Karin Mellskog, Catherine Mesich, Doug Metzler, David Meyer, Val Meyer, Gary Meyers, Mark Michaelis, John Mickett, Hugh Milburn, Paul Millage, Gordon Miller, Aimee Mills, David Minsk, Laurel Minter, Jeffrey Mirsepasy, Margaret Misenti, Alex Moll, Jane Moore, Brad Moore, Jo Moore, Margaret Moore, Nickie Moran, Michael Moreland, Karol Dana Morphew, Judi Morris, Michal Morrison, Dennis Morrissette, Ann Morrow, Margo Morse, Kari Mosden-Schlosshauer, Joe Moyer, Mark Mumm, Katarina Murphy, George Murray, Amy Murry, Aya Nakazato, Florizel Negrillo, William Neville, Marie Nishida, Peter Nobes, John Nolan, Dominick Novelo, Mariano De Ocampo, David Oliver, Nadine Oliver, Frances Olson, Jennifer O'Neill, John Otakie, Samuel Otis, Michael Pace, Radu Palanca, Bernd Pankow, Oleksiy Pantyeyev, Clare Parfitt, Lauren Parke, Mark Parker, Anita Parks, John Pauletti, Don Pease, Joie Pedersen, Chris Peele,

Tonja Pekic, Steve Pellegrin, Adrian Perera, Eric Perlin, Aeron Perlman, Terri Perlman, Ellen Peterson, Eric Peterson, Bruce Petrie, Carole Pettenski, Steve Philips, John Phillips, Gregg Pinkerton, Ted Piotrowski, Jenna Pisel, Marina Pita, Eugene Pitcher, Kristin Poinar, David Pope, Alan Presley, Sandy Privett, Sheridan Probst, Ronald Proctor, John Quattrocchi, Iain Quigley, Alan Quincy, Paul Quinn, Francisco Ragland, Guillermo Ramos Ramirez, Allan Rand, Charlene Rankin, Peggy Ratermann, Kit Rawson, Pete Ray, David Reeder, Eileen Reichert, Bob Reid, Cheryl Dos Remedios, Wroy Renaghan, Scott Renz, Alicia Reuter, Rick Reuter, Sharon Reuter, Bobby Reyes, Laurie Rhein, James Rice, Kim Rich, Paul Richter, Amber Ricketts, Scott Riggs, Tim Riley, Russ Ringer, Paul Ringsrud, Ricardo Rios-Zalapa, Nate Ripperton, Richard Roberts, Allen Roberts, Brett Roberts, Leslie Rogers, Hakim Ronaque, Patricia Rose, Rex Rosekrans, Alan Ross, Philip Rudolph, Scott Ruff, Dan Russell, William Ruth, Rodney Rutherford, Aden Ryan, Gary Ryno, Sangeeta Saigal, Peter Sajal, Julie Salathe, Ali San, Steven Saner, Hilla Sang, B L Saunders, Michael Scavezze, Trevor Schaaf, Eric Scharnhorst, Phillip Schlachter, Christopher Schneider, Sharon Schneider, Jennifer Schofield, Norman Schroeder, Brian Schuessler, Ryan Schuetze, Audra Schumacher, Kent Scott, Shelby Scovel, J Sea, Allan Seeger, Alexander Seguin, Lucinda Selk, Bryan Selner, Ronald Shackelford, Susanne Sherburne, Rajashekhar Shirantaoka, Susan Shultz, Karen Singer, Phillip Singer, Sudipta Sinha, Robert Slack, Kim Slater, Doug Sluis, Stephen Smith, Barbara Smith, Jerry Smith, Preston Smith, Renee Smith, Richard Smith, Alice Smith, Eve Smith, Mark Smith, Kris Solem, Evelyn Spieker, Jennefer Sporleder, Radhakrishnan Kadathur Srinnasan, Sarah Steiger, Steven Steiner, Matthew Sterner, Peter Stevens, Zach Stevenson, Anne Stewart, Tristan Stone, Jeff Stucky, Nathan Sugg, Pamela Suiaunoa, Ryan Surface, Sean Sweeney, William Sweigert, Christina Swift, Kris Symer, Anne Symonds, Robert Sympson, Scott Tallman, Bee Tan, Linda Tarte, Dan Tasse, Peter Tassoni, Mark Taylor, Robert Taywr, Cosimo Terranella, Thuy Thiem, Scott Thomas, Heather Tillman, Elena Tolkova, Bret Torbelk, Jason Torrie, Tyson Trautmann, Jenifer Trusty, Richard Tupper, Eren Turgay, Mark Turner, Debbie Uhler, Mark Ullberg, Benjamin Upsall, Richard Vanderwouden, Anwar Vanegas, Erick Vargas, Nicole Vela, Eric Vernon, Zach Vincent, Robert Vogt, Richard Vonlehman, Darrel Vorderstrasse, Kat Wamba, Steve Wangen, Daniel Ward, Liberty Waters, Tracy Wayman, James Weber, Thomas Weber, Stuart Weiler, Kristi Weir, Jeff Weissman, Michael Weldon, Susan Wetstone, Robert Wharton, Nancy Wheelwright, Gregg Whitcomb, Gary White, Bryan Whitlock, Lane Wilkinson, Dawn Williams, Brian Williams, Greg Williams, Mark Williams, Nathan Williams, Jay Williamson, Michael Wilsey, Dean Wilson, Kelvin Wing, Dave Withrow, James Witte, Thomas Wojtkowiak, Jeff Wolf, Melanie Wood, Raenette Wood, Todd Woodcock, Dave Woods, Karalee Woody, Steve Wright, Daniel Wright, Lynn Yarnall, Robert Yarnell, Michael Yoder, Greg York, Rob Younger, Dale Zach, Barbara Zaroff, Mohammad Zuberi, Maryanne Zukowski, and Thomas Zylstra.)

I-027 Luhman, Annalee

I-028 Reed, Ann

I-029 Hicks, Gina

I-030 Bird, Stoney

I-031 Winans, Janet

I-032 McBride, Joan

I-033 Plummer, David F.

I-034 Franklin, Joshua
I-035 Lykken, Jeff
I-036 Worthington, John
I-037 Coppola, Lary
I-038 Ketcham, Burk
I-039 Whitener, Philip C.
I-040 Goodwin, Andy
I-041 Worthington, John
I-042 Bryant, Bruce
I-043 Brandt, Will
I-044 Hudson, Jonathan
I-045 Gangemi, Matt
I-046 Gieseke, Gerald
I-047 Cox, Allison
I-048 Powell, Gary
I-049 Guller, Barbara
I-050 Benson, Max
I-051 Koetke, Dale
I-052 Monroe, Amber
I-053 Easton, Amy
I-054 Espinosa, Angela
I-055 Tramposh, Ben
I-056 Scheulen, Bob
I-057 Throssell, Brad
I-058 Leaman, Bruce
I-059 Uhlman, Carl
I-060 Allen, David
I-061 Mildes, David
I-062 Seal, David
I-063 Klosowski, Debbie
I-064 Hanson, Ellen
I-065 Williams, George
I-067 Shick, Gwinn
I-068 Gerwitz, Hans
I-070 Barden, Jed
I-071 Walseth, Jim
I-072 Engel, John
I-073 Gilbert, John
I-074 Freedman, Jonathan
I-076 Majkrzak, Julia
I-077 Smith, Krystene
I-079 Barr, Lance
I-080 Ramirez, Laura
I-081 Petery, Lawrence
I-082 Zimmerman, Lief
I-083 Szendre, Loren

I-084 Williams, Lori
I-085 Pidgeon, Matthew
I-087 Hepp-Buchanan, Max
I-088 Gonzalez, Melissa
I-089 Williamson, Michael
I-090 Reynolds, Michael
I-091 Nichols, Nicole
I-092 Terjak, Paul
I-093 Sutherlin, Paula & Jamie
I-094 Price, Peggy
I-095 Rafoth, Richard
I-096 Blythe, Rick
I-097 Watters, Rob
I-098 Weinheimer, Roger
I-099 McBride, Sonia
I-100 Brien, Steve
I-101 Schoonejans, Teresa
I-102 Yanich, Yael
I-103 Gayne, Zachary
I-104 Wilson, Beth
I-105 Rudolph, Dale
I-106 Murillo, Mar
I-107 Plummer, David F.
I-108 MacIsaac, James
I-109 Bates, Amy
I-110 Hernandez, Angel
I-111 Abegglen, Lynn
I-112 Cyrus, William
I-113 Clark, Judy & Joe
I-114 Foster, Georgine
I-115 Gould, Tim
I-117 Harvey, F.N.
I-118 Berry-Maraist, Linda
I-119 Knedlik, Will
I-120 MacDonald, Douglas B.
I-121 MacDonald, Douglas B.
I-122 Niles, John
I-123 Padelford, Gordon
I-124 Russell, Dave
I-125 Russell, Gordon L.
I-126 Swindale, David
I-127 Tatum, John
I-128 Taylor, Josef
I-130 Furtwangler, Tom
I-131 Luongo, Alfred
I-132 Murry, Amy

I-133 Davis, Ann
I-134 Pigott, Barbee & George
I-135 Johnson, Benjamin
I-136 Woosley, Todd
I-137 Redell, Charles
I-138 Rapp, David
I-139 Raichart, Doraine
I-140 Umbanhowar, Elizabeth
I-141 Herlihy, Glenn
I-142 Fleck, Janet
I-143 Youngman, Jennifer
I-144 Carlsen, Jill
I-145 Davies, Julian
I-146 Rasmussen, Karen
I-147 Bjork, Kerstin
I-148 Kovic-Skow, Linda
I-149 Lupton, Marcia
I-150 Libby, Mark
I-151 Minch, Melinda
I-152 McDermott, Pat
I-153 Johansen, Peder
I-154 Evans, Phil
I-155 Attemann, Rein
I-156 Powell, Gary
I-157 Hanson, Brian
I-158 Blackburn, Bruce
I-159 Berkowitz, Carl
I-160 Collins, Kathy
I-161 McNulty, Chris
I-162 Thoreen, Chris
I-163 Clifford, Christopher
I-164 Dolan, Chuck
I-165 Callewaert, Craig
I-166 Allison, Dan
I-167 Abbott, Danielle
I-168 Brewer, Devon
I-169 Heniges, Dirk
I-170 Yoshida, Edward M.
I-171 Larios, Elizabeth
I-172 Parker, Jeffrey
I-173 Hahn, Jeremy D.
I-174 Ray, Joel
I-175 Enthoven, John
I-176 Howell, Jon
I-177 Coryell, Julie
I-178 Watts, Karen

I-180 Poinar, Kristin
I-181 Trace, Kristin
I-182 Williams, Manda
I-183 Nomi, Margaret
I-184 Hasselquist, Mary Beth
I-185 Evans, Matthew
I-186 Cvitkovie, Michelle
I-187 Freeland, Neal
I-188 Wieneke, Richard L.
I-189 Conn, RJ
I-190 Snyder, Rosanna
I-191 Macfarlane, Ross
I-192 Selby, Ryan
I-193 Longworth, Sara
I-194 Hogshead, Shari
I-195 Etchevers, Shawn
I-196 Brodzik, Stacy
I-197 Skadowski, Suzanne
I-198 Williams, Tyler
I-199 Gayne, Zach
I-200 Geenen, Hugh
I-201 Kamenzind, Carl
I-202 Parast, Adam (Note: This identical letter was submitted by the following 264 commenters: Rodrigo Aceves, Daphne Adair, Doug Adams, Joshua Adler, Imtiaz Alam, Mark Anable, Tommy Arends, Nicholas Arndt, Rance Arnold, Kathleen Arthur, Tom Atkinson, Alexander Babanov, Michael Bagwell, Eric Bailey, Andrew Baker, Christian Becker, Gregg Bergstrom, Jennifer Berliln, Marc Besman, Eric Bisset, Ross Bleakney, Mimi Boothby, Brian Bothomley, Andrew Bound, Bruce Bowman, Ted Browning, Glen Buhlmann, John Butler, Rick Butzberger, Ryan Byars, Ruby Cacchione, Rebecca Caldwell, Reylaureano Canonizado, Shane Carr, Brian Cary, Gregg Cato, Pablo Celi, Ming Chen, Tom Chwojko-Frank, Heidi Clary, James Clement, Lee Colleton, Connie Compton, Steve Cross, Bill Currie, Kelli Currie, Neil Dahmen, Peter Dane, Mark Darling, Andrew Davidson, Jeff Day, Matthew Dean, Kay Dees, Lou Deleon, Darren Dencklau, Robert Diercks, Travis Dougan, Sarah Driggers, Rodney Dwyer, Sheila Dye, Peter Eby, Peter Ellis, Jeff Elrod, Stephen Estep, Michael Fagan, John Fawcett, Greg Flaucher, Albert Foster, Georgine Foster, Marjolijn Francissen, Andy Friedlander, David Gackenbach, Thomas Gaffney, Thomas Gallagher, Chris Garcia, Nathan Garnett, Sara Gilbert, David Glickerman, Julie Goldberg, Roman Golovin, Emily Gonzales, James Goodman, Barbara Gordon, Natalie Greco, Cindy Greenig, Susan Griffith, Michael Grisaffi, Annie Groeninger, David Habib, Bruce Hale, Jeff Hall, Daniel Hanlon, Ryan Harrison, Peggy Hawkins, Stephen Hawksford, Theresa Haynie, Daniel Herron, Glenn Hinrichsen, Kimberle Hoff, John Hopkins, Katie Van Horne, Vince Houmes, Robert Hoyt, Drew Hunt, Dayle Iverson, Matthew Jaffy, Darcy Jayne, Emily Jewell, M Johnson, Mikio Kang, Jacob Kasper, Stephen Katz, Jeff Kauffman, Emily Keegans, Mary Jane Kelly, James Kennedy, Klaus Kerl, Carol Killingsworth, Daniel Kinney, Laila Kinnunen, Naomi Knoble, Tim Kornegay, Michael Krasnow, Cynthia Krass, Deepak Kumar, Jason

Land, Matthew Landkamer, Dan Larkin, Dieter Laskowski, Dan Ledbetter, Roxanne Lenahan, Douglas Lewis, Peter Liljengren, Pat Limberg, Kim Lokan, Brian Loos, Corwin Loreman, Jessica Lundin, Cameron Macdonald, Barbara Mack, Carlos Madrid, Josh Mahar, Lisa Marfa, Dennis Mcafee, Oscar Mcbride, Liz Mccarthy, Thomas Mcelroy, Sarah Mcgann, Cindy Mcguiness, Dave Mckee, Barbara Mckernan, C Mealy, Jacob Mellinger, Laureen Miki, Josh Miller, Julie Miller, Matthew Miller, James Minstrell, Donald Missel, Hideki Mizutani, Daniel Moorman, Joff Morgan, Colin Morrison, Peter Morrison, Tim Van Mouwerik, James Murphy, Arunkumar N, Dolly Neumann, Vu Nguyen, Joel Niemi, Sean O'Connor, Allan Ohlsen, Daniel Oliver, Joanne Olsen, Monica Paolini, Adam Parast, Sean Parent, Peter Parker, Rob Patton, Tom Patton, Jo-Ann Payne, Sarah Peshkin, Timothy Petersen, Christina Petrie, Steven Philips, Carry Porter, Juan Posada, George Pressley, Francisco Ragland, Steve Railing, Ajoy Raj, Rick Reininger, Deling Ren, Kris Rhodes, Richard Ribellia, Scott Riggs, Russ Ringer, Brett Roberts, David Rosenbaum, Robb Rough, Mike Roze, Scott Satter, Matthew Saunders, Michael Scavezze, Bob Scheulen, Andrew Schlotfeldt, John Schmied, Ted Schmitt, Steve Schneider, Kiira Schoessler, Daniel Schremser, Jim Schwend, Kent Scott, David Seelig, Dan Shumow, Robert Sims, Doug Sluis, Chad Smith, Patrick Smith, Patrick Smith, Michael Snyder, Nick Spang, Oren Sreebny, Erin Stamper, Marya Stanfield, Brooks Stanfield, Kate Stewart, Ryan Stickney, David Stockman, Kate Stoll, John Streich, Graham Summerlee, Perri Sutton, Anne Symonds, Bryan Terry, Caryn Thomas, George Thompson, Norm Tjaden, Elena Tolkova, Everett Tsang, Sean Tufts, V Foss Turcan, Rick Valdes, Mark Vanderveen, Nicole Vela, Chad Waldman, Alex Walker, Paul Wallace, Andrew Walter, Todd Ward, Allison Warren, Erica Weiland, Ariel Wetzel, Steve Wilhelm, Brandon Wilhite, Joe Williams, Andy Williams, Dean Wilson, Jocelyn Woolsey, David Yao, Fred Young, Cristine Zacher, Dan Zasloff, and Lief Zimmerman.)

## Hearing Transcript

H-001 Ziegler, Brian
H-002 Locke, Paul W.
H-003 Walser, Donetta
H-004 Niles, John
H-005 Hendersen, Vivian
H-006 Tully, Marge
H-007 Weed, Mark

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 8, 2009

Mr. Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

Re: **Puget Sound Regional Council (PSRC) Transportation 2040 Draft Environmental Impact Statement (DEIS)**
**EPA Project Number: 06-041-MPO**

Dear Mr. Abbott:

F-001-001

The U.S. Environmental Protection Agency would like to thank you for the opportunity to participate in the Transportation 2040 Update process. It has been and continues to be a privilege to serve on the Ad Hoc Environmental Advisory Group for this planning process and to participate in the Regional Staff Committee meetings. We also appreciate this opportunity to comment on the Transportation 2040 Long Range Transportation Plan SEPA Draft EIS. It provides a chance for early involvement needed to integrate environmental considerations with transportation planning, as envisioned in the National Environmental Policy Act (NEPA) and Section 6001 of SAFETEA-LU.

F-001-002

We support the goals of VISION 2040, and the objectives of Transportation 2040, particularly the objective to "improve the region's water and air quality and find creative ways to address climate change", as well as to promote environmental stewardship by avoiding impacts to significant habitats, resource lands, and ecological processes. We appreciate the magnitude of this challenge in planning for an additional 1.4 million persons and 1.1 million jobs by 2040. Our comments on the DEIS, which follow, are focused on ways we think would be helpful in shaping a long-range transportation plan that could meet these challenges.

**Create a transportation plan with clear vision, theme for change.**

F-001-003

F-001-004

The Transportation 2040 DEIS presents 6 alternatives that emphasize different strategies and project types to shape the transportation system and its means for funding. In order to build upon and successfully implement VISION 2040, the Region needs a transportation plan that rises to meet our environmental challenges, improves quality of life, and offers real choices. To create this plan, we recommend selecting a preferred alternative with a theme that sends a clear message for change and a vision for how we want to move people and goods from now into the future -- one that is significantly cleaner, healthier, safer, more diverse and environmentally sensitive than it is now. We think such a plan would adopt, as a starting point, the alternative that goes the farthest to achieve these goals, and move forward from there. The resulting plan would offer a means for transport to live, work, and play in the Region that places much less emphasis

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**F-001-001**

PSRC appreciates your agency's comments and staff support on the Transportation 2040 planning process and development of the Preferred Alternative.

**F-001-002**

Comment noted.

**F-001-003**

Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and (4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.

Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

**F-001-004**

Comment noted.

F-001-004 upon privately owned vehicles (POVs) as the dominant travel mode, and significantly increases emphasis upon transit, non-motorized transportation, and the health and livability of the human and natural environment.

**Alternative 5 is preferred.**

F-001-005 We recommend developing a transportation plan based upon a preferred alternative that is fully responsive to the needs described above as well as to climate change and the State reduction goals for greenhouse gases (GHGs). We commend PSRC for developing Alternative 5, and for analyzing and evaluating the range of alternatives for their potential to reduce greenhouse gas emissions. As designed, Alternative 5 would do the most to reduce GHGs, yet would not meet the State mandate. While we cannot predict the transportation fleet of the future, F-001-006 it would be useful to explore with modeling tools how the GHG reduction goals could be met if additional adjustments were made, such as through alternative fuels, vehicle efficiencies, transit subsidies, and so on. These modeling exercises would inform future decision making and action that could potentially help us to fully achieve needed GHG and VMT reductions.

F-001-007 We recommend selecting Alternative 5 as the preferred alternative starting point, and working to improve it further. According to analyses in the DEIS and Appendix D, Alternative 5 would perform best in all of the policy focus areas but one – minimize disruption of natural ecological processes and wildlife corridors. This focus area is an important one. It would pose a challenge, but we think that if the non-motorized infrastructure proposed in Alternative 5 were sited, designed, and constructed in a fully context sensitive manner, it would be possible to avoid and minimize most of the potential impacts to natural ecological processes and wildlife corridors that are anticipated. Collaboration among transportation entities, resource agencies, local governments, tribes, businesses, interest groups, and citizens would help this to happen.

F-001-008 A word of caution is that when projects are mixed and matched to create a hybrid preferred alternative, it could potentially weaken Alternative 5. The result could be less supportive of VISION 2040, and insufficient to adequately reduce GHGs, impervious F-001-009 surface/polluted runoff to Puget Sound, and vehicle miles traveled (VMT). The preferred alternative should connect the existing population centers with clean non-motorized and public transportation, and avoid including projects that would tend to do otherwise. For example, new roadway projects that point away from centers, that emphasize use of privately owned vehicles, and/or that would impact significant habitat, would tend to encourage dispersed development, F-001-010 increase VMT, and diminish our natural heritage. If a hybrid alternative is selected, we recommend providing an additional opportunity for public comment.

**Non-work transit use could increase with strategic additions.**

F-001-011 The DEIS states that non-work trips via single occupancy vehicle (SOV) would increase under each alternative by between 41% and 45%. Non-work trips via transit would grow by between 78% and 136%. This is an improvement for transit, yet we think non-work transit use could improve even more, and SOV trips lessen, if the preferred alternative would include the following two features:

- Eastside rail service (using existing BNSF line) from Snohomish to Renton with stops at cities in between; and

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**F-001-005**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**F-001-006**

Based on recommendations from EPA and others, PSRC, in conjunction

F-001-011

- Convenient and efficient service from the Eastside to large public event centers, including Seattle Center, with connections to the above Eastside rail line.

Other than the Seattle monorail and a few local Seattle-based bus routes, we know of no existing or proposed service to Seattle Center, particularly for those attending events from the Eastside. Severe westbound traffic congestion is common over SR 520 each evening when event centers are active and peak hour commuter traffic has ended. Eastside event participants have no travel options other than POV use. We are pleased that Alternative 5 includes the Eastside commuter rail line on the BNSF right of way. We recommend it as being essential to any preferred alternative for providing both work and non-work trips.

F-001-012

**Disclosure of funding mechanisms is uneven among alternatives.**

Alternative 5 is the only alternative that discloses its funding strategy. The impacts and feasibility of funding the other alternatives needs to be more fully analyzed, disclosed, and compared to Alternative 5 to inform decision making. If this is too speculative or simply not feasible, to be fair then the EIS should indicate that no viable means for funding the other alternatives is known, thereby providing some assessment of the likelihood that they could be implemented.

We commend and thank PSRC for the informative and inclusive Transportation 2040 public process, and for all the hard work to prepare this EIS. We look forward to continued participation and to a preferred alternative and transportation plan that provides thrust to a future of transport in health and harmony with the human and natural environments.

Sincerely,

/s/
Christine B. Reichgott, Manager
Environmental Review and Sediment
Management Unit

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with the Department of Ecology, did conduct an analysis of alternative fuels and vehicle efficiency changes that has been presented to staff and decision makers in the region. Also, sensitivity analyses were conducted on various levels of transit service, higher vehicle operation cost and transit subsidies. These analyses included impacts on GHG emissions.

**F-001-007**

The Transportation 2040 plan endeavors to fulfill regional planning policies as laid out in VISION 2040 to ensure good environmental stewardship. These measures include practices that will safeguard the natural environment and preserve the beauty and natural ecological functions of the Puget Sound. Some of the measures include:

- Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality and on climate change.
- Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative, environmentally sensitive development practices, including design, materials, construction, and ongoing maintenance.
- Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.
- Preserve and enhance habitat to prevent species from inclusion on the Endangered Species List and to accelerate their removal from the list.
- Identify and protect wildlife corridors both inside and outside the urban growth area.
- Preserve and restore native vegetation to protect habitat, especially where it contributes to the overall ecological function and where invasive species are a significant threat to native ecosystems.

**F-001-008**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**F-001-009**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**F-001-010**

The Preferred Alternative was developed in what may be considered a hybrid approach, selecting projects and strategies from among the six alternatives in the DEIS. The FEIS and the draft plan were available for review and public comment.

**F-001-011**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**F-001-012**

Comment noted. The alternatives evaluated and compared in the DEIS were developed to provide decision makers with a series of

transportation choices and the impacts associated with those choices. Not every alternative contained a complete funding plan. This is not the intent of SEPA. However, in the case of Alternative 5, the funding plan (which is heavily dependent on tolling/pricing) was included as part of the way the alternative was defined. To meet federal requirements, as we developed the Transportation 2040 plan we identified reasonable funding sources to implement the projects and programs contained within the plan.

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

JUL 24 2009

In Reply Refer To:
**13410-2008-FA-0241**

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, Washington 98104-1035

Dear Mr. Ardussi:

**F-002-001** Thank you for requesting our input on Transportation 2040, Puget Sound region's long-range transportation plan. We commend the Puget Sound Regional Council for your substantive consideration of the effects of climate change in the State Environmental Policy Act Draft Environmental Impact Statement (DEIS). We are encouraged to see a build-alternative that attempts to meet our State's greenhouse gas reduction goals by maximizing transit opportunities and de-emphasizing the need for additional highway capacity.

**F-002-002** Now is the time to plan transportation infrastructure in ways that best prepare our region to respond to climate change. Sustained changes in climate are projected by 2050 (USGCCRP 2009), just past the planning horizon for this document. This regional planning effort is an opportunity to make better choices. The right choices now, and in the near future, can have far-reaching consequences related to climate change (TRB 2008; USGCCRP 2009). Reductions in emissions can lessen warming over this century and beyond. If these reductions are sizable, we can significantly reduce the pace and overall effect of climate change (USGCCRP 2009).

**F-002-003** It is widely recognized that transportation-related emissions have a major impact on climate. In addition, climate change will substantially impact transportation systems. Transportation planning has typically not accounted for climate change, but the longevity of transportation infrastructure, and its impacts, coupled with the long-term nature of climate change, warrants serious attention during the planning of transportation systems (USGCCRP 2009).

TAKE PRIDE IN AMERICA

**F-002-001**

Thank you for your comment.

**F-002-002**

Thank you for your comment.

**F-002-003**

Thank you for your comment. A section on adaptation to climate change and the specific impacts to the transportation system is included as part of the final Transportation 2040 document.

F-002-004 In that light, we express our support for the further refinement and development of Alternative 5. As noted in the DEIS, this alternative's emphasis on reducing emissions and limited highway investments make it the one that comes closest to meeting our State's goals for greenhouse gas reductions. As you refine alternatives, we urge you to ensure that the funding strategies for each alternative are presented fairly and are analyzed in a manner that ensures consistent comparison amongst the alternatives.

F-002-005 As the nation's principle federal conservation agency, we are dedicated to helping reduce the impacts of climate change on fish, wildlife, plants and their habitats. Accelerating climate change will amplify many of the conservation challenges our resources face today. We cannot meet these challenges alone, which is why we appreciate your consideration of the role that regional transportation planning can play in reducing greenhouse gas emissions. Should you need further technical assistance in this matter, please feel free to contact Emily Teachout, Transportation Team Lead, at (360) 753-9583.

Sincerely,

for

Ken S. Berg, Manager
Washington Fish and Wildlife Office

**LITERATURE CITED**

Transportation Research Board (TRB). 2008. Special Report 290 – Potential Effects of Climate Change on U.S. Transportation. National Research Council, Washington, D.C.

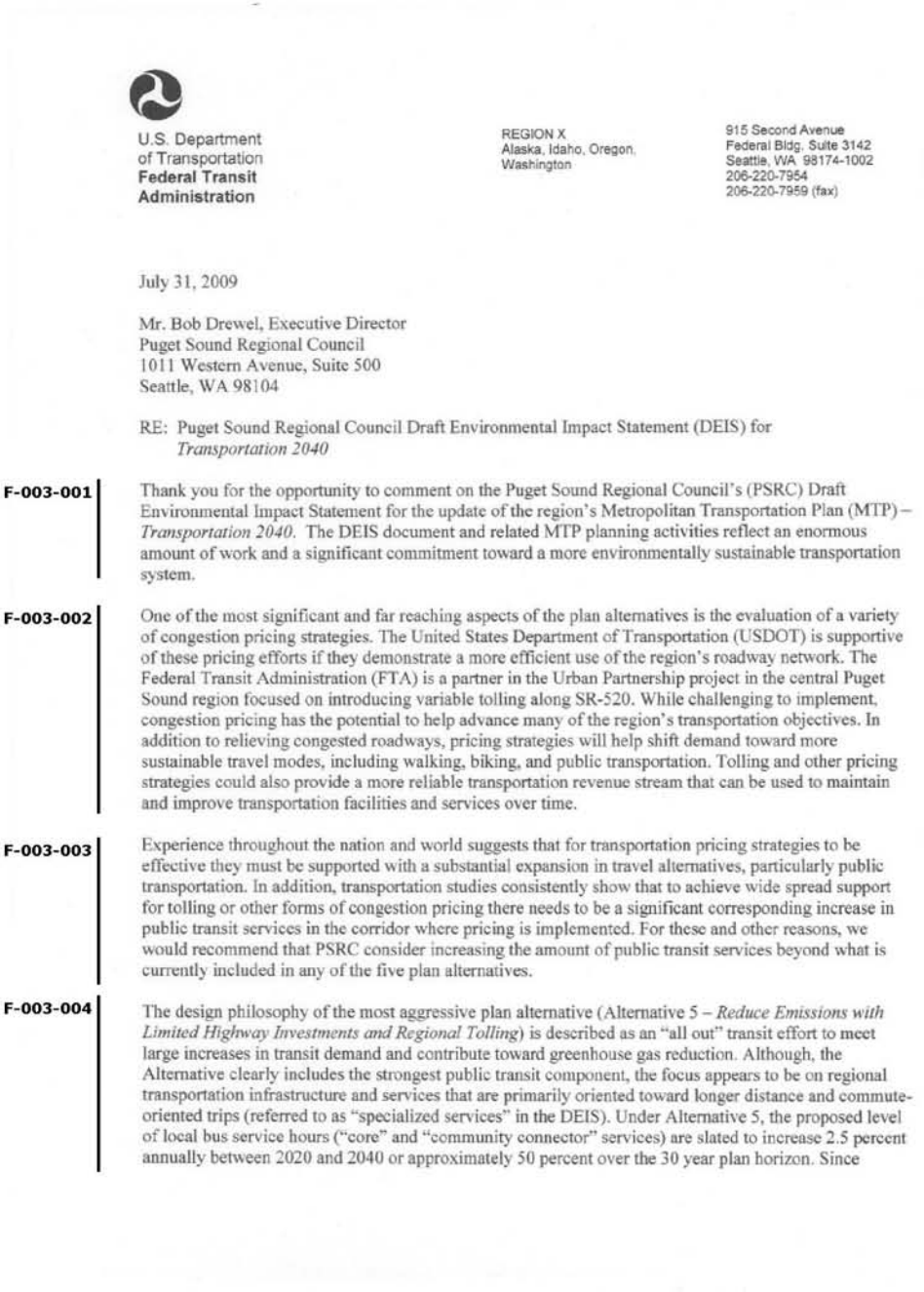
U.S. Global Climate Change Research Project (USGCCRP). 2009. Global Climate Change Impacts in the United States. Cambridge University Press.

**F-002-004**

Thank you for stating your preference among the alternatives. The analysis of the Preferred Alternative for the final plan has undergone extensive review, and has been consistently compared to the alternatives contained in the DEIS using the same evaluation criteria and metrics, including financial revenues and costs.

**F-002-005**

Thank you.



U.S. Department
of Transportation
**Federal Transit**
**Administration**

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Washington

915 Second Avenue
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206-220-7954
206-220-7959 (fax)

July 31, 2009

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

RE: Puget Sound Regional Council Draft Environmental Impact Statement (DEIS) for *Transportation 2040*

**F-003-001** Thank you for the opportunity to comment on the Puget Sound Regional Council's (PSRC) Draft Environmental Impact Statement for the update of the region's Metropolitan Transportation Plan (MTP) – *Transportation 2040*. The DEIS document and related MTP planning activities reflect an enormous amount of work and a significant commitment toward a more environmentally sustainable transportation system.

**F-003-002** One of the most significant and far reaching aspects of the plan alternatives is the evaluation of a variety of congestion pricing strategies. The United States Department of Transportation (USDOT) is supportive of these pricing efforts if they demonstrate a more efficient use of the region's roadway network. The Federal Transit Administration (FTA) is a partner in the Urban Partnership project in the central Puget Sound region focused on introducing variable tolling along SR-520. While challenging to implement, congestion pricing has the potential to help advance many of the region's transportation objectives. In addition to relieving congested roadways, pricing strategies will help shift demand toward more sustainable travel modes, including walking, biking, and public transportation. Tolling and other pricing strategies could also provide a more reliable transportation revenue stream that can be used to maintain and improve transportation facilities and services over time.

**F-003-003** Experience throughout the nation and world suggests that for transportation pricing strategies to be effective they must be supported with a substantial expansion in travel alternatives, particularly public transportation. In addition, transportation studies consistently show that to achieve wide spread support for tolling or other forms of congestion pricing there needs to be a significant corresponding increase in public transit services in the corridor where pricing is implemented. For these and other reasons, we would recommend that PSRC consider increasing the amount of public transit services beyond what is currently included in any of the five plan alternatives.

**F-003-004** The design philosophy of the most aggressive plan alternative (Alternative 5 – *Reduce Emissions with Limited Highway Investments and Regional Tolling*) is described as an "all out" transit effort to meet large increases in transit demand and contribute toward greenhouse gas reduction. Although, the Alternative clearly includes the strongest public transit component, the focus appears to be on regional transportation infrastructure and services that are primarily oriented toward longer distance and commute-oriented trips (referred to as "specialized services" in the DEIS). Under Alternative 5, the proposed level of local bus service hours ("core" and "community connector" services) are slated to increase 2.5 percent annually between 2020 and 2040 or approximately 50 percent over the 30 year plan horizon. Since

**F-003-001**

Thank you for providing detailed comments on the Transportation 2040 DEIS. The Preferred Alternative includes a larger expansion of transit facilities and service hours than any other alternative. The Preferred Alternative also includes a 4-part greenhouse gas reduction strategy, described in the FEIS.

**F-003-002**

Comment noted.

**F-003-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these

**F-003-004** population growth is estimated to increase by 50 percent during this time period, the increase in localized transit services would only keep pace with projected growth and does not reflect a substantial expansion.

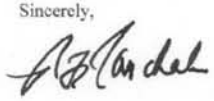
**F-003-005** The preferred alternative should put more emphasis on arterial based local bus service investments, especially within major corridors where congestion pricing strategies are implemented. Local transit agencies throughout the region have been working hard at creating a significantly expanded network of transit improvements along urban arterials, including a number of localized bus rapid transit (BRT) elements. Over the period of the plan, as more of the commuter market shifts to regional rail modes, these core and community connector services will be of major importance in feeding regional transit routes. In addition, the PSRC sensitivity analysis conducted on the alternatives specifically supports the strategy of building on these local, all-day bus transit services. To help support additional local bus services, greater emphasis should be placed on transit priority treatments, including more arterial high-occupancy vehicle (HOV) lanes, business access and transit (BAT) lanes, transit signal priority (TSP), queue jumps, and other priority infrastructure.

**F-003-006** In addition to supporting the implementation of congestion pricing, public transportation will also play an important role in addressing the serious challenge of climate change. FTA commends PSRC on their efforts toward meaningful reductions in greenhouse gas emissions, particularly in Alternative 5. We do suggest, however, that more in-depth analysis be provided to determine strategies necessary to fully achieving the Washington State goals established for reducing greenhouse gas emissions and vehicle miles traveled (VMT). More analysis is warranted to help policy-makers understand the potential impact of reducing the amount of vehicle trips and vehicle miles traveled in conjunction with other emission reduction strategies. In particular, additional analysis that estimates the potential for establishing a more efficient vehicle fleet and promoting the use of cleaner fuels would be useful. In turn, the analysis should estimate the level of regional and local transit service that would be needed to support the significant shift in travel demand if State goals are to be met.

**F-003-007** In conclusion, Alternative 5 appears to come closest toward meeting many of the region's transportation and growth management objectives. The Alternative is estimated to have the greatest reduction in green house gas emissions, the largest increase in transit use, the most significant reduction in single occupancy vehicle use, and the greatest increase in walking and biking. The Alternative provides an excellent framework upon which a locally preferred alternative can be adopted that establishes an environmentally sustainable transportation system for the central Puget Sound region.

Thank you again for the opportunity to provide comments on this important effort. Please free to contact me at (206) 220-7957 if you have any questions.

Sincerely,



R. F. Krochalis
Regional Administrator

cc: Charlie Howard, Director of Transportation Planning, PSRC
Rebecca Reyes-Alicea, Planning and Program Development Office Director, FTA Region 10
Ned Conroy, Community Planner, FTA Region 10

investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**F-003-004**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**F-003-005**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement VISION 2040's Regional Growth Strategy. This strategy was adopted as a description of the development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. The updated Transportation 2040 plan increases local transit service by approximately 90%, while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies. This service will be local and regional. The plan also includes the completion of transit-supportive and efficiency investments in local roads and access to and within centers, with the addition of a limited number of strategic projects.

**F-003-006**

Transportation is one of many sectors in the state that need to achieve

reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**F-003-007**

Thank you for stating your preference among the alternatives.

**Marina King**

**From:** Reinbold, Stewart G (DFW) [Stewart.Reinbold@dfw.wa.gov]
**Posted At:** Thursday, July 09, 2009 7:37 AM
**Conversation:** WDFW Region 4 PSRC Transportation 2040 DEIS comments
**Posted To:** Transportation 2040
**Subject:** WDFW Region 4 PSRC Transportation 2040 DEIS comments

Sean,

S-001-001 From a preliminary review the Washington Department of Fish and Wildlife Region 4 Office (Snohomish and King Counties) we would prefer Alternative 1 with the least amount of stream/river, wetland and imperious surface
S-001-002 projects. However we realize this is not always possible. Also the expansion of mass transit has some promising possibilities and we have and will continue to support the design of these projects.

S-001-003 The main comment we would have is to let our fellow Federal, State, County and local Cities agencies/departments know with the projected population growth making sure we have proper protection of fish and wildlife with these projects is critical to allow the residents of this state to continue enjoying the fish and wildlife opportunities we have now. Full spanning bridges/Stream Simulation culverts, bio-engineered banks, addressing limiting factors like the lack of large woody debris and results of stormwater, and providing proper wildlife migration corridors underneath as well as over roadways with heavily planted lids needs to be a goal.

Hope this helps.

Stewart Reinbold

Stewart G. Reinbold
Assistant Regional Habitat Program Manager
Washington Department of Fish and Wildlife
Region Four, Issaquah Office
Tel: 425-313-5660
Cell: 425-301-9081
Fax: 425-427-0570



**S-001-001**

Thank you for stating your preference among the alternatives.

**S-001-002**

Thank you and your comment is noted.

**S-001-003**

The Transportation 2040 plan endeavors to fulfill regional planning policies as laid out in VISION 2040 to ensure good environmental stewardship. These measures include practices that will safeguard the natural environment and preserve the beauty and natural ecological functions of the Puget Sound. Some of the measures include:

- Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality and on climate change.
- Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative, environmentally sensitive development practices, including design, materials, construction, and ongoing maintenance.
- Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.
- Preserve and enhance habitat to prevent species from inclusion on the Endangered Species List and to accelerate their removal from the list.
- Identify and protect wildlife corridors both inside and outside the urban growth area.
- Preserve and restore native vegetation to protect habitat, especially where it contributes to the overall ecological function and where

JUL-31-2009 FRI 01:46 PM FAX NO. P. 02

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300*
*711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

July 31, 2009

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

S-002-001 Dear Mr. Drewel:

Ecology appreciates the opportunity to comment on the Puget Sound Regional Council Transportation 2040 DEIS. We commend PSRC on including assessments of the impacts of their five alternatives on air quality, greenhouse gas emissions, water quality, and other environmental factors.

S-002-002 **Policy Framework**

RCW 70.235.020 requires the State of Washington to reduce greenhouse gas emissions:

- To 1990 levels by 2020
- 25% below 1990 levels by 2035
- 50% below 1990 levels by 2050

In Washington, almost half of our greenhouse gas emissions come from the transportation sector. The state will not reach its statutory emissions reductions unless we significantly reduce emissions from transportation. To help reduce emissions from transportation, the legislature set benchmarks for the statewide reduction in per capita vehicle miles traveled (VMT) codified in RCW 47.01.440. The state goal is to decrease per capita VMT compared with a baseline of 75 billion by:

- 18% by 2020
- 30% by 2035
- 50% by 2050

In addition, Executive Order 09-05, signed by Governor Gregoire on May 21, directs the Secretary of the Department of Transportation to work with regional transportation planning organizations, including PSRC, to develop transportation plans that expand transportation alternatives and choices, reduce greenhouse gases, and reduce per capita VMT.

**Department of Ecology Comments**

In choosing a preferred alternative from the five DEIS options, Ecology believes it is critically important for PSRC to develop a plan that that ensures GHG emissions consistent with the region's proportional

share of the transportation sectors GHG emissions reductions. Reducing transportation GHGs will require a combination of reduced VMT, cleaner vehicles and cleaner fuels. Since Transportation 2040 can most directly address VMT, it's critical that the plan adopt robust strategies to give people alternatives to single occupancy vehicles.

**S-002-001**
Thank you.

**S-002-002**
Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

S-002-002

As outlined in the 2008 Climate Action Team report, to achieve the needed GHG reductions it will be necessary to utilize highly effective VMT reduction measures that go well beyond what has typically been considered. The PSRC 2040 Transportation Plan must move Washington towards a future where all citizens have a number of safe, reliable, and affordable alternatives to single occupancy vehicles, including transit services, walking, bicycling, ridesharing, and telecommuting. In order to implement these dramatic changes in our transportation system, this plan must also work to address the crisis in transportation funding and develop sustainable funding sources and strategies for VMT reduction strategies, road and transit maintenance, and system improvements.

While reducing per capita VMT will help Washington meet its statutory GHG emissions reductions, the modeling in the DEIS and at the national level show that VMT strategies alone will not be sufficient to achieve the necessary emissions reductions from the transportation sector. The plan should acknowledge the need for more efficient vehicles and cleaner transportation fuels including biofuels and electricity. The plan must also utilize strategies and funding measures compatible with such broader measures. Ecology will continue to work to enact statewide strategies that will lead to further emissions reductions from fuels and vehicles. We welcome the opportunity to work with PSRC staff to update modeling results to estimate the effects of other transportation polices to reduce emissions from PSRC Transportation 2040 alternatives.

S-002-003

In addition, the Puget Sound region is on the verge of violating federal standards for ground-level ozone and vehicle emissions are a major source of ozone precursors. All indications are that federal ozone standards are going to get even tougher in coming years, making it likely that EPA will find much of the PSRC region out of attainment with ozone levels at some point. Developing a final plan that includes measures that are most effective for reducing ozone precursors is very important. Since these are the same measures that reduce VMT and GHGs, it's clearly important that the plan include robust travel reduction strategies.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact Sarah Lukas, Shorelands & Environmental Assistance program, at (360) 407-7459 or by e-mail at sarah.lukas@ecy.wa.gov.

Department of Ecology
Southwest Regional Office

(AW: 09-3130)

cc: Sarah Lukas, SEA

**S-002-003**

Thank you for your comment. PSRC is an active participant with the region's air quality consultation partners, and monitors the region's air quality status and upcoming issues related to the ozone and fine particulate standards. The alternatives analyzed in the Transportation 2040 DEIS were found to conform to the existing State Implementation for Air Quality, and a full conformity analysis was conducted on the Preferred Alternative to ensure the region remains in conformity. Should the region go out of attainment to any of the national ambient air quality standards, PSRC will work with Ecology and the Puget Sound Clean Air Agency on a maintenance plan with appropriate measures to further reduce emissions and come back into compliance.

State of Washington
Department of Fish and Wildlife

Mailing Address: 600 Capitol Way N, Olympia WA 98501-1091, (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia WA

July 31, 2009

Puget Sound Regional Council
Attn: Sean Ardussi, Associate Planner
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

*SUBJECT: WDFW comment on Transportation 2040 DEIS*

S-003-001

Dear Mr. Ardussi:

Thank you for providing the Washington Department of Fish and Wildlife (WDFW) the opportunity to review and comment on the Transportation 2040 Draft Environmental Impact Statement. We focused our review on Chapter 9, Water Quality and Hydrology and Chapter 10, Ecosystems and Endangered Species Act Issues. We appreciate the comprehensive analysis performed in these chapters and the tables describing potential impacts for each transportation alternative. We have a few comments for your consideration.

S-003-002

Road Impacts to Fish Habitat

Historically, transportation improvements that cross streambeds have resulted in barriers to fish passage. Fish passage barriers include poorly designed culverts and dams as well as areas made too shallow for fish to swim past because of water diversion or groundwater pumping. Fish passage barriers can result in complete barriers blocking all fish migration, temporal barriers delaying access which can result in mortality before spawning, and partial barriers that block juvenile or weaker salmonids within a species and reduce genetic diversity (Wofford et al. 2005).

To address the loss of migratory access, WDFW performed an analysis of fish passage barriers. As transportation improvements and expansions occur with the implementation of this plan, we recommend utilizing this information to inform improvement projects where fish passage barriers should be replaced or removed entirely. We recognize the DEIS is not focused on site-specific design, but think it worth noting that bridges are a preferred alternative to culverts where stream crossings cannot be avoided. For specific recommendations, the state has convened an Aquatic Habitat Group that developed several documents that include recommendations on the design of culverts and protecting streambanks. For more information go to: http://wdfw.wa.gov/hab/ahg/.

In reviewing the alternatives, it is difficult to discern which would have the least impact on fish and wildlife resources (excluding the no change baseline alternative). It appears that in the short-

**S-003-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. During future project-level environmental review, your comments will provide useful information to guide site-specific design.

**S-003-002**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

**S-003-002**

term the least impact would occur with Alternative #1, due to its zero expansion, efficiency improvement scenario resulting in less habitat loss. However, it appears that long-term fish and wildlife benefits occur with Alternative #5, because it will increase commuter transit (and likely decrease vehicle miles traveled and the need for future expansions) and includes integrated corridor management. This could benefit wildlife by decreasing habitat fragmentation and therefore habitat loss. Here are a few examples of road impacts worth including in the final environmental impact statement.

**S-003-003**

Road Impacts to Wildlife Habitat

- Direct mortality to wildlife; vehicle collisions with large mammals and "run-overs" of smaller animals such as reptiles, amphibians, and scavengers that are attracted to road kill,
- Creation of movement barriers for animals that will not cross roads,
- Fragmentation of habitat and subsequent interruption of movement from one habitat to another, including dispersal of young animals, that some species must make in order to complete their life cycles,
- Alteration of the natural behavior of animals, in terms of home ranges, patterns of movement, reproductive success, and ability to escape danger,
- Fragmentation of animal populations, leading to genetic problems and susceptibility to catastrophic events, such as disease and natural disasters,
- An increase in the ratio of edge habitat to interior habitat, which harms interior species (e.g. forest-dwelling), while artificially enhancing edge specialists,
- Proliferation of non-native plant and animal species that compete with native species,
- Pollution and degradation of habitat from increased noise, light, and heat, as well as the addition of exhaust, pavement de-icers, oil, heavy metals, and ozone to the environment,
- Disruption of natural hydrologic processes.

Road mortality, habitat loss, and reduced connectivity are considered to be the three main detrimental effects of roads on wildlife (Forman et al. 2003).

**S-003-004**

We appreciate the inclusion of our PHS list in Appendix G and are available to offer further technical assistance regarding how a particular species is affected by transportation improvements. WDFW also has digital PHS data showing known species and habitat locations across the landscape, and management recommendations useful to protecting these habitats and species listed in Appendix G, including effective mitigation. The WDFW PHS data is updated regularly, is considered best available science and is the most up-to-date knowledge we can provide about species and habitats. This data could be used to inform which alternatives are least likely to impact known priority habitats and species.

**S-003-003**

Comment noted.

**S-003-004**

Comment noted.

S-003-004

Thank you again for this opportunity to comment. Please contact me directly if we can be of further assistance at (360) 902-2618 or katie.knight@dfw.wa.gov.

Sincerely,

Katie Knight
Land Use and Environmental Planner

cc: David Brock, Regional Habitat Program Manager, WDFW
Bob Burkle, Assistant Regional Habitat Program Manager, WDFW
Jennifer Davis, Technical Assistance Section Manager, WDFW
Kirk Lakey, Watershed Steward, WDFW

Citation: Forman, R. T. T., D. Sperling, J. A. Bissonette, A. P. Clevenger, C. D. Cutshall, V. H. Dale, L. Fahrig, R. France, C. R. Goldman, K. Heanue, J. A. Jones, F. J. Swanson, T. Turrentine, and T. C. Winter. 2003. *Road ecology: science and solutions*. Island Press, Washington, D.C., USA.

Wofford, J. E. B., R. E. Gresswell, and M.A. Banks. 2005. Influence of barriers to movement on within-watershed genetic variation of coastal cutthroat trout. Ecological Applications 15:628-637.

**Washington State Department of Transportation**
**Paula J. Hammond, P.E.**
Secretary of Transportation

**Strategic Planning & Programming**
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July 30, 2009

Mr. Sean Ardussi
Senior Planner, PSRC
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Dear Mr. Ardussi:

S-004-001

The Washington State Department of Transportation (WSDOT) has reviewed the DEIS for the Transportation 2040 Plan with considerable interest. The inclusion of various roadway pricing scenarios represents a significant advancement in thinking about how the regional transportation system can be most effectively managed. The DEIS is also enhanced by the use of graphics, though in some instances the impacts appear exaggerated because inappropriate scales have been used, or obscured because a scale has not been provided. The extensive use of maps helps provide a better picture of how transportation system improvements and impacts are distributed around the region.

S-004-002

WSDOT appreciates the difficulty of preparing an environmental document that encompasses the broad scope of a Metropolitan Transportation Plan. The DEIS is a commendable effort at that daunting task and we feel the analysis raises a number of questions that would benefit from further explanation. Three major areas of interest are:

S-004-003

1) **The differences in performance among the action alternatives are slight.** In many instances the differences in mode share, vehicle trips, and emissions are only one or two percent. The text of the DEIS focuses on these small differences, but when the results are so similar despite the widely varying levels of investment it begs the question why the investments in the alternatives don't translate into a truly meaningful difference in performance. If future performance of the region's transportation system is largely independent of the investments and policies included in the alternatives then that is a significant finding which should be emphasized in the text of the DEIS.

**S-004-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. As noted below, the FEIS has been updated in response to your comments. PSRC would like to acknowledge your concerns regarding the configuration of the alternatives and the results of the alternatives analysis. Hopefully, the comments below help to address your concerns.

**S-004-002**

Thank you.

**S-004-003**

While some measures are similar across alternatives, others are not. This in and of itself is important. Small changes in mode share, for example, may result as a consequence of larger changes in the performance of transportation systems. These changes in performance may translate into significant differences across alternatives in terms of the benefits to the users of the transportation systems. This is further demonstrated by notable changes in travel time and delay in the network from one alternative to another. To this end, the Transportation 2040 EIS has tried to emphasize the measures that demonstrate importance differences, while also reporting measures that are typically reported in transportation planning even if the differences appear minor. Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

PSRC Transportation 2040 DEIS
July 30, 2009
Page 2 of 5

S-004-004

2) **The alternatives have been defined in ways that make comparison difficult**. Though each of the alternatives was developed around a particular theme the overlapping components among the alternatives make it difficult to ascertain what accounts for the small changes in performance. For instance, are the differences in mode share and VMT between alternatives 2 and 3 attributable to the expansion of capacity in alternative 2 or to the expanded use of tolls in alternative 3? Or perhaps the very small performance differences between those alternatives are the result of something else altogether. The composition of alternatives makes it very difficult to understand what actually causes the differing impacts. WSDOT is not asking that the alternatives be revised. They are what they are. But the text should explain that the action alternatives have been defined in a way that limits the conclusions that can be legitimately drawn regarding individual policy or operational components.

S-004-005

3) **The DEIS relies heavily on forecasts for year 2040 but there is no indication of how reliable those forecasts are**. One of the most consequential uses of the information in the DEIS will be development of a preferred transportation system alternative for the year 2040. That process should be informed by an understanding of how the model results diverge from actual trends. The graphs and tables give no indication whether the results fall within the margin of error. The DEIS should give a sense of whether forecasts (such as mode share, delay, etc) supporting prior plans have generally been on target when compared to what actually happened. At the very least the DEIS should make clear which results have statistically meaningful differences and which are essentially indistinguishable.

S-004-006

Addressing the three points identified above is necessary to enable policy makers to assess the probable impacts from each of the alternatives and to inform discussion of a preferred alternative. In addition to those general concerns WSDOT would like to offer the following specific comments:

- The DEIS emphasizes the importance of increasing efficiency (page 2-5 and elsewhere throughout the document) but it isn't always apparent the alternatives result in improved efficiency. For instance, all of the action alternatives show a substantial increase in arterial delay compared with conditions in 2006, which suggests that large parts of the regional transportation system are expected to become less efficient by 2040. From the information provided it can't be determined how transit system efficiency changes, but the unprecedented increase in transit investment suggests that total cost per rider will rise substantially from current levels. Since reducing per-rider cost is a frequently used measure of efficiency it follows that a trend in the opposite direction would not normally be regarded as an improvement.

**S-004-004**

The plan analysis examined a broad array of potential transportation actions combined in different ways into the alternatives tested. Given that each alternative contains a mix of many different actions the analysis results apply to the alternative as a whole rather than to any individual action therein. Staff stated this clearly in many meetings and outreach efforts.

**S-004-005**

Thirty-year forecasts always represent a challenge in determining the potential forecast error. Few agencies have been forecasting transportation performance, or population and employment, for that period of time in an consistent manner. This makes a systematic review of forecast error very difficult for this time frame. PSRC has reviewed their past forecast efforts over smaller intervals of time. These forecasts have performed reasonably.

It is important to remember that the Tranportation 2040 Alternative analysis is intended to assess the relative implications of choosing one alternative instead of another. The absolute value of the various froecast variables over a thirty-year period in not the target of the analytical exercise. In this sense any forecast errors are included in all alternatives in a consistent manner.

**S-004-006**

Between 2006 and 2040 the region will see a 40 percent increase in population. Along with that increase in population will come an increase in travel and traffic. It is true that this traffic will result in greater delay on the arterial network than is present today. This is especially true for the Baseline Alternative. The other alternatives are compared with the baseline and include alternatives that improve upon this baseline condition in terms of arterial performance. The Preferred Alternative achieves these gains most notably.

S-004-006

If the plan makes increasing efficiency a primary objective then the text should include a more thorough discussion of how system efficiency would be expected to change under each of the alternatives.

S-004-007

- The section discussing water quality equates new impervious surface area with adverse impacts on water quality. That may have been true in the past and in certain instances it may be true in the future, however the analysis does not appear to take into consideration the improvements in storm-water treatment that would be incorporated in new roadway projects. In many instances the addition of new impervious surface area will trigger the need to better treat roadway runoff resulting in better water quality than if there had been no project. Similarly, the table showing the number of projects in the vicinity of flood zones under each alternative gives the impression that a higher number is bad. In fact, the higher standards used for new projects should result in decreased vulnerability and may help minimize environmental damage.

S-004-008

- The DEIS states that "the same assumptions for future land use policies and strategies for growth management" were used in analyzing all the alternatives (page 7, executive summary). The DEIS should describe how the assumed distribution of growth compares with historical trends. If other distributions of population and employment are just as likely but would result in significant differences in transportation system performance then the DEIS should at least acknowledge that impacts outside those analyzed are possible.

S-004-009

- The assumption that proximity of road projects to known hazardous waste sites means there will be environmental degradation is flawed or at least oversimplified (chapter 13). In many cases, project work helps to remediate hazardous waste sites by cleaning up existing contamination and diminishing future problems. This section of the DEIS should be revised to present a more even handed discussion of impacts from transportation projects.

S-004-010

- The discussion of impacts on freight would benefit from additional detail. In particular, it would be helpful to know what assumptions have been made regarding toll rates for trucks and what affect tolls are expected to have on truck VMT and time of delivery. Would roadway pricing of congested highways influence where major logistics centers are located or where warehousing takes place?

S-004-011

- In some instances the performance of the alternatives does not correspond well with WSDOT's expectations. In particular, WSDOT would expect the two-lane HOT network in alternative 2 to perform noticeably better than the single lane network assumed in alternative 1, but the results as shown in exhibits 1-6, 1-7 and 1-8 indicate little or no difference.

Bus service efficiency is not only a function of roadway performance but also of how well the bus service attracts patrons. Each of the action alternatives increases transit patronage, but to varying degrees.

**S-004-007**

Thank you for your comment. The FEIS includes the appropriate edits.

**S-004-008**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.

PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

**S-004-009**

Thank you for your comment. The FEIS includes the appropriate edits.

**S-004-010**

Tolls do not appear to have a major influence over the location of logistics in the modeling analysis. For a detailed discussion of freight modeling see both Appendix E and the model documentation on the

PSRC Transportation 2040 DEIS
July 30, 2009
Page 4 of 5

S-004-011 Since roadway pricing is a key policy issue the text should explain these counter-intuitive results.

S-004-012
- The discussion of energy in Chapter 11 mentions that energy from transit vehicles is not included in Exhibit 11-5. Since transit vehicles don't usually produce energy the presumable meaning is that energy *consumed* by transit vehicles has not been included in the table. Assumptions about transit service hours have been made for each alternative therefore it should be possible to estimate energy consumed. Because the analysis also includes ridership projections energy consumption per passenger mile for the major modes in each alternative can be estimated. That information would be more illuminating than the incomplete data shown in Exhibit 11-5. Full disclosure of energy impacts should also include energy consumed in construction.

S-004-013
- Chapter 6 includes a lengthy discussion of air quality impacts. The text notes that emissions are closely tied to fuel consumption. That being so, it would seem appropriate to include at least some discussion of the recently adopted Federal CAFÉ standards since they are designed to increase fuel efficiency.

S-004-014
- Even though the Governor's Executive Order 09-05 regarding GHG and VMT reduction was issued after scoping for the MTP, it would still be useful if the DEIS discussed how results for the alternatives compare with the State's benchmarks for VMT reduction. The Executive Order directs WSDOT to work with PSRC to "develop and adopt" regional transportation plans that "reduce GHGs and the statutory benchmarks to reduce annual per capita VMT" (Sec. 2(b)).

S-004-015
- The assessment of fiscal and economic impacts would be improved by additional analysis. As noted above, the differences in performance among the alternatives is very small but the differences in cost are much greater. These differences in the level of investment may have implications for regional economic growth and environmental justice. We realize that for purposes of the DEIS total regional population and employment growth is held constant across all the alternatives, but in fact the cost-effectiveness of transportation investments will have an impact on the level of economic growth, and depending on how the investments are funded, it may also influence where growth occurs, who pays and who benefits. The DEIS should at least mention these facts even if no detailed analysis is presented.

S-004-016
- The evaluation of safety is an important element of the DEIS but it isn't entirely clear how facility type was taken into consideration in the analysis. The methodology used for estimating safety impacts should be described in greater detail.

PSRC web page www.psrc.org/data/models. Toll rates are the same as for other vehicles in the Baseline and five action alternatives.

**S-004-011**

Alternative 2 contains many other investments within a large transportation network and the consequences of the two-lane HOT network (as compared with the one-lane network in Alternative 1) are not easily determined from an examination of the aggregate results.

**S-004-012**

Thank you for your comment. The estimation of transit energy usage is an area within the current modeling framework that we were unable to compile to the same degree of accuracy as our other indicators. This is an area that PSRC will continue to strive to improve upon. Regarding construction impacts, estimating energy usage from construction at the scale of a long-range regional planning document is not currently an area for which robust data and methodologies exist. PSRC will continue to monitor the state of the practice and make improvements to our modeling capabilities as resources and available data allow.

**S-004-013**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system,

PSRC Transportation 2040 DEIS
July 30, 2009
Page 5 of 5

S-004-017

WSDOT appreciates the opportunity PSRC has provided to participate in development of the Transportation 2040 Plan. With the exception of several points listed above, the issues WSDOT identified in the scoping process have been addressed.

We look forward to working with PSRC on development and evaluation of a preferred alternative that balances mobility, access, economic vitality, environment, livable community and financial constraint goals—not an easy task.

Sincerely,

Chris R. Picard
Manager, Urban Planning Office

Cc: Troy Cowan
Kevin Dayton
Ray Deardorf
Russ East
Lorena Eng
Barbara Ivanov
Bob Jones
Carol Moser
Charles Prestrud
Elizabeth Robbins
Brian Smith
Craig Stone
Katy Taylor
Shuming Yan

expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**S-004-014**

Chapter 6 includes an analysis of each of the alternatives compared to the state's VMT reduction benchmarks.

**S-004-015**

Appendix D provides details of a number of measures of the benefits and costs of the alternatives. While measures of aggregate performance appear similar in many instances, an accurate accounting of benefits to the users of the system demonstrates sizable differences. This is precisely when the analysis has focused on these types of measures of benefit to users, in order to fully appreciate the variations across the alternatives that might get missed when examining only aggregate measures of performance. With the data provided in Appendix D it is not only possible to combine data elements into measures of "cost-

effectiveness," it is in fact the intent of this analysis to support such assessments and comply with the intent behind least-cost planning. When benefits to users exceed the costs of implementation it is an indication that the region may enjoy increases in production possibilities resulting in more sizable economic growth than would otherwise be the case in the absence of the investments.

**S-004-016**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**S-004-017**

Comment noted.

D-001

PORT of TACOMA U.S.A.

RECEIVED
JUN 02 2009
PUGET SOUND REGIONAL COUNCIL

May 29, 2009

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

To Whom It May Concern:

Thank you for the opportunity to comment on the Puget Sound Regional Council's Destination 2040. The Port of Tacoma applauds the hard work of the PSRC in preparing the draft report. The Port has three general comments.

R-001-001

1) The Port recommends the aggressive use of systems management technology where appropriate. The Port recognizes that in an era of limited transportation dollars, the region ought to adopt those strategies that optimize the use of the current system wherever possible.

R-001-002

2) This support for systems management technology comes with one key caveat: these solutions only work when the system is complete. A fractured transportation network that lacks key connectors is not a unified system, but rather, a collection of roadways and communities. As such, it can not be managed effectively.

This issue is particularly acute for the Pierce County, where incomplete roadways result in a fractured transportation system. Two important projects come to mind: the completion of the limited access SR-167 freeway connecting Puyallup to Tacoma, and the completion of SR-704, connecting the developed (and growing) communities of Spanaway and Frederickson to Interstate 5. Both of these projects, identified in Alternatives 2 and 3 of Transportation 2040, have remained unfinished for decades, and provide critical links within the Pierce County road network. Although the Port can not comment on whether increased capital investments are the solutions elsewhere in the Region, some capital improvements to roadways are needed in Pierce County to complete the system. Improving and managing the entire transportation system is a laudable goal, but the strategic infrastructure gaps must first be filled.

R-001-003

3) The Port of Tacoma believes that tolling can and should be a viable tool for generating revenue needed for construction, at least for those projects needed to complete the system. The Port supports the tolling recommendations in Alternative 3 as it relates to the completion of SR-167 and SR-704. This

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**R-001-001**

Improving the efficiency and safety of our existing transportation system is prioritized in Transportation 2040. Optimizing the efficiency and effectiveness of our multimodal transportation system is a low-cost means to manage congestion, increase reliability and provide convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit and traveler information ITS projects.

**R-001-002**

This project has been included in the Preferred Alternative.

**R-001-003**

Comment noted.

R-001-003

support should not be construed as support or opposition to system tolling for the purposes of demand management as the Port has not adopted a formal position on this issue.

Once again, the Port of Tacoma appreciates the opportunity to comment on Transportation 2040 and participate in the regional collaborative process. If you have questions or concerns about the Port's comments, please contact Brian Mannelly at 428-8671 or Sean Eagan at (253) 428-8663.

Sincerely,

Timothy J. Farrell
Executive Director

CITY OF Mill Creek WASHINGTON

RECEIVED
JUL 09 2009
PUGET SOUND REGIONAL COUNCIL

July 2, 2009

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

SUBJECT: RSC REQUEST REGARDING TRANSPORTATION 2040

Dear Mr. Drewel: Bob

R-002-001 The PSRC staff has asked the Regional Staff Committee (RSC) to be the lead staff committee in developing the Transportation 2040 plan. The RSC agreed to assume the role of reviewing the work generated by staff and other PSRC committees and providing recommendations to PSRC's policy boards. The RSC is committed to continue this role in developing the Transportation 2040 preferred alternative for transmittal to and consideration by the Transportation 2040 Working Group and the Transportation Policy Board.

R-002-002 However, in order to be successful in this role and enable the RSC to schedule additional or extended meetings that will be necessary for the Committee to provide timely comments on proposed Transportation 2040 document, we respectfully request a written response to the following questions by the time of Committee's July 16th meeting:

- The committee believes that the comments received during the public review period for the DEIS should be an important factor in its deliberations towards a recommended preliminary preferred plan alternative. When will the results of the comments received during the public review period be available to the Committee for its review?
- When will PSRC staff have a preliminary preferred plan identified for the Committee's consideration?
- When will the analysis of the preliminary preferred plan be available for review by the Committee?
- What is the final deadline for the Committee to transmit its recommendations to the Transportation 2040 Working Group and Transportation Policy Board?

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**R-002-001**

Comment noted.

**R-002-002**

Comment noted. Regional Staff Committee has since been briefed on numerous occasions and these questions have been addressed.

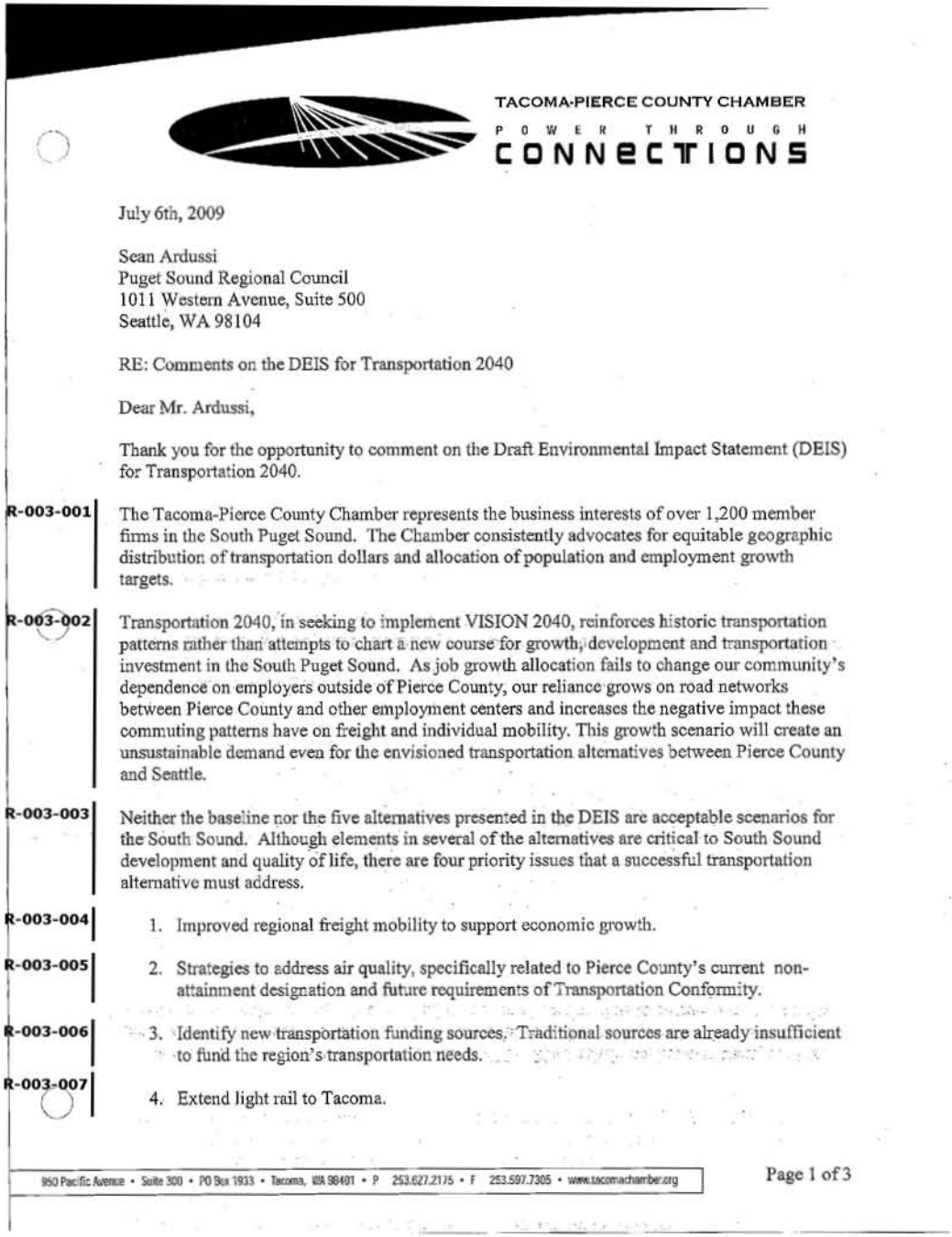
SUBJECT: RSC REQUEST REGARDING TRANSPORTATION 2040

R-002-002 It is particularly important that PSRC's schedule for Transportation 2040 accommodate Regional Staff Committee work well in advance of presentation of a recommended preliminary preferred plan alternative to the Working Group and Policy Board.

Sincerely,

Bill Trimm, FAICP
Chair, Regional Staff Committee

cc: Sean Ardussi, Transportation 2040 Update



TACOMA-PIERCE COUNTY CHAMBER
POWER THROUGH
CONNECTIONS

July 6th, 2009

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

RE: Comments on the DEIS for Transportation 2040

Dear Mr. Ardussi,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Transportation 2040.

R-003-001 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 allocation of population and employment growth targets.

R-003-002 Transportation 2040, in seeking to implement VISION 2040, reinforces historic transportation patterns rather than attempts to chart a new course for growth, development and transportation investment in the South Puget Sound. As job growth allocation fails to change our community's dependence on employers outside of Pierce County, our reliance grows on road networks between Pierce County and other employment centers and increases the negative impact these commuting patterns have on freight and individual mobility. This growth scenario will create an unsustainable demand even for the envisioned transportation alternatives between Pierce County and Seattle.

R-003-003 Neither the baseline nor the five alternatives presented in the DEIS are acceptable scenarios for the South Sound. Although elements in several of the alternatives are critical to South Sound development and quality of life, there are four priority issues that a successful transportation alternative must address.

R-003-004 1. Improved regional freight mobility to support economic growth.

R-003-005 2. Strategies to address air quality, specifically related to Pierce County's current non-attainment designation and future requirements of Transportation Conformity.

R-003-006 3. Identify new transportation funding sources. Traditional sources are already insufficient to fund the region's transportation needs.

R-003-007 4. Extend light rail to Tacoma.

950 Pacific Avenue • Suite 300 • PO Box 1933 • Tacoma, WA 98401 • P 253.627.2175 • F 253.597.7305 • www.tacomachamber.org

Page 1 of 3

**R-003-001**

Thank you for providing detailed comments on the Transportation 2040 DEIS. PSRC would like to acknowledge your stated preference that Transportation 2040 improve freight mobility, address air quality, identify new funding sources, and include the extension of light rail to Tacoma. The Preferred Alternative was designed with these concerns in mind, and as the responses below indicate, does improve freight mobility, address air quality, identify new funding sources, and extend light rail to Tacoma.

**R-003-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**R-003-003**

Comment noted.

**R-003-004**

Improving the performance of the entire transportation system

R-003-008

**1. Regional Freight Mobility**

The South Puget Sound economy is largely dependant on warehousing and manufacturing activities related to the movement of goods through the Port of Tacoma plus commuter and freight transportation associated with Ft. Lewis and McChord AFB. The South Puget Sound is one of the few communities in the country with an incomplete highway system. The completion of State Route 167 and State Route 509 is crucial to the efficient movement of people and goods to promote economic growth. Similarly, building State Route 704, the Cross-base Highway and associated I-5 improvements will provide a direct connection between Frederickson, Pierce County's industrial area with the Port of Tacoma marine-industrial area.

These highway projects will move freight off arterials, easing congestion and improving travel times. There is no more effective means to promote freight mobility and industrial job growth than to complete these crucial highway connections. The SR 167 completion has more economic benefit than any other proposed project according to a Washington Department of Transportation study. Currently underway, an Office of Economic Adjustment funded grant to the City of Lakewood will document the impacts and needed improvements associated with the growth of Fort Lewis. These results should be included in Transportation 2040.

R-003-009

**2. Air Quality**

Most of the Tacoma metropolitan area is currently designated as a non-attainment area for PM 2.5. The DEIS treats air quality as a given for PM-10 and CO and ignores new standards and designations. Yet, in addition to most of the Tacoma metro, other parts of the region are perilously close to designation of non-attainment for PM 2.5 as well, perhaps as early as the end of this year. And, the entire region faces the new federal standard for ozone, with its precursor generation in the urban metro area with the likely designation of the entire urban region as non-attainment for ozone. The DEIS characterizes ozone formation as a visibility issue in forested, mountainous regions rather than as an environmental and public health issue. The DEIS treats this situation as both inevitable (which it may be) and as insolvable (which it most assuredly is not).

One year after the non-attainment designation for PM-2.5, the area will be subject to the U.S. Environmental Protection Agency's Transportation Conformity. This means that all projects that receive federal dollars (Federal Highway Administration and Federal Transit Administration), must comply with EPA's jurisdiction to achieve attainment. As this level of pollution has been determined to directly affect the public health in the non-attainment area, the PSRC must develop a prioritization process which puts regional highway and transit projects' contribution to attainment at the head of the line.

R-003-010

**3. New Transportation Funding Sources**

Traditional sources of transportation funding, primarily sales and gas tax revenue are not sustainable funding sources in the long-term. Any viable transportation alternative must include user fees, like tolls and high occupancy toll lanes. However, tolling must be implemented in a geographically equitable manner and revenue collected from tolls must remain within the geographic area where they are collected. That is to say, there must be a nexus between the source of the revenue and project(s) it funds.

Page 2 of 3

demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities. The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**R-003-005**

PSRC is an active participant as one of the region's air quality consultation partners, and continues to monitor air quality issues facing the region such as the recent violation of the fine particulate standard in Pierce County. Transportation 2040 will contain many strategies designed to improve air quality, and will be required to demonstrate conformity to the State Implementation for Air Quality. PSRC will continue to work with the State Department of Ecology and the Puget Sound Clean Air Agency as they prepare an attainment plan and strategies to address the fine particulate emissions in Pierce County.

**R-003-006**

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge. Whatever we ultimately adopt as our long range financial strategy, we will need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

R-003-011

**4. Light Rail to Tacoma**

The PSRC projects Tacoma's population to grow by 127,000 people by 2040. Given this growth target and the unbalanced distribution employment growth allocated by VISION 2040, without investment in alternative transportation modes between Pierce County and Seattle our major highways will be gridlocked by 2040. To combat this congestion, a viable long range transportation plan must extend light rail between Federal Way and Tacoma before 2040.

R-003-012

Given these concerns, none of the proposed alternatives in Transportation 2040 adequately address the needs of Pierce County. The Tacoma-Pierce County Chamber urges the PSRC to reevaluate Transportation 2040, giving more attention to the unique employment and environmental concerns and the long-term mobility needs of the South Sound.

Thank you for considering these comments on the DEIS for Transportation 2040. The Tacoma-Pierce County Chamber looks forward to working with you to increase the geographic equity of transportation infrastructure throughout the Puget Sound Region.

Sincerely,

David W. Graybill, CCE. CEcD
President & CEO

Page 3 of 3

**R-003-007**

This project has been included in the Preferred Alternative.

**R-003-008**

The projects of SR 167 Extension, SR 509, and SR 704 have all been identified by stakeholders in the freight community as being some of the most important investments with regards to freight mobility. These projects are all included in the Transportation 2040 Preferred Alternative.

Improvement of performance for the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities.

**R-003-009**

PSRC, as an active participant in the region's air quality consultation partners, is well aware of the upcoming issues related to the fine particulate matter and ozone standards. The EIS has analyzed the alternatives for all of the relevant pollutants and compared the results to the 2040 Baseline. The region is in maintenance status and has approved maintenance plans only for CO and PM10, which are the two pollutants to which we are currently required to demonstrate conformity. Demonstrating transportation conformity involves a comparison to an established motor vehicle emissions budget that can not be exceeded. There are currently no motor vehicle emissions budgets nor adopted attainment plans for fine particulate matter or the current 8-hour ozone standard.

PSRC continues to work with the State Department of Ecology and the

Puget Sound Clean Air Agency to monitor these issues and to assist in the preparation of attainment plans as appropriate. PSRC will meet all requirements set forth in the State Implementation Plan for Air Quality and will continue to demonstrate transportation conformity of Transportation 2040.

**R-003-010**

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. Transportation 2040 advances the notion that road tolling must come with a strong commitment to dedicate revenues to the purpose of improving mobility, in the form of direct investments in transportation systems, or offsetting other existing transportation taxes and fees. Beyond this basic commitment, there are likely to be other specific constraints that get placed on the use of revenues from road pricing. Possibilities include at least the following:

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

All of the above uses of revenues provide direct benefit to some of the users of the transportation system. Some approaches are more supportive of the toll payers themselves; others provide additional

incentives for people to modify their travel behavior away from paying tolls. A major conclusion, however, is that how revenues are used has a profound effect upon most of the important dimensions of policy related to road tolling.

**R-003-011**
The extension of Light Rail south to Tacoma Dome is included in the Preferred Alternative.

**R-003-012**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.



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Joyce Eleanor
Chief Executive Officer

July 10, 2009

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

Dear Mr. Drewel:

R-004-001 Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement. Community Transit staff have been involved in the T2040 development process through the Alternatives Technical Group, Transit Operators Committee and Regional Staff Committee. We appreciate the increased emphasis on involving transit agencies in this update to the Metropolitan Transportation Plan.

R-004-002 It is understood that the alternatives in the DEIS were developed to test a variety of strategies and approaches for solving regional transportation issues. As such, it is assumed that a preferred alternative will likely incorporate elements from several alternatives that best combine to meet our collective goals. With this in mind, we are providing comments highlighting the strategies we see as most effectively fulfilling this objective.

R-004-003 **Regional Growth Strategy**
Vision 2040 provided a Regional Growth Strategy focusing population and employment growth in urban centers and connecting corridors. This strategy facilitates development densities that support transit. We support a transportation plan that implements the Regional Growth Strategy and likewise encourages growth in centers and corridors.

R-004-004 **Completing Existing Projects**
We support continued implementation of projects already funded under current programs such as the "Nickel" and TPA programs, Sound Transit Phase 2, *Swift* BRT on Hwy 99 and Rapid Ride in King County.

R-004-005 **Transportation Demand Management**
Improving efficiency is a theme in several of the alternatives. Efficient and sustainable transit is a key goal for Community Transit as well. Transportation Demand Management (TDM) is called out as a strategy to reduce SOV travel and maximize utilization of existing transit services. Community Transit has had great success in our TDM partnership with Snohomish County, the "Curb the Congestion" program, on 164th St., 128th St, and 20th St. We support this type of program and the partnership approach in the preferred alternative.

**R-004-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. The Preferred Alternative was designed with these comments in mind and includes a larger expansion of transit facilities and increase in transit service hours than any other alternative. It also includes a 4-part strategy aimed at reducing greenhouse gas emissions, as described in the FEIS.

**R-004-002**

Thank you.

**R-004-003**

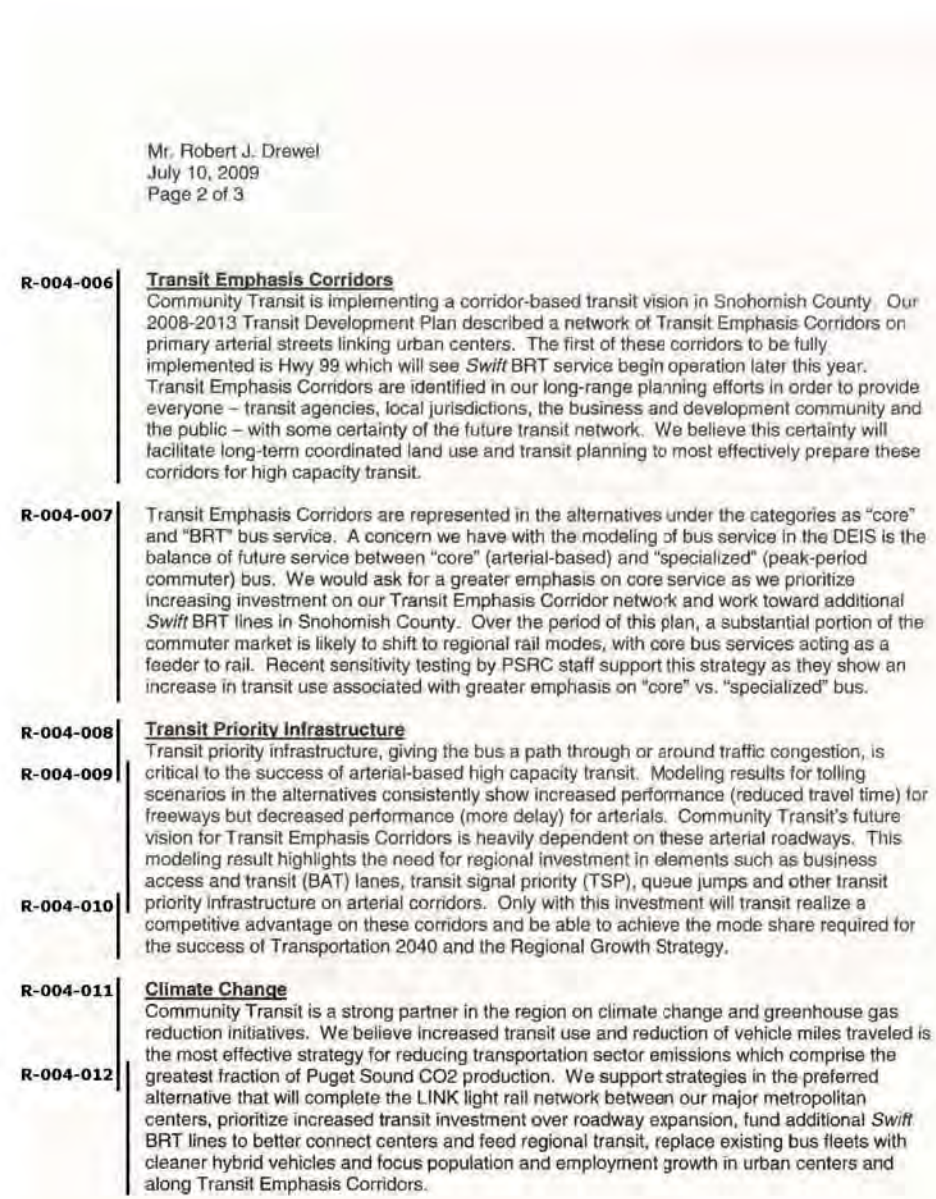
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**R-004-004**

Comment noted.

**R-004-005**

Thank you for your comment. Preservation, maintenance and operation



Mr. Robert J. Drewel
July 10, 2009
Page 2 of 3

R-004-006 **Transit Emphasis Corridors**
Community Transit is implementing a corridor-based transit vision in Snohomish County. Our 2008-2013 Transit Development Plan described a network of Transit Emphasis Corridors on primary arterial streets linking urban centers. The first of these corridors to be fully implemented is Hwy 99 which will see *Swift* BRT service begin operation later this year. Transit Emphasis Corridors are identified in our long-range planning efforts in order to provide everyone – transit agencies, local jurisdictions, the business and development community and the public – with some certainty of the future transit network. We believe this certainty will facilitate long-term coordinated land use and transit planning to most effectively prepare these corridors for high capacity transit.

R-004-007 Transit Emphasis Corridors are represented in the alternatives under the categories as "core" and "BRT" bus service. A concern we have with the modeling of bus service in the DEIS is the balance of future service between "core" (arterial-based) and "specialized" (peak-period commuter) bus. We would ask for a greater emphasis on core service as we prioritize increasing investment on our Transit Emphasis Corridor network and work toward additional *Swift* BRT lines in Snohomish County. Over the period of this plan, a substantial portion of the commuter market is likely to shift to regional rail modes, with core bus services acting as a feeder to rail. Recent sensitivity testing by PSRC staff support this strategy as they show an increase in transit use associated with greater emphasis on "core" vs. "specialized" bus.

R-004-008 **Transit Priority Infrastructure**
R-004-009 Transit priority infrastructure, giving the bus a path through or around traffic congestion, is critical to the success of arterial-based high capacity transit. Modeling results for tolling scenarios in the alternatives consistently show increased performance (reduced travel time) for freeways but decreased performance (more delay) for arterials. Community Transit's future vision for Transit Emphasis Corridors is heavily dependent on these arterial roadways. This modeling result highlights the need for regional investment in elements such as business access and transit (BAT) lanes, transit signal priority (TSP), queue jumps and other transit
R-004-010 priority infrastructure on arterial corridors. Only with this investment will transit realize a competitive advantage on these corridors and be able to achieve the mode share required for the success of Transportation 2040 and the Regional Growth Strategy.

R-004-011 **Climate Change**
Community Transit is a strong partner in the region on climate change and greenhouse gas reduction initiatives. We believe increased transit use and reduction of vehicle miles traveled is the most effective strategy for reducing transportation sector emissions which comprise the
R-004-012 greatest fraction of Puget Sound CO2 production. We support strategies in the preferred alternative that will complete the LINK light rail network between our major metropolitan centers, prioritize increased transit investment over roadway expansion, fund additional *Swift* BRT lines to better connect centers and feed regional transit, replace existing bus fleets with cleaner hybrid vehicles and focus population and employment growth in urban centers and along Transit Emphasis Corridors.

of the existing system, plus safety and security will be top priorities of Transportation 2040, and will use most of the available funding. Mobility improvements will include a major emphasis on improving system efficiency with limited new capacity. System efficiency includes creating "smart corridors" with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit and nonmotorized facilities, with new roadways limited to a few missing links.

**R-004-006**
Comment noted.

**R-004-007**
The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**R-004-008**
The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit and traveler information ITS projects.

**R-004-009**
Comment noted.

R-004-013 **Funding**
A significant feature of alternatives 3, 4 and 5 is tolling of the transportation network and investment of the resulting revenue stream. Alternative 3 is characterized as being more "road-centric" focusing on road capacity expansion and preservation as opposed to transit. It is likely
R-004-014 that tolling will be a significant element of the final preferred alternative. Community Transit encourages PSRC to include transit service and capital funding in any scoping assumption related to road capacity expansion or preservation. Transit provides crucial capacity on the metropolitan transportation system and should be a recipient of funding generated on that network.

R-004-015 We look forward to continued involvement in the development of the preferred alternative and the final Transportation 2040 plan.

Sincerely,

Joyce Eleanor
Chief Executive Officer

**R-004-010**
Comment noted.

**R-004-011**
Thank you for your comment.

**R-004-012**
Thank you for stating your preference among the alternatives. Some of the strategies of the preferred alternative are to improve transit in the region, reduce emmisions from vehicles, and improve connections to transit and urban centers.

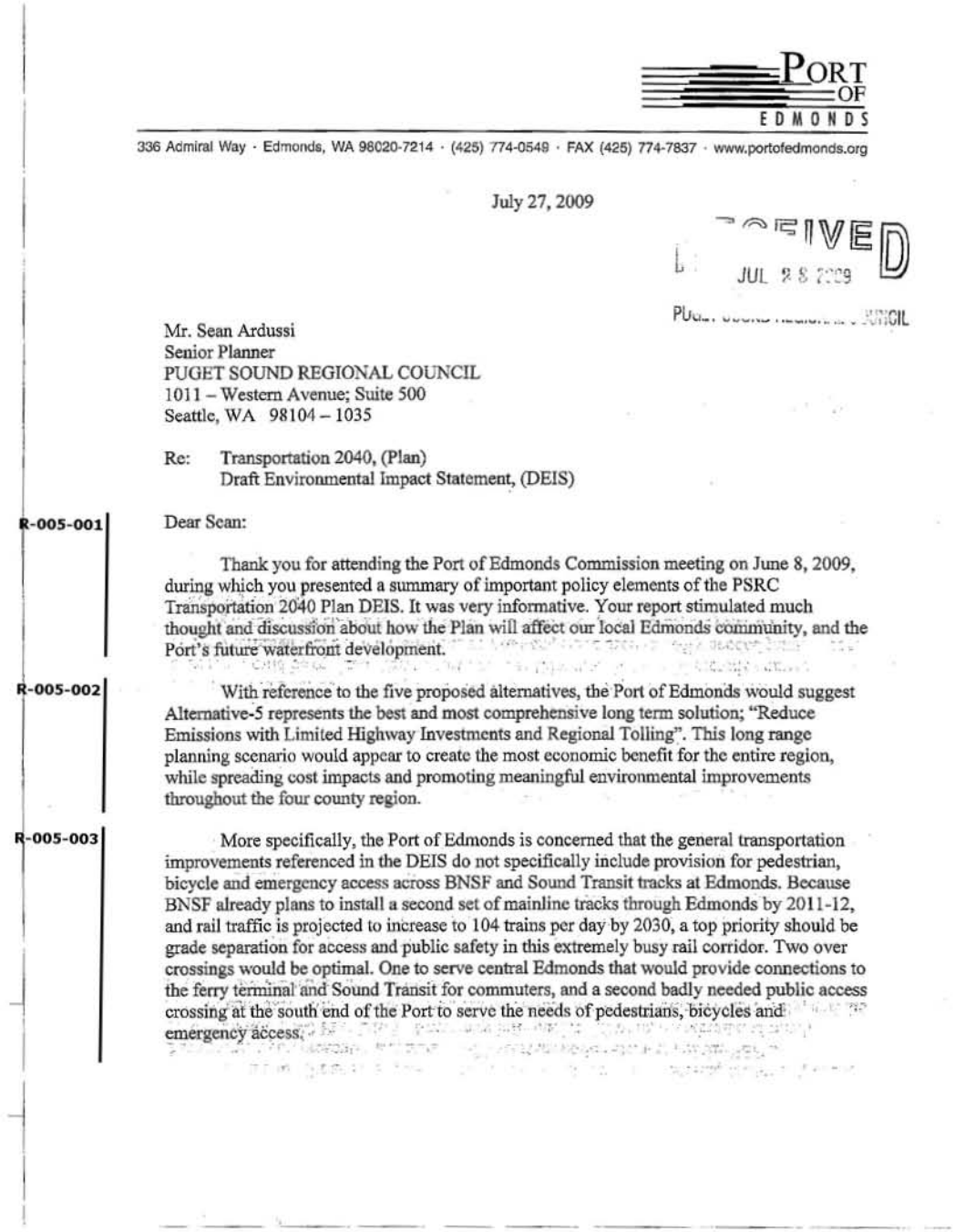
**R-004-013**
Comment noted.

**R-004-014**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline

and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**R-004-015**
Thank you.



PORT OF EDMONDS

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July 27, 2009

RECEIVED
JUL 28 2009
PUGET SOUND REGIONAL COUNCIL

Mr. Sean Ardussi
Senior Planner
PUGET SOUND REGIONAL COUNCIL
1011 – Western Avenue; Suite 500
Seattle, WA 98104 – 1035

Re: Transportation 2040, (Plan)
Draft Environmental Impact Statement, (DEIS)

R-005-001 Dear Sean:

Thank you for attending the Port of Edmonds Commission meeting on June 8, 2009, during which you presented a summary of important policy elements of the PSRC Transportation 2040 Plan DEIS. It was very informative. Your report stimulated much thought and discussion about how the Plan will affect our local Edmonds community, and the Port's future waterfront development.

R-005-002 With reference to the five proposed alternatives, the Port of Edmonds would suggest Alternative-5 represents the best and most comprehensive long term solution; "Reduce Emissions with Limited Highway Investments and Regional Tolling". This long range planning scenario would appear to create the most economic benefit for the entire region, while spreading cost impacts and promoting meaningful environmental improvements throughout the four county region.

R-005-003 More specifically, the Port of Edmonds is concerned that the general transportation improvements referenced in the DEIS do not specifically include provision for pedestrian, bicycle and emergency access across BNSF and Sound Transit tracks at Edmonds. Because BNSF already plans to install a second set of mainline tracks through Edmonds by 2011-12, and rail traffic is projected to increase to 104 trains per day by 2030, a top priority should be grade separation for access and public safety in this extremely busy rail corridor. Two over crossings would be optimal. One to serve central Edmonds that would provide connections to the ferry terminal and Sound Transit for commuters, and a second badly needed public access crossing at the south end of the Port to serve the needs of pedestrians, bicycles and emergency access.

**R-005-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. The Preferred Alternative was developed with input from a variety of stakeholders, including Sound Transit and WSDOT. The Preferred Alternative includes a permanent Sounder station at Edmonds and includes numerous bicycle and pedestrian projects intended to increase walk-on ferry passengers.

**R-005-002**

Thank you for stating your preference among the alternatives.

**R-005-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board

recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

R-005-004

Additionally, since ferry traffic and Sound Transit will be increasing transient parking demand for commuters, the Port would strongly suggest the Transportation 2040 Plan should provide for public parking garage in close proximity to the Edmonds rail station and ferry terminal. Indeed, the Plan should develop a working concept that encourages transit access to the waterfront.

R-005-005

It seems an error of omission that the Edmonds Station has not been specifically identified in Chapter 4-17 "Transportation", under heading 9 "What existing intercity passenger rail services are in the region?". The Port would ask this be corrected and that the Plan address specific concerns of the Edmonds community more fully.

R-005-006

Although, in general terms, the Port encourages continued planning to test ideas and concepts for long-term transportation improvements, the public investment policy should be directed toward building the most cost effective project elements as soon as it becomes practical. That said, and without contradiction, we would also encourage PSRC to provide a more complete cost/benefit analysis that identifies regional economic benefits, and to forecast the cost effectiveness of concept alternatives and their attendant project elements. This will ensure the investments in public transportation infrastructure recommended by the Plan will be equitable across all participating jurisdictions in both time and dollars.

Again, the Port of Edmonds would like to thank you for coming to our Commission meeting, and for giving us the opportunity to comment. We look forward to working with you to make the PSRC Transportation 2040 Plan the best it can be.

Sincerely,

Robert E. McChesney
Executive Director

**R-005-004**

Comment noted. The Transportation 2040 alternatives incorporate the work of Washington State Ferries (WSF) in planning for the long range ferry system. In addition, the Transportation 2040 plan incorporates the findings and recommendations resulting from the Regional Passenger Only Ferry Study, completed in 2008. Both the WSF Long Range Plan and the Regional POF study encourage a shift toward increased walk-on passengers on state and regional ferries, as well as improved transit access serving ferry terminals. These findings are consistent with this DEIS comment from the Port of Edmonds.

**R-005-005**

Comment noted.

**R-005-006**

Detailed information about cost by alternative can be found in Appendix D.

July 22, 2009

Mr. Sean Ardussi
Senior Planner
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

R-006-001

Dear Mr. Ardussi,

Pierce Transit has reviewed the Transportation 2040 Draft Environmental Impact Statement which is out for public comment. Attached please find some specific comments on the DEIS. We appreciate the opportunity to comment on this document.

If you have any questions concerning our comments, please contact Jessyn Farrell, Strategic Policy Advisor at (253) 984-8213.

Sincerely,

Kelly Hayden
Director, Scheduling & Planning

Enclosure

cc: Lynne Griffith, CEO
Jessyn Farrell, Strategic Advisor
Peter Stackpole, Sr. Planner

**R-006-001**

Thank you for reviewing the Transportation 2040 DEIS alternatives and stating your preference. The Preferred Alternative includes many of the components of Alternative 5, including the largest expansion of transit and nonmotorized facilities and an aggressive tolling strategy.

PSRC TRANSPORTATION 2040 DEIS COMMENTS

R-006-002

The following are comments pertain to the six alternatives proposed by the PSRC for expansion and funding of transportation projects through 2040

BASELINE ALTERNATIVE

Pierce Transit believes this alternative does not improve conditions in the region and will over time degrade an already untenable situation. The annual expansion by 1% of core, community connector, and specialized service will fail to meet the demand of a growing population and does little to address congestion and associated environmental impacts. Pierce Transit would not endorse the Baseline Alternative.

R-006-003

ALTERNATIVE 1

While this alternative encourages spending in the area of transit, it makes no attempt to make transit desirable through exclusive rights-of-way or other demand management strategies. Tolling of existing HOV lanes will do little to encourage people to ride transit as existing HOV lanes are limited and hence derive limited revenues to be re-invested into the road system. This may be a more attractive alternative if the HOV lanes were turned into bus lanes only for intercity travel. Without a new funding mechanism, however, transit would be unable to support the additional ridership. Pierce Transit would not endorse Alternative 1 as proposed.

R-006-004

ALTERNATIVE 2

This alternative encourages the use of single occupancy vehicles through increasing freeway capacity. It does not address any reduction to VMT, VHT or emissions. Reliance on traditional funding (e.g., gas tax) is not sustainable. The implementation of a two-lane HOT lane network on major highways, while generating some revenue, does little to discourage SOV congestion.

This alternative would be a step backward for the region. Pierce Transit does not endorse Alternative 2.

R-006-005

ALTERNATIVE 3

This alternative, like alternative 2 promotes a large expansion of infrastructure rather than a compromise of roads and transit. It tolls new roads, but introduces no more funding to existing transit operations. While it does address the costs of SOV use in the region more than current funding sources, it does not allocate the funding throughout the region. Those who are willing to pay for the convenience should have their charges distributed to areas that do not have the room to expand roads, but could use the funds to promote transit over existing freeways or arterials. It is vital that revenue provide funding across the region as opposed to focused on a particular roadway.

Existing funding formulas for transit are not working in the State of Washington and unless tolls were re-directed to transit there would be no improvement in the benefits of transit. Pierce Transit does not support Alternative 3.

R-006-006

ALTERNATIVE 4 & 5

Alternative 4 & 5 combined will more closely address the concerns of Pierce Transit. While Alternative 4 generates revenue to be spent throughout the region, it still utilizes funding formulas which are neither friendly nor flexible to transit. The alternative increases local bus service, but it also potentially ties into intercity service and creates a network that provides little competition with automobile usage. In all cases, public transit should be excluded from tolling.

**R-006-002**

Comment noted.

**R-006-003**

Comment noted.

**R-006-004**

Comment noted.

**R-006-005**

Comment noted.

**R-006-006**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

R-006-007

ALTERNATIVE 5

Alternative 5 provides for the largest expansion of transit and support for non-motorized infrastructure while using tolling as a funding mechanism. It takes more SOVs off the road, provides more transportation choices while aggressively reducing greenhouse gas emissions. As such, it most closely reflects the desire of Pierce Transit.

Alternative 5 greatly increases transit in all areas and discourages the use of the SOV. It may also have a side effect of creating more jobs within Pierce County due to the desire to reduce commute costs. Residents regularly commute to either King County or Thurston County for jobs due to a lack of employment centers in Pierce County. As stated above some compromise between Alternatives 4 & 5 might need to exist. Where we endorse the tolling of freeways, we feel that the tolling of arterials may adversely affect the residents of Pierce County which has one of the region's lowest household incomes. There are few freeway alternatives in Pierce County where a great number of residents use the arterials for day to day travel. Tolling of these would unduly affect their cost of living.

Alternative 5 also introduces a new funding structure which is important to transit and transportation within the region. Transit needs to become less dependent upon County sales tax as the prime source of funding. This alternative creates a broader market for transit with the expansion of bike/pedestrian infrastructure and the relationship that these two modes have to a transit market. An improvement in pedestrian accessibility generally translates to an increase in transit usage.

Pierce Transit supports Alternative 5 or some combination of Alternative 4 and Alternative 5.

**R-006-007**

Thank you for stating your preference among the alternatives.

Port of Seattle

July 31, 2009

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 Transportation-2040 DEIS

R-007-001 Dear Mr. Howard:

Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement (DEIS) recently completed by the Puget Sound Regional Council. The Port of Seattle (Port) greatly appreciates the staff effort that was required. The perspective we offer is based on the Port's mission to create jobs, opportunity and quality of life in King County and the region, through our global perspective, trade relationships, and community and transportation infrastructure partnerships. International and domestic shipping, tourism, air travel, aerospace, fishing and manufacturing are critical components of our region's economy. Success of these sectors depends heavily on efficient movement of freight and passengers. Our ability to compete in the global marketplace is directly related to the speed and cost of transportation.

Puget Sound's transportation system serves as the first and last miles for trans-Pacific international trade flows from ships to road or rail. The transportation system also supports our Manufacturing and Industrial Centers (MICs), urban centers and Sea-Tac International Airport by carrying domestic freight and product to and through the region, moving trucks, cars, buses and passenger trains, and bringing workers to jobs. For the Port, and the 194,000 jobs related to businesses using our facilities, Transportation 2040 provides the roadmap for our businesses to thrive.

R-007-002 The Port supports the objectives and goals of Transportation 2040, especially in regard to improved freight mobility, as stated on page 4 of the Executive Summary. However, there are many different ways to achieve these objectives. The five alternatives contained in the DEIS address these objectives and goals through providing different levels of new roadway and/or transit capacity or by employing new efficiencies. The efficiencies are defined by differing levels of demand management techniques, transit and High Occupancy Vehicle (HOV). The funding side includes traditional funding, or focusing on tolling concepts that either provides new funds to build more facilities, or discouraging traffic to provide more capacity on existing systems. In all the alternatives, there is some balance. The range of alternatives includes a traditional funding option with increased roadway capacity to an extensively tolled system, demand management and minimal new roadway capacity.

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**R-007-001**
Comment noted.

**R-007-002**
Thank you.

R-007-002 The Port believes that balance is good; however, we must be assured that the system will provide needed mobility. We are looking forward to working with PSRC staff to build on the analysis carried out to date to develop a preferred alternative that meets the region's mobility needs and best balances its economic, environmental, and social justice goals.

R-007-003 To meet these goals, Transportation 2040, and the preferred alternative, must be based on sufficiently detailed sensitivity analyses, many of which PSRC staff is currently conducting. The sensitivity analyses help test some of the assumptions used and give an indication of what might occur if the assumptions are not ultimately correct. Below, the Port has listed some areas, including freight mobility, funding and the economy, where further sensitivity analysis may help in the development of the preferred alternative.

R-007-004 The following questions outline critical areas for sensitivity analysis:

1. How solid is our understanding of the existing freight system and of future freight mobility needs? Will the preferred alternative maintain and enhance our region's economy and its national and global competitiveness and adequately address freight needs? What must the preferred alternative include to ensure economic growth isn't hampered by lack of adequate freight movement, considering that our understanding of freight needs is incomplete?

R-007-005 2. How realistic are the mode choice assumptions for existing and new person trips, especially under Alternative 5? How large is the margin of error for this alternative to perform adequately if the mode split assumptions are too optimistic?

R-007-006 3. Does our approach to Transportation 2040 ensure that the region will be able to compete for federal funds under new programs, which are likely to place significant emphasis on performance- and cost-benefit-based selection criteria?

R-007-007 4. Do we as a region have the process in place to prioritize funding for the projects that will comprise the preferred alternative, knowing that some of the projects in the baseline, like the remaining FAST corridor projects and the South Park Bridge, have been languishing due to lack of funds for years? What happens if we don't and continue to distribute funds based on subarea equity?

R-007-008 5. How much would system performance change if actual tolls differ significantly from those assumed in the analysis? Do we have the mechanisms to make the tolling (and toll revenue distribution) decisions necessary to make the required system improvements?

R-007-009 6. How do we approach an ever growing need for system preservation of maintenance, which historically has not been a focus of PSRC's funding distribution?

R-007-010 7. How accurate is the rating of different alternatives in their ability to support the economic and commercial transportation goals of Transportation 2040? How much does it depend on the assumptions contained in the analysis? What is the risk to freight mobility and the economy if we get it wrong? How important will freight mobility needs and the economic impact of goods movement be when developing the preferred alternative?

R-007-011 8. How do the current alternatives address the Port's scoping comments, and how will the preferred alternative address the Port's scoping comments? The Port's scoping comments are attached as an appendix to this DEIS comment letter.

**R-007-003**

Comment noted.

**R-007-004**

Improvement of performance for the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the DEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities.

The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**R-007-005**

Mode choice is explicitly modeled within the region's regional travel models and is not an assumption of any Alternative. The mode choice model has been calibrated to existing data and appears to perform within the range of expected performance. It is not possible to place a specific quantitative estimate on the margin of error for a specific element within a linked and integrated set of travel models. However, the performance of Alternative 5 is not necessarily dependent upon shifts in mode of travel. There appear to be more sizable improvements in travel time as a result of destination, time of day and route choices.

**R-007-006**

The evaluation criteria developed for the Transportation 2040 alternatives analysis relies on a rigorous set of performance measures, including benefit-cost analysis. The information we're now able to generate should place our plan in an excellent position to compete for federal funds.

R-007-012 The following provides additional considerations for addressing these questions.

**1. Meeting Freight Mobility Needs**

The Port's mission is to create jobs, opportunity and quality of life in King County and the region, through our global perspective, trade relationships, and community and transportation infrastructure partnerships: last year we served 32 million annual passengers at Seattle-Tacoma International Airport. We own or operate many of the Seattle waterfront cargo terminals and piers, as well as recreational and fishing facilities; last year 1.7 million TEUs (twenty-foot equivalent units) moved through our terminals. Today, Puget Sound's Ports of Seattle and Tacoma together rank in the top three US load centers. However, all of our customers operate in a competitive environment, and we must continually enhance our region's investments to accommodate industry and technology advancements, regional changes, and competitive moves at other ports. Continued development and efficient management of the region's freight transportation system is important to sustain Puget Sound ports' competitive position in the global economy. In turn, a healthy economy generates the revenue that allows us to work towards achieving environmental and social goals.

R-007-013 The Port strongly supports the PSRC's inclusion of all remaining FAST projects in the baseline. We believe this is a good basis for improved freight mobility and safety in the Puget Sound area. We are also supportive of completing the gaps in the highway system, which includes the SR 509 Extension and the improvements proposed to Interstate 5 through downtown Seattle. While the SR 509 Extension is included in Alternatives 2, 3 and 4, it is not included in Alternatives 1 and 5. Past studies have shown that while general purpose traffic is the main beneficiary of an SR 509 Extension, SR 509 is a critical freight carrier and reduces freight travel time between Seattle and Federal Way significantly. The extension has significant benefit for congestion relief for people and goods movement on Interstate 5 as well. Several southeast King County communities have also relied on the SR 509 Extension to meet concurrency goals. If the SR 509 Extension were left out of the Transportation 2040 Plan, it is unlikely to be built. With that said, we believe the SR 509 Extension project should be included as part of Alternative 5 and ultimately in the preferred alternative.

R-007-014 The Port greatly appreciates the efforts of PSRC staff to raise the profile of freight mobility in the planning process, and to increase the level of freight analysis in the Transportation 2040 update process. We strongly support these efforts, and await the results from Cambridge Systematics' freight study, which is currently underway, to inform and mold the development of the preferred alternative, and the plan itself.

However, despite these great strides, much remains to be done. Region-wide, our understanding of what the system will need to look like to support our region's economy into the future is limited, as are our analysis capabilities regarding the movement of freight on that system. The freight picture is much less clear than that of other modes, making decisions more risky.

R-007-015 We are also concerned about the lack of definition of the process that will used to mold the findings of Cambridge Systematics' work to date into a viable freight plan that can be incorporated into Transportation 2040 and selection of the preferred alternative. We understand the PSRC and regional staff are in the process of defining criteria and components of the

**R-007-007**

Prioritizing funding for projects after the plan is adopted will be an important issue. The plan includes guidance on project prioritization.

**R-007-008**

Through the development and analysis of the alternatives, including the Preferred Alternative, various toll rates where tested. These toll rate variations did result in different performance characteristics. Toll policy has a significant influence over roadway performance, and the performance results for each Alternative are specific to the toll policy that is part of that Alternative. The second part of the comment asks about institutional capacity to implement tolling in a manner that would yield the results as analyzed in each Alternative. For each approach to tolling that has been analyzed it is likely that some new legislation would be required, and possibly some modifications to existing institutional roles and structures. However, none of the approaches appear to require an unreasonable redesign of current approaches to service delivery, given the time-frames involved and the magnitude of the issues that tolling would be expected to address.

**R-007-009**

Thank you for your comment. In the Preferred Alternative maintenance and operation of the existing system, plus safety and security are top priorities, and use most of the available funding.

**R-007-010**

Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific

R-007-015 preferred alternative. Yet, the work on the freight component does not appear to be advanced enough to be meaningfully integrated into the development of the preferred alternative. This is especially true if the preferred alternative is similar to Alternative 5, whose freight benefits are due to aggressive person mode split assumptions and toll rates for trucks that are unrealistically low (see section 5 "Tolling" below). We are looking forward to continue working with PSRC staff to incorporate the system elements necessary to support tomorrow's economy in the preferred alternative.

R-007-016 **2. Mode Choice Projections**

The Port supports efforts to increase mode choice options and reduce the reliance on the single occupant vehicle (SOV). Minimizing SOV trips provides needed capacity for freight that is dependent on a reliable, efficient roadway system. Port staff appreciates all the work that has gone into the development of the DEIS alternatives, and the great level of detail which the PSRC staff has incorporated into this effort. However, one concern the Port has is the reliance on transit in several alternatives to decrease traffic congestion, especially in Alternative 5.

While the transit goals are admirable, we wonder if they're realistic. The report lacks evidence to support the expectation that enough people will change their transportation behavior to achieve the projected mode splits. Will we be able to fund the transit improvements that are supposed to help achieve this mode split? What will happen to the region's mobility, and in turn, our economy, quality of life and environment, if transit expectations are not met due to underfunded transit service and infrastructure, or the unwillingness of people to use it? The preferred alternative must allow the region to function even if these worthwhile goals prove unachievable.

R-007-017 **3. Compliance with Future Federal Mandates**

Congress is currently in the process of developing the next federal transportation bill. While there is still uncertainty about what the final law will look like, there is enough policy guidance to enable the region to prepare and position itself to be competitive in the future:

- A strong emphasis on a freight program that supports the regional and national economy in the global marketplace
- A focus on selecting projects based on clear, quantifiable performance measures, including cost-benefit analysis
- Integration of economic, social, and environmental goals

PSRC is already a leader in developing and implementing the tools necessary to compete effectively under new federal guidelines. What is the planned process for adjusting our own project selection criteria to use these tools effectively to compete for funds from federally administered programs in the future?

R-007-018 **4. Funding Priority Projects**

Port staff worked with the PSRC and other jurisdictions in identifying the projects contained in the various alternatives. We supported the inclusion of freight mobility projects like the

transportation investments independent of all other externalities. The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**R-007-011**

Scoping comments were addressed in the Destination 2030 Plan Update Final Scoping Report, available online: http://www.psrc.org/assets/2105/finalscopingreport.pdf

Here is an excerpt from that report:

Destination 2030 Plan Update: Final Scoping Report

The following was prepared in response to comments as the region develops the plan alternatives over the next several months.

- The alternatives will include a broad range of options to address the region's transportation needs, including actions to increase capacity (in all modes), strategies to manage demand, programs to improve operational efficiency, and a broad range of tolling and pricing programs.
- The alternatives will include a range of improvements (projects and programs) to serve all kinds of system users: single-occupant vehicles (SOVs), high-occupant vehicles (HOVs), etc., on all categories of roadways and rights-of-way, including investments in transit, passenger and auto ferries, nonmotorized, freight, special needs, and air transportation.
- The alternatives will include a broad range of transit options, including local bus, regional and express bus, bus rapid transit (BRT), light rail, commuter rail, and other options.
- The alternatives will contain a mix of strategies to help reduce peak hour travel demand, including commute trip reduction,

**R-007-018** remaining FAST Corridor projects and the South Park Bridge in the baseline. The Port also encourages the inclusion of SR-509, to provide freight mobility between Seattle's MICs and the Green River Valley, to improve access to the airport, and other state and regional benefits. We further recognize the importance of improvements to Interstate 5 through Seattle to keep traffic flowing on this major artery. We are wondering, however, how these critical projects will get funded considering that they have been languishing for many years. SR-509 has been shown to provide significant mobility benefits for both passenger and goods movement, more than any other project evaluated in a recent cost-benefit analysis, yet it is not included in the baseline. What is the planned process for implementing the projects that provide the largest benefit to the region, independent of location or mode?

**R-007-019**

**5. Tolling**

The Port concurs with PSRC's assessment that a combination of traditional transportation revenue sources and tolling will be necessary to fund the required system improvements and manage demand for SOV travel. However, how tolling will be implemented is of great concern to the Port and the freight community.

The DEIS has evaluated all tolling with the assumption that trucks pay the same toll as other vehicles. In Alternative 5, this assumption appears to lead to high freight benefits, contributing to a positive survey response to this alternative. Yet, existing truck tolls on the Tacoma Narrows Bridge are 2-3 times those of passenger cars, depending on the number of axles. What are the benefits to freight if more realistic assumptions about toll rates are made? How would Alternative 5 fare compared to other DEIS alternatives with toll rate adjustments, and what does that tell us for the development of the preferred alternative?

**R-007-020** We are also concerned that tolling of only freeways may put much more congestion on the arterial system, which may impact arterials such as Spokane Street and East Marginal Way, which are critical for access to the Port and the region's manufacturing-industrial centers. Similarly, in south King County near Sea-Tac Airport, tolling Interstate 5 risks spillover traffic on International Boulevard and other local streets, congesting airport access. We hope that the analysis leading to the development of the preferred alternative will take these concerns into consideration.

**R-007-021**

**6. System Preservation and Maintenance**

One of the biggest challenges the region's jurisdictions face is a lack of funding for maintenance and system preservation. This is particularly critical for those facilities in local communities that bear disproportionate amounts of truck traffic in support of the regional economy. One community in southeast King County, which serves as the warehousing and distribution center for the entire region, has floated the idea of closing streets to trucks because there are no resources to help for maintenance. We hope that Transportation 2040 will address this issue and support maintenance and preservation of the system that is necessary to help local jurisdictions help maintain facilities that serve the economy of the entire region and contribute to the national and global competitiveness of Puget Sound.

telecommuting, flex schedules, intelligent transportation system (ITS) applications, incentives for travelers to change their travel behavior, and other options.

- The alternatives will evaluate improvements to the auto and passenger ferry system to meet the region's current and long-range water transportation needs.
- The alternatives will be designed with the objectives of reducing impacts on water and air quality, climate change, greenhouse gases, and other important measures of environmental quality.
- The alternatives will address the need for investment in the maintenance and preservation of the transportation system.
- The planning process will include a more robust funding and financing plan.
- The alternatives will explore options for giving transit higher priority on the region's roadways.
- The plan will explore how to effectively incorporate the latest technologies into alternatives to enhance system operational efficiency, manage demand, reduce congestion and delay, improve safety, and improve travel time reliability.

**R-007-012**

Comment noted.

**R-007-013**

Thank you for your comment in support of the SR 509/I-5 Corridor Completion and Freight Improvement Project. The Preferred Alternative for Transportation 2040 includes this project.

**R-007-014**

Comment noted.

R-007-022

**7. Supporting Regional Policies**

The Port does have some concern with the findings of how different alternatives best met the goals of the region's transportation, economic, land use, and environmental policies (Page 9 of the Policy Analysis and Criteria Evaluation Report, and further detail on the following pages). Alternative 5 was rated the choice that best met the policy focus in 18 of 19 categories. We know these findings were based on assumptions analyzed in the study, which, as indicated above, may or may not be accurate, potentially leading to skewed results. The DEIS findings regarding freight benefits didn't seem intuitively correct from a freight perspective. Examples of policy goals where the validity of the conclusions should be revisited before they are incorporated into any preferred alternative include:

R-007-023
R-007-024

**Development Patterns:**

- Create a high degree of connectivity in street network to accommodate walking, biking and transit

Alternative 5 was selected as the alternative best meeting the goal. How do minimal investments in arterial capacity, combined with repurposing some existing arterial (i.e. freight) capacity for non-motorized modes and transit support freight mobility, and the development patterns that support our economy? The Port feels that Alternatives 2, 3 and 4 meet this goal as well if not better.

R-007-025

**Economy:**

- Support the flow of people, goods, services and information—particularly to and within established regional growth centers
- Support business, ports and agencies involved in trade-related activities. System should improve connections and support for manufacturing/industrial centers
- Support established and emerging industry clusters

It appeared to the Port that Alternatives 2, 3 and 4 met the above goals more so than Alternative 5. Alternative 5 appears to support these policy goals entirely based on current assumptions about transit mode split and truck tolls rate. How realistic are these assumptions?

R-007-026

**Transportation:**

- Make commercial movement more reliable and efficient

Again, Alternative 5 appears to support these policy goals entirely based on current assumptions about transit mode split and truck tolls rates. How realistic are these assumptions?

In the Port's opinion, the rationale for scoring the various alternatives with regard to these policy goals appears to be inconsistent among alternatives. As indicated under sections 2 and 5 above, we are concerned that the assumptions underlying the scoring may lead to conclusions about benefits that prove unattainable.

R-007-027

**8. Addressing Previous Port Comments**

On January 30, 2008, the Port transmitted scoping comments to the PSRC for the Destination 2030 Update (since renamed to Transportation 2040 Update). The Port would like to re-submit

**R-007-015**

Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities. The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**R-007-016**

No Alternative is dependent upon one single course of action, and in particular Alternative 5 performs as it does as a consequence of not just the transit investments but in particular as a result of time-of-day road tolls. These tolls result in destination, time of day and route changes that minimize roadway congestion and delay. It is true that any Alternative that is analyzed during this planning process is dependent upon the actual implementation of the projects and programs that are part of the Alternative. Implementation of any specific action will be dependent upon a host of political and practical steps that advance that action.

**R-007-017**

Thank you for your comment. We've put considerable time and effort into our Transportation 2040 planning process to address these critical issues. In addition, we've developed our new plan with an eye toward positioning the region to effectively compete at the Federal level for transportation funds. One essential ingredient will be for our plan to be flexible, knowing the details about the new Federal funding program which will replace SAFETEA-LU are currently uncertain.

The Transportation 2040 Plan includes an outline of a process by which we would admit projects and programs into the plan; delete projects and

Mr. Howard
Page 7

**R-007-027** the comments in hope that the updated plan will include a substantial freight mobility element. Many of the comments made at the time may be addressed as part of the ongoing Cambridge Systematics' freight study. The scoping comments will be sent with the recent DEIS comments. The Port continues to hope for a much more visible freight component that would include a Puget Sound freight profile and a map listing key freight routes and project gaps.

**R-007-028** Again, thanks for the opportunity to be part of this process and to provide comments on the Draft Environmental Impact Statement. We realize what a Herculean task this is and would like to continue to support the PSRC staff through completion of the process. If you have any questions, please feel free to call me at 206-787-3376.

Sincerely,

Dan Burke
Regional Transportation Program Planner

cc: Mike Cummings, Sean Ardussi (PSRC)

programs from the plan; change the status of projects and programs within the plan (among the Constrained and Unprogrammed parts of the plan); and provide guidance on the region's investment priorities, which would inform the Regional Transportation Improvement Program (RTIP), as well as local planning and funding efforts. Transportation 2040 includes language which directs the region, in coordination with state and local agencies, to develop a Plan Amendment and Project/Investment Prioritization Process which will help the region program scarce dollars, and will position the region to be more effective incompeting for Federal funds based on the new Federal Authorization program.

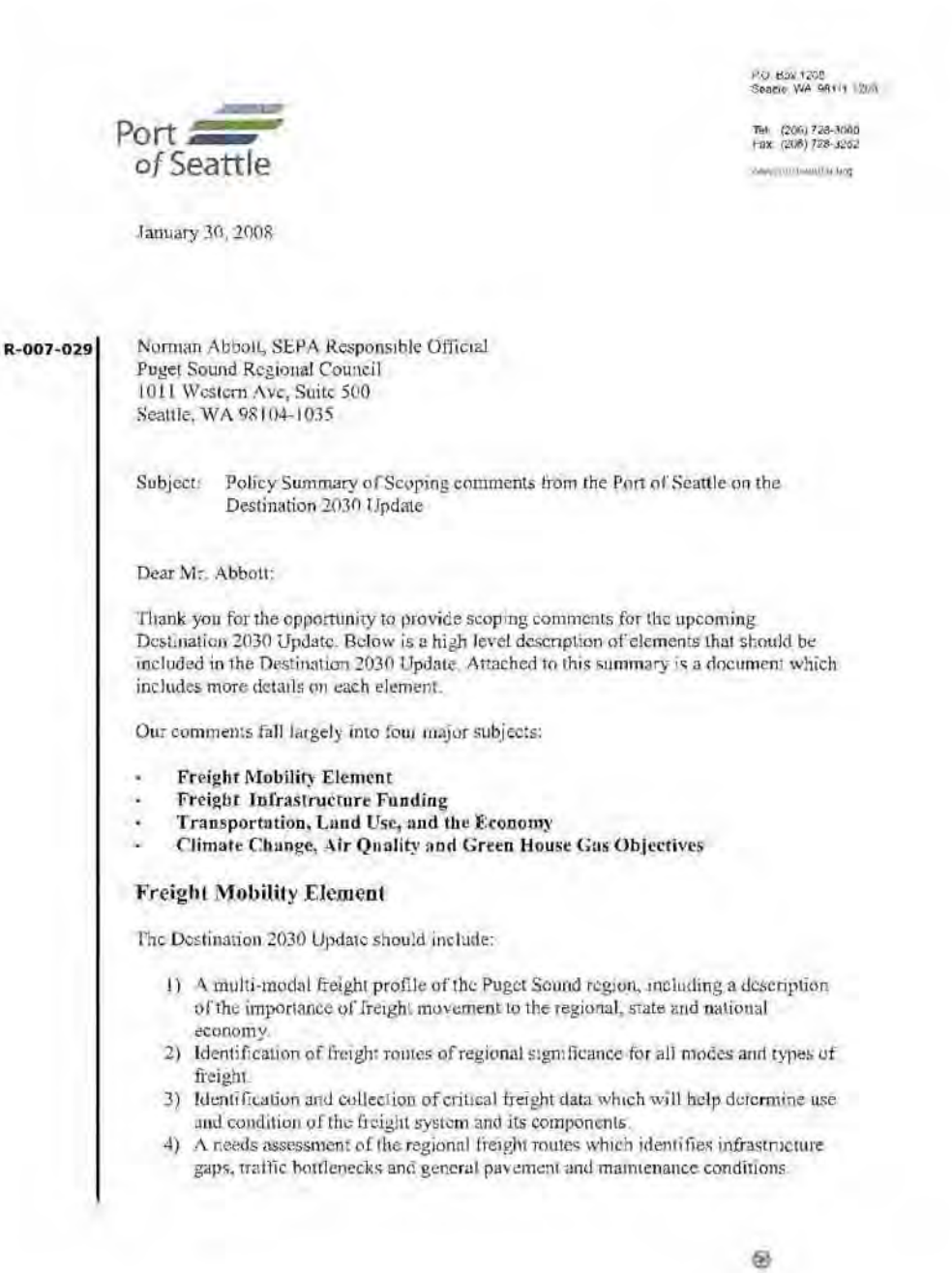
**R-007-018**

Thank you for your comment in support of the SR 509/I-5 Corridor Completion and Freight Improvement Project. The Preferred Alternative for Transportation 2040 includes this project.

**R-007-019**

It is true that most examples of toll implementations include higher tolls for trucks than for other vehicles, often reflecting the weight-based costs imposed by larger vehicles, the fact that the market will bear these higher rates, or both. The Preferred Alternative reflects this fact by including truck tolls that are a passenger car equivalent (medium trucks are 1.5x and heavy trucks are 2.0x) of the auto rates. The travel benefits and behavior of the truck vehicles differs very little under this toll structure but clearly the trucks will bear a larger share of the fiscal burden of toll payments.

**R-007-020**



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January 30, 2008

R-007-029

Norman Abbott, SEPA Responsible Official
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Subject: Policy Summary of Scoping comments from the Port of Seattle on the Destination 2030 Update

Dear Mr. Abbott:

Thank you for the opportunity to provide scoping comments for the upcoming Destination 2030 Update. Below is a high level description of elements that should be included in the Destination 2030 Update. Attached to this summary is a document which includes more details on each element.

Our comments fall largely into four major subjects:

- **Freight Mobility Element**
- **Freight Infrastructure Funding**
- **Transportation, Land Use, and the Economy**
- **Climate Change, Air Quality and Green House Gas Objectives**

**Freight Mobility Element**

The Destination 2030 Update should include:

1) A multi-modal freight profile of the Puget Sound region, including a description of the importance of freight movement to the regional, state and national economy.
2) Identification of freight routes of regional significance for all modes and types of freight.
3) Identification and collection of critical freight data which will help determine use and condition of the freight system and its components.
4) A needs assessment of the regional freight routes which identifies infrastructure gaps, traffic bottlenecks and general pavement and maintenance conditions.

The highway system toll rates analyzed during the alternative analysis were specifically designed to minimize user costs across the entire network, including the arterials. This means that the tolls on each link of the freeways were adjusted downward until the marginal benefits to freeway users were exactly equal to the marginal costs to the arterial users that were experiencing spillover effects from the tolls. As tolling is actually implemented it is expected that attempts will be made to design toll rates that will also minimize the diversion of traffic onto secondary networks, but this must be done with care at the time of actual implementation. Traffic diversion from tolls is a real issue that must be addressed at a project level or program design analysis.

**R-007-021**

Thank you for your comment. Preservation, maintenance, and operation of the existing system as well as safety and security will be top priorities of Transportation 2040, and will use most of the available funding.

**R-007-022**

Comment noted.

**R-007-023**

Thank you, without more information regarding current intuition it is difficult to provide a detailed response to the comment.

**R-007-024**

The range of draft alternatives represents different levels of investment in arterial roadways, sidewalks, and bicycle paths, all of which provide greater local connectivity and directly support the viability of walking and bicycling to meet local transportation needs.
Investments resulting in greater local connectivity in Alternatives 3 and 4 are modest, while in the Baseline Alternative and Alternatives 1 and 2

R-007-029

5) Identification of metrics to help measure the benefits provided by freight route investments with regard to both system improvements and preservation & maintenance.
6) A review of recent federal, state and local transportation policy which places greater emphasis on intermodal freight mobility as a key driver of promoting the region's economic development and vitality.
7) Analysis of alternatives that consider the importance of moving freight as a high priority on all major roadways.

**Freight Infrastructure Funding**

The Destination 2030 Update should include:

8) An analysis of different funding scenarios for needed infrastructure of the entire transportation system required through 2040.
9) An analysis of the economic impacts due to the failure to fund and implement the needed transportation network.
10) Regional priority freight needs for discussions regarding the upcoming reauthorization of the federal transportation bill.
11) Identification of new freight mobility investment and finance principles which consider directing needed funding for preservation and maintenance of the existing freight routes in addition to capacity improvements. Support and incorporate the Valley Cities policy recommendations for arterial truck route maintenance and preservation prioritization and funding.

**Transportation, Land Use and the Economy**

The Destination 2030 Update should include:

12) A discussion of the different transportation and freight needs between Urban Centers and Manufacturing and Industrial Centers (MIC's).
13) Consideration of any transportation implications in upcoming work related to the region's industrial land capacity.
14) The recognition of the Puget Sound region as an international gateway and a hub for the dissemination of goods to and from the rest of the world.

**Climate Change, Air Quality and Green House Gas Objectives**

The Destination 2030 Update should include:

15) The recognition of potential alternatives that are more global in nature than you have currently proposed and could have a dramatic impact on the ability of the region to manage its transportation system.
16) An analysis of the impacts of increasing prices for oil and other resource for this region (impacts on land use and modal choice).

there is less emphasis on local connectivity as a primary transportation strategy. Alternative 5 contains extensive nonmotorized and transit investments and focuses on complete streets policies to rebalance roadway programming. The Preferred Alternative has a combination of extensive arterial roadway investments, nonmotorized investments, and transit investments, and it focuses on complete streets policies to rebalance roadway programming.

**R-007-025**

The plan analysis examined a broad array of potential transportation actions combined in different ways into the alternatives tested. Given that each alternative contains a mix of many different actions the analysis results apply to the alternative as a whole rather than to any individual action therein. Staff stated this clearly in many meetings and outreach efforts.

**R-007-026**

All plan alternatives will include investments in the region's roadway system, which will have positive impacts on freight and goods mobility. In Appendix D, Policy Analysis and Criteria Evaluation Report, Criteria M1 through M4 – Annual Transportation Mobility Benefits, display the annual benefits (in millions of 2008 dollars) that would accrue to commercial users in three categories (light trucks, medium trucks, and heavy trucks) from the plan alternatives (in terms of change from the Baseline Alternative). All categories of system users will receive benefits under each of the alternatives. Overall commercial-related benefits increase, as a share of total benefits, with Alternatives 3, 4, and 5 and the Preferred Alternative. Whereas commercial benefits would account for about 50% of total benefits with Alternatives 1 and 2, the share of benefits to commercial users would increase to 54% in Alternative 3, 64% in Alternative 4, 63% in Alternative 5, and decrease to between 37% and 40% of total user benefits. While the Preferred Alternative would produce the greatest overall user benefit, Alternatives 4 and 5

R-007-029

17) A discussion of global population growth and its potential impact on the economy on the Northwest.
18) The impacts of the Puget Sound Region falling into a non-attainment air quality status (economic, health, funding, etc.).

Thank you again for the opportunity to provide scoping comments for the Destination 2030 Update. If you have any questions, please feel free to contact me at 728-3832, or Dan Burke, Regional Transportation, at 206-728-3376.

John Okamoto

Chief Administrative Officer
Port of Seattle

would have the greatest benefits to freight users.
The Preferred Alternative, along with Alternatives 3, 4, and 5, appear to yield the greatest reliability and mobility benefits for freight.

**R-007-027**
Comment noted.

**R-007-028**
Thank you.

**R-007-029**
Comment noted. Reference material has been accepted for review and entered into public record.

As noted in the response to comment R-007-011, scoping comments were addressed in the Destination 2030 Plan Update Final Scoping Report, available online:
http://www.psrc.org/assets/2105/finalscopingreport.pdf

R-007-029

January 30, 2008

Subject: Attached Technical Comments to Scoping comments from the Port of Seattle on the Destination 2030 Update

The Port remains very interested in having input into the updates of the region's planning documents. In the fall of 2007, the Port sent comments on the Vision 2040 Plan and SDEIS, with our greatest focus being on land-use, transportation and air quality concerns. During that process, we worked with the Regional Council to strengthen many of the Metropolitan Planning Policies to better protect industrial lands, place a higher emphasis on freight mobility and needed infrastructure, and protect the region's air quality attainment status. The Port also participated in the Prosperity Partnership's development of the Regional Economic Strategy. We see the Destination 2030 Update as an important partner to those planning processes.

The Port of Seattle's mission is to create jobs and economic opportunities while retaining the high quality of life in King County and the region. A major part of this mission is to ensure that significant volumes of people and cargo can move efficiently to and through the region. Over the past several years, the PSRC and community have updated the economic and land use plans for this region. The final piece of this planning effort is this transportation plan to help reach the vision for the Puget Sound region in 2040.

The Port's scoping comments fall into in four major categories:

- **Freight Mobility Element**
- **Freight Infrastructure Funding**
- **Transportation, Land Use, and the Economy**
- **Climate Change, Air Quality and Green House Gas Objectives**

Each recommendation is addressed in more detail below.

## Freight Mobility Element

The Destination 2030 Update should include:

1 *A multi-modal freight profile of the Puget Sound region, including a description of the importance of freight movement to the regional, state and national economy.*

The Plan should describe the importance of freight movement for the economy of the Puget Sound area. Washington State is the most trade dependent state in the country. This has an incredible impact on economic growth and the creation and retention of jobs. The Plan should include a Puget Sound freight and industry profile. This profile should quantify the economic value and importance of freight

R-007-029

with sufficient detail to support freight-related cost-benefit analysis of projects submitted for inclusion in future TIP's.

Air cargo needs also need to be better reflected in the Destination 2030 Update. Air cargo at Sea-Tac Airport (75%) and Boeing Field (25%) contribute greatly to the regional and state economies. Air Cargo is a growth component of the region's logistics and transportation industry cluster and needs to be considered when making priority decisions for infrastructure improvements.

2 *Identification of freight routes of regional significance for all modes and types of freight.*

In the past there has been very little work focused on freight mobility in our regional plans. In the 2001 Destination 2030 Plan, freight movement was generally lumped in with the movement of general purpose traffic. While the 2001 document appendix did contain a map of "regionally significant truck routes" there was only limited analysis of the freight moving through the region, or for the freight system's infrastructure needs. With regard to projects, the prior focus was on the grade separations of roads and rails with the FAST Partnership. While very important, this is only one type of project needed to improve freight movement. In general, we currently have little understanding of where the major freight is moving in the region, or what its role and value is for the economy. This makes it difficult to make priority decisions based on the benefit of freight mobility.

The updated plan should identify and describe the existing freight system infrastructure in the region. This should include an assessment of amount and value of freight moving on the regional freight system and a determination of its condition. There should be an improved Goods Movement System Map showing the routes and modes which are moving the majority of freight in the region.

3 *Identification and collection of critical freight data which will help determine use and condition of the freight system and its components.*

The Plan should include the collection and analysis of freight data for the region, addressing the three components of the freight system: Global Gateways; Made in Washington; and Delivering Goods to You. PSRC staff is working with WSDOT and other agencies to identify existing freight data and critical freight data gaps, and to develop an approach that supports consistent data collection and analysis throughout the state. Continuing this effort will be important to ensure compatibility at the state level. The PSRC is also working on a Congestion Management System Plan that will include some elements of freight mobility and this work should be included in the Plan update.

We are encouraged by the recent PSRC decision to add staff to address freight-related data needs and we see this as a first step to PSRC developing the

R-007-029

analytical capabilities to translate freight mobility policies into regional actions or local policy guidance. For example, solid freight data is needed for review and update of the Regional Freight and Goods Transportation System. Yet, the Vision 2040 traffic analysis did not evaluate its impact on freight mobility. Only general measures of delay are used in addressing freight mobility needs. Such a generic measure is not sufficient when we must identify priorities among different actions and modes.

4 *A needs assessment of the regional freight routes which identifies infrastructure gaps, traffic bottlenecks and general pavement and maintenance conditions.*

The Plan should include a needs analysis that identifies freight infrastructure needs based on existing and future demand. It should determine the ability of the current system to meet the existing and future demand. It should identify gaps and bottlenecks and set the stage for implementation of projects that address the system deficiencies. The Plan should evaluate the need of the freight system based on the PSRC projected economic forecasts through 2040.

5 Identification of metrics to help measure the benefits provided by freight route investments with regard to both system improvements and preservation & maintenance.

The Update should establish criteria for freight system improvement and preservation priorities. This should include establishing priorities for investing limited funding to enhance and protect freight routes. Other priorities might include identification and completion of infrastructure gaps and the development of performance standards. We suggest an approach that tracks performance for the following measures:

a. Connectivity/congestion—focused on speed in key freight corridors
b. System preservation—focused on PCI or other condition indicators for all parts of the freight system
c. Safety—based on accidents and roadway geometry
d. Reliability—buffer index in key freight corridors
e. Intermodal—throughput, access and egress at key freight facilities
f. Economic—jobs, warehousing, and other indicator growth and impacts.

6 *A review of recent federal, state and local transportation policy which places greater emphasis on intermodal freight mobility as a key driver of promoting the region's economic development and vitality.*

The need for efficient freight movement, combined with a concern about both a lack of understanding of its nature, and a lack of funding for freight mobility projects, has moved to the forefront of the transportation policy discussion at the federal, state, and regional levels. Recent focus on freight policy includes reports

R-007-029

from the National Commission on Transportation Revenue and Policy, AASHTO, the GAO and ARTBA, to name a few.

The recommended policy language below was included in the Draft Vision 2020 Update comment letter from the Port in July 2006 for consideration and inclusion. The freight element of Destination 2040 should enable both PSRC and its member jurisdictions to achieve the goals supported by these policies:

a. Give priority to trucks on the existing system of major truck routes to help reduce truck traffic on other facilities.
b. Provide adequate truck access to Manufacturing-Industrial Centers, seaport-and airport facilities, and intermodal rail yards.
c. Complete a regional system of truck routes linking Manufacturing-Industrial Centers and freight intermodal facilities.
d. Provide reliable freight access to intermodal facilities serving international trade, such as sea-and airports and intermodal rail yards.
e. Enhance the existing system of major truck routes to provide reliable freight mobility between/among intermodal freight facilities and Manufacturing-Industrial Centers
f. Manage the transportation system to enhance the reliability and efficiency of freight movement in the region
g. Adopt a regional transportation policy that ensures preservation of critical freight intermodal sites and corridors to meet long-term regional freight needs.

The Plan Update should highlight the regional and national policy changes that strongly support freight movement as a priority and identify our region's needs and priorities for freight mobility investments.

7 *Analysis of alternatives that consider the importance of moving freight as a high priority on all major roadways.*

The freight element of the Plan needs to reflect the intermodal nature of freight, where cargo may use multiple modes on a single trip. The plan should address truck, rail, air, pipeline, and marine cargo systems, as well as intermodal freight transfer facilities. The Update should analyze the potential of freight-only facilities in certain corridors and analyze the impact of freight vehicles using HOV lanes or HOT lanes.

## Freight Infrastructure Funding

The Destination 2030 Update should include:

8 *An analysis of different funding scenarios for needed infrastructure of the entire transportation system required through 2040.*

R-007-029

The landscape for funding public transportation infrastructure is changing quickly from a reliance on gas tax to a system of user fees such as tolling, congestion pricing and fees based on mileage fees. It will be important in the Update to identify the cost of needed infrastructure and include a discussion on raising the funds needed to implement the system.

9 *An analysis of the economic impacts due to the failure to fund and implement the needed transportation network.*

Long range plans are guides to the future and often fail to match infrastructure needs with growth. It would be helpful to understand the impacts to the economy if the required infrastructure is not provided do to funding shortfalls. An alternative should be considered that includes minimal improvements in the transportation network which results in increased traffic congestion and delay. The impact of this additional delay should be analyzed.

10 *Regional priority freight needs for discussions regarding the upcoming reauthorization of the federal transportation bill.*

As we approach the reauthorization of the federal transportation bill, we must be prepared regionally to identify and communicate our priority freight needs to those creating and implementing federal transportation funding legislation. The ability to move freight in an efficient and cost effective manner affects local, regional, and national economies, urban design, and quality of life.

11 *Identification of new freight mobility investment and finance principles which consider directing needed funding for preservation and maintenance of the existing freight routes in addition to capacity improvements. Support and incorporate the Valley Cities policy recommendations for arterial truck route maintenance and preservation prioritization and funding.*

It is extremely important to identify strategies to fund and implement freight projects on the major freight network. However, it is also important to recognize freight routes in local cities that provide a needed regional economic function but are negatively impacted by decreased revenue for transportation improvements due to voter initiatives or legislative actions. The Update should identify new freight mobility investment and finance principles which direct needed funding for preservation and maintenance of the existing freight routes in addition to capacity improvements. This need is illustrated by work done by the Valley Cities which have identified freight routes and are requesting that the PSRC develop a plan which directs maintenance and preservation funding to local streets serving regional freight routes. We understand that a regional process is being established through the Regional Project Evaluation Committee (RPEC) that identifies criteria and performance measures to help prioritize maintenance and preservation needs and funding on arterial freight roads and the Port supports that.

R-007-029

## Transportation, Land Use, and the Economy

The Destination 2030 Update should include:

12 *A discussion of the different transportation and freight needs between Urban Centers and Manufacturing and Industrial Centers (MIC's).*

Freight planning should be an important element of the Plan Update because it is an integral part of a land-use planning process. The Port commented on this in the Vision 2040 update with an emphasis on protecting Manufacturing and Industrial Centers (MIC's), the importance of viewing these centers differently from urban centers, and preserving, maintaining and protecting major truck routes which connect these centers to the National Highway System. Destination 2030 needs to consider the differences in transportation needs between Urban Centers and Manufacturing and Industrial Centers. These two distinct center types are often discussed together even though they have very different characteristics and transportation infrastructure needs. MIC's tend to have a lower density but have a much higher concentration of truck movement. The update should address the differences in centers and discuss criteria that should be considered when discussing facility priorities between the two center types.

13 *Consideration of any upcoming work related to the region's industrial land capacity.*

Additional analysis is being done in parts of the region on whether there is enough industrial land capacity for the plan build-out. The value of land near urban areas has put pressure on the viability of industrial lands in some areas of the region. The Plan Update should consider the transportation requirements in order to grow industrial land capacity. The update should consider the economic implications of inadequate transportation facilities for industrial lands (this could create a comparative alternative in the Plan).

14 *The recognition of the Puget Sound region as an international gateway and a hub for the dissemination of goods to and from the rest of the world.*

The Plan Update should discuss the region's position as an international gateway and the kind of transportation system needed to support a gateway. Research on the freight economy in Puget Sound would help define next steps for developing efficient infrastructure for the gateway. Along with the general discussion on the importance of the Puget Sound region as an international gateway, additional focus on the important transportation link between port resources, land use, and the economy is warranted

## Climate Change, Air Quality and Green House Gas Objectives

R-007-029

The Destination 2030 Update should include:

15 *The recognition of potential alternatives that are more global in nature than you have currently proposed and could have a dramatic impact on the ability of the region to manage its transportation system.*

The Plan Update should begin to address climate change, greenhouse gases, and regional environmental objectives within the context of regional transportation. The effects of global warming on the transportation systems in the region will cause increasing capital and maintenance costs stemming from impacts such as: sea level rise in coastal areas; increasing intensities of stormwater peak volumes; and streambed relocations and flooding caused by silt and erosion. These and other local impacts of global warming need to be inventoried and evaluated.

16 *An analysis of the impacts of increasing prices for oil and other resource for this region (impacts on land use and modal choice).*

Regional energy policy should be considered in the Update. The likelihood of higher oil and energy prices in the future due to future government policies on greenhouse gases could have an impact on conventional assumptions about mode choices and land use development patterns. Multiple scenarios of the transportation demand models should be developed to explore these possibilities in the long range plan. Energy policy relates directly to the gas tank and thus relates directly to Destination 2030. The Plan Update should address transportation demand strategies and how congestion pricing might be used as one demand strategy

17 *A discussion of global population growth and its potential impact on the economy on the Northwest.*

The effects of global warming and global population growth in other parts of the world on regional growth in population and transportation demand should be incorporated into the plan by using forecasts with a range of scenarios about the progress of the global economy. The United Nations Millennium Assessment project has extensively developed four of these scenarios, which could be used as the basis for sensitivity analysis and modeling in the PSRC long range plan updates without having to "re-invent the wheel."

18 *The impacts of the Puget Sound Region falling into a non-attainment air quality status (economic, health, funding, etc.).*

The Plan Update should have an objective to "maintain the region's air quality conformity" or "maintains the region's air quality". The Plan should discuss recent changes in state policy on emission reduction goals that did not exist at the time of the last transportation planning effort in 2001

R-007-029

Again, thank you for the opportunity to provide scoping input into the Destination 2030 Update. The Port has been an active partner with the Regional Council in a variety of transportation and economic development forums for many years. We look forward to coordinating with the PSRC on this project through completion in 2010. If you have any questions about the Port comments, please feel free to call me at 206-728-3376.

Dan Burke

Program Planner
Regional Transportation

Port of Seattle

July 31, 2009

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

Dear Mr. Howard:

R-008-001

The Port of Seattle Commission is writing to strongly support the inclusion of the I-5/SR-509 Corridor Completion and Freight Improvement Project (I-5/SR-509) in the preferred alternative for the Transportation 2040 Update (T-2040). The T-2040 Draft Environmental Impact Statement (DEIS) currently being reviewed indicates Alternative 5 as the alternative which best meets the region's policies, goals and project criteria. However, Alternative 5 doesn't include the strategic investment in the I-5/SR-509 project, which has demonstrated significant benefits through a variety of studies.

Over the last two decades, the Port has worked with the SR-509 partnership including Washington State Department of Transportation (WSDOT), the cities of SeaTac, Des Moines, Kent, Burien, Normandy Park and Federal Way, and King County and Sound Transit completing environmental documentation, permitting, and project design, and beginning right-of-way acquisition. The I-5/SR-509 Project will:

- Support the continued expansion of cargo activity and the 56,000 jobs dependent on our Seaport activities
- Help South King County create and retain jobs
- Support economic development in South King County
- Reduce congestion on I-5 in South King County by providing an alternate route for I-5 and adding HOV lanes on I-5
- Provide a direct route for freight movements between industrial area of Seattle and the industrial areas in south King County
- Improve traffic flow and reduce congestion at the I-5/SR 516 interchange and along SR-516
- Improve access to Sea-Tac International Airport by providing a connection between I-5 and the airport from the south
- Reduce commute times for thousands of residents
- Reduce congestion on local streets near the airport
- Protect the environment by improving air quality near the airport.

**R-008-001**

Thank you for your comment in support of the SR 509/I-5 Corridor Completion and Freight Improvement Project. The Preferred Alternative for Transportation 2040 includes this project.

R-008-001

The I-5/SR-509 project compares favorably to other large state projects on benefits to cost ratio, has long been the top transportation priority of the South County Area Transportation Board (SCATBd), compares favorably to other large state projects on benefits to cost ratio and has been included in various comprehensive plans as well as the recent Regional Transportation Investment District (RTID) program. It is also shovel ready. Local agencies and WSDOT have invested a great deal of time and resources on this project, and area agencies rely on the new roadway capacity to meet local concurrency standards and planning visions.

The I-5/SR-509 Executive Committee and Steering Committee recently met and discussed the project's status in light of the T-2040 Update and DEIS process. The Committee is concerned that if the I-5/SR-509 project is not included in the upcoming preferred alternative, it will be removed from the state and region's long range plans.

The Port of Seattle's mission is to help support and grow economic vitality in King County and the region. We exist to support job growth and to advocate for capacity in the transportation system to preserve freight access and mobility. The completion of the I-5/SR-509 project will complete a gap in the strategic highway system and address traffic needs around the airport and South King County. The Port Commission urges decision makers at the Puget Sound Regional Council to include the I-5/SR-509 project in the preferred alternative of the Transportation 2040 Plan.

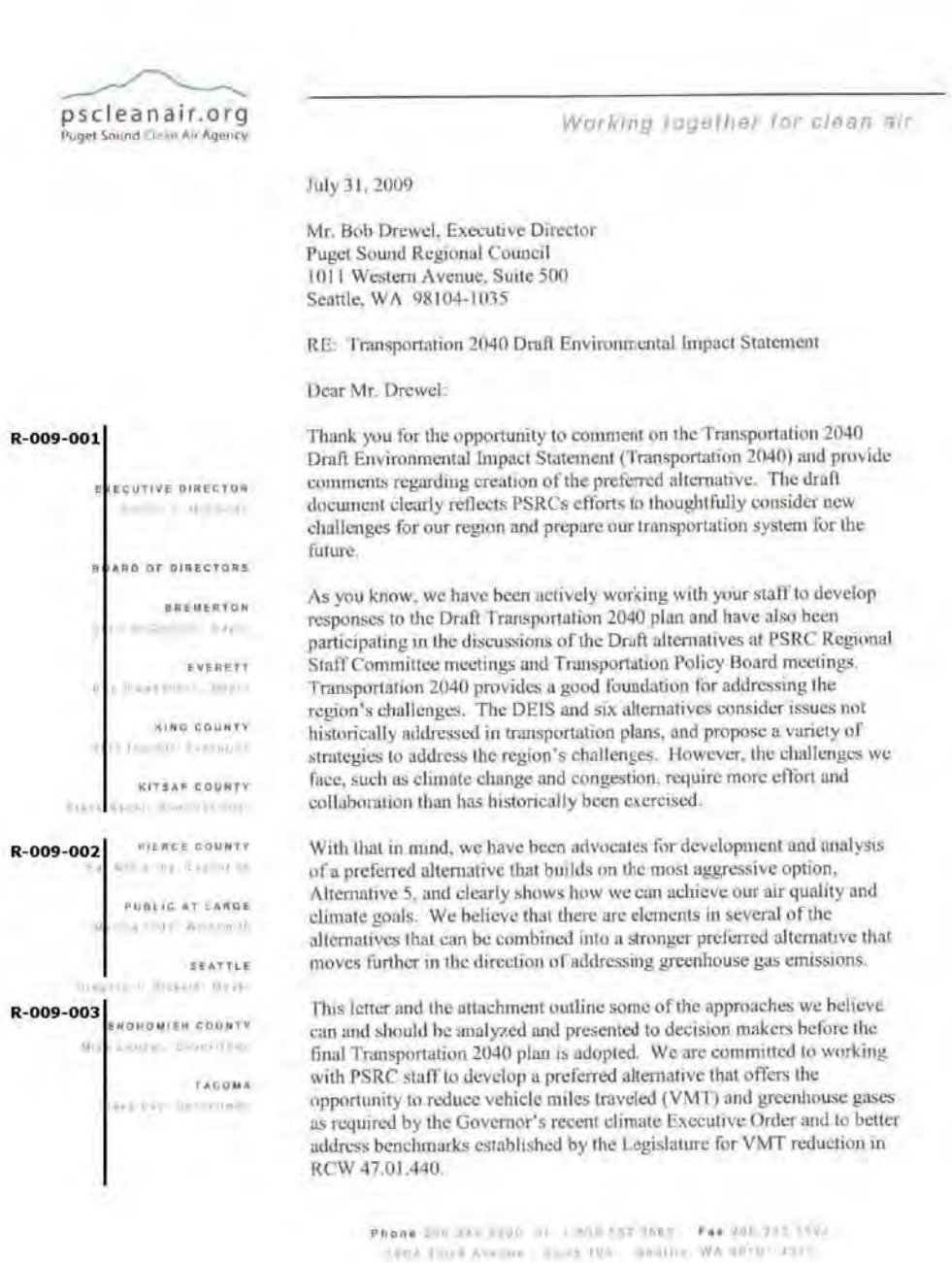
Sincerely,

Bill Bryant
President
Port of Seattle Commission

cc: Bob Drewel, Puget Sound Regional Council
Sean Ardussi, Puget Sound Regional Council
Craig Stone, Washington State Department of Transportation
Paula Hammond, Washington State Department of Transportation
Port of Seattle Commissioners

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pscleanair.org
Puget Sound Clean Air Agency

Working together for clean air

July 31, 2009

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

RE: Transportation 2040 Draft Environmental Impact Statement

Dear Mr. Drewel:

Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement (Transportation 2040) and provide comments regarding creation of the preferred alternative. The draft document clearly reflects PSRC's efforts to thoughtfully consider new challenges for our region and prepare our transportation system for the future.

As you know, we have been actively working with your staff to develop responses to the Draft Transportation 2040 plan and have also been participating in the discussions of the Draft alternatives at PSRC Regional Staff Committee meetings and Transportation Policy Board meetings. Transportation 2040 provides a good foundation for addressing the region's challenges. The DEIS and six alternatives consider issues not historically addressed in transportation plans, and propose a variety of strategies to address the region's challenges. However, the challenges we face, such as climate change and congestion, require more effort and collaboration than has historically been exercised.

With that in mind, we have been advocates for development and analysis of a preferred alternative that builds on the most aggressive option, Alternative 5, and clearly shows how we can achieve our air quality and climate goals. We believe that there are elements in several of the alternatives that can be combined into a stronger preferred alternative that moves further in the direction of addressing greenhouse gas emissions.

This letter and the attachment outline some of the approaches we believe can and should be analyzed and presented to decision makers before the final Transportation 2040 plan is adopted. We are committed to working with PSRC staff to develop a preferred alternative that offers the opportunity to reduce vehicle miles traveled (VMT) and greenhouse gases as required by the Governor's recent climate Executive Order and to better address benchmarks established by the Legislature for VMT reduction in RCW 47.01.440.

EXECUTIVE DIRECTOR

BOARD OF DIRECTORS
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KING COUNTY
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SEATTLE
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TACOMA

Phone [redacted] Fax [redacted]

R-009-001

R-009-002

R-009-003

**R-009-001**

Thank you and your staff for the strong support you have provided in the development of the Preferred Alternative. We agree with the stated need for additional collaboration and have implemented such a process in the development of the Preferred Alternative. While this is an important first step, the Preferred Alternative recognizes that, in these uncertain times, Transportation 2040 will need to be flexible and adapt to future changes.

**R-009-002**

The Preferred Alternative was developed with a focus on reducing greenhouse gas emissions and includes a thorough analysis of transportation options and emissions impacts. This analysis was performed even without specific GHG goals defined for the region or the transportation sector. Many of the features of Alternative 5 are incorporated in the Preferred Alternative, including as much high capacity transit, more nonmotorized facilities and bus transit service hours than Alternative 5. We also worked closely with the Department of Ecology to develop technology assumptions about "likely" and "aggressive" technology improvements to understand the role of these improvements in reducing GHG emissions.

**R-009-003**

PSRC, at your request, set up and attended a meeting to discuss the GHG issue and the Governor's Executive Order and will continue to support the direction that was given to the Washington State Departments of Transportation and Ecology. The work that has been done and tools that have been developed have been fully disclosed to decision makers and are available for public review through this EIS and plan development process.

R-009-003 Both Governor Gregoire and the Washington State Legislature have directed our state to reduce greenhouse gas emissions by 25% below 1990 levels by 2020, and to reduce per capita VMT by 18% by 2020. They also require the Washington Department of Transportation to work with PSRC and create transportation plans that achieve statutory VMT benchmarks. We believe a more aggressive alternative is needed to adequately respond to the Governor's direction and to address the Legislature's concerns that the transportation sector meet the challenge of addressing climate change goals. We also realize how difficult that may be to accomplish without significant political controversy. We would suggest that a dialogue between PSRC, the Washington State Department of Transportation, the Department of Ecology and other key organizations would be appropriate regarding how to approach the issue of meeting the terms of the Governor's Executive Order. We would be happy to participate in that discussion and are concerned that without it there is significant potential for a disconnect between Transportation 2040 and the key policy directives on climate coming from the state.

The transportation sector produces approximately 50% of the greenhouse gases within the Puget Sound Region and nearly that percentage statewide. It will require a mix of growth management policies that enhance use of alternatives to motor vehicles and transportation plans and policies that aggressively promote transit use and reduced reliance on single occupant vehicles, along with more efficient vehicles and cleaner fuels, to meet greenhouse gas targets for the state and the region. Aggressive use of transportation pricing will be a key part of meeting greenhouse gas targets and will also be a necessary part of any future funding strategy. We believe the preparation of a preferred alternative needs to analyze the full range of opportunities to reduce VMT and greenhouse gas reduction. From our discussions with your staff, we believe that analysis has largely been completed but has not been fully presented in the Draft EIS or the draft plan. We believe a more complete discussion of that analysis with decision makers would help address what it will take to move more aggressively to meet greenhouse gas and VMT targets.

R-009-004 We also understand that your staff is exploring what further developments in vehicle technology may provide to address greenhouse gas emissions. The Puget Sound Clean Air Agency has been very active in promoting transportation measures such as adoption of the Washington Clean Cars bill that will help offset growth in greenhouse gas emissions. We also believe there is a strong potential to reduce growth in greenhouse gas emissions with increased vehicle electrification and from improvements in medium and heavy duty vehicle fuel economy through increased hybridization, use of anti-idling and other EPA Smartway technologies and use of natural gas for these fleets. We have been working aggressively on these areas through our Diesel Solutions and Puget Sound Clean Cities Coalition programs. However, studies by expert groups like the Center for Clean Air Policy (CCAP) conclude that vehicle technologies alone will not be enough to meet current state and expected federal climate policies. The CCAP study demonstrates that even with corporate average fuel efficiency (CAFE) standards at 50 miles per gallon and extensive use of renewable fuels, communities still need to reduce their VMT by 25% in order to

**R-009-004**

Comment noted.

**R-009-004** reduce greenhouse gas (GHG) 20% below 1990 levels.[1] Pure technology changes, while reducing greenhouse gases, will do nothing to offset growth in VMT and congestion. We don't believe the region should expect technology shifts alone to address the necessary reductions in greenhouse gases from transportation and urge you not to rely too greatly on technology shifts at the expense of including other strategies in a preferred alternative. We look forward to working with you as you address how much the region can expect to benefit from emission reductions due to technology shifts, but fully expect there will still be a need to address VMT and alternative transportation modes to achieve the majority of needed emission reductions.

**R-009-005** Legislation is also developing at the federal level that will require greenhouse gas targets be set and met in transportation plans. The U.S. House of Representatives has developed a long-term surface transportation funding bill that requires states and metropolitan planning organizations (MPOs) to develop strategies that meet national GHG reduction goals. The bill also links emission reduction requirements to performance measures and MPO certification.[2] The Puget Sound region has an opportunity with Transportation 2040 to continue developing plans and policies that lead the nation and anticipate meeting new federal requirements that are almost certain to come. To make the most of this opportunity, decision makers need more information on the influence of underlying assumptions, such as fuel prices, and the effectiveness of individual strategies, such as corridor pricing, on vehicle miles traveled and GHG emissions.

**R-009-006** Transportation 2040 is also a key to being able to meet the promise of Vision 2040 and the State Growth Management Act. Under the Draft plan, Alternative 5 best complies with the State Growth Management Act directive that the transportation plan implement the land use plan, i.e., VISION 2040. The Summary of Results in the Policy Analysis and Evaluation Criteria report, (Appendix D of the DEIS), highlights that Alternative 5 meets more of the policy areas of Vision 2040 than any of the other alternatives. However, we believe there are a number of elements of the other alternatives that could be integrated into a preferred alternative that would do more to meet GMA directives and leverage achieving the targets of Vision 2040. We also would like to see additional strategies included that are not currently present in any of the alternatives and have included some of those in the attachment. We again stand ready to assist your staff in integrating these into a stronger preferred alternative.

**R-009-007** In addition to climate concerns, the region will continue to face challenges in meeting federal ambient air quality standards. The region recently was designated a Federal Non-Attainment Area for fine particles in the Tacoma/Pierce County area. Although wood smoke is the primary

[1] Ewing, Bartholomew, Winkelman, Walters and Chen. *Growing Cooler: The Evidence on Urban Development & Climate Change*. ULI, 2008

[2] The Surface Transportation Authorization Act of 2009, Committee on Transportation and Infrastructure, U.S. House of Representatives, presented June 17, 2009 by Chairman James L. Oberstar

**R-009-005**

Comment noted.

**R-009-006**

Thank you for stating your preference. Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy and the Growth Management Act. The Preferred Alternative includes elements from all the alternatives in the DEIS.

**R-009-007**

Comment noted.

R-009-007 driver of PM non-attainment in the area, transportation is one of the contributors to fine particle concentrations. More importantly, the region once again threatens to go out of attainment of federal ozone standards. While EPA has not yet designated the region an ozone non-attainment area, the region violated the ozone standard over the last three summers. We anticipate a further tightening of the ozone standard by EPA over the next year or two. Ozone concentrations here are driven primarily by motor vehicle emissions. If the federal standard tightens as we anticipate, further reductions in motor vehicle emissions will be needed and reductions in VMT and measures to reduce climate change emissions will help address ozone formation in the region. Because we anticipate it will be very difficult to meet a tighter ozone standard it will be important to have transportation strategies in place that reduce vehicle emissions as aggressively as possible.

R-009-008 We recognize the dilemma in addressing political imperatives that are seemingly contradictory. On the one hand, the region has many who are demanding that congestion and chokepoints be addressed with additional capacity. On the other, the Legislature and Governor are appropriately requiring that the transportation sector reduce greenhouse gases and reduce VMT. We view the appropriate response to be a plan that focuses on providing continued capacity for goods movement and growth in commerce and provides for movement of people, but that does not
R-009-009 focus on creating undue additional capacity for single occupant vehicles. We recognize that addressing some key choke points and congested areas is required, but we also believe that it is unrealistic to try and fund significant additional single occupant vehicle capacity and still meet current and anticipated air quality and climate goals. The region needs to focus on how to most efficiently use the infrastructure we currently have and ultimately consider where some existing capacity can be converted to dedicated goods movement and higher capacity transportation
R-009-010 modes. With current transportation funding sources beginning to wane and with the knowledge they will be inadequate to fund much more than maintenance and minor enhancements of existing facilities, the region also needs to more seriously address the use of transportation pricing as a tool for congestion management and meeting climate targets. We also realize that this needs to be phased in appropriately to build public and political support gradually. However, we also urge that the more visionary elements of the plan not be back-loaded to later years of the planning horizon in a preferred alternative.

R-009-011 In conclusion, we believe PSRC must develop an aggressive transportation plan for the region to meet current and anticipated state and federal air and climate imperatives. We propose working with PSRC staff to develop a preferred alternative that:

- Incorporates and enhances the best GHG and VMT reduction strategies from the six alternatives. We recommend PSRC build on Alternative 5 to create a preferred alternative which encompasses the most advanced Transportation 2040 strategies. For example the baseline parking charges in Alternative 5 should be replaced by the higher parking charges of Alternative 1.

**R-009-008**

Thank you for stating your preference among the alternatives.

**R-009-009**

Preservation, maintenance and operation of the existing system, plus safety and security will be top pri-orities, and will use most of the available funding. Mobility improvements will include a major emphasis on improving system efficiency with limited new capacity. System efficiency includes creating “smart corridors” with advanced technology, user infor-mation, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit and nonmotorized facilities, with new roadways limited to a few missing links.

**R-009-010**

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. The plan includes policy guidance regarding how toll revenues are used, including their use on tolled facilities, in tolled corridors, and to what extent toll revenues may be used more broadly around the region. In addition, the plan's financial strategy includes the possibility of VMT charges. Whatever we ultimately adopt as our long range financial strategy, we will need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

Bob Drewel
Puget Sound Regional Council
July 31, 2009
Page Five

R-009-012 • Removes Alternative 5 strategies that promote single occupant vehicle usage, such as significant freeway capacity expansion.

R-009-013 • Includes new GHG/VMT reduction strategies such as converting general purpose lanes to high occupancy vehicle lanes and increasing transit service rather than building new lane capacity.

R-009-014 • Finances an efficient transportation system with a financial strategy that leverages traditional funding sources (e.g., gas taxes) and creates new sources (e.g., corridor pricing) for all transportation investments.

R-009-015 We stand ready to work with you to insure decision makers have the information necessary to decide what it would take to meet current and anticipated environmental imperatives. We urge you to develop a more compelling preferred alternative that focuses more directly on the VMT and climate directives and offer to assist in developing a solid option. We have provided more detailed information and recommendations for the preferred alternative in Attachment A. If you have questions, please contact Paul Carr of my staff at (206) 689-4085 or paulc@pscleanair.org.

Sincerely,

Dennis McLerran
Executive Director

Attachments

cc: Paul Roberts, PSCAA Board Chair
PSCAA Board of Directors
Mike Cummings, PSRC
Stu Clark, Dept. of Ecology

jwc

**R-009-011**

Comment noted.

**R-009-012**

Thank you. The plan recognizes the need for investments in transit and non-motorized facilities. The Preferred Alternative includes significant enhancements to serve non-SOV travel.

**R-009-013**

The plan does not include converting general purpose lanes to high occupancy vehicle lanes. However, the plan does include a substntial increase in transit.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the

ATTACHMENT A

R-009-016

**Recommended Components of the Preferred Alternative**

The following specific recommendations are intended to identify what we believe should be included in an aggressive preferred alternative:

1. Limit roadway expansion to removing only the most significant bottlenecks and chokepoints.

2. Use existing general purpose (GP) lanes to create new high occupancy vehicle (HOV) lanes rather than building new lane capacity.

R-009-017

3. Change the park-and-ride lot strategies to support additional reductions in VMT and GHGs For example, replace the incubator park-and-ride lots with improved transit services and improved bicycle and pedestrian access to transit stops and centers such as providing:
   - additional transit service ahead of demand rather than providing an incubator park-and-ride lot
   - shuttle transit service to existing trunk park-and-ride lots in lower density areas rather than providing an incubator park-and-ride lot
   - pedestrian paths within ½ mile of park-and-ride lots as well as transit centers
   - bicycle paths within 5 miles of park-and-ride lots as well as transit centers

R-009-018

4. Focus the bicycle and pedestrian strategies on supporting transit-oriented and pedestrian-oriented development, such as giving priority to those projects that improve access to transit, schools, community centers, and parks. For example the plan could require:
   - "complete streets" (which support all modes of transportation) in all new development
   - sidewalks within:
     - ½ mile of high capacity transit centers
     - ¼ mile radius of all transit stops
     - ¼ mile of all schools, libraries, community centers, and parks
   - bicycle lanes within 5 miles rather than 3 of:
     - high capacity transit stations
     - transit centers
     - ferry terminals
     - park-and-ride lots
     - schools, libraries, community centers, and parks

R-009-019

5. Change the Demand Management Strategy to implement urban center parking charges that reduce GHGs, VMT, and SOV usage. For example, use the highest surcharge options from each of the 6 alternatives:
   - 20% surcharge atop the baseline for daily SOV parking
   - 20% surcharge atop the baseline for hourly parking
   - set the parking charge to manage supply for park-and-ride SOV parking
   - set the parking charge to manage supply for park-and-ride HOV parking

Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-19, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**R-009-014**

Concur.

**R-009-015**

Thank you for your willingness to continue to work with us. We have carefully considered your advice when developing the draft plan.

**R-009-016**

The plan includes only limited roadway expansion.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles,

R-009-020 6. Increase transit service, for example by adding taxi-buses and jitneys in urban centers and shuttle connections to the bus system, and providing bus-only streets in urban centers.

R-009-021 7. Implement system management strategies that can reduce GHGs and VMT, such as signal coordination with transit override functions, transit bypasses and queue-jumping on arterials and freeway HOV ramps, and direct HOV connections to freeways.

R-009-022 8. Use transportation pricing to maximize reductions in GHGs and VMT rather than maximize revenue or system efficiency. Include a future study to determine the transportation pricing that would maximize reductions in GHG and VMT.

R-009-023 9. Review and incorporate strategies from new studies of transportation measures that can reduce greenhouse gases such as Moving Cooler, which can be found at: http://movingcooler.info/.

while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-19, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**R-009-017**

Comment noted.

**R-009-018**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**R-009-019**

Thank you for your comment. The Preferred Alternative includes a new focus on the development and implementation of a regional parking pricing and management program. While the full scope of this program has not yet been established, it will focus on urban centers and potentially smaller employment centers and could include shared-parking policies, parking cash-out, on- and off-street parking pricing and/or management techniques, the establishment of parking minimums and maximums based on geography and facility type, and a parking surcharge.

ATTACHMENT B

**Detailed Comments On**
**Transportation 2040 Draft Environmental Impact Statement**

R-009-024 **Executive Summary**

p. 16 Auto Travel – Vehicle Miles Traveled, Hours Traveled, and Delay: The section should explicitly discuss how the VMT reductions of the 6 alternatives address the legislatively mandated per capita VMT reduction goals, (Chp. 14 Laws of 2008, (ESHB 2815)).

R-009-025 p. 24 Impacts Common to All Alternatives. The section should explicitly discuss how all 6 alternatives address the Governor's Executive Orders on climate change. (The Governor has issued Executive Orders #09-05 and #07-02 on climate change.)

R-009-026 **Chapter 4 Transportation**

P. 4-14 What existing bicycle and pedestrian facilities are in the region? Add a discussion on the bicycle and pedestrian facilities within designated growth centers, around key land uses and around transit services. For example, the EIS should identify what percent of the streets in a specific growth center include sidewalks, what percent of the streets within 5 miles of a school have bicycle lanes or paths, and what percent of the streets within ¼ mile of a transit stop have sidewalks.

R-009-027 **Chapter 6 Air Quality and Climate Change**

p. 6-2 Particulate Matter Add an illustration of the size of a $PM_{2.5}$ particle.

R-009-028 p. 6-5 Greenhouse Gases and Climate Change: Add a graph showing sources of greenhouse gas emissions. Add a discussion of the Governor's executive orders on climate change, i.e., Executive Orders #09-05 and #07-02. Add a discussion of the recent state legislation on per capita VMT reductions, i.e. Chp. 14 Laws of 2008, (ESHB 2815).

R-009-029 p. 6-7 Highlighting the violation of the new ozone standard and the actions being taken by EPA, perhaps through a sidebar, would improve readers' understanding of the air quality challenges the region faces. Providing the most recent information on the status of EPA's actions would also assist readers.

R-009-030 p. 6-16 Highlighting that the region is in the top 5% of the country for potential cancer risk, perhaps in a sidebar, would improve readers' understanding of the public health threat.

R-009-031 p. 6-17 While greenhouse gas emissions are expected to grow fastest in the building and facilities sector and electricity supply, greenhouse gas emissions from the transportation sector will also grow unless Transportation 2040 contains strategies to reduce these emissions and VMT.

**R-009-020**

The plan includes a substantial increase in transit service. The other ideas, such as a jitney service, are good ideas for the transit agencies to consider.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-19, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**R-009-021**

The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low

R-009-032 p. 6-22 Highlight that Alternative 5 produces the lowest per capita VMT. Clarify if the capturing of the mode shift from SOV to transit provides an indirect indication of the effect on overall emissions.

R-009-033 p. 6-23 Provide examples of the policies and market mechanisms that would be needed to achieve full fleet replacement by 2040. Identify the likely percentage of the fleet that would be zero emission vehicles by 2040 if these policy and market mechanisms are not implemented.

R-009-034 p. 6-24 Providing an illustration of the connection between fuels, vehicles, and VMT in addressing air pollution could assist readers in understanding how the effects to air quality can be mitigated.

R-009-035 **Chapter 11 Energy**

p. 11-6 Given that the travel demand models do not adequately represent all transit vehicle miles on the transportation network and the impact from transit on energy consumption is not represented in the quantified analysis, are there studies of the general effect of transit usage on energy consumption that could provide an indication of the effect of increased transit usage on energy consumption?

R-009-036 **Chapter 18 Human Health**

p. 18-2 Add air to the range of environmental media that could be affected by operation and maintenance of the region's transportation system.

cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit and traveler information ITS projects.

**R-009-022**

The Transportation 2040 alternatives included various approaches to tolling, including parking charges, HOT lanes, highway tolling, and tolling the full road network. In each case the toll rates were designed to minimize the total costs (time and money costs) to the transportation system users (all users). This analytical objective was established up front by the Transportation Policy Board, but does not preclude other objectives from being considered. Employing a common tolling objective permits a more useful comparison across the various types of tolling that were analyzed. By definition, straying from this objective will result in additional costs to the transportation system users, which may or may not be justified through the realization of other objectives (e.g., lower emissions). This is why the analysis has also attempted to quantify many of these other objectives, so that policy makes can make an informed judgment about the exact degree of trade-off (one objective against another) that they wish to support.

The specific question raised in the comment is essentially straight-forward. The emission minimizing toll is one that produces no vehicle use, and as a result no emissions, and no revenues. The exact toll rates required to eliminate vehicle use is unfortunately not answerable with existing models. The tolls would be extremely high, and existing models would be unlikely to yield believable results from this range of toll inputs.

**R-009-023**

Thank you for providing information on Moving Cooler.

**R-009-024**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**R-009-025**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological

advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**R-009-026**

The purpose of the Transportation 2040 EIS is to determine the effects of the Transportation 2040 plan upon the environment, to disclose these effects, and to propose means to mitigate adverse effects. A detailed discussion of nonmotorized facilities in the proximity of key land uses would be illuminating, but would not change the conclusions regarding the effect of the proposed nonmotorized system upon the environment. Thank you for the suggestion.

**R-009-027**

Comment noted.

**R-009-028**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address

both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**R-009-029**
Chapter 6 of the FEIS contains references to the air quality status current at the time of publication, as well as upcoming air quality issues facing the region.

**R-009-030**
Thank you for your comment. The FEIS includes the appropriate edits.

**R-009-031**
Comment noted.

**R-009-032**
Comment noted.

**R-009-033**
PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**R-009-034**
Comment noted.

**R-009-035**
Thank you for your comment.  This is an area that PSRC is continuing to research for improved estimations in the future.

**R-009-036**
Thank you for your comment. The FEIS includes the appropriate edits.

July 31, 2009

Sean Ardussi
1011 Western Avenue, Suite 500
Seattle, WA 98104

R-010-001 Dear Mr. Ardussi,

The PSRC Regional Traffic Operations Committee (RTOC) is a group of transportation professionals representing city, county, state, and other agencies within the Puget Sound area. Committee participants include King, Pierce, Snohomish, and Kitsap County, WSDOT, FHWA, and over 30 local jurisdictions. This Committee promotes cooperation and collaboration between agencies to improve how we operate the region's freeway and arterial streets. This letter provides comments to the Transportation 2040 Draft Environmental Impact Statement on behalf of the RTOC Committee.

R-010-002

1. We recommend the preferred alternative provide emphasis and significant investment for operating our existing freeways and arterials in the most efficient manner possible. This will ensure that the region receives the maximum benefit of the roadways for the movement of freight, transit, and the travelling public on our existing roadways. Although alternative 1 and 5 place the most emphasis on system management, we recommend every alternative place this same level of emphasis on efficient and responsive operations.

R-010-003

2. Tolling on freeways as proposed by alternatives 3 and 4 may shift significant regional traffic onto local streets and arterials. Tolling on freeways and arterials proposed by alternative 5 may shift significant regional traffic onto local collector and residential streets. A VMT based road user fee along with robust HOT lanes should be considered to minimize this travel shift.

Sincerely,

Regional Traffic Operations Committee

**R-010-001**

Thank you.

**R-010-002**

Thank you for your comment. The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit and traveler information ITS projects.

**R-010-003**

VMT-based user fees are included among the user fee options in the Preferred Alternative.

R-011 Special Needs Transportation Committee.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 29, 2009 4:53 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Margaret Tully

Address: 1102 SW 348th Place

City: Federal Way, WA 98023

Email: mtully77@yahoo.com

R-011-001

The various components in the six alternatives: We would like to acknowledge all of the hard work that has gone into the preparation of the plans for the future, and the Draft Environmental Impact Statement (DEIS). We would also like to inform you that as each of these plans have been presented to the Special Needs Transportation Committee we have expressed our concern that the planning process does not take into account the fact that nearly one third of the population has a greater need for transportation due to age, disability or income status. Through each step of the process, as the plans have been presented to us, and we have raised this concern, we have been told that transportation demand models are not readily available for special needs transportation. We believe that a plan that does not include one third of the population is not an adequate plan.

R-011-002

The environmental impacts of the alternatives: The signs of the impact of global warming are increasing rapidly. We think that the issue of reducing greenhouse gas needs to needs to be taken much more seriously. None of the alternatives goes far enough in reducing greenhouse gas emissions. We encourage the PSRC to develop at least some alternatives for Transportation 2040 and Vision 20 40 that would have a more drastic impact on greenhouse gas reductions.

R-011-003

Funding strategies, for raising revenue and paying for transportation needs: The plan states ¡§Core assumption ¡V all alternatives include full funding of maintenance, preservation, and operation of existing assets and facilities prior to allocation of funds for expansion.¡¨ At least one 2040 alternative must include more funding for the expansion of public and human services transportation.

R-011-004

„Ï The Regional Coordinated Transit - Human Services Transportation Plan is posted on the PSRC website. It says ¡§One of the primary difficulties associated with special needs transportation is that these individuals are not centrally located, and in most cases are dispersed throughout the county often in rural or isolated areas due to the soaring housing costs within the region¡¦s urban population centers. Unfortunately, these high-cost areas are usually where necessary and sometimes critical specialized services are located, therefore creating long and expensive trips from the outlying locales¡K¡¨ This is part of the population that will be greatly impacted by tolls, as they drive long distances for work and basic services. They will need some alternate choices.

R-011-005

The information contained in the analysis: In the Puget Sound Region at least 10 to 15% of the population is considered low-income, and transportation costs put a tremendous strain on low-income budgets. The poorest 20% of American households ¡V those earning less than $13, 900 after taxes ¡V spend over 40% of their take-home pay on transportation. This is WAY above the 2% of annual income predicted in Transportation 2040. So while people in upper income brackets will simply absorb tolls and increasing gas prices as the cost of living in a modern society, the impact on lower income people is profound. This disparity in income is not dealt with in the transportation models used in developing Transportation 2040, and an example of the need for expanded public and human service transportation funding.

The magnitude of the need for additional special transportation is hard to image, but between 2003 and 2030 the older adult population will increase by 77%. With this large increase in population of people over age 65, there will be a huge need for increased public transportation for the elderly. People generally outlive their ability to drive by an average of six to eleven years. According to an AARP report,

Page 1

**R-011-001**

Thank you for your comment. It is generally true that not all aspects of the transportation system are modelable, and this includes nonmotorized travel and demand response. However, the analysis of the Plan alternatives did not solely rely on technical modeling.

VISION 2040 is the organizing framework for evaluating the alternatives. The Regional Growth Strategy and the goals, objectives and policies in VISION 2040 guided the development of the evaluation criteria and the organization of the policy analysis. These evaluation criteria are a way to measure progress toward achieving VISION 2040. They were developed to address the overarching goals of the transportation planning process. Individual metrics were developed to quantify different aspects of each evaluation criterion. The criteria measures are grouped into seven categories: mobility, finance, growth management, economic prosperity, environmental stewardship, quality of life, and equity.

**R-011-002**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the

R-011-005

one in five Americans over age 65 do not drive, and more than 50% of these non-drivers stay home on any given day due to a lack of adequate transportation options. At least one of the alternatives of 2040 has to address this issue that impacts such a large part of the population.

Seniors face many barriers when it comes to using public transit services, too. Research shows that the same medical conditions that may cause a person to stop driving, such as vision, cognitive or physical changes, are also likely to limit their success at using public transportation. Only about half of Americans age 65 and older have access to public transportation to meet their daily needs. An AARP study found that in suburban areas, less than half of the households are within a half mile of public transit. Lack of access is particularly critical in rural areas where less than one in eight households has access to public transit. At least one of the alternatives for 2040 must address this issue.

R-011-006

The alternative you think best accomplishes our regional needs out to 2040: The data indicate that our aging population will rely more and more on transportation services. At least one of the alternatives must include a substantial increase in funding for public and human services transportation.

We need to plan for the huge demographic shift by insuring some real equity in the distribution of our transportation resources. A transportation funding system that provides multiple transportation options (fixed route buses, paratransit shuttle buses, and human services transportation) through various funding mechanisms would reduce the burden on current transit districts¡¦ tax bases and support coordinated transportation services.

A plan that includes tolling as the only new financing option, and doesn¡¦t include the creation of additional transit first, and doesn¡¦t necessarily include the alternative of a free roadway system, will have a disproportionate negative impact on low-income households. At least one of the alternatives must include increased funding for public and human services transportation.

Other comments: We need to develop viable community options for transportation and for funding that consider the needs of the elderly, the disabled, the people with low incomes and the youth and children among us. We also need to plan to for a future in which some people will not be living in an urban center, and some people will not live near public transit, and some people will not be driving cars. This plan fails to address the needs of at least one third of the people in Puget Sound Region. This plan should not be allowed to continue to ignore such a large segment of the population. We ask that this concern be addressed before the plan proceeds to the next phases of development and implementation.

Thank you on behalf of the PSRC - Special Needs Transportation Committee



Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**R-011-003**

Comment noted.

**R-011-004**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**R-011-005**

The updated Transportation 2040 plan will increase local transit service by approximately 90%, while achieving opera-tional efficiencies to reduce long-run costs; emphasize additional all-day service with high frequencies (generally every 15 minutes). The plan will also include the completion of transit supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects. However, PSRC recognizes that public

transportation is not always usable for all purposes for residents in our region.

Through the update to PSRC's Coordinated Transit-Human Services Plan, ways, in addition to public transportation, to address mobility for those who cannot drive for themselves due to age, income level, or physical ability will be identified.

**R-011-006**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

R-012 Pierce Transportation Coalition.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 29, 2009 5:54 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Marge Tully

Address: 3602 Pacific Avenue

City: Tacoma,WA 98418

Email: mtully@co.pierce.wa.us

R-012-001 The various components in the six alternatives: The Pierce County Coordinated Transportation Coalition (PCCTC)would like to praise the effort of everyone who has helped with the the preparation of the Vision 2040 and Transportation 2040 plans and the Draft Environmental Impact Statement(DEIS). We would also like to express our concern that the needs of senior citizens, people with disabilities and people with low incomes are not adequately represented in these plans.

R-012-002 We understand that there is growing momentum for using so called "congestion pricing" or tolling to solve urban traffic congestion problems. However, the discussion should not simply be based on resolving traffic congestion. While this idea about traffic congestion persists, we focus on delays at individual points in the system of roadways. But we need to remember that driving is really a means to achieve other purposes. Having the ability to reach a destination provides a person with opportunities - to shop, to seek medical care, to work, to engage in social activities.

R-012-003 It is important to remember that travel opportunities are not equally distributed. Income should not interfere with a person's ability to travel, but it does. People with low income, people with disabilities and the elderly, especially if they don't drive, have less access to employment opportunities, to doctors' appointments, to grocery shopping to meet their basic needs, and to social activities. We need to employ travel models that include impacts on these populations.

R-012-004 The Plan also includes 6 "overarching objectives" that should be advanced by the preferred alternative - 6 is "distribute transportation costs and benefits equitably." We ask that the plan include at least one alternative that increases the funding for special needs transportation both through public transit and through human services transportation.

R-012-005 The environmental impacts of the alternatives: None of the alternatives goes far enough in reducing greenhouse gas emissions. We encourage the PSRC to develop at least some alternatives for Transportation 2040 and Vision 2040 that would have a greater impact on reducing greenhouse gas emissions.

R-012-006 Funding strategies, for raising revenue and paying for transportation needs: There needs to be an overall increase in investment in all forms of community and public transportation, including human services transportation. It is disappointing that only one new financing strategy-tolling- has been ofered through all the alternatives. Before the plan proceeds, at least one alternative should identify new and diverse sources of funding.

The transportation alternatives to toll roads have to exist BEFORE tolls are imposed. In London and Stockholm, where tolling has been successful, it was preceded by large transportation improvements (i.e., 197 more buses, 16 new bus lines, and more trains at peak periods in Stockholm). Yet in regard to expanding the regional public transit system Transportation 2040 states "Although all of the alternatives assume the continued operation of the existing system, only a portion would be improved during the 30 year planning horizon for Transportation 2040." At least one 2040 alternative must include greater funding for public and human services transportation PRIOR to the implementation of tolls.

The plan also states "Core assumption - all alternatives include full funding of maintenance, preservation, and operation of existing assets and facilities prior to allocation of funds for expansion." At least one 2040 alternative must include more



**R-012-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. As noted below, Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Please refer to the Coordinated Transit-Human Services Plan at www.psrc.org for more information about special needs transportation.

**R-012-002**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally

**R-012-006**

funding for public and human services transportation expansion.

Using tolling as the only new funding source presents a conundrum. The state has a policy of trying to reduce the Vehicle Miles Traveled for drivers by 50% by 2050. To simultaneously adopt a revenue stream using tolls that rely on driving, to support the revenue stream from the gas tax that also relies on driving, is an interesting concept. In essence, the Transportation 2040 Plan proposes to reduce the amount of driving people do while also making money based on maintaining the amount of driving people do.

**R-012-007**

The information contained in the analysis: We have concerns that the models used in developing these plans do not adequately consider elders, people with disabilities or people with low incomes.

The older adult population will increase dramatically in the coming years. With this large increase in population of people over age 65, there will be a huge need for increased public transportation for the elderly. People generally outlive their ability to drive by an average of six to eleven years. An AARP report says one in five people over age 65 do not drive, and more than 50% of these non-drivers stay home on any given day due to a lack of adequate transportation options. At least one of the alternatives of 2040 has to address this issue that impacts such a large part of the population by proposing and increase in funding for public and human services transportation.

Seniors face many barriers when it comes to using public transit services, too. Research shows that the same medical conditions that may cause a person to stop driving, such as vision, cognitive or physical changes, are also likely to limit their success at using public transportation. It is crucial that at least one alternative include an increase in human services/special needs transportation funding to assist people who cannot drive or use public transportation.

**R-012-008**

The Transportation 2040 models include the concept of "employment centers" – but Pierce County does not yet have these employment centers. The model also includes economic development and affordable housing near transit centers, but these things do not currently exist. While it is good to plan for a future when housing and economic development and transit are all considered together, reality also needs to be addressed. There are new housing projects in both King and Pierce County for low income people, and there is no employment center, no grocery stores, and no transportation nearby. We can not assume that everyone will live in/near one of these centers, nor that it will have all of the life sustaining necessities nearby.

**R-012-009**

The alternative you think best accomplishes our regional needs out to 2040: One third of the population, the people who need specialized transportation, is not considered in the "models" used in developing this plan The physical reality, that people live beyond the reach of the public transit system is not considered in this plan. The fact that many people outlive their ability to drive is not considered in this plan. The fact that there needs to be a steady stream of funding to support the transportation needs of one third of the population that does not drive is not included in this plan. There should be an alternative that includes the expansion of both public and human services transportation through a more equitable distribution of the transportation funding resources.

**R-012-010**

Other comments: Transportation availability has a direct effect on an individual's longevity, connection to community, and economic contributions. Constrained public resources are unlikely to be able to meet the increasing need for senior transportation as the older population continues to grow. It is a good time to consider solutions which are available, affordable, accessible and bring better opportunities for seniors to remain active, vibrant, and productive.

We need to develop viable community options for transportation and for funding that consider the needs of the elderly, the disabled, the people with low incomes and the youth and children. We also need to plan to for a future in which some people will not be living in an urban center, and some people will not live near public transit, and some people will not be driving cars. We need to see some alternatives in Transportation 2040 that would expand services for the 33% and more of the population that does not drive. We encourage the development of an alternative in the plan that will increase the funding for both public transit and human services transportation services.



show travel time improvements on the selected routes relative to the Baseline.

**R-012-003**

Comment noted.

**R-012-004**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

**R-012-005**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline

R-012 Pierce Transportation Coalition.txt

Thank you on behalf of the Pierce County Coordinated Transportation Coalition.

Page 3

Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**R-012-006**

Your comment about the exclusive use of tolling to fund transportation is accurate. Transportation 2040 includes a range of revenue sources that recognize other objectives (reduced VMT and lower greenhouse gas emissions). For this reason, Transportation 2040 includes a continued reliance on existing taxes and fees (gas tax, sales tax, etc.) in the short term and, in the longer term, phased implementation of new funding sources, such as roadway tolls and HOT lanes, VMT charges, a possible carbon tax, a new MVET-like fee, parking surcharges, and possible other revenue instruments.

**R-012-007**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

**R-012-008**

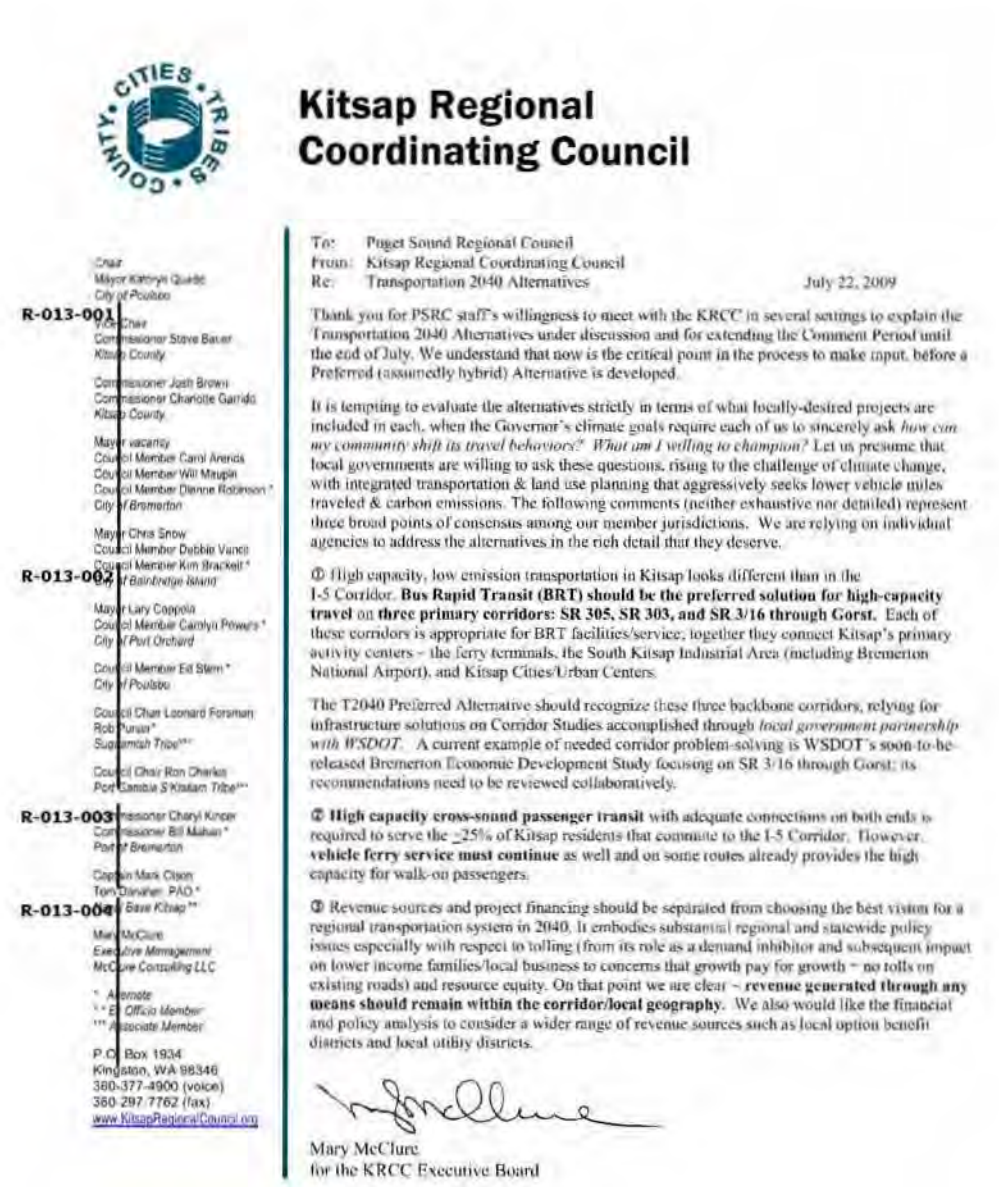
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**R-012-009**

Comment noted.

**R-012-010**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.



# Kitsap Regional Coordinating Council

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*** Associate Member

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R-013-001

R-013-002

R-013-003

R-013-004

To: Puget Sound Regional Council
From: Kitsap Regional Coordinating Council
Re: Transportation 2040 Alternatives July 22, 2009

Thank you for PSRC staff's willingness to meet with the KRCC in several settings to explain the Transportation 2040 Alternatives under discussion and for extending the Comment Period until the end of July. We understand that now is the critical point in the process to make input, before a Preferred (assumedly hybrid) Alternative is developed.

It is tempting to evaluate the alternatives strictly in terms of what locally-desired projects are included in each, when the Governor's climate goals require each of us to sincerely ask *how can my community shift its travel behaviors? What am I willing to champion?* Let us presume that local governments are willing to ask these questions, rising to the challenge of climate change, with integrated transportation & land use planning that aggressively seeks lower vehicle miles traveled & carbon emissions. The following comments (neither exhaustive nor detailed) represent three broad points of consensus among our member jurisdictions. We are relying on individual agencies to address the alternatives in the rich detail that they deserve.

① High capacity, low emission transportation in Kitsap looks different than in the I-5 Corridor. **Bus Rapid Transit (BRT) should be the preferred solution for high-capacity travel** on **three primary corridors: SR 305, SR 303, and SR 3/16 through Gorst.** Each of these corridors is appropriate for BRT facilities/service; together they connect Kitsap's primary activity centers – the ferry terminals, the South Kitsap Industrial Area (including Bremerton National Airport), and Kitsap Cities/Urban Centers.

The T2040 Preferred Alternative should recognize these three backbone corridors, relying for infrastructure solutions on Corridor Studies accomplished through *local government partnership with WSDOT*. A current example of needed corridor problem-solving is WSDOT's soon-to-be-released Bremerton Economic Development Study focusing on SR 3/16 through Gorst; its recommendations need to be reviewed collaboratively.

② **High capacity cross-sound passenger transit** with adequate connections on both ends is required to serve the ~25% of Kitsap residents that commute to the I-5 Corridor. However, **vehicle ferry service must continue** as well and on some routes already provides the high capacity for walk-on passengers.

③ Revenue sources and project financing should be separated from choosing the best vision for a regional transportation system in 2040. It embodies substantial regional and statewide policy issues especially with respect to tolling (from its role as a demand inhibitor and subsequent impact on lower income families/local business to concerns that growth pay for growth – no tolls on existing roads) and resource equity. On that point we are clear – **revenue generated through any means should remain within the corridor/local geography.** We also would like the financial and policy analysis to consider a wider range of revenue sources such as local option benefit districts and local utility districts.

Mary McClure
for the KRCC Executive Board

**R-013-001**
Comment noted.

**R-013-002**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the draft plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**R-013-003**
The Preferred Alternative includes a balance of passenger and auto ferry investments across Puget Sound. The plan recognizes the importance of preserving and maintaining the current auto ferry routes and services, and will seek to develop a sustainable financial plan to close the current

funding gap identified in the WSF's Long Range Plan for the state ferry system. Transportation 2040 also builds on the findings and recommendations of the 2008 Regional Passenger Only Ferry Study in two ways: (1) maintain and preserve the existing passenger ferry service operated by Kitsap Transit (service between Bremerton and Port Orchard and Annapolis) and King County Ferry District (service between downtown Seattle and West Seattle and Vashon Island); and (2) provide expanded passenger ferries across Puget Sound and Lake Washington.

**R-013-004**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region, and choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA process to evaluate environmental impacts by project. Decisions specific to how and where transportation revenue is raised and how and where those funds are spent will be made by local and state governments in a separate process.

Jeff
MP
JR
CH
SK

# KITSAP TRANSIT

## Response to the Puget Sound Regional Council's V2040 Plan Alternatives

R-014-001

Kitsap Transit prefers the following combination of elements

R-014-002

1. The transit emphasis from Alt. 5 but with the following substitutions:
   - Bus Rapid Transit (BRT) instead of light rail
   - High-capacity transit funds instead of Sound Transit dollars
2. Plus the HOV lanes and park and rides and funding from Alt. 2
3. Plus the limited tolling from Alt. 3 because there are very few tolling sites work in Kitsap (Gorst, Agate Pass and Hood Canal)
   - funds must be kept on the tolled corridor and would be used for transit facilities and operations
   - limited tolling as a medium to longer-term funding source because
     - the required state approval process is difficult and slow, esp. for transit uses such as BRT
     - grant funding will be equally slow
   - Limited tolling is recommended to support the core system as it is the only funding source that collects from users outside of Kitsap County (Mason, Clallam and Jefferson counties) so that the overall project funding is fairer to our taxpayers

R-014-003

4. The development of these BRT corridors and the pursuit of denser development in general along the corridors will be the focus of a joint planning effort between KT, the Kitsap Regional Coordinating Council and the planning staffs of Kitsap County and the cities.

   Kitsap County will see up to 150,000 new residents (a 60% increase) by 2040. This is the challenge that KT's recommended combination of service elements and this new joint planning process is designed to address.



**R-014-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. The Preferred Alternative includes significant investments in BRT, HOV, and park and ride facilities in Kitsap County. Developing the region's tolling strategy will be an ongoing process. Thank you for your contributions to this process.

**R-014-002**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**R-014-003**

Comment noted.

R-014-003

Definitions/Additional Elements:

1. Bus Rapid Transit is a highly enhanced bus service that features, at its lower levels, intersection treatments such as signal pre-emption and queue by-pass lanes, and, at its higher levels, continuous bus lanes and larger, purpose-built buses matched to a network of at-floor-height terminal platforms and platform-based fare collection. BRT has many of the features and advantages of light rail without the huge land requirements and construction costs. KT is proposing this because:

   - We won't have the population densities, even by 2040, to support light rail
   - We cannot begin to afford light rail
   - We can get almost all of the benefit of light rail at a much lower cost via BRT

2. The key service corridors identified on the map will require:

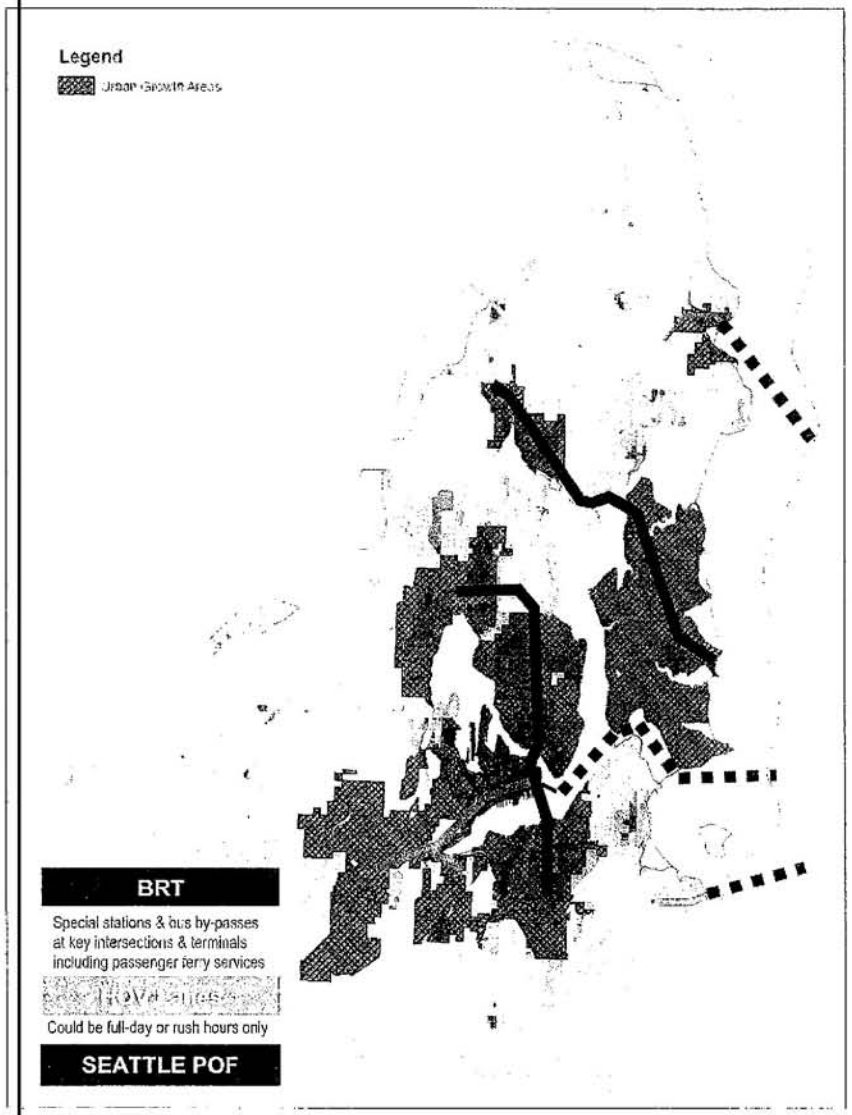
   - significantly increased park-and-ride lot capacity, particularly at the starting points of both HOV lanes and BRT lines and
   - for BRT, established stations as part of major Transit-Oriented Development/mixed-use developments (park-and-rides, multi-family residential and first-floor commercial)

3. There will be other routes and services, both connectors and feeders, but transit staff and the KT Board of Commissioners Planning Sub-Committee believe it is best to focus on the key services that are the heart of the plan and account for the bulk of its cost.

   - Connectors would include links between Silverdale and Poulsbo and between the Kingston and Southworth POF routes and the main (high capacity) system
   - Feeder routes would operate in a range of modes, from regular routes to rural loop services. Headways would range from 1-2 hours for routes to 2-3 times a day for rural loops
   - The Worker/Driver and Vanpool programs (Rideshare) will continue indefinitely as major service features, along with the Kitsap Transit Foot Ferry service across Sinclair Inlet between Bremerton and Port Orchard

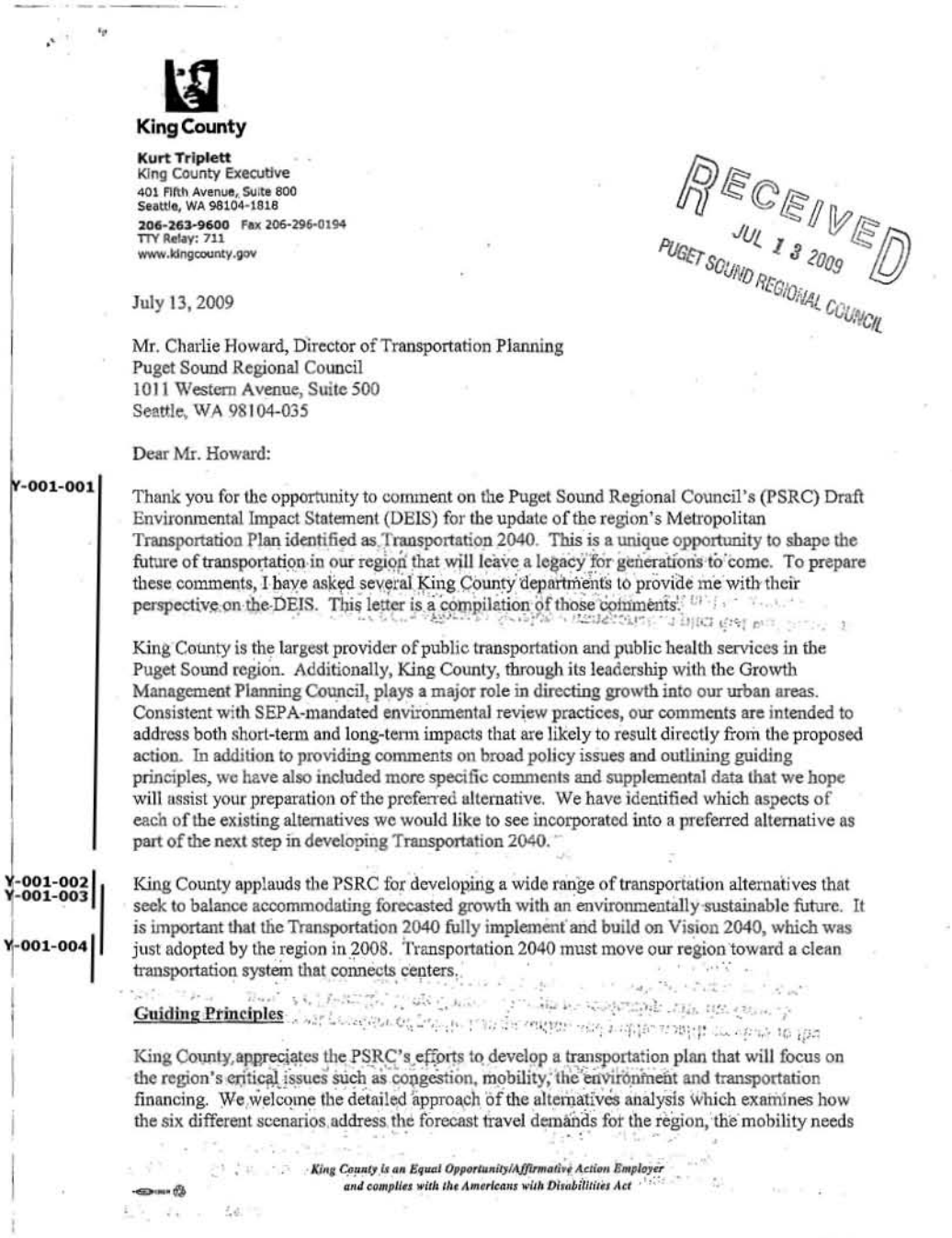
R-014-003

## Kitsap Transit's Recommended Alternative to PSRC's V2040 Plan




7/2/2009

KT's response to PSRC's V2040 Plan 7/2/2009 Page 3 of 3



King County

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JUL 13 2009
PUGET SOUND REGIONAL COUNCIL

July 13, 2009

Mr. Charlie Howard, Director of Transportation Planning
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-035

Dear Mr. Howard:

Y-001-001

Thank you for the opportunity to comment on the Puget Sound Regional Council's (PSRC) Draft Environmental Impact Statement (DEIS) for the update of the region's Metropolitan Transportation Plan identified as Transportation 2040. This is a unique opportunity to shape the future of transportation in our region that will leave a legacy for generations to come. To prepare these comments, I have asked several King County departments to provide me with their perspective on the DEIS. This letter is a compilation of those comments.

King County is the largest provider of public transportation and public health services in the Puget Sound region. Additionally, King County, through its leadership with the Growth Management Planning Council, plays a major role in directing growth into our urban areas. Consistent with SEPA-mandated environmental review practices, our comments are intended to address both short-term and long-term impacts that are likely to result directly from the proposed action. In addition to providing comments on broad policy issues and outlining guiding principles, we have also included more specific comments and supplemental data that we hope will assist your preparation of the preferred alternative. We have identified which aspects of each of the existing alternatives we would like to see incorporated into a preferred alternative as part of the next step in developing Transportation 2040.

Y-001-002
Y-001-003

Y-001-004

King County applauds the PSRC for developing a wide range of transportation alternatives that seek to balance accommodating forecasted growth with an environmentally sustainable future. It is important that the Transportation 2040 fully implement and build on Vision 2040, which was just adopted by the region in 2008. Transportation 2040 must move our region toward a clean transportation system that connects centers.

**Guiding Principles**

King County appreciates the PSRC's efforts to develop a transportation plan that will focus on the region's critical issues such as congestion, mobility, the environment and transportation financing. We welcome the detailed approach of the alternatives analysis which examines how the six different scenarios address the forecast travel demands for the region, the mobility needs

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**Y-001-001**
Thank you.

**Y-001-002**
Thank you.

**Y-001-003**
The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**Y-001-004**
Comment noted.

Y-001-004 across all modes of travel in the region and most importantly, explores alternative options on how to finance our future transportation needs.

Y-001-005 The region must do its part to comply with the Washington State regulations regarding greenhouse gas emissions. This must be a three-pronged approach with no single strategy able to fulfill our commitment alone. The three-part strategy includes: greater vehicle fuel efficiency, cleaner fuels, and reduction in the amount of driving or vehicle miles traveled (VMT.)

Y-001-006 The Transportation 2040 DEIS makes it apparent that the application of tolls is the most influential factor in moving the region's transportation network toward its goals of financial stability, reduced greenhouse gas emissions and efficient use of the transportation network.

Y-001-007 Accordingly, we believe the following principles should be followed to help guide the development of a preferred alternative for Transportation 2040 and the use of tolls in meeting the region's goals.

- **Financial Stability:** The region should move toward a fair and sustainable financing program to pay for and maintain our region's transportation system. King County supports variable tolling of transportation infrastructure as a means to reduce reliance on the traditional taxes that are no longer able to sustain needed transportation investments. Tolling would produce a sustainable revenue stream to maintain and improve roads and transportation services, including transit. Tolling is an equitable way to raise transportation revenues — users pay for the transportation system they use.

Y-001-008

- **Use of Revenues:** Toll revenues should be used to pay for maintenance, capital, transit investments and facility improvements that result in greater public mobility. Toll revenues should not be restricted to the facility on which the tolls are collected to result in the greatest public benefit. Eligible transportation investments should include the complete family of mobility options including, but not limited to transit, ferries, vanpools, active traffic management, transportation demand management, sidewalks and other non-motorized paths or improvements. These investments should provide systemwide transportation benefits to improve the movement of people, freight and goods.

Y-001-009
Y-001-010
Y-001-011

- **Greenhouse Gas Emissions:** Transportation 2040 should include aggressive policies and actions to reduce greenhouse gas emissions consistent with Vision 2040. King County supports policies and actions that reduce vehicle miles traveled through: 1) tolling and other user fees, 2) increased investments in access to transit and biking and pedestrian facilities, and 3) incentives promoting compact urban communities. The county encourages efforts to increase the use of fuel-efficient bus fleets as well as legislation setting higher fuel-efficiency standards for all vehicles. The county also supports the continued use of clean fuels in the region's public and private vehicles.

Y-001-012

- **Transportation Management:** King County commends PSRC for the groundbreaking work contained in the DEIS relating to modeling the impacts of Transportation Demand Management (TDM) programs. King County supports continued partnerships to enhance TDM programs. It is important to note that even with variable tolling, there

**Y-001-005**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Y-001-006**

Comment noted.

Y-001-012
Y-001-013

will still be a need for transit and shared ride modes to be prioritized through High Occupancy Vehicle, High Occupancy and Toll, and Business Access and Transit lanes etc. In addition, King County also supports transportation strategies that prioritize Intelligent Transportation Systems, Active Traffic Management and Transportation Demand Management.

Y-001-014
Y-001-015

- **Regionally Significant Transit:** The preferred alternative needs greater emphasis on bus service. Bus service is a critical element of the transportation system providing the majority of the region's transit trips and connecting the maximum number people to the maximum number destinations possible. Buses circulate through neighborhoods and are key for moving people between their homes and rail stations. The preferred alternative should preserve and improve transit priority on both freeways and arterials. Since the majority of the region's transit systems rely on the arterial network, arterial performance is critical to transit effectiveness. Transit priority on freeways and arterials allows transit service to operate at higher speeds and improves reliability, thereby encouraging transit use and environmentally responsible travel behavior.

Y-001-016

**Transit**

With the exception of Alternative 1, all alternatives analyzed in the DEIS are primarily concerned with regional transportation infrastructure at the expense of local transportation. This is demonstrated by the modeling of several regional light rail, highway and ferry configurations, while only minor incremental growth in local bus service is modeled in the alternatives. We suggest that the DEIS provide a meaningful analysis of significant transit improvements to the arterial network, as well as a comparison of a range of local transit investments in the alternatives.

Y-001-017
Y-001-018

The most aggressive alternative in terms of transit, Alternative 5, still shows an inadequate increase in service hours. Alternative 5 only shows a 50 percent increase in bus service hours over the baseline. However, since the region's population is expected to grow by 50 percent over the next 30 years, this only represents a status quo situation for the future. Further, with Vision 2040 focusing 93 percent of population growth within the Urban Growth Area, and with the vast majority going to centers and compact communities, bus service combined with rail service can play a much greater role in meeting our mobility needs. This needs to be recognized in the preferred alternative.

Y-001-019

The DEIS emphasizes the use of tolls and TDM measures to increase lane capacity on regional highways. A consequence of this is that there would be additional congestion on local arterials which adversely effects local transit operations. This emphasis appears to be inconsistent with Vision 2040 which promotes urban density, as such density is relatively more dependent on local transit and pedestrian improvements than it is on regional transit. We recognize that it is difficult to analyze simultaneous changes to both transportation and land use. However, a change to the regional transportation vision should only be made in the context of policies that will align the new vision with a complementary land use strategy.

**Y-001-007**

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. The plan includes policy guidance regarding how toll revenues are used, including their use on tolled facilities, in tolled corridors, and to what extent toll revenues may be used more broadly around the region.

**Y-001-008**

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. The plan includes policy guidance regarding how toll revenues are used, including their use on tolled facilities and tolled corridors and to what extent toll revenues may be used more broadly around the region.

**Y-001-009**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of

Charlie Howard
July 13, 2009
Page 4

Y-001-020 **Tolling**

The Tacoma Narrows Bridge began collecting tolls in 2007 and SR 167 high occupancy toll lane project began in 2008. Tolling will next occur on the SR 520 Bridge beginning in 2010. These tolling actions are an important step toward encouraging effective use of the transportation system and providing additional sources of transportation funding. Ultimately, and perhaps in phases, the region should move toward an expanded system of tolling and other mechanisms such as vehicle miles traveled (VMT) fees that will continue encouraging effective use of the transportation system and provide additional and diverse transportation funding sources.

Recent opinion research on tolling conducted independently by King County along with the SR 520 Tolling Implementation Committee process conducted by the state in 2008 both suggest strong general support for tolling. Among those that support tolling, variable tolling is also supported as a way to maximize the efficiency of the roadway system and improve traffic conditions. Variable tolling also gives people more choices about when and where to travel by adjusting the rates according to the levels of congestion. Furthermore, King County's research shows support for tolling greatly increases when associated with increased transit services in the corridor being tolled. Additionally, King County's transit models suggest that tolling results in an increased demand for transit services in the corridor being tolled by as much as 35 percent.

It is for these reasons that King County strongly encourages the use of toll revenues to be shared among state and local governments for multiple purposes beyond roadway improvements, including transit expansion and coordination for new service, related projects such as new or expanded park and rides, and advanced traffic technology to improve traffic flow. Using toll revenue for multiple purposes gives people more mobility choices, is more equitable and ultimately increases the public's willingness to pay for tolls.

Y-001-021 **Non-motorized Transportation**

King County appreciates the recognition of the importance of non-motorized transportation in the overall transportation system to increase travel options. Alternative 5 anticipates the completion of the entire Regional Trails System, as currently planned, and specifies support of an n additional 458 miles of regional off-road paths. Non-motorized transportation needs to be recognized as an integral part of the region's strategy for reducing overall vehicle miles traveled (VMT.)

Y-001-022 **Land Use**

The land use pattern is a critical element in reducing overall VMT. We need to design our urban communities so that they function with increased opportunities for walking, biking, and transit. We have an unprecedented opportunity to shape the built environment. According to some estimates, nearly two-thirds of the development on the ground in 2050 will be built between 2007 and then. We can harness this opportunity to guide sustainable, health-focused development to benefit future generations.

Development within the Urban Growth Area must focus on centers and on compact communities. By creating vibrant urban communities that foster biking, walking, and transit

the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Y-001-010**
Comment noted.

**Y-001-011**
Thank you for your comment.

**Y-001-012**
Comment noted.

Y-001-022
Y-001-002

service, we will be able to realize a sustainable future. Guiding growth to the Urban Growth Area is not enough – it is how this growth will be developed will determine the region's ability to reduce VMT. The changing demographics of the American populace points to fewer households with children, more single-person households, and more people over 65. According to Vision 2040, the population age 65 and older, which represented 10 percent of the region's population in 2000, is expected to grow by nearly 150 percent to constitute 17 percent of the total 2040 population of the region. These demographic changes point to a future population that can be less reliant on the automobile with the availability of the right transportation alternatives.

The preferred transportation alternative must have elements in place to support compact urban communities such as a robust bus system, sidewalks, bicycle facilities, and non-motorized trails. Please clearly articulate how the preferred alternative will best connect centers while supporting localized transportation needs within the compact urban communities. Alternative 5 represents the minimum standard for accomplishing this but King County believes the preferred alternative must go further in implementing Vision 2040.

Y-001-023

**Health**

To quote from the Vision for 2040, "Land use, economic, and transportation decisions will be integrated in a manner that supports a healthy environment, addresses global climate change, achieves social equity, and is attentive to the needs of future generations."

While creating communities that have a positive effect on public health we are also creating communities that will have appositive effect on climate change. When people replace their vehicle trips with walking or biking, they are improving their health and reducing their carbon footprint at the same time.

Y-001-024

As stated in the Land Use section above, the preferred transportation alternative must be one that supports compact urban communities. This type of community can be described as one that has compact residential development, compact retail development, a mix of land uses and a well-connected street network.

Y-001-025

King County is concerned that health is not comprehensively addressed in the DEIS. For example, the effects of increased noise need to be more fully examined. The preferred alternative must advance travel options that produce less noise within the region's communities. Further, additional analysis should describe the estimated number of people potentially affected by health hazards (air pollution, noise, water pollution, etc.) from the transportation system and the number of people not to be affected if the hazards are reduced or eliminated.

Y-001-026

**Climate Change**

None of the proposed alternatives in the DEIS set the region on a path to achieve emissions reduction policies as envisioned in Vision 2040. For example, Alternative 5, the most aggressive alternative in terms of greenhouse gas emissions still shows a net increase in mobile source emissions of a 24 percent decline compared to the 2006 baseline, whereas the state goal for 2035 is a 25 percent decrease below 1990 levels.

**Y-001-013**

Thank you for your comment. Preservation, maintenance, and operation of the existing system along with safety and security will be top priorities, and will use most of the available funding. Mobility improvements will include a major emphasis on improving system efficiency with limited new capacity. System efficiency includes creating "smart corridors" with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit and nonmotorized facilities, with new roadways limited to a few missing links.

**Y-001-014**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**Y-001-015**

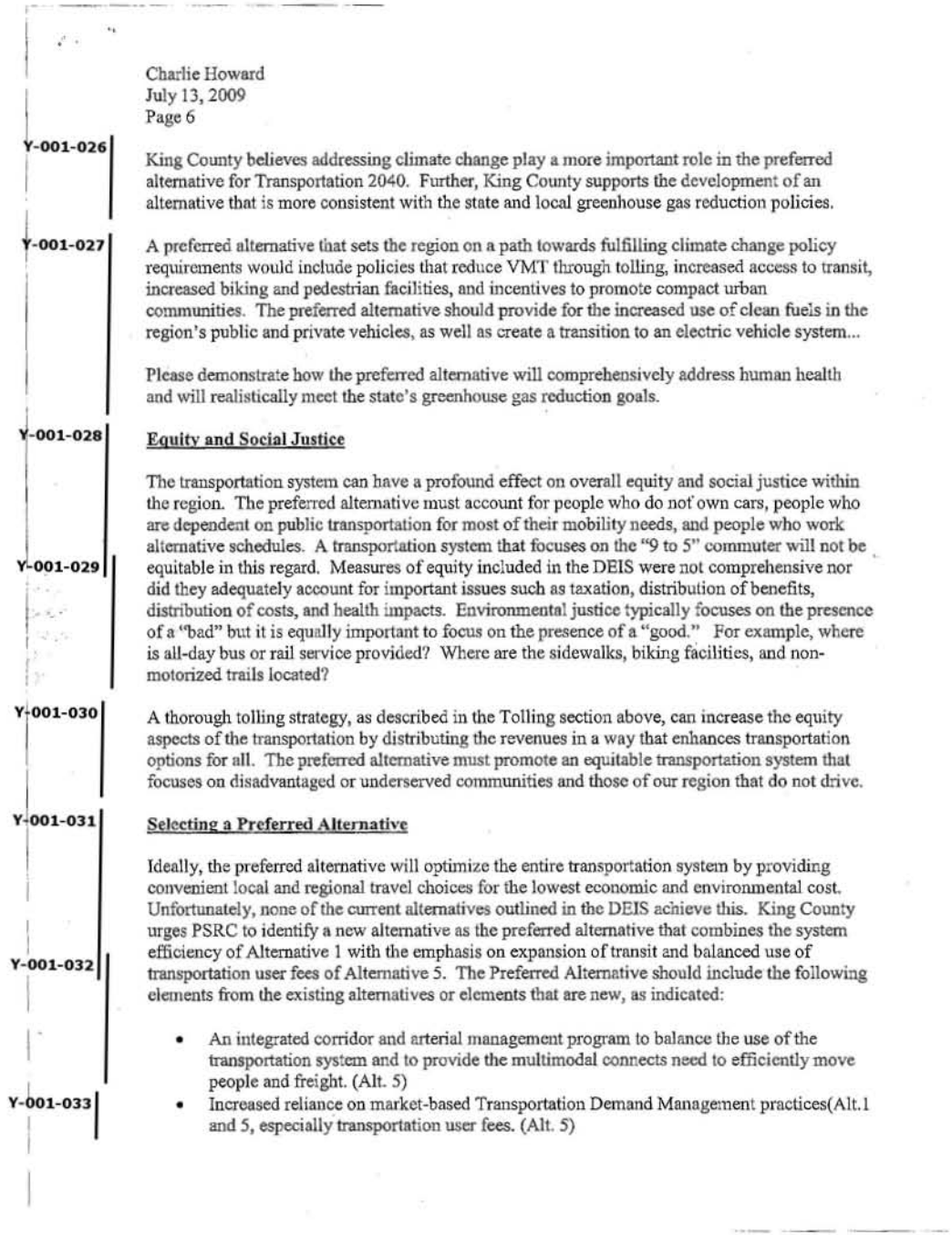
Concur.

**Y-001-016**

Detailed information about cost by alternative can be found in Appendix D.

**Y-001-017**

Based on comments from King County and others, the Preferred Alternative includes significantly higher transit investment levels than were included in the other alternatives.



Charlie Howard
July 13, 2009
Page 6

Y-001-026 King County believes addressing climate change play a more important role in the preferred alternative for Transportation 2040. Further, King County supports the development of an alternative that is more consistent with the state and local greenhouse gas reduction policies.

Y-001-027 A preferred alternative that sets the region on a path towards fulfilling climate change policy requirements would include policies that reduce VMT through tolling, increased access to transit, increased biking and pedestrian facilities, and incentives to promote compact urban communities. The preferred alternative should provide for the increased use of clean fuels in the region's public and private vehicles, as well as create a transition to an electric vehicle system...

Please demonstrate how the preferred alternative will comprehensively address human health and will realistically meet the state's greenhouse gas reduction goals.

Y-001-028 **Equity and Social Justice**

The transportation system can have a profound effect on overall equity and social justice within the region. The preferred alternative must account for people who do not own cars, people who are dependent on public transportation for most of their mobility needs, and people who work alternative schedules. A transportation system that focuses on the "9 to 5" commuter will not be

Y-001-029 equitable in this regard. Measures of equity included in the DEIS were not comprehensive nor did they adequately account for important issues such as taxation, distribution of benefits, distribution of costs, and health impacts. Environmental justice typically focuses on the presence of a "bad" but it is equally important to focus on the presence of a "good." For example, where is all-day bus or rail service provided? Where are the sidewalks, biking facilities, and non-motorized trails located?

Y-001-030 A thorough tolling strategy, as described in the Tolling section above, can increase the equity aspects of the transportation by distributing the revenues in a way that enhances transportation options for all. The preferred alternative must promote an equitable transportation system that focuses on disadvantaged or underserved communities and those of our region that do not drive.

Y-001-031 **Selecting a Preferred Alternative**

Ideally, the preferred alternative will optimize the entire transportation system by providing convenient local and regional travel choices for the lowest economic and environmental cost. Unfortunately, none of the current alternatives outlined in the DEIS achieve this. King County urges PSRC to identify a new alternative as the preferred alternative that combines the system

Y-001-032 efficiency of Alternative 1 with the emphasis on expansion of transit and balanced use of transportation user fees of Alternative 5. The Preferred Alternative should include the following elements from the existing alternatives or elements that are new, as indicated:

- An integrated corridor and arterial management program to balance the use of the transportation system and to provide the multimodal connects need to efficiently move people and freight. (Alt. 5)

Y-001-033
- Increased reliance on market-based Transportation Demand Management practices(Alt.1 and 5, especially transportation user fees. (Alt. 5)

**Y-001-018**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**Y-001-019**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that

Charlie Howard
July 13, 2009
Page 7

Y-001-034 • Transportation user fees that maintain transit priority (New) and protect arterials. (Alt. 5)

Y-001-035 • User fees should be used to finance or partially finance multiple modes within broadly defined transportation corridors, allowing the transportation system the flexibility to respond to changes in demand. (Alt. 5)

Y-001-036 • Rely on identified cost/new rider or cost/transit user benefit metrics to monitor return on investment of the transit system. These costs should include both monetary and environmental impacts (carbon emissions and additional impervious surface) and be consistent with applicable regulations. (New)

Y-001-037 • Prioritization of travel times on local arterials as key system components for transit and other modes. (New)

Y-001-038 • Greater emphasis on local transit, particularly local bus service. (New)

Y-001-039 • Greater emphasis on compact, transit-supportive land uses and investments that support pedestrians and cyclists and facilitate access (especially pedestrian access) to transit. (Alt. 5)

Y-001-040 • Greatly improve freight mobility as a result of congestion mitigation that general
Y-001-041 roadway tolling is likely to bring. (Alt. 5) Continue to support access to the regional airport system for the efficient movement of passengers and cargo. (New)

Y-001-042 • Focused freeway expansion investments to eliminate bottlenecks and chokepoints and provide the capacity necessary for a tolled system. These investments include additional lanes on sections of I-5 and I-405, completing the Core HOV system on SR 167, and improvements to the I-405/SR 167 interchange. (Alt. 2)

Y-001-043 • Non-motorized transportation as an integral part of the region's strategy for reducing overall VMT including development of the Regional Trails System. (Alt. 5)

Y-001-044 • More fully connect centers while supporting localized transportation needs within the compact urban communities. (New)

Y-001-045 • Fully meet the state regional greenhouse gas reduction goals. (New)

Y-001-046 • An equitable transportation system that focuses on disadvantaged or underserved communities and those of our region that do not drive. (New)

Y-001-047 We hope that by providing relevant questions, suggestions, and data, these comments prove helpful to PSRC as you refine the environmental analysis and develop a preferred alternative as the EIS is finalized.

If you have further questions about the recommendations presented in this letter, please contact Doug Hodson, Transportation Manager in my office, at 206-263-9619. Thank you for your consideration.

Sincerely,

Kurt Triplett
King County Executive

cc: Harold Taniguchi, Director, Department of Transportation (DOT)

additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**Y-001-020**

Thank you for your comments and recommendation.

**Y-001-021**

Comment noted. The Preferred Alternative expands bike and walk infrastructure to fully connect the bicycle network to, within, and between regional centers (3 mile access) and provide full sidewalks and pedestrian networks in all cities (1 mile access). It includes more than 580 miles of additional off-road regional trails and focuses bike and walk improvements in regional growth centers, along facilities with one terminus in a center, or within ¾ mile of transit passenger facilities, and locations that overcome a barrier (such as crossing I-5) or provide a missing link. It would complete approximately 350 miles of the envisioned regional off-road trails. A key goal is to improve pedestrian and cyclist access to transit with improved terminal access, terminal facilities, and bike racks on transit vehicles. The plan would also add online regional nonmotor trip planning services, fund education/outreach programs, and make roadside investments to improve bicycle and pedestrian safety. The plan will promulgate both a "no net loss" policy to ensure that construction or modification of other transportation facilities does not diminish the supply or connectivity of the bicycle and pedestrian networks and a new way of thinking about the use of public right-of-way that gives full attention to the needs of all users. Finally, the plan proposes to explore the concept of a regional bike sharing program.

Stephanie Warden, Director, Department of Development and Environmental Services (DDES)
Theresa Jennings, Director, Department of Natural Resources and Parks (DNRP)
David Fleming, Director, Department of Public Health (DPH)
Noel Treat, Chief of Staff, King County Executive Office (KCEO)
Pam Bissionette, Director, Office of Strategic Planning and Performance Management (OSPPM)
Doug Hodson, Transportation Manager, KCEO
Karen Wolf, Manager, OSPPM
Ron Posthuma, Assistant Director, KCDOT

**Y-001-022**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**Y-001-023**

Comment noted.

**Y-001-024**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region’s growth. These are high priority areas for the region’s transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should

receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**Y-001-025**

Each of the Transportation 2040 alternatives contains hundreds of individual projects. If constructed in the future, these projects could affect the region's built and natural environments. This EIS does not contain a regionwide analysis for all projects included in Transportation 2040. Future project-level environmental review will identify the specific localized effects on these environmental areas.

**Y-001-026**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006

levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Y-001-027**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**Y-001-028**
The FEIS contains an expanded discussion of environmental justice.

**Y-001-029**
The Environmental Justice chapter in the FEIS contains additional information about availability of transportation options.

**Y-001-030**
As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**Y-001-031**
Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and (4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.
Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

**Y-001-032**
Comment noted.

**Y-001-033**
Comment noted.

**Y-001-034**
Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel

benefits to all users of the transportation system.

- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**Y-001-035**
Thank you for your comment and recommendation.

**Y-001-036**
The evaluation criteria used to evaluate the Transportation 2040 alternatives include the measures you suggest: benefits per trip by user category (SOV, HOV, transit, light trucks, and medium/heavy trucks); emissions by pollutant type (CO2, CO, NOX, VOC, and PM2.5); and amount of impervious surface.

**Y-001-037**
Comment noted.

**Y-001-038**
The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**Y-001-039**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**Y-001-040**

Transportation 2040 recognizes the importance of freight mobility and provides more detail in the plan itself under Regional Freight Strategy.

**Y-001-041**

In 2005 PSRC published a Regional Airport Ground Access Plan to address current and long range issues related to airport ground access. This plan is being incorporated into Transportation 2040. In addition, PSRC published a Regional Air Cargo Strategy in 2006 to identify issues and needs related to the movement of air and ground cargo to the region's major airports.

**Y-001-042**

This project has been included in the Preferred Alternative.

**Y-001-043**

Comment noted.

**Y-001-044**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major

transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**Y-001-045**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is

expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Y-001-046**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**Y-001-047**

Thank you.

**Snohomish County**
**Executive Office**

**Aaron Reardon**
County Executive

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3000 Rockefeller Avenue
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July 13, 2009

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

**RE: Transportation 2040 Draft Environmental Impact Statement**

Y-002-001 Dear Mr. Drewel:

Thank you for the opportunity to comment on PSRC's Transportation 2040 Draft Environmental Impact Statement (DEIS) and it's various technical appendices. Snohomish County appreciates and supports the growth and transportation planning that PSRC is coordinating across the Central Puget Sound Region. This planning effort is clearly a challenging task that PSRC officials and staff have pursued with uncommon dedication. We believe that within the transportation alternatives, described and illustrated by the DEIS, is the makings of a Preferred Transportation Alternative that will serve Snohomish County and the region well towards the year 2040. In this letter are a set of policy-related and technical comments on the DEIS that declare our view related to the Preferred Alternative and guidance on how to evaluate these preferences relative to local and regional policy. Also, within Attachment A, you will find more detailed and technical comments related to the actual Draft EIS document.

Y-002-002 **Transportation Components of the Preferred Alternative for Snohomish County**

Snohomish County officials have surmised, like many others in the region, that the composition of the Preferred Alternative will be a "hybrid" of the six alternatives and will rely on the most
Y-002-003 effective and popular components considered under the DEIS. Snohomish County recommends that the following components be included and evaluated as part of the Preferred Alternative.

- **Intelligent Transportation Systems:** implement with a variety of techniques and tools on a region-wide basis in order to regulate traffic flow and improve travel times on principal arterials and state highways.
- Y-002-004 **Transportation Demand Management:** invest traditional funds and toll revenues on a county basis in demand management programs with the aim of reducing automobile use within urban centers and along transit emphasis corridors.



county.executive@snoco.org
www.snoco.org

**Y-002-001**

Thank you and your staff for the strong support you provided in the development of the Preferred Alternative. As you will find, it incorporates the major program areas you have recommended. We will continue to work with your staff in the refinements and upgrades to UrbanSim.

**Y-002-002**

Comment noted.

**Y-002-003**

Efficiency of the region's existing transportation system is identified as one of the highest
priorities in Transportation 2040. One way to improve system efficiency is with transportation
system management and operations (TSM&O) strategies. These strategies, also referred to as
intelligent transportation systems (ITS), are meant to optimize the efficiency and effectiveness of
the Metropolitan Transportation System by managing congestion, increasing reliability and
providing convenient connections for people and goods. The Preferred Alternative includes an aggressive program of advanced technology on arterials and freeways, including better signal coordination, active traffic management, new and expanded traveler information services, and transit-specific technologies to ensure on-time performance and provide customers with more complete, up-to-date travel information.

**Y-002-004**

Thank you for your comment. The Preferred Alternative includes TDM strategies targeted towards employers, commuters, and residents through a focus on urban centers, education, incentives, requirements, innovative partnerships, and policies that promote ridesharing and

Y-002-005 ▪ **Bicycle and Pedestrian Facilities and Programs:** finance and commit right-of-way space to complete a continuous network of walkways and bicycles within centers and along transit emphasis corridors.

Y-002-006 ▪ **Ferry System:** maintain existing ferry routes while managing vehicle demand, add passenger service and invest in multi-modal terminals and connections.

Y-002-007 ▪ **Transit Services and Facilities:**

1. designate and finance bus-related services and facilities within transit emphasis corridors;

Y-002-008 2. provide Community Transit Swift-Ride on SR-99, SR-525 and 128th Street SE/Cathcart Way, and bus-rapid-transit (BRT) on Airport Road, I-5, I-405, SR-522 (extended into Snohomish County) and SR-526;

Y-002-009 3. fully implement the services and facilities under Sound Move, Phase II;

Y-002-010 4. consider funding additional trains and/or negotiating more rail-time with the BNRR, if such service increases are needed to meet increased demand on Commuter Rail from Everett to Seattle;

Y-002-011 5. finance the preservation and purchase of right-of-way for an eventual Eastside Rail Commuter Corridor, while maintaining options for freight movement, nonmotorized transportation and recreation uses between the cities of Renton, Woodinville and Snohomish;

Y-002-012 6. continue to develop the extension of light-rail transit (LRT) as identified under Sound Move Phase II and its alignment within the I-5 corridor from Lynnwood to the Everett Multi-modal Station, and consider connecting to the Paine Field/Boeing Manufacturing Center with BRT along Airport Road;

Y-002-013 7. designate and design Growth and Transportation Efficiency Centers (GTEC) in the Everett, Lynnwood and Canyon Park Urban Centers; and

Y-002-014 8. implement projects and programs to improve transit connections to all terminals.

Y-002-015 ▪ **Highway and Arterial Investments, including studying a Tolling Option:**

1. finish constructing the nickel and TPA-funded (Transportation Partnership Account) state highway projects;

Y-002-016 2. complete HOV lanes on I-5 and I-405 for their entire length in Snohomish County;

Y-002-017 3. study the feasibility of adding HOT lanes (high occupancy toll) on the I-5, I-405, SR-525 and SR-526 freeways;

Y-002-018 4. add general-purpose lane capacity to the SR-9 Corridor north of 178th Street SE, to the SR-2 Corridor from the City of Everett across the trestle and bypassing the

Y-002-019 City of Monroe, to the SR-522 Corridor from City of Woodinville to Monroe; and

5. endeavor to finance other state highway, county and city projects identified under Attachment B.

Y-002-020 **Other Transportation Issues Deserving Attention as Part of the Preferred Alternative**

As PSRC undertakes development and evaluation of the Preferred Alternative, there are four other unaddressed issues that deserve some attention.



efficient land-use. These strategies were developed by an interagency group of stakeholders and recommended by PSRC's Transportation Demand Management Steering Committee. While the plan contains specific programs and projects, it also supports demand management efforts from both the public and private sectors as they directly support regional environmental and congestion relief goals.

**Y-002-005**

Comment noted. The Preferred Alternative expands bike and walk infrastructure to fully connect the bicycle network to, within, and between regional centers (3 mile access) and provide full sidewalks and pedestrian networks in all cities (1 mile access). It includes more than 580 miles of additional off-road regional trails and focuses bike and walk improvements in regional growth centers, along facilities with one terminus in a center or within ¾ mile of transit passenger facilities, and in locations that overcome a barrier (such as crossing I-5) or provide a missing link. It would complete approximately 350 miles of the envisioned regional off-road trails. A key goal is to improve pedestrian and cyclist access to transit with improved terminal access, terminal facilities, and bike racks on transit vehicles. The plan would also add online regional nonmotor trip planning services, fund education/outreach programs, and make roadside investments to improve bicycle and pedestrian safety. The plan will promulgate both a "no net loss" policy to ensure that construction or modification of other transportation facilities does not diminish the supply or connectivity of the bicycle and pedestrian networks and a new way of thinking about the use of public right-of-way that gives full attention to the needs of all users. Finally, the plan proposes to explore the concept of a regional bike sharing program.

**Y-002-006**

The Preferred Alternative includes a balance of passenger and auto ferry investments across Puget Sound. The plan recognizes the importance of preserving and maintaining the current auto ferry routes and services,

Y-002-020

- Explore substitutes for poor performing revenue and funding sources, such as the federal highway trust fund and state transportation improvement account (TIB), to ensure state and local governments and operating agencies can acquire monies needed for transportation services and facilities that will serve the RGS towards 2040.

Y-002-021

- Freight mobility is an important issue as it directly influences economic viability of our aerospace cluster centered at Paine Field and major urban centers, but can be particularly vital to smaller outlying towns and the agricultural areas.

Y-002-022

- Jobs/Housing balance is an important regional objective that directly impacts transportation demand and other policy issues. While the DEIS does briefly speak to this topic, the potential impacts on jobs/housing balance should be a major factor in developing and evaluating a Preferred Alternative in the FEIS

Y-002-023

- A Preferred Alternative under Transportation 2040 should acknowledge the opportunity for an FCC allowed under the Washington State growth management act, and anticipate that regional transportation infrastructure would be impacted depending on an FCC's size and location.

Y-002-024

**Preferred Alternative Must Support Growth in County's Unincorporated Southwest Urban Growth Area (SW UGA)**

The Transportation 2040 DEIS analysis of population and employment growth places unincorporated Urban Growth Areas (UGAs) into the category of "outlying urban" and states a preference for alternatives which show less growth than the share recommended by the Vision 2040 Regional Growth Strategy (RGS) for this category. Consistent with the concerns voiced in my comment letter of July 31, 2006, and also in Snohomish County Tomorrow's comment letter of July 26, 2006, regarding the PSRC Vision 2020 Update DEIS, this is problematic in two respects for Snohomish County:

- Our unincorporated SW UGA is a large centrally located area stretching along transit corridors targeted for high-density development in the future. Metropolitan, Core, and Larger cities surround the area. Municipal Urban Growth Areas (MUGAs) for cities in the SW UGA have been designated, indicating areas within the unincorporated SW UGA that may be subject to future annexation. Right now there are active proposals to annex 9,986 acres, over one-third of the unincorporated SW UGA. Clearly, the area isn't an outlying area, in contrast to other unincorporated UGAs in the region. In addition, there is a regional Manufacturing/Industrial Center located in the SW UGA. Vision 2040 RGS calls for focusing growth in regional centers. The Preferred Alternative for Transportation 2040 should support growth, not discourage growth, in the unincorporated SW UGA.

- The Vision 2040 RGS adopted in 2008 calls for 21% of the region's population growth through 2040 to be located in the unincorporated UGA regional geography. There is no policy direction provided by Vision 2040 that supports a preference for less than the adopted share of growth in the unincorporated UGA. This growth preference, stated in



and will seek to develop a sustainable financial plan to close the current funding gap identified in the WSF Long Range Plan for the state ferry system. Transportation 2040 also builds on the findings and recommendations of the 2008 Regional Passenger Only Ferry Study in two ways: (1) the plan would maintain and preserve the existing passenger ferry service operated by Kitsap Transit (service between Bremerton and Port Orchard and Annapolis) and King County Ferry District (service between downtown Seattle and West Seattle and Vashon Island); and (2) provide expanded passenger ferries across Puget Sound and Lake Washington.

**Y-002-007**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority the development of designated centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth. The updated Transportation 2040 plan will increase local transit service by approximately 90% while achieving opera-tional efficiencies to reduce long-run costs, and emphasize additional all-day service with high frequencies (generally every 15 minutes). The plan will also include the completion of transit supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

Y-002-024

the DEIS, would be a significant shift away from actual policy direction provided by Vision 2040. The environmental analysis for Transportation 2040 isn't the appropriate forum for introducing a new policy position for the RGS. Also, there is also no justification offered for aggregating the six regional geographies of Vision 2040 into the three "super-geographies" used in the DEIS analysis.

Y-002-025

**Formulating a Preferred Alternative that serves the Regional Growth Strategy**

Snohomish County recommends that PSRC model and evaluate the Preferred Transportation 2040 Alternative in the context of static population and employment forecasts consistent with the RGS, and not under the dynamic and integrated-modeling procedure that alters growth allocations. PSRC acknowledges, within the DEIS, that the integrated-modeling of land use and transportation (i.e., UrbanSim) didn't arrive at significant shifts in population and employment at the regional scale; particularly as related to the transportation service and facility alternatives. Snohomish County's own spatial analysis, of population and employment allocations construed by PSRC's integrated-modeling, actually reveals significant shifts in growth among traffic analysis zones (TAZ); however, these shifts aren't always consistent with the reaction expected when changes in transportation services and facilities are introduced. Our transportation planners have concerns regarding the current integrated-modeling effort and the resulting evaluation of alternatives presented within the DEIS. These concerns are detailed within Attachment A, including a technical review of the alternatives evaluation.

We have two key observations about the forecasts, common to each of the alternatives, that don't seem plausible and may affect the ability to accurately model impacts for regional projects within Snohomish County:

- There isn't as much growth going into regional growth centers as Vision 2040 would anticipate, particularly regional growth centers in the core cities in Snohomish County, where there is almost no growth at all.
- Residential growth in the Snohomish County unincorporated Southwest Urban Growth Area is spread evenly, without a pattern of dense growth in subregional centers and along transit corridors that the Snohomish County Comprehensive Plan Future Land Use Map anticipates in the future.

County staff review indicates that more work is needed to ensure that UrbanSim produces a reliable 2040 population and employment distribution that is proposed for the plan adoption next spring. Additional work may be required beyond the Transportation 2040 project in order to ensure that UrbanSim is able to produce forecast products required for local plan updates in the future. Snohomish County would be far more comfortable with static land use inputs to transportation modeling and evaluation of the RGS under the current Transportation 2040 effort. This approach will better tell us what local growth management actions we need to pursue in order to accommodate regional allocations of population and employment.



**Y-002-008**

This project has been included in the Preferred Alternative.

**Y-002-009**

Sound Move and ST2, Sound Transit's currently funded programs, are included in Transportation 2040.

**Y-002-010**

Comment noted.

**Y-002-011**

This project has been included in the Preferred Alternative.

**Y-002-012**

LRT to Everett is included in the Preferred Alternative. BRT along Airport Road is included in the Preferred Alternative.

**Y-002-013**

Comment noted.

**Y-002-014**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**Y-002-015**

Y-002-026 **Components and Programs Supporting County Climate Change Mitigation Goals**

Snohomish County is committed to policies, services and facilities that aid efforts to reduce greenhouse gases and mitigate the effects of climate change on our planet. The County commends PSRC's similar stance in formulating the DEIS transportation alternatives and evaluating their potential, beneficial impacts on our region's air quality and climate; however, we could not discern an analysis of the alternatives relative to the statewide greenhouse gas reduction goals. This analysis should occur as part of the evaluation of the Preferred Alternative under the FEIS.

Y-002-027 The Transportation 2040 components we advocate and believe will have the greatest potential to reduce carbon gas emissions and negative climate impacts are: 1) intelligent transportation systems, 2) transportation demand management, 3) the extension of light-rail from its terminus in King County to the Everett Multi-modal Station, and 4) the establishment of transit emphasis corridors with compact, mixed-use development serving urban growth centers within Snohomish

Y-002-028 County. We believe PSRC should also continue to advocate and support the funding and implementation of these programs, facilities and policies. We look forward to partnering with PSRC in this regard.

Y-002-029 **Support for Housing Affordability, Human Health and Disadvantaged Groups**

The Preferred Alternative should support housing affordability. Two specific housing choice impacts implied by Vision 2040 are "affordability" and "fair and equal access." The interaction with transportation costs inevitably affects both affordability and fair choice of locations for housing. Higher transportation costs will limit the mobility of lower-income households, consequently reducing their residential location choices. Higher-income households, on the other hand, attain a greater choice of residential location. Because housing and transportation costs are related, the final environmental impact analysis of the Preferred Alternative should consider the spatial differences of transportation and housing costs in combination.

The PSRC's multi-county planning policies have a number of commendable statements that promote and pursue beneficial transportation impacts for all residents living within the Central Puget Sound Region. Snohomish County believes the impact analysis and evaluation provided for housing affordability, human health and transportation services for disadvantaged groups should be strengthened. Specifically, we believe it would be helpful to have a more rigorous documentation within a Final EIS of potential social and health impacts and any mitigation needed to support the Preferred Alternative.

Itemizing some of the potential benefits that can be achieved relative to affordable housing, human health and disadvantaged groups would help to justify adoption and implementation of the Preferred Alternative. Additional commentary in this regard is provided by Attachment A.

Y-002-030 **Local Agency Involvement in the Development of the Preferred Alternative is Crucial**

It is critically important, as PSRC leads the development and evaluation of a Preferred Alternative, that local agencies be involved and consulted on the major technical and policy



All Nickel and TPA investments are in the Transportation 2040 Baseline, and as such are in the Preferred Alternative.

**Y-002-016**

This project has been included in the Preferred Alternative.

**Y-002-017**

I-5 and I-405 HOT lanes are included in the mid-term tolling strategy in the plan. The proposal for HOT lanes on SR 525 and SR 526 can be included in the concepts list which, while not formally part of the plan, indicates emerging issues or ideas regional stakeholders believe deserve attention.

**Y-002-018**

As mentioned in the response to comment Y-002-003, the Preferred Alternative was designed through lengthy consultation with many stakeholders. Improvements to SR-9, SR-2, and SR-522 were discussed with representatives from WSDOT, Snohomish County, and various municipalities.

The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested.

**Y-002-019**

As noted in the response to comment Y-002-003, the Preferred Alternative was designed through lengthy consultation with many stakeholders. These stakeholders considered the projects listed in Attachment B and considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal

decisions. PSRC's technical and staff committees will perform invaluable work as we move toward a decision on the Preferred Alternative. Intermediate decisions leading to action on the Preferred Alternative must be preceded by timely outreach and participation by local staff experts. Policy decisions by PSRC elected official committees should not occur in advance of the needed input and recommendations that are provided by local agencies.

Y-002-031 Snohomish County officials and staff look forward to working with the PSRC within the planning and decision making process that will define and evaluate a Preferred Transportation Alternative. We appreciate your thoughtful and continued leadership in our efforts to adopt an effective transportation plan that will serve the Central Puget Sound Region towards the year 2040. If you have any questions or need additional information, please feel free to contact me at your convenience.

Sincerely,



Aaron Reardon
Snohomish County Executive



maturity, proposal  support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested.

**Y-002-020**

Our federal mandates require PSRC to develop a financially feasible transportation plan. We have also received direction from the public and our boards expressing a desire for a sustainable funding strategy to support the plan. The constrained plan contains sufficient sustainable revenue sources for its implementation. The financial strategy relies on continued and increased revenues from traditional sources (such as gas and sales tax) in the short term; implementation of tolling on major state highway projects and HOT (high occupancy toll) lanes in the medium term; and tolling the entire freeway system in the long term. In addition, the financial strategy includes full system tolls (on all highways and arterials) as a way to fund all projects and programs contained in the unprogrammed plan.

**Y-002-021**

Freight mobility is an important concern in the development of Transportation 2040. For more information on freight mobility in the central Puget Sound region please refer to the Regional Freight Strategy (Appendix J) in Transportation the 2040 plan document.

**Y-002-022**

Comment noted.

**Y-002-023**

It is beyond the scope of this effort to anticipate the development of fully contained communities at this time.

## ATTACHMENT A

### TECHNICAL REVIEW OF PSRC's TRANSPORTATION 2040 DRAFT EIS

Y-002-032 Included here are Snohomish County staff comments that address specific technical contents of the PSRC Draft Environmental Impact Statement (DEIS) for the Transportation 2040 Regional Transportation Plan. It is Snohomish County's expectation that our policy-review of the DEIS and the staff technical comments will guide and improve preparation of a Final EIS and provide valuable input to the decision making process; this leading to adoption and implementation of a Preferred Transportation Alternative. Snohomish County looks forward to working in partnership with PSRC, over the next few months, to develop and evaluate the Preferred Alternative.

**Chapter 1: Executive Summary**

Y-002-033 General Questions – Please consider the following questions when preparing the FEIS.

- Why does it seem that the price of fuel/energy is not a factor in the travel projections?

Y-002-034

- Was advancement in automotive fuel technology (less emission) taken into consideration when developing alternatives or were the alternatives based on current automobile emissions?

Y-002-035

- Was the impact of congestion on freight truck traffic considered, particularly if more peak truck traffic is shifted to night hours under the heavy tolling alternatives?

Y-002-036 Page 6, Question 6, 3rd Bullet: If I understand the statements – the State does not require the plan to be financially constrained, but the Feds do require it? Is this right?

Y-002-037 Page 7, Exhibit 1.3 - While this exhibit does show consistent elements for the plan alternatives, it is not very clear in showing investments (as labeled), and especially not the smaller segments such as TDM or passenger-only ferries. One has to look very closely to determine which alternative is best for which entity, i.e., Alt. 5 looks best for Sound Transit, Alt. 2 looks best for counties and state highways, etc. Also, without a scale, it is difficult to see the difference in investment dollars for each entity.

Y-002-038 Page 12, Exhibit 1-4 - This exhibit does not seem to indicate which elements of the alternative are most useful/beneficial – it is taken as a whole, and therefore, impossible to determine the best elements of the best alternatives.

A-1

**Y-002-024**

The assumptions for unincorporated areas from VISION 2040 are standardized based on regional geography across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

**Y-002-025**

Thank you for the comment. PSRC appreciates that UrbanSim is a new model and that this will potentially cause some anxiety about its use in the current planning process. However, PSRC feels that the many advantages of using an integrated land use-transportation modeling approach outweight the potential anxiety it may engender. These advantages include being able to better understand the potential land use consequences of different transportation investments and policies; a more realistic representation of market factors than was possible under the previous land use modeling framework; and an explicit representation of policy as expressed in the adopted growth plan for our region, VISION 2040. Result from the use of a model with these advanced features cannot be expected to conform to previous land use modeling exercises, and may not conform to expectations that are derived from a policy-driven exercise. It is not the intent of the current process to predict population and employment locations at a small area geography, but rather to allow the land use model to react to the various transportation plan alternatives. Much more work will occur outside of the current transportation planning process to refine the land use model and to build familiarity and understanding among the its many potential users.

**Y-002-026**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the



Y-002-039 Page 13
- Total daily person trips (second bullet)
- Total daily person trips difference is less than ½% between alternatives
+ No reduction in trips even with transit oriented alternative.

Y-002-040
- Total vehicles owned in the year 2040 (third bullet)
- Total vehicles owned difference is less than ½% between alternatives
+ Number of vehicles is not different with tolls and other travel modes?

Y-002-041 Page 14
- Average vehicle occupancy (second bullet)
- Average vehicle occupancy would stay the same in all alternatives
+ Even with tolls and other deterrents the occupancy isn't changing?

Y-002-043
- Average Work Trip Length (third bullet)
- Not much difference between the alternatives
+ Average work trip lengths do not change among the alternatives?

Y-002-042
- Average non-work trip time (fifth bullet)
- Remains constant / slightly decline across all alternatives
+ The trip times remain the same whether car or transit oriented

Y-002-044
- Average vehicle travel speeds on region arterials (sixth bullet)
- Differences between alternatives are not significant
+ Shouldn't the arterial speeds be faster with alternatives 4 & 5?

Y-002-045 Page 15
- Average daily vehicle trips (Exhibit 1-6)
- Baseline is very close to alternatives 1-5 (Change of 0-3%)
+ HOT lanes and transit does not reduce average daily vehicle trips.

Y-002-046 Page 20
- Ferry Drive-On (Exhibit 1-12)
- Baseline is within 5% of Alternatives 1-4.
+ Why are ferry drive-ons almost double with alternative 5?

Y-002-047 Page 24
- CO2 Buildings (Exhibit 1-17)
- Small variance between Baseline and all the alternatives
+ Shouldn't increased density reduce building CO2?

Y-002-048 Page 24
- PM 2.5 (Exhibit 1-17)
- Very small differences between baseline and the alternatives
+ Shouldn't there be more differences between alternatives?

Chapter 3: Plan Alternatives

A-2

transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Y-002-027**
Comment noted.

**Y-002-028**
Thank you.

Y-002-049 Page 3-8, Exhibit 3-3 – For the Program Investments exhibit, what is the relative scale (dollars?)? Based on one interpretation, it could be assumed that the primary distinction between the alternatives is Sound Transit investments and State Highway investments. Most everything else is either the same or minor in scale.

Y-002-050 Page 3-18, Paragraph 3: Alternative 1 - "Toll rates would be set to maximize system efficiency, and most revenues would be spent to operate the HOT network, with the remainder spent on investments in the tolled corridors."

- First part: Higher toll rates reduce cars in HOT lane, so the HOT lanes run faster and the other lanes slower – is this maximizing efficiency?
- Most revenues part: How expensive is it to "operate" the HOT network? Or will you be collecting lower rates?
- "Revenue and Costs" chart does not show toll revenue for Alternate 1.
- Alternative 1 Strategic Expansion (last sentence)
  - Tolling both directions on SR 520
  + Tolling could occur on I-90 Bridge too?

Y-002-051 Page 3-23, Paragraph 2 - "Alternative 2 would rely on significantly more traditional funding (gas tax, etc.), as well as new revenues from implementing a two-lane HOT lane network on major highways." "Revenue and Costs" chart on "Release and Public Comment Period" handout does not show "Estimated Toll Revenue" (green) for Alt. 2.

Given the amount of new capacity investments, this alternative would likely have the highest need for generating new revenue." What is the new revenue? Not shown on chart.

Y-002-052 Page 3-23, Paragraph 3 - Alternative 3: Toll revenues are used for highway projects (lane additions, ramps, interchanges), and traditional revenues are used for "substantial bus service investments" and non-motorized "new off-road trail infrastructure." This should be evaluated to show fairness to the citizens – gas tax going for non-motorized travelers and transit only may feel like the driver is paying twice for the same service, traveling the roads.

Y-002-053 Page 3-26, Paragraph 3 - "It is important to note that Alternative 3 proposes to adhere to a traditional tolling philosophy that targets the use of toll revenue to the facility where it is collected. The collected toll funds would not be spent on transit or other projects, programs, or system improvements." This would seem to be a popular concept in the Puget Sound Region and also a selling point for this Alternative. Since the tolling is restricted to high use areas, it would likely not create the animosity toward spending some of traditional sources of revenue on investments other than roads. In addition:

- Alternative 3 Demand Management (third to last sentence)
- User fee charged at Park-And-Ride lots

A-3

**Y-002-029**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

Human Health:

Please refer to Appendix D: Policy Analysis and Evaluation Criteria Report. The evaluation of the Transportation 2040 alternatives included this policy focus: The region's built and natural environments should promote health. The policy focus sought to answer the following questions, as they related to guiding transportation investments in Transportation 2040:

Q. How do land use patterns, environmental factors, transportation systems, and other infrastructure impact health?

Q. To what degree does the system promote environmental health (minimize emissions/pollutants and carcinogens); active living and wellness (increased opportunities for nonmotorized transportation); and safety?

Disadvantaged Groups:

As shown in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found

Y-002-053 + This could encourage people to drive and be hard to start with public.

Y-002-054 Page 3-30, Paragraph 3 - Alternative 4: Adds ITS technology and eliminates congestion at bottlenecks: Will the congestion be eliminated at bottlenecks or chokepoints by spot improvements, or are they system improvements?

Y-002-055 Page 3-31, Paragraph 2 - Alternative 4: Uses tolls for both highway and transit. This may be a controversial concept to the public.

Y-002-056 Page 3-35, Paragraph 1 - "the system would offer commuters safer and more efficient travel alternatives." I think at some point "safer and more efficient" should be explained.

Y-002-057 Page 3-35, Paragraph 2 - "Alternative 5 would replace existing traditional funding sources (gas tax, etc.) with user-based fees and place tolls on all highways and arterials." Is there a complementary component to this plan that aids those who would find it unaffordable to get to work?

Y-002-058 Page 3-39, Exhibit 3-16 - The results provided by PSRC's UrbanSim integrated land use/ transportation model, at the traffic analysis (TAZ) zone or corridor scale, is at best inconsistent and brings into question the reliability of the modeling to allow an accurate comparison and evaluation of the alternatives. The declaration of "no significant change" for housing population, employment at the regional scale may be a relatively accurate statement; however, this observation doesn't hold true when examining model results at the TAZ scale or urban center scale. There is quite a bit of variation at the TAZ scale that translates into urban centers and expected growth areas exhibiting significant shifts of population and employment. Some of the drops and increases don't make sense given what would be expected to happen to population and employment under the different alternatives. The evaluation criteria analysis results imply a level of accuracy that may not be warranted (e.g., travel time savings, vehicle-miles-of-travel).

Once the Preferred Alternative is negotiated, the evaluation of its impacts with an integrated model may need to be reconsidered and the use of static land use inputs required.

## Chapter 4: Transportation

Y-002-059 Page 4-5, Exhibit 4.1 – The MTS map doesn't seem to include 134th Place SE/Cathcart Way (a County principal arterial) as part of the MTS network of roadways. This arterial needs to be added consistent with the recent Snohomish County federal-aid system map submittal.

Y-002-060 Page 4-7, Exhibit 4-3 and Exhibit 4-4 - Although the focus of the Executive Summary (ES) is data reflecting the alternatives for the region as a whole, Exhibits 4-3 and 4-4 are good starting points for those reviewing it for their constituents, and might fit into telling the story in the Executive Summary, along with some of the text around it.

A-4

in Appendix E: Technical Description of the Modeling Framework.

**Y-002-030**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007.

The PSRC received more than 1200 comment letters and more than 3700 individual comments during the DEIS comment period, all of which have been considered and have been responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the preferred alternative was developed.

**Y-002-031**

Thank you.

**Y-002-032**

Thank you.

**Y-002-033**

The price of fuel is included in the modeling analysis as a vehicle operating cost. The PSRC has a forecast of vehicle operating costs and has used the mid range of the forecast as the default value for vehicle operating costs in the EIS analysis. PSRC has tested the Baseline with higher and lower vehicle operating cost assumptions as part of model validation. Vehicle operating costs were kept constant across alternatives to maintain comparability for the testing of transportation policies included in each alternative.

Y-002-061 | Page 4-20, Paragraph 2 – "There are approximately 3,500 traffic signals within the region that are operated and owned by local jurisdictions to manage the arterial system. Many of these signals are operated from ten existing traffic management centers. In addition to the ten existing centers, five new traffic management centers are planned." Gives context to management systems (for ES).

Y-002-062 | Page 4-26, Exhibit 4-5 – Add SR-527 to West Snohomish County congested travel corridors list for consistency with Exhibit 4-7.

Y-002-063 | Page 4-29
- Most Congested Facilities (Exhibit 4-7).
- Most congested facilities map might need updating.
+ Does 164th St SW & 128th St SW in Snohomish County meet standards?

Y-002-064 | Page 4-41 – Thanks for the insert that clarifies the distinction between the MTP and RTP; however, PSRC ought to consider dropping the MTP moniker and just use RTP.

Y-002-065 | Page 4-47, Paragraph 1 - compared to today's conditions, 2040 will have similar traffic characteristics:
- Vehicle occupancies, trip lengths, & travel times
+ Vehicle occupancies similar even with tolls and incentives?
+ Vehicle Trip Lengths similar even with tolls?
+ Travel times would be similar even with flexible tolling?

Y-002-066 | Page 4-48, Paragraph 5 - "Average work trip times (in minutes) would increase for all alternatives, except Alternative 5, compared to the base year 2006 trip times." Projected growth will outstrip all investments except the most drastic. This is a bold statement wanting some numbers/percentages attached indicating how much each alternative increases – is it a few minutes, or a lot? Looking at Exhibit 4-20, line "Work trips," is it true? It indicates 2006 work trip time of 36 minutes and all alternatives are higher, ranging from 38 to 42 minutes, with Alternative 5 shown as 42 minutes. Average daily speed for Alt. 5 on freeways looks to be the best.

Y-002-067 | Page 4-51, Exhibit 4-20 – The lack of significant variation in daily vehicle trips among the alternatives shown by the Analysis Summary is disturbing. VMT seems to be going down where tolling is employed in a significant way. The TAZ and Urban Centers' population and employment forecasts, produced by the Urbanism model, may be overly sensitive to tolling, and thereby creating suspect results in its reallocation of growth. Tolling as applied within the integrated land use/transportation model may be over-reacting and lowering the employment in expected growth centers. This is difficult to pin-down without more practical research; however, this possibility should be explored before the same methodology is used to evaluate the Preferred Alternative.



**Y-002-034**

The analysis started with vehicle fleet assumptions that reflected the current adopted CAFE standards. PSRC is working towards a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving towards a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**Y-002-035**

The EIS reports performance information about each alternative. This information is contained in Appendix D. Freight performance, including average speeds that are influenced by vehicle loadings on the road network, is specifically considered and evaluated.

**Y-002-036**

No. The reference in the DEIS Executive Summary is to WAC 197-11-440(8), which allows lead agencies to include non-environmental analysis in an EIS. This reference does not relate to the state or federal requirements on financial constraint.

**Y-002-037**

Exhibit 1.3 summarizes information available in more detail in Appendix A, which includes itemized lists of the major investments and programs in each alternative, and section 3.2 of Appendix D, which covers the financial resources necessary to implement those investments.

**Y-002-038**

The plan analysis examined a broad array of potential transportation actions combined in different ways into the alternatives tested. Given

**Y-002-068** Page 4-54, Exhibit 4-22 – Some of the data results displayed are suspect. For example, it is somewhat worrisome that the average work trip length is 13 miles for all alternatives, except it is 12 miles for alternative 4, but the average work trip time ranges from 38 to 42 minutes. One explanation is that trips are in the same pattern, but in more congested corridors. But this doesn't make sense given the expected benefits from some alternatives. The lack of variation in data values among the alternatives is disturbing. It is hard to fathom the interplay between roadway improvements, transit service expansions, tolling and land use changes induced by transportation supply and costs. Again, this inconsistency needs some review before employing the same methodology to evaluate the Preferred Alternative.

**Y-002-069** Page 4-55, Paragraph 4 – The example, under the first bullet of a sizeable decrease in VMT of 16 percent for Alternative 5 relative to the 2006 transportation system VMT seems reasonable; however, the variation between 2040 alternatives may actually be more attributable to a reallocation of population and employment growth by the integrated model. An examination of TAZ-level employment allocations towards 2040 by transportation alternative shows some reductions in growth centers that don't always make sense across the alternatives. The region-wide numbers being analyzed may mask some poor performance of an alternative in a particular corridor based on model runs.

**Y-002-070** Page 4-56, Bullet 5
- Total delay on freeways and arterials will increase for all alternatives
+ How can the travel times be similar to today with an increase in delays?

**Y-002-071** Page 4-57, Exhibit 4-23
- Baseline VMT is slightly worse than alternative 4 and better than 1-3
+ Baseline would seem to be a way at keeping VMT low.

**Y-002-072** Page 4-58
- Vehicle Speeds (second bullet)
- Differences in speeds by time of day is not significant in alternatives
+ If the speeds are not much different, they why change from baseline?

**Y-002-073** Page 4-59, Exhibit 4-24 – Other than for average-daily freeways speeds, the improvement of average speeds on arterials and freeways is unimpressive. I suspect some insensitivity with respect to the traffic model,

**Y-002-074** Page 4-60, Middle Paragraph and Exhibit 4-25 on 4-61
- Non-work and total trips SOV share are constant under baseline and alts
+ This implies that tolls may not be enough of a deterrent to driving that a major shift to transit will occur

**Y-002-075** Pg 4-60, Bullet 3
- Work trip carpools lose mode share in baseline and alternatives 1-3
+ Implies that even with HOT lanes and congestion, people won't carpool

A-6

that each alternative contains a mix of many different actions the analysis results apply to the alternative as a whole rather than to any individual action therein. Staff stated this clearly in many meetings and outreach efforts.

**Y-002-039**
Comment noted.

**Y-002-040**
Comment noted.

**Y-002-041**
Comment noted.

**Y-002-042**
Thank you for the comment.

**Y-002-043**
Thank you for the comment.

**Y-002-044**
Thank you for the comment.

**Y-002-045**
Thank you for the comment.

**Y-002-046**
Under Alternative 5 ferries are an attractive alternative to driving around the Sound when tolls are in place on both the highways and the arterial streets.

Y-002-076 Page 4-61, Exhibit 4-25 – Taken on face-value, the statistics presented by Exhibit 4-25 on mode share performance could be viewed as depressing. On a regional basis and for all trips, the major expenditure on public transportation towards 2040 only increases transit use from a 2.9% in 2006 to a share that ranges from 4.2% to 5.2% depending on the alternative. This regional-scale analysis is not of much value. Mode share performance has to be analyzed within transit-emphasis corridors and in association with urban centers in order to show realistic comparisons. Corridor level of analysis for transit should be part of the evaluation of the Preferred Alternative. Importantly, the lack of significant variation in mode performance across alternatives makes the modeling results suspect or brings into question the value of the policies and programs being modeled.

Y-002-077 Page 4-62, Bullet 3
- Alternative 5 would provide an additional 66 miles of light rail
+ None of the additional 66 miles of light rail is in Snohomish County.

Y-002-078 Page 4-64, Exhibit 4-26 – The increase in transit use from 2006 to 2040 implied by all the alternatives is impressive. However, the variability between the alternatives in 2040, except for alternative 5, would appear to be disappointing. For example, despite major investments in public transit and HOT toll lanes under alternative 2, it is the lowest in terms of transit trips for alternatives 1-5. It would appear that the increasing use of tolling imposed under alternatives 3, 4 and 5 has most of the impact in terms of shifting person trips to transit. Under alternative 5 is it the inclusion of extensive transit-related services and facilities or the inclusion of areawide, dynamic tolling that's achieving the major shift to transit. There is concern on our part at Snohomish County that the toll modeling is too sensitive and may be overstating impedance to driving automobiles and causing an unrealistic shift to transit. Conversely, mode shifts due to planned transit services and facilities may be understated.

Y-002-079 Page 4-73, Paragraph 3
- Walk and bike trips will increase between 92-137%
+ With the area topography is it realistic to expect a double?

Y-002-080 Page 4-74, Exhibit 4-33 – It is hard to believe that alternative 2 would precipitate a drop in percentage walking and bicycle trips, when compared to the baseline, given its mix of service and facility initiatives, while alternative 5. What makes PSRC think this is realistic?

Y-002-081 Page 4-82, Paragraph 3
- Transportation provided by schools are outside of the DEIS scope.
+ School buses are a large contributor of PM 2.5 and particulate matter.

Y-002-082 Page 4-85, Paragraph 1
- Mobility Benefits and costs are measured as monetary value.
+ Reliability costs may not be worth the savings to people.

A-7

**Y-002-047**

The land use effects on net density appear to be small across the alternatives, and the total building square footage by building type remains similar across the alternatives.

**Y-002-048**

The range of results for PM2.5 compared to the Baseline is of a similar scale as the other pollutants, between approximately 1-6 percent.

**Y-002-049**

The basis is constant dollars, and differences across alternatives by different programs of investments can be seen in greater detail in Appendix D.

**Y-002-050**

High-occupancy toll lane rates were set to seek the point where additional gains to HOT lane users (from the next incremental increase in toll rates) would exactly be offset by losses to non-HOT lane users. This is the definition of efficiency that has been applied. Operation of the HOT lanes actually requires some investments in physical infrastructure in order to complete missing sections of HOT lane continuity.

**Y-002-051**

Additional financial detail is contained in Appendix D.

**Y-002-052**

Comment noted.

**Y-002-053**

Comment noted.

Y-002-082 + Should display Baseline numbers in Exhibit 4-35 too.

Y-002-083 Page 4-86, Exhibit 4-36
- Mobility Benefits for SOV, HOV, Transit, and Commercial
+ Why are Transit benefits not measured for 3 of the 4 comparisons?
+ Should display Baseline numbers in Exhibit 4-36.
+ HOV reliability benefits should increase in Alt 2 due to 2 lanes.

Y-002-084 Page 4-87, Bar chart
- Annual Mobility Benefits Relative to the 2040 baseline).
+ Should display Baseline numbers.

Y-002-085 Page 4-88, Exhibit 4-37
- Annual Accident Reduction Benefits
+ Why is Alternative 4 equal to the baseline accident costs?
+ Should display baseline numbers in Exhibit 4-37
+ If not confidential, individual accident costs should be stated.

Y-002-086 Page 4-91, Exhibit 4-39
- Annual user benefits by regional sub-area
+ Should display baseline numbers in Exhibit 4-39

Y-002-087 Page 4-95, Exhibit 4-42 and Bar Chart
- Benefits to Environmental Justice Populations
+ Hard to believe a fully tolled roadway system is the most beneficial
+ Should display the baseline in chart and exhibit

Y-002-088 Page 4-96, Paragraph 2
- It appears that all six alternatives would produce benefits to environmental justice
+ Exactly why the baseline numbers should be displayed in comparison.

Y-002-089 Chapter 5: Land Use, Population, Employment and Housing

Page 5.2, Paragraph 3 – the paragraph in question states:

*"The Regional Growth Strategy plans for an increased role in accommodating growth for metropolitan cities and core cities, as well as larger cities. At the same time, the Regional Growth Strategy anticipates a decreased role for smaller cities, unincorporated urban growth areas (UGAs), and rural areas. Exhibit 5-3 depicts a conceptual map of potential future population and employment densities."*



**Y-002-054**

ITS would for the most part applied at a system or corridor level.

**Y-002-055**

Comment noted.

**Y-002-056**

The qualitative judgments of safer and more efficient follow from the quantitative analysis of accident risk costs and user benefits that are itemized in Appendix D: Policy Analysis and Evaluation Criteria Report.

**Y-002-057**

The EIS does not include evaluation of specific programs that would provide such aid. Such programs might be implemented but are beyond the scope of this plan EIS.

**Y-002-058**

Thank you for the comment. The findings of no significant change relate to specific measures included in Appendix D: Policy Analysis and Evaluation Criteria. These measures include measures of population and employment at the Regional Growth Strategy geography and for urban centers. PSRC believes this conclusion is accurate given those measures. It is true that at the individual TAZ level there are changes that represent a more significant share of each TAZ population or employment. PSRC believes this also is a reasonable result as individual development projects would indeed change the nature of individual TAZ population or employment. It is not clear what basis is being suggested to be used in determining the reasonableness of the land use results given the specific nature of the investments and policies tested in the alternatives.

PSRC has reviewed results and does not find specific reasons why the

**Y-002-089** Importantly, this statement is based on the policy direction established for the Vision 2040 Regional Growth Strategy when it was originally developed for adoption in 2008. The RGS clearly established an increased or decreased role for accommodating growth for the different regional geographies as described above, but solely in relation to pre-Vision 2040 adopted growth targets for the year 2025 for these same areas. This Vision 2040 policy direction cannot be construed as implying a policy basis for the stated preference (shown on pages 5-13 and 5-14) for DEIS alternatives that result in more 2000-2040 growth going to "urban core" areas and less growth to "outlying urban"/"rural" areas than the baseline forecast produced.

**Y-002-090** Page 5-7, Paragraph 2: Alternative Population and Employment Forecasts - Local staff should have the opportunity to review the residential, commercial and industrial development forecasts before they are used to analyze the preferred alternative: The DEIS found that there wasn't an appreciable difference in population and employment distributions at the regional geography level across the baseline and five alternatives. This was based on the results of the new integrated modeling system PSRC implemented for Transportation 2040. Snohomish County staff reviewed the local-level forecasts (available by request from PSRC) after they were used for the DEIS analysis. Based on that local-level review, staff feel the forecasts may be adequate for the purposes of measuring regional environmental impacts, but aren't confident in the ability to produce localized and corridor forecasts for planning purposes. County staff expects to have the opportunity to review the land use forecasts for the preferred alternative before the analysis is completed.

**Y-002-091** Please explain more thoroughly, within the FEIS, the minimal difference between alternatives - The DEIS analysis suggests that the different transportation alternatives have very little impact on the distribution of population (and housing) and employment throughout the region. Based on the modeling output, the difference between the high and low alternatives in terms of population distribution for each of the regional geographies is as follows:

| | | | |
|---|---|---|---|
| Metro cities – | 1.3% of baseline total | | |
| Core cities – | 1.5% " | " | " |
| Larger cities - | 0.3% " | " | " |
| Unincorporated UGA - | 0.4% " | " | " |
| Rural - | 0.2% " | " | " |

For employment distribution, the gaps as a percent of baseline total are as follows:

| | | | |
|---|---|---|---|
| Metro cities – | 2.1% of baseline total | | |
| Core cities – | 5.5% " | " | " |
| Larger cities - | 5.5% " | " | " |
| Unincorporated UGA - | 6.3% " | " | " |
| Rural - | 1.0% " | " | " |



various other measures reported by the models would be unreasonable as a result of the land use modeling. It is without question that all results reported from modeling are subject to uncertainty, and models by their nature are simplified mathematical representations of aspects of the world around us; they are suggestive of the kind of future that may be realized as a result of implementing specific policy.

**Y-002-059**

PSRC derives our functional classification from the federal and state functional class. If a facility is designated differently at the local level, we will accept that classification (per our MTS guidance) regarding whether projects should be listed in our project lists and be considered regionally significant. However, our geodatabase used to create the MTS maps of the existing facilities only represents the functional class at the state or federal level. This can be changed if there is a petition for a functional classification upgrade to the state. The WSDOT functional class map (located on the Web and recently updated) still shows this facility as a minor arterial but our functional class amendment request data shows there is an approved request to upgrade this facility from a minor to a principal arterial from SR 99 to Seattle Hill Road on 132nd Street Southeast/ 134th Place South/ Cathcart Way (dated 10-15-2008). Because of this, we will update the data.

**Y-002-060**

Thank you.

**Y-002-061**

Comment noted.

**Y-002-062**

Exhibit 4-5 was a sample of congested corridors identified in the region as part of the congestion management process (CMP). The full CMP

**Y-002-091** The differences between alternatives for population (and housing) are truly insignificant, whereas the differences in employment are possibly significant, but still pretty minor. One obvious conclusion is that the alternative transportation plans may not be as different from one another as they would appear. The DEIS suggests this uniformity is due to the transportation system of 2040 already being largely in place and that the variation between the alternatives affects a relatively small percentage of the total transportation network. This is not a particularly convincing explanation since the analysis looks at only the projected population and employment growth over the next 30 years, not the total year 2040 population and employment levels and distribution. Other possible explanations are: 1) that transportation does not influence land use as much as we think – at least not within the 30-year horizon of these regional plans; 2) that the model is not adequately sensitive to the differences that do exist, or was artificially constrained to meet the overarching goal of supporting the baseline regional growth strategy (a more likely explanation); or 3) that the regional geographies are too coarse to pick up the differences that would be apparent at a smaller geographical scale (also possible). There should be some attempt to identify and disclose the most likely explanation. If it lies with the alternatives, perhaps some of them should be revised – or new alternatives added to enrich the analysis. *If it lies with the model or how the model was deployed, that should be disclosed and the results of the analysis appropriately qualified.*

**Y-002-092** Page 5-15, Paragraph 1: Support Housing Affordability - the Transportation 2040 preferred alternative should support housing affordability. Two specific housing choice impacts implied by Vision 2040 are affordability and "fair and equal access." The interaction with transportation costs inevitably affects both affordability and fair choice of locations for housing. For example, locations closer to regional employment centers tend to offer lower transportation costs (shorter commutes), but have higher land values and housing prices. Tolling has the effect of reducing transportation-to-work costs for higher income households (through reduced commute times), while increasing the costs for lower income households, as shown in the DEIS analysis for Alternatives 4 and 5. Higher transportation costs will limit the mobility of lower-income households, consequently reducing their residential location choices. Higher-income households, on the other hand, attain a greater choice of residential location. Greater income segregation may result Mitigation through transit investments wouldn't necessarily address income segregation, since that would encourage concentration of lower income households closer to transit facilities. The DEIS appears to lack a proper evaluation of the income segregation impacts of the draft alternatives. Because housing and transportation costs are related, the environmental impact analysis of Transportation 2040 alternatives should consider the spatial differences of transportation and housing costs in combination. The Center for Neighborhood Technology (http://htaindex.cnt.org) has shown that when housing and



report became available in late 2009 and included a more comprehensive list of congested locations based on the data shown in Exhibit 4-7 in addition to other data sources.

**Y-002-063**

Exhibit 4-5 was a sample of congested corridors identified in the region as part of the congestion management process (CMP). The full CMP report became available in late 2009 and included a more comprehensive list of congested locations based data the data shown in Exhibit 4-7 in addition to other data sources. The list discussed here is more representative of state routes. The CMP also included arterials based on information supplied by the available data sources and expert opinion such as that of the Regional Traffic Operators Committee.

**Y-002-064**

Comment noted.

**Y-002-065**

Comment noted. These measures do vary across the 2040 alternatives.

**Y-002-066**

Thank you for your comment. The FEIS includes the appropriate edits.

**Y-002-067**

PSRC does not see evidence for a land use model that is overly sensitive to tolls. Many aspects of the models are responding to the tolls, including trip generation, mode choice, work location, time of day, and route choice. In the face of higher transportation costs from tolls it is not entirely unexpected that some employment might decentralize to the extent that this is happening.

Y-002-092 transportation costs are combined into a single indicator, the geographic distribution of residential location affordability is dramatically different than housing cost-only indicators.

Y-002-093 Page 5-15, Paragraph 2: Disclose impacts on jobs/housing balance - this is an important objective for regional growth and transportation strategies because they can provide more opportunities for people to live close to their work and reduce commute trip distances and perhaps open up more modal options for more people, thereby reducing emissions and energy consumption (see *Vision 2040*, page 70 and MPP-H-4). The chapter does discuss this criterion and shows that projected impacts at the county scale are relatively minor (see Exhibit 5-9). In looking at the regional geographies, the DEIS indicates that Alternative 4 supports somewhat more employment growth in the "outlying urban" and rural geographies, and somewhat less in the "urban core" – and that this is not a good thing (see Exhibit 5-8). However, from the perspective of jobs/housing balance, this might, in fact, be a good thing, and Alternative 4 could be considered the best-performing alternative precisely because the outlying urban and rural areas are currently the areas with the lowest ratio of jobs to housing (by far). Exhibit 5-9 does, in fact, suggest that Alternative 4 produces the "best" results at the county level – increasing the jobs/housing ratio in Pierce and Snohomish Counties and decreasing it in job-rich King County.

Y-002-094 Page 5-17, Exhibit 5-6:UrbanSim TAZ-level Forecasts and Population and Employment Growth - The PSRC's Transportation 2040 DEIS shows no appreciable difference in population and employment distributions at the regional geography level across the five alternatives to the baseline forecasts and transportation scenario. Snohomish County staff requested and reviewed the TAZ-level residential and employment forecasts underlying the Transportation 2040 DEIS analysis. We appreciate that PSRC staff were willing to share this data in order to support a transparent and rigorous analytical process for developing the regional plan. County staff looks forward to working with PSRC staff at the LUTAC meetings during the remainder of the year on further UrbanSim development and review and testing of the results. County staff expects a thorough review process for the land use forecast for the preferred alternative before it is used for completing the analysis, as has been the practice in the past. Based on a review of the TAZ-level 2040 population and employment densities for the baseline and each of the alternatives, county staff feel that the forecast may be adequate at the regionwide scale for the purposes of measuring the regionwide environmental impacts of the transportation plan. However, staff isn't confident that the forecast is reliable at the TAZ-level for corridor or local planning purposes. Based on a review of the densities in the 2040 forecasts for each alternative, there are specific short-comings in the way growth has been distributed to individual TAZs. In addition, a review of the differences between the alternative forecasts shows that the magnitude of change raises concerns about the sensitivity of the model to changes in the transportation system. Large percent shifts in 2040 population and employment occur for no obvious reason, though it is difficult to intuit what the combined impact of



**Y-002-068**

Thank you. PSRC has not been able to determine what inconsistency is being described in this comment. It is true that with many interacting elements in the modeling it can be hard at times to determine exactly the causal chain between policy and final result, but each model component appears to be displaying theoretically consistent responses.

**Y-002-069**

Thank you. While land use may play a role in total VMT across alternatives, it is unclear what is meant by growth numbers that "don't always make sense across the alternatives." The larger point is true that the location of growth will have an influence on downstream aspects of the travel modeling.

**Y-002-070**

Delay is simply the measure of travel time that is in excess of what the travel time would be under uncongested conditions. It is possible to have all VMT be congested travel and no VMT to be congested travel and still have the same total travel time (different length trips, or trips under different posted speed conditions). While this example is highly unlikely it illustrates the difference between travel time and delay.

**Y-002-071**

Comment noted.

**Y-002-072**

Comment noted.

**Y-002-073**

Thank you. PSRC does not see evidence of insensitivity in the travel model. As displayed in Appendix D measures of travel time savings are significant in the case of some of the alternatives.

Y-002-094 numerous regionwide project changes and tolling regimes between the alternatives would be on a localized level.

We have two key observations about the forecasts, common to each of the alternatives, that don't seem plausible and may affect the ability to accurately model impacts for regional projects within Snohomish County:

- There isn't as much growth going into regional growth centers as Vision 2040 would anticipate, particularly regional growth centers in the core cities in Snohomish County, where there is almost no growth at all.
- Residential growth in the Snohomish County unincorporated Southwest Urban Growth Area is spread evenly, without a pattern of dense growth in subregional centers and along transit corridors that the Snohomish County Comprehensive Plan Future Land Use Map anticipates in the future.

County staff review indicates that more work is needed to ensure that UrbanSim produces a reliable 2040 population and employment distribution that are proposed for the plan adoption next spring. Additional work may be required beyond the Transportation 2040 project in order to ensure that UrbanSim is able to produce forecast products required for local plan updates in the future.

Y-002-095 **Chapter 6: Air Quality and Climate Change**

Page 6.1 - we applaud your inclusion of climate change impacts in the DEIS, as this inclusion will provide the Transportation 2040 plan with benchmarks for climate change impact analysis that is sure to become increasingly important in coming years. We also appreciate the recognition that altering modes of travel must be coupled with technological advancement in order to meet statewide greenhouse gas reduction goals (to reduce emissions by 20% below 2000 levels by 2020), and are pleased to see the consistent recognition of this need in the region's transportation plan.

We recognize this in working toward our countywide greenhouse gas reduction goals and are pleased to see the consistent recognition of this need in the region's transportation plan.

Y-002-096 **Chapter 8: Visual and Aesthetic Impacts:**

Page 8-1 -This chapter presents a much generalized discussion of possible impacts on the visual environment and concludes that a regional analysis is not really possible for this element of the environment. This is not unreasonable because impacts are project-specific and design-dependent and each alternative contains hundreds of projects that have not yet been designed. In theory, each project has the potential for both positive and negative visual impacts which would be hard to determine in the absence of project designs and harder still to aggregate.



**Y-002-074**

Comment noted.

**Y-002-075**

Comment noted. It is likely that HOT lanes do not offer additional incentives to carpool as they may involve a conversion from HOV lanes to HOT.

**Y-002-076**

Thank you, comment noted. The comment suggests that less than expected mode share response is evidence that either the modeling results are suspect or the value of the policies are questionable. It is difficult to respond in greater detail to such either/or comments.

**Y-002-077**

The Preferred Alternative includes investments that would expand Link Light Rail service from Lynnwood to Everett. It also includes some type of high capacity transit along the I-405 corridor north to Lynnwood and commuter rail service on the Burlington Northern/Santa Fe right-of-way north to Snohomish.

**Y-002-078**

PSRC does not see evidence of an oversensitivity to tolls in the mode choice models. It is true that tolls are influencing mode choice, as would be expected, and may be more influential on transit use than incremental changes to transit supply.

**Y-002-079**

Yes. Increases in walk and bike trips are taking place in many neighborhoods with considerable existing walk and bike mode share. As population increases in these neighborhoods so do the walk and bike trips.

Y-002-096

The DEIS notes that road-building and transit-building projects (particularly elevated highways and rail lines) generally have the greatest potential for adverse impact on the visual environment. This is a reasonable premise reflected in exhibit 8-2 showing the miles of new infrastructure for each alternative. It is reasonable to conclude that the alternatives that emphasize the expansion of road and transit networks will likely have greater adverse impacts on visual resources than those emphasizing efficiency of the existing networks or non-motorized modes. However, it would be helpful to know (through exhibit 8-2) how many of the new road and rail miles involve new corridors, because it is there where the visual impacts will likely be greatest – as recognized by the first mitigation measure mentioned in the DEIS. The permanent visual impact (as opposed to the temporary impact of construction activity) of a mile of new highway or light rail line where there is currently none is much greater than the addition of a new roadway lane or light/commuter rail line where there is an existing road or rail line. The eastside rail corridor contained in alternative 5, for example, although not currently in use for commuter rail (and therefore a "new" corridor for purposes of transportation impacts) is already in place physically and therefore, not really a new corridor from the standpoint of visual impacts.

Another concern is the use of the ratio of new infrastructure miles over the total existing system as a way of gauging the relative impacts of each alternative – this measure greatly undervalues their differential impacts. The 1253 new miles in Alt2 is significantly more than the 343 miles in the baseline case – and this difference should not be diluted by adding in the total existing system, which is not under evaluation, but is rather part of the "affected environment." The alternatives should be compared in terms of their impacts relative to each other or to the baseline (in effect conceding that there will always be some impacts to the visual environment). The figures under this method would more accurately reflect real differences between the alternatives, and contrast sharply with the figures now in the DEIS, as follows:

| | Baseline | Alt 1 | Alt2 | Alt3 | Alt4 | Alt5 |
|---|---|---|---|---|---|---|
| In DEIS | 3% | 4% | 10% | 7% | 6% | 5% |
| As proposed | -- | +57% | +265% | +157% | +129% | +82% |

Furthermore, projects that expand and enhance non-motorized (slow speed) travel actually exploit visual resources by exposing them to more people from "new" locations. The analysis would be greatly enhanced if exhibit 8-2 recognized this by including the new miles of non-motorized bike lanes and pedestrian/bike trails in each alternative as a positive-impact counter-weight against the new road and transit miles. Assigning opposite-value points for positive and negative impacting elements would substantially refine the analysis and enhance its value in evaluating alternatives. To illustrate, one could assign 3 points for each new corridor mile and one point for each new lane or rail mile within an existing corridor. One opposite value point could then be assigned for each new bike/pedestrian lane/path mile to represent the countervailing positive impacts of these facilities. This type of point system would give a much



**Y-002-080**

Alternative 2 has considerable investment in road facilities making auto trips relatively more attractive. Alternative 5 includes tolling on all highways and arterial streets, making auto trips relatively less attractive.

**Y-002-081**

Comment noted.

**Y-002-082**

Thank you for the comment. The reliability benefits are a measure of decreases in the variability of travel times. These benefits accrue to users and are valued as a certainty equivalent at their respective values of time.

**Y-002-083**

Transit benefits are measured for all alternatives; refer to Appendix D for details. For the benefit measures the Baseline serves as the point of comparison, and so for each measure the Baseline values are exactly zero.

**Y-002-084**

The Baseline is the point of comparison. The Baseline benefits (as compared to the Baseline) are exactly zero.

**Y-002-085**

The Baseline is the point of comparison, and therefore these values are zero. Alternative 4 has similar accident costs as the Baseline.
Please see Appendix D for details. The accident benefits are a reduction in accident probability based on modeling, and are not associated with any actual specific real-world accident.

Y-002-096 better idea of the relative differences between the alternatives. Exhibit 8-2 could then include three evaluation criteria: new lane/rail miles within existing corridors (-1 point per mile); new road or rail corridor miles (-3 points per mile); and new bike lane/pedestrian path miles (+1 point per mile). A final "score" could be easily calculated for each alternative - which could also be expressed as a percentage of the baseline score, as suggested above.

Y-002-097 **Chapter 9: Water Quality and Hydrology**

Page 9-1 - While the agency sources are identified, the data sources used are not. Without knowing what data was used to identify "impaired waters" or "significant habitat areas" there is no way to evaluate the quality of the analysis in the DEIS. Simply knowing who the data came from (DOE, DNR, WDFW, NOAA, etc) without knowing what the data is actually showing (and what it isn't) undermines the credibility of the analysis and the conclusions.

The analysis compares the relative impacts of the alternatives but does not go the next step to identify which, if any, of the alternatives produce impacts above an acceptable threshold resulting in adverse environmental impacts.

The analysis does not address the secondary impacts to the ecological environment of the various alternatives – that is, the impacts of the development that will occur as a result of improvements to the transportation system, like houses, commercial development, etc.

Project-level transportation mitigation should not place an undue burden on resource lands; particularly with respect to agricultural uses. Where transportation agencies are seeking off-site mitigation, they should look whenever practicable to other areas besides agricultural lands for suitable mitigation sites.

Y-002-098 **Chapter 10: Ecosystems/Endangered Species Act Issues**

Page 10-1 – The comments provide above for Chapter 9: Water Quality and Hydrology also apply and are relevant to Chapter 10.

Page 10-2, Exhibit 10-1 - What is the definition of a Significant Habitat Area? It appears that Significant Habitat Areas include only portions of some streams (rivers). Why aren't all streams included as significant habitat?

Y-002-099 **Chapter 17: Environmental Justice**

Page 17-1 - while use of 2000 Census data may be necessary in order to provide census tract and census block level data for mapping purposes, more recent county level estimates are available from both the Census Bureau and Washington State Office of Financial Management.

A-14

**Y-002-086**

The Baseline is the point of comparison.

**Y-002-087**

Comment noted. The Baseline is the point of comparison.

**Y-002-088**

The Baseline is the point of comparison. Each of the other alternatives provides benefits when compared with the Baseline.

**Y-002-089**

Comment noted.

**Y-002-090**

As with the analysis for the DEIS, the analysis of the Preferred Alternative involves using the integrated land use and transportation modeling framework. In this approach, the population and employment distributions are a product of the analysis and not an input. Inputs to the land use modeling include a representation of land use and development constraints, and these inputs are identical across all alternatives including the Preferred Alternative.

**Y-002-091**

The DEIS alternatives, and consequently the FEIS Preferred Alternative, were designed around fundamental principles and assumptions related to VISION 2040 in such a way that each was a viable alternative that could meet the objectives of VISION 2040 on its own. The minimal variance among alternatives is a consequence of applying these principles and assumptions consistently, resulting in a range of draft alternatives and one Preferred Alternative that all are consistent with VISION 2040.

Y-002-099 These official estimates indicate that in 2008 people of color had increased by almost 36% since 2000, while the total population had grown by just under 15%. People of color are now over 19% of Snohomish County's population. These estimates provide important trend information that should be included in Transportation 2040, along with explicit commitments to the updating of this long-range planning document with 2010 Census information as soon as it is available.

The introduction to Chapter 17 describes "environmental justice" as being concerned with (1) avoiding disproportionately greater negative human health and environmental effects from transportation strategies on low income or minority communities than on the population as a whole; and (2) developing projects that benefit low income or minority communities. The maps in this chapter displaying 2000 Census data illustrate very well how the distribution of low-income and minority populations in Snohomish County is concentrated in high-transportation corridors, such as Hwy 99 or I-5, where housing tends to be more affordable, or in outlying communities, such as Monroe or the Tulalip Reservation. While low-income and minority communities will hopefully share in the benefits of the transportation improvements that this plan contemplates, the primary task of this chapter is to help assure that adequate consideration is taken of the possible disparate distribution of negative effects generated by transportation improvement projects, e.g. disruptions in community cohesion, restricted access, safety concerns, higher exposures to hazardous materials, raised noise levels, increased water and air pollution, etc. Unfortunately, chapter 17 reports primarily on the benefits of transportation improvements and defers analysis of the possible negative effects to future project-level reviews. Integrating chapter 17 with the focus on human health in chapter 18 would help achieve the full intent of "environmental justice".

The requirements of Executive Order 12898 and USDOT are to provide (1) meaningful opportunities for public involvement by low-income and minority populations, and (2) public information concerning human health or environmental impacts that addresses the concerns of low-income and minority populations. PSRC has initiated a broad program of outreach to low-income and minority communities but it is not clear that those communities have enough information to be able to provide the input that PSRC is seeking. More information and impact analysis would yield more well-informed commentary from the affected communities regarding the transportation strategies that PSRC will be pursuing.



**Y-002-092**

Transportation costs and land values are linked. Theory suggests that for any given site, as transportation costs rise the land values must fall, and vice versa. The integrated models operate in a manner that is consistent with this representation of economic geography. In a complex urban geography like that of the central Puget Sound region, the specific implications of these theories are not always easily determined but are also not generally consistent with some of the assertions made in the comment. A detailed examination of residential sorting is beyond the scope of this planning process.

**Y-002-093**

Jobs-housing balance is addressed in Appendix D.

**Y-002-094**

Thank you, comment noted. Please refer to responses to comments Y-002-025 and Y-002-092.

**Y-002-095**

Thank you for your comment.

**Y-002-096**

Thank you for your comment. The FEIS includes the appropriate edits.

**Y-002-097**

Thank you for your comment. Data sources are identified in the FEIS.

Discussions of impact thresholds, induced development, and mitigation sites would take place during future project-level environmental review.

Y-002-100

## ATTACHMENT B

### STATE, COUNTY AND CITY PROJECTS FOR INCLUSION IN EVALUATION OF THE PREFERRED TRANSPORTATION 2040 ALTERNATIVE

Included here are three tables that present proposed state, county and city projects that should be included within an evaluation of the Preferred Transportation 2040 Alternative.

- B.1 – State Highway Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation.
- B.2 – County Arterial Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation.
- B.3 – City Arterial Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation.



**Y-002-098**

Significant habitat areas are those areas that have been identified by various agencies and organizations as having high priority for conservation. The areas shown in Exhibit 10-1 were identified by Washington Department of Natural Resources - Natural Heritage Program's High Quality Native Ecosystems, Washington Department of Fish and Wildlife - Priority Habitats and Species Program, and Nature Conservancy - Willamette Valley, Puget Trough, Georgia Basin Ecoregional Assessment.

**Y-002-099**

The FEIS contains an expanded discussion of environmental justice.

**Y-002-100**

Please see Appendix B for a listing of the State Route projects that are part of the Preferred Alternative. Research of the county principal arterials listed indicates that a majority of these are minor arterials. Local projects (minor arterial and below or on any facility that does not add/ reconfigure capacity) are part of the local programs in the Preferred Alternative but are considered exempt from the candidate to approval process and are therefore not explicitly listed in the project lists. Projects that are located on a principal arterial (and above) AND reconfigure the roadway system in some way are part of the plan. Because the project descriptions are vague in this attachment, PSRC was unable to assess if any of them qualify to be listed as explicit projects because of the capacity requirement. Please see our criteria on the our Web page. http://www.psrc.org/transportation/destination2030/criteria. Regarding the arterial projects that have a D2030 ID, please see Appendix B.

Y-002-100

Attachment B.1

## State Highway Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation

| D2040 ID | Title | Description | From | To | On | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| 4174 | US 2 | Add one westbound lane and modify the US 2/SR 204 interchange. | I-5 | SR 204 | US 2 | 2030 | WSDOT | Snohomish County |
| 5324 | US 2 - Alternate | Widen the trestle to 3 lanes each direction with standard lane and shoulder widths and improve the US 2/I-5 interchange. | I-5 | SR 204 | US 2 | 2030 | WSDOT | Snohomish County |
| 4175 | US 2 | Widen to 4 lanes. Construct interchange at Bickford Road. | SR 204 | Bickford Ave. | US 2 | 2030 | WSDOT | Snohomish County |
| 4176 | US 2 | Widen to four lanes, bridge modifications, install median barrier. | Bickford Ave. | City of Monroe (SR 522) | US 2 | 2030 | WSDOT | Snohomish County |
| 1620 | US 2 (Monroe Bypass) | Construct a four lane, limited access bypass around Monroe on new alignment to the north of the city. This project could be constructed in two stages. | SR 522 | Munroe east city limits | US 2 | 2030 | WSDOT | Snohomish County |
| 4177 | US 2 | Widen the corridor to four lanes. | Monroe east city limits | Sultan west city limits | US 2 | 2030 | WSDOT | Snohomish County |
| 4178 | US 2 | The long term vision through Sultan is a four-lane section (two lanes in each direction with bike lanes, sidewalks and a center median). The existing signalized intersections would be replaced with roundabouts. | City of Sultan west city limits | City of Sultan east city limits | US 2 | 2030 | WSDOT | Snohomish County |
| 1704 | US 2 | In between Sultan and Gold Bar would be a four lane section (two lanes in each direction) separated by a four foot median with rumble strips to improve safety. The four-lane widening is carried through Gold Bar to just east of Reiser Road. Within the city of Goldbar, this will be a a four-lane section (two lanes in each direction with bike lanes, sidewalks and a center median). **The existing signalized intersections would be replaced with roundabouts. | City of Sultan east city limits | (just east of) Reiser Road | US 2 | 2030 | WSDOT | Snohomish County |
| 5315 | I-5 Shoulder Modification | This project picks up the a lane as a shoulder modification to accommodate a peak period HOT lane in the Northgate to Everett area. | Northgate | Everett | I-5 | 2030 | Agency not identified | Urban Region |
| 1625 | I-5 @ SR 524/196th St | This project would construct Northbound and Southbound collector distributor lanes to improve the operation and safety of the I-5 196th Street Interchange. | SR 524 I/C | | I-5 | 2035 | WSDOT | Snohomish County |
| 4009 | South Everett Interchange Improvements (I-5@100th and Everett Mall | Construct a new crossing under I-5 at 100th St and provide NB and SB HOV access south of SR 526/SR527/South Broadway interchange. | SR 527/South Broadway I/C | SB I-5, 7th Avenue SE | I-5, 100th Street SE | 2030 | WSDOT | Snohomish County |
| 4061 | HOV Access Ramps at Mariner Park-and-Ride | Construct transit and HOV access ramps directly connecting the Mariner Park-and-Ride with the center HOV lanes on I-5, providing access to and from both the north and south; design the facility to accommodate possible future connection to the east side of I-5 | I-5 @ Mariner Park-and-Ride | | I-5 @ Mariner Park-and-Ride | 2027 | Sound Transit | Snohomish County |
| 1706 | I-5 @ SR 96 / 128th St SW | Construct single point urban interchange. | SR 96/128th St SW I/C | | I-5 | 2030 | WSDOT | Snohomish County |
| 1703 | I-5 | Construct HOV lanes in each direction. | SR 2 | SR 529 | I-5 | 2030 | WSDOT | Snohomish County |
| 4204 | I-5 | Widen from three to four lanes in each direction and reconstruct interchanges and interchange ramps ( 88th St NE and 116th NE). | SR 531 | SR 531 | I-5 | 2030 | WSDOT | Snohomish County |
| 1045 | I-5 @ 88th St N Interchange | Reconstruct existing interchange. | Steamboat Slough | SR 526/I-5 Interchange | I-5 / SR 529 / SR 528 | 2012 | WSDOT | Snohomish County |

B.1-7

Y-002-100

Attachment B.1

## State Highway Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation

| T2040 ID | Title | Description | From | To | On | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| | I-5 @ 116th St. N Interchange | Reconstruct existing interchange. | | | I-5 | 2012 | WSDOT | Snohomish County |
| 1787 | I-5 | Widen from 3 to 4 lanes in each direction. Reconstruct interchange ramps. Park and ride lot by others. | SR 531 | SR 530 | I-5 | 2040 | WSDOT | Snohomish County |
| 1788 | I-5 | Widen from 3 to 4 lanes in each direction. Reconstruct interchange ramps. Expand Starwood-5 park & ride lot | SR 530 | SR 532 | I-5 | 2040 | WSDOT | Snohomish County |
| 1824 | I-5 | Construct a northbound auxiliary lane. | 220th St SW | 44th Ave W | I-5 | 2030 | WSDOT | Snohomish County |
| 4199 | I-5 | Construct a southbound auxiliary lane on I-5 from SR 104 down to NE 175th Street. | SR 104 I/C | NE 175th St. | I-5 | 2030 | WSDOT | King County |
| 4206 | SR 9 | Widen to four lanes. | 176th St SE | SR 96 | SR 9 | 2030 | WSDOT | Snohomish County |
| 4207 | SR 9 | Widen to four lanes. | Marsh Rd. | US-2 | SR 9 | 2030 | WSDOT | Snohomish County |
| 4208 | SR 9 | Widen to 4/5 lanes from US-2 to Lake Stevens Road, and improve US-2/SR 9 interchange. | US-2 | Lake Stevens Rd. | SR 9 | 2030 | WSDOT | Snohomish County |
| 4209 | SR 9 | Provide four thru lanes from 20th Street SE vicinity to Lundeen Parkway. | 20th Street SE I/Cvicinity | Lundeen Parkway | SR 9 | 2030 | WSDOT | Snohomish County |
| 4210 | SR 9 | Construct an interchange between SR 9 and SR 204. | SR 9/SR 204 Intersection | | SR 9 | 2030 | WSDOT | Snohomish County |
| 4211 | SR 9 Widening: SR 92 to SR 528 | Widen to four lanes. | SR 92 | SR 528 | SR 9 | 2030 | WSDOT | Snohomish County |
| 4212 | SR 9 Widening: SR 528 to SR 531 | Widen to four lanes. | SR 528 | SR 531 | SR 9 | 2030 | WSDOT | Snohomish County |
| 4269 | SR 9/ 84th Street NE Intersection | This project extends or builds right and left turn lanes on SB and NB SR 9 and builds right and left turn lanes on 84th St. NE. Existing illumination, traffic signal, drainage and stormwater facilities will be upgraded. Environmental impacts will be mitigated. | 84th St. NE Intersection | 84th St. NE Intersection | SR 9 | 2013 | WSDOT | Snohomish County |
| 4270 | SR 9/ SR 531 Intersection | Construct new right turn lanes in both directions on SR 9 and add right turn lanes in both directions on SR 531/172nd Street NE. Existing illumination, traffic signal, drainage and stormwater facilities will be upgraded and environmental impacts will be mitigated. | SR 531 Intersection | SR 531 Intersection | SR 9 | 2013 | WSDOT | Snohomish County |
| 1794 | SR 5 | Widen to 4 lanes w/ TWLTL (Arlington). | SR 530 | City of Arlington(NCL) | SR 9 | 2030 | WSDOT | Snohomish County |
| 1795 | SR 92 | Widen to 4 lanes. Aggressive access management | SR 9 | 147th Ave NE | SR 92 | 2030 | WSDOT | Snohomish County |
| 1709 | SR 99 | Add transit queue jump lane and transit priority signal from MP 0.00 - 3.26 (132nd Ave SE) | I-5 | Seattle -Mi Rd | SR 99 | 2030 | WSUO1 | Snohomish County |
| 4063 | Business Access/Transit Lanes on SR 99 and Evergreen Way (Snohomish County) | Construct curb-side BAT lanes in both directions. See also Everett (#62*) and WSDOT (#171C) projects which overlap this. PSRC assumption is that the BAT lanes will go the entire extent of this ST project but there may be multiple sponsors on different segments for implementation. | 116th Street SW | Pacific Avenue in Everett | SR 99/ Evergreen Way | 2027 | Agency not Identified | Snohomish County |

Attachment B.1

Y-002-100

## State Highway Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation

| D2020 ID | Title | Description | From | To | Via | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| 5710 | SR 99 | Widen to 6/7 lanes for HOV. Aggressive access management. Signal coordination. Regional Bus Service. See also Events (#631) and ST (Potential ST3 N11) projects which overlap this; PSRC assumption is that the BAT Lanes will go the entire extent of this project but there may be multiple sponsors on different segments for implementation | SR 525 | Airport Rd | SR 99 | 2030 | WSDOT | Snohomish County |
| 1682 | SR 104 | Add one lane each direction on SR 104 from 17th to SR 522 with intersection channel ization improvements at 17th, 175th and SR 522. | SR 522 | 17th | SR 104 | 2030 | WSDOT | King County |
| 1781 | SR 104 | APS - New connection from existing SR 104 alignment to proposed multimodal terminal location. | Proposed ferry terminal | Pine St. WB | SR 104 | 2030 | WSDOT | Snohomish County |
| 1712 | SR 204 | Relocate Frontier Village access out of intersection with SR 9 and look at removing signal at 91st. Add storage for traffic from eastbound SR 204 to northbound SR 9. | US-2 | SR 9 | SR 204 | 2030 | WSDOT | Snohomish County |
| 4360 | I-405 Corridor: I-5 to SR 169 (I-5 south I/C and Bypass ramp) | (a) Reconstruct the following I-5/I-405 interchange ramps: NB I-5 to NB I-405 (c) adds new GP direct connector flyover ramp from SB I-405 to SB I-5 (c) SB I-5 to NB I-405 | I-405 @ I-5 I/C | | I-405 @ I-5 I/C | 2030 | WSDOT | King County |
| 4362 | I-405 Corridor: I-5 to SR 169 (I-5/ I-405 HOV direct connector ramps) | (f) adds HOV direct connector ramps between I-405 and I-5 in all directions. | I-405 @ I-5 I/C | | I-405 @ I-5 I/C | 2030 | WSDOT | King County |
| 4399 | I-405 Corridor: SR 522 to I-5 (240th St. SR direc access ramp) | (d) Construct direct access ramp to 240th St. SE. | I-405 @ 240th St SR I/C | | I-405 @ 240th St SR I/C | 2030 | WSDOT | Snohomish County |
| 4401 | I-405 Corridor: SR 522 to I-5 (SR 527 I/C) | (f) Reconfigure the SR 527 interchange. | I-405 @ SR 527 I/C | | I-405 @ SR 527 I/C | 2030 | WSDOT | King County |
| 4402 | I-405 Corridor: SR 522 to I-5 (I-5 north/ I-405 I/C and HOV direct access ramps) | (g) Construct HOV direct connection ramps connecting I-405 managed lanes with I-5 HOV lanes north and south of the I-5 interchange. (h) Reconfigure the NB I-405 to NB I-5 from 1 lane to a 2 lane on connection. (i) Add/rework I-5 connecting capacity to I-405 as necessary by adding one lane approaching ramp to I-405 to avoid turbulence. | I-405 @ I-5 I/C | | I-405 @ I 5 I/C | 2030 | WSDOT | Snohomish County |
| 4257 | SR 523 | SR 523 - Paradise Lake Rd - New Interchange | Paradise Lake Road | Paradise Lake Road | SR 522 | 2020 | WSDOT | Snohomish County |
| 1098 | SR 522 | Add two lanes converting a two lane arterial roadway to a four lane divided highway. | Paradise Lake Rd. | Snohomish River | SR 522 | 2020 | WSDOT | Snohomish County |
| 1714 | SR 524 | Widen to five lanes adding two general purpose lanes and a two-way-left-turn-lane. | 24th Ave. | 9th Ave SE | SR 524 | 2020 | Snohomish County | Snohomish County |
| 4259 | SR 524 | Widen to five lanes adding two general purpose lanes and a two-way-left-turn-lane. | SR 527 | 35th/39th Street | SR 524 | 2030 | WSDOT | Snohomish County |
| 4260 | SR 524 | Widen to five lanes adding two general purpose lanes and a two-way-left-turn-lane. | 35th/39th Street | SR 522 | SR 524 | 2030 | WSDOT | Snohomish County |

B.1-3

Y-002-100

Attachment B.1

## State Highway Projects for Inclusion in Transportation 2040 Preferred Alternative Evaluation

| D2030 ID | Title | Description | From | To | Cost | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| 4009 | SR 524 (196th St SW) Widening | Increase capacity of existing major east-west 3 lane arterial by increasing roadway section to 7 lanes, bike lanes,curb,gutter and sidewalk. | 48th Ave W | 33rd Ave W | SR 524 (196th St SW) | 2012 | Lynnwood | Snohomish County |
| 1715 | SR 525 | NFS - Connect to proposed ferry terminal location. | SR 526 | Proposed Multi-Mon Multi-modal Terminal | SR 525 | 2027 | WSDOT | Snohomish County |
| 4260 | SR 527 | Widen to 4/5 lanes between SR 522 and 240th St. SE and between 228th St SE and I-405 | SR 522, 240th St SE | I-405, 228th St. SE | SR 527 | 2030 | WSDOT | King County |
| 1271 | SR 527 - 240th St SE to 228th St. SE | This project will widen SR 527 from two lanes to four lanes with a center dual left turn lane, bike lanes, transit stops and sidewalks, curb/ gutter/ plantings, minor side street improvements, interconnect and coordinate signals, provide access management, retaining walls, storm drainage facilities, landscaping and illumination. | 240th St SE | 228th St. SE | SR 527 | | WSDOT | Snohomish County |
| 984 | SR 527 | BEGIN TO IMPLEMENT ROUTE DEVELOPMENT PLAN, FRONTAGE IMPROVEMENTS CONSTRUCTED ALONG THE CORRIDOR | SR 522 | I-405 | SR 527 | 2006 | Bothell | Snohomish County |
| 1769 | SR 528 | Widen to 4 lanes. Aggress ve access management. | 83rd Ave. | SR 9 | SR 528 | 2030 | WSDOT | Snohomish County |
| 4122 | SR 528 (Ash64th St. NE) | Upgrade existing 2/4 lane roadway to 4/5 lanes | Allen Creek | 83rd Avenue NE | SR 528 | 2006 | Marysville | Snohomish County |
| 1620 | SR 530 | Widen to 4 lanes w/ restricted median. Aggressive access management. | I-5 | Arlington city limits | SR 530 | 2040 | WSDOT | Snohomish County |
| 1501 | SR 530 | Widen to 4 lanes Aggressive Access Management. | Arlington city limits | Arlington Heights/Jordan Road | SR 530 | 2040 | WSDOT | Snohomish County |
| 1639 | SR 531 | Widen to 5 lanes. (I-5 interchange area covered under I-5 urban mobility) | 43rd Ave. | 67th Ave | SR 531 | | WSDOT | Snohomish County |

B.1-4

Y-002-100

Attachment B.2

## County Arterial Projects for Inclusion within Transportation 2040 Preferred Alternative Evaluation

| ID | Title | Description | From | To | On | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|
| AC-8, AC-15 | Airport Way | Widening to 2/3 lane urban standards with bicycle lanes | SR 9 | Snohomish C/L | Airport Way Granite Falls Alternative Route (Bypass) | Snohomish County | Snohomish |
| NR-4 | Granite Falls Alternative Route (Bypass) | New 2-lane principal arterial | State Route 92 | Mountain Loop Highway | | Snohomish County | Snohomish |
| AC/C-7 | 20th Street SE | Urban 4-lane standards with operational improvements | US 2 | Cavalero Road | 20th Street SE | Snohomish County | Snohomish |
| AC/C-8 | 20th Street SE | Urban 4-lane standards with turn pockets | Cavalero Road | 91st Avenue SE | 20th Street SE | Snohomish County | Snohomish |
| AC/C-9 | 20th Street SE | Urban 5-lane standards (crossing State Route 9) | 91st Avenue SE (across SR-9) | 99th Avenue SE | 20th Street SE | Snohomish County | Snohomish |
| AC/C-[illegible] | 20th Street SE | Urban 5-lane standards | 99th Avenue SE | S. Lake Stevens Road | 20th Street SE | Snohomish County | Snohomish |
| AC/C-[illegible] | 180th Street SE | Urban 5-lane standards | State Route 527 | Brook Boulevard | 180th Street SE | Snohomish County | Snohomish |
| AC-28 | 180th Street SE | Urban 5-lane standards | Brook Boulevard | 25th Avenue SE | 180th Street SE | Snohomish County | Snohomish |
| AC-29 | 180th Street SE | Urban 5-lane standards | 25th Avenue SE | 35th Avenue SE | 180th Street SE | Snohomish County | Snohomish |
| AC-33 | 180th Street SE | Urban 3-lane standards | 35th Avenue SE | 51st Avenue SE | 180th Street SE | Snohomish County | Snohomish |
| AC-34 | 180th Street SE | Rural 3-lane standards | 51st Avenue SE | Snohomish Avenue | 180th Street SE | Snohomish County | Snohomish |
| AC/C-[illegible] | 180th Street SE | Urban 5-lane standards w/ signal | Snohomish Avenue | 83rd Avenue SE | 180th Street SE | Snohomish County | Snohomish |
| AC-25 | 35th Avenue SE | Urban 3-lane standards | Seattle Hill Road | 162nd Street SE | 35th Avenue SE | Snohomish County | Snohomish |
| AC-26 | 35th Avenue SE | Urban 3-lane standards | 162nd Street SE | 180th Street SE | 35th Avenue SE | Snohomish County | Snohomish |
| AC-27 | 35th Avenue SE | Urban 3-lane standards | 180th Street SE | 188th Street SE | 35th Avenue SE | Snohomish County | Snohomish |
| AC-30 | 35th Avenue SE | Urban 3-lane standards | 188th Street SE | 198th Place SE | 35th Avenue SE | Snohomish County | Snohomish |
| AC-31 | 35th Avenue SE (York Road) | Urban 3-lane standards | 198th Place SE | State Route 524 | 35th Avenue SE (York Road) | Snohomish County | Snohomish |
| AC-32 | 39th Avenue SE | Urban 3-lane standards (intersection improvement at State Route 524 completed) | 207th Street SE | 228th Street SE | 39th Avenue SE | Snohomish County | Snohomish |
| JP-7 | 39th Avenue SE | Urban 3-lane standards | 228th Street SE | 240th Street SE | 39th Avenue SE | Snohomish County | Snohomish |
| AC-23 | Seattle Hill Road | Urban 3-lane standards | State Route 96 | 35th Avenue SE | Seattle Hill Road | Snohomish County | Snohomish |

B.2-1

Y-002-100

Attachment B.2

## County Arterial Projects for Inclusion within Transportation 2040 Preferred Alternative Evaluation

| ID | Title | Description | From | To | On | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|
| AC-3 | 67th Avenue NE | Urban 3-lane standards | Marysville City Limits | 108th Street NE | 67th Avenue NE | Snohomish County | Snohomish |
| AC-15 | 52nd Avenue West | Urban 3-lane standards | Lynnwood City limits | 148th Street SW | 52nd Avenue West | Snohomish County | Snohomish |
| AC-36 | 228th Street SE | Urban 4-lane standards | 39th Street SE | 45th Street SE | 228th Street SE | Snohomish County | Snohomish |
| AC-37 | 228th Street SE | Rural 3/5-lane standards (some Brightwater Mitigation) | 45th Street SE | State Route 9 | 228th Street SE | Snohomish County | Snohomish |
| NR-2 | 51st Avenue NE | Urban 3-lane standards w/ northbound auxiliary lane | 84th Street NE | 88th Street NE | 51st Avenue NE | Snohomish County | Snohomish |
| AO/C-4 | 51st Avenue NE | Urban 3-lane standards | 88th Srteet NE | 108th Street NE | 51st Avenue NE | Snohomish County | Snohomish |
| AO/C-3 | 51st Avenue NE | Urban 3-lane standards | 108th Street NE | 136th Street NE | 51st Avenue NE | Snohomish County | Snohomish |
| JP-2 | 51st Avenue NE | Urban 3-lane standards | 136th Street NE | 152nd Street NE | 51st Avenue NE | Snohomish County | Snohomish |
| JP-1 | 51st Avenue NE | Urban 3-lane standards | 152nd Street NE | State Route 531 | 51st Avenue NE | Snohomish County | Snohomish |
| AO/C-5 | Lundeen Park Way | Urban 4-lane standards | State Route 9 | 99th Avenue NE | Lundeen Park Way | Lake Stevens | Snohomish |
| AC-11 | 4th Avenue West | Urban 5-lane standards | 112th Street SW | Everett City Limits | 4th Avenue West | Snohomish County | Snohomish |
| AC-19 | 28th Avenue West | Urban 5-lane standards | 164th Street SW | State Route 525 Off-ramp | 28th Avenue West | Snohomish County | Snohomish |
| AO-3 | 88th Street NE | Urban 3-lane standards | 44th Drive NE | 61st Drive NE | 88th Street NE | Snohomish County | Snohomish |
| AC-17 | 36th/35th Avenue West | Urban 3-lane standards | 156th Street SW | 164th Street SW | 36th/35th Avenue West | Snohomish County | Snohomish |
| AC-21 | North Road | Urban 3-lane standards | SR 524 | 184th St SW | North Road | Snohomish County | Snohomish |

Y-002-100

Attachment B.3

## City Arterial Projects for Inclusion within Transportation 2040 Preferred Alternative Evaluation

| DBSMID | Title | Description | From | To | On | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| 4537 | Capacity improvements - SR 99 interchanges | Capacity improvements, adding lanes heavy movements such as left turn and right turns - improve the intersection capacity, reduce delay, go from split phasing traffic signal operation to normal 8-phase traffic signal operation | | | Hwy 99 intersections | 2015 | Edmonds | Snohomish County |
| 5268 | West Marine View Drive / Rucker Ave / 41st St Freight Route Improvements | Improved freight mobility through surface and turn improvements as well as signal timing | - | - | West Marine View Drive / Rucker Ave / 41st St Freight Route Improvements | 2020 | Everett | Snohomish County |
| [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |
| 1679 | Evergreen Way | Widen Evergreen Way from 5 to 7 lanes, with curb, gutters and sidewalks and drainage improvements. | 115th Street | Airport Road | Evergreen Way | 2009 | Everett | Snohomish County |
| 1880 | Everett Ave Extension and Overcrossing | Eastern extension of Everett Ave over the existing BNSF rail lines to riverfront industrial property, 4 total lanes | Everett Ave and E. Grand | Riverfront industrial property | Everett Ave | 2010 | Everett | Snohomish County |
| 4005 | Everett Arterial Access Improvements | Arterial access improvements to US 2 and I-5 in Everett | Everett Avenue | Pacific | Vicinity of Walnut and Chestnut on various streets | 2010 | Everett | Snohomish County |
| AOIC-5 | Lundeen Park Way | Urban 4-lane standards | State Route 9 | 92th Avenue NE | Lundeen Park Way | 2012 | Lake Stevens | Snohomish County |
| 4119 | 44th Ave. W. Northbound Widening | Adc a new northbound travel lane along 44th Ave W, from just north of 199th St SW to 200th St SW.This project will help accommodate the heavy traffic that exists from I-5 onto 44th Ave W and it is necessary to shorten traffic delays caused by future growth, especially in the planned City Center. | 198th St. SW | 200th Ave. W | 44th Ave. | 2011 | Lynnwood | Snohomish County |
| 4632 | Braiding of NB 196th to I-5 on-ramp and NB I-5 to SB I-405 off-ramp | Replace existing at grade weave by constructing a braided ramp system. | 196th St SW | I-405 | I-5 | 2025 | Lynnwood | Snohomish County |
| 4123 | 88th St NE | Upgrade existing 2 lane roadway to 5 lanes, ingrade State Ave. intersection. | State Avenue | 87th Avenue NE | 88th St NE | 2015 | Marysville | Snohomish County |
| 4124 | State Avenue | Upgrade existing 3 lane roadway to 5 lanes | 116th St. NE | 136th St. NE | State Avenue | 2008 | Marysville | Snohomish County |
| 4126 | State Avenue | Upgrade existing 3 lane roadway to 5 lanes | 100th St. NE | 116th St. NE | State Avenue | 2012 | Marysville | Snohomish County |
| [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] | [illegible] |
| 4006 | South Everett Interchange Improvements (I-5@100th and Everett Mall | Construct a new crossing under I-5 at 100th St and provide NB and SB HOV access south of SR 526/SR527/South Broadway interchange. | SR 527/South Broadway I/C | SB I-5; 7th Avenue SE | I-5, 100th Street SE | 2030 | WSDOT | Snohomish County |
| | Poplar Way Extension Bridge | Extend Poplar Way over I-5 and connect with 33rd Avenue West | Poplar Way | 33rd Avenue West | Poplar Way | | Lynnwood | Snohomish County |

B.3-1

Y-002-100

Attachment B.3

## City Arterial Projects for Inclusion within Transportation 2040 Preferred Alternative Evaluation

| D2030ID | Title | Description | From | To | On | Completion Year | Lead Sponsor | Main County |
|---|---|---|---|---|---|---|---|---|
| | 36th Avenue West | Road Expansion working with Snohomish County | Maple Road | 164th St SW | 36th Avenue West | | Lynnwood | Snohomish County |

07/31/2009 FRI 18:23 FAX 253 798 7627 Tac Pierce Co Hlth Dept 002/003

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July 29, 2009

Mr. Charlie Howard, Director of Transportation Planning
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-035

Dear Mr. Howard,

Y-003-001 On behalf of the Tacoma-Pierce County Health Department, I wish to provide comment on the Transportation 2040 Draft Environmental Impact Statement Plan. The purpose of this letter is to confirm our support for Alternative #5 as outlined in the plan.

The mission of the Tacoma-Pierce County Health Department is to safeguard and enhance the health of all Pierce County residents. We do this through a variety of direct services and population based initiatives. A few of our focus areas include obesity prevention, health equity and environmental health. Each of these areas is directly impacted by the Transportation 2040 Draft Plan.

Y-003-002 Obesity Prevention

As you are most likely aware, the incidence of overweight and obesity has increased significantly over the last 30 years. This increase is positively correlated to the rise in chronic diseases such as diabetes and cardiovascular disease. The health and economic costs of obesity affect every individual in Pierce County. The common view of obesity has been that it is a negative, personal failure in self-care. However, recent research and understanding of the issue frames obesity as a predictable consequence of an "obesogenic" environment-an environment that discourages activity because of poor design, thus creating a paradigm shift in how we think about the causes and solutions to the problem. This new perspective illustrates the importance of environmental design and how it influences health related behaviors. In development of a regional transportation plan we must be forward-thinking in our approach and consider the implications of the built environment on our health and well being. **The outcome of the Transportation 2040 plan will have significant economic and societal effects on the health and wellbeing of the residents we serve.**

Y-003-003 Within the City of Tacoma, we have invested considerable resources to support the development of a non-motorized transportation plan and an infrastructure that supports our residents' ability to be physically active. Unfortunately, we are working against years of city planning that has placed emphasis on vehicular travel and streets over development of an infrastructure that supports walking and biking. The cost to retro-fit our current infrastructure to encourage physical activity is now a necessary but daunting task. This example demonstrates our need to have foresight and to focus on prevention strategies rather than fixing past mistakes.

The benefits of primary prevention become more apparent when we consider relative cost, savings and impact compared to the costs of treatment. Chronic disease accounts for 75% of medical costs in Washington State and 10% of all Medicaid costs are obesity related. Pierce County has among the state's highest prevalence of diabetes, heart disease and stroke. Community-based prevention programs in Washington State have an estimated return of $5.60 for every $1 invested.

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**Y-003-001**

Thank you for providing detailed comments on the Transportation 2040 DEIS. Obesity prevention, health equity, and environmental health are discussed in the FEIS in chapters 18: Human Health, 17: Environmental Justice, and 13: Environmental Health, respectively. These issues were taken into consideration during the development of the Preferred Alternative.

**Y-003-002**

Please refer to Appendix D: Policy Analysis and Evaluation Criteria Report. The evaluation of the Transportation 2040 alternatives included this policy focus: The region's built and natural environments should promote health. The policy focus sought to answer the following questions, as they related to guiding transportation investments in Transportation 2040:

Q. How do land use patterns, environmental factors, transportation systems, and other infrastructure impact health?

Q. To what degree does system promote environmental health (minimize emissions/pollutants and carcinogens); active living and wellness (increased opportunities for nonmotorized transportation); and safety?

**Y-003-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Y-003-003

Recognizing the importance of Prevention, especially as it relates to obesity, our department has dedicated significant resources to support eight Active Living and Healthy Eating staff who engage in policy, systems and environmental change approaches to reducing obesity. Through their work, we have made considerable gains in this field. These gains include the adoption of both an Obesity Prevention and Complete Streets Resolution by the Tacoma-Pierce County Board of Health and a community driven Action Plan for Active Living and Healthy Eating (http://www.tpchd.org/files/library/f88dec11fd52279e.pdf). Through a community-based participatory process, Pierce County identified **Creating Built Environments that Support Physical Activity as Part of Everyday Life** as the top priority for obesity prevention in our community. Recommended actions to meet this goal include a call to elected officials to support promotion of non-motorized alternatives in transportation funding and a call to city and county planners to develop pedestrian and bicycle infrastructure to make it easier for residents to be physically active. In order for us to reach these goals, we must have the support and funding by local, regional and state entities that have the ability to advocate for the priorities identified above.

Y-003-004

Health Equity

In Pierce County, there is an unequal distribution of obesity, diabetes and other health issues across different populations. Racial and ethnic minorities and individuals with less education and low incomes are more likely to be overweight or obese. For example, Pierce County adults earning less than $15,000 per year have obesity rates 70% higher than those earning more than $75,000 per year. Area-based measures of wealth, such as average home value or percent of residents living at poverty levels, can be even stronger predictors of health status, suggesting that "place" matters for health behaviors and outcomes. Some infrastructure improvements such as bringing electric light rail to low income communities can have considerable economic benefit. However, other infrastructure changes such as building highways over these same communities can be intrusive and can have negative health impacts in these areas due to increased exposure to environmental pollutants which can lead to poor health effects such as asthma. In 2008, the Health Department conducted focus groups with low income individuals to assess the challenges to being physically active. A common theme was the lack of infrastructure for pedestrians to walk safely in their neighborhoods.

While we recognize that considerable efforts were taken to analyze the effects of the various alternatives to low income populations, we ask that you further consult with individuals and community organizations that represent these populations to ensure that the analysis addresses their needs and are represented in all aspects of the plan.

Y-003-005

Environmental Health

In addition to obesity and health equity, we are additionally concerned with the environmental impact of some proposed transportation alternatives that support increasing capacity for roads and motorized transportation. Our top areas of concern are air quality due to vehicle emissions and storm water run-off. Currently, the greater Tacoma area is not meeting federal air quality standards. Supporting increased capacity for public transportation such as light rail and buses which can efficiently move people from one place to another while minimizing impact to the environment should be a primary consideration in choosing an alternative. In addition to air quality concerns, the increase in impervious surfaces and vehicular traffic that would result from several of the alternatives would further stress our storm water systems and add additional contaminants to the already degraded waters of Puget Sound.

Given the above considerations, we feel that Alternative #5 of the draft EIS would provide our region with the most opportunity to support the health and economic welfare of our community. We believe that this forward thinking approach would be beneficial by supporting regional growth in a way that promotes the future health of our community. Thank you for your consideration.

Anthony L-T Chen, MD MPH, Director of Health

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**Y-003-004**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**Y-003-005**

Please refer to the FEIS for a discussion of air quality and water effects. Thank you for stating your preference among the alternatives.

King County

**Julia Patterson**
Councilmember, District 5
**Metropolitan King County Council**

July 30, 2009

Mr. Sean Ardussi, Senior Planner
Puget Sound Regional Council (PSRC)
1011 Western Ave, Suite 500
Seattle WA 98104-1035

RE: Transportation 2040 DEIS Comments
I-5/SR 509 Corridor Completion and Freight Improvement Project

Y-004-001 I am writing today to express my support for the I-5/SR 509 Corridor Completion and Freight Improvement Project (Project) and request that PSRC include the Project in the Transportation 2040 preferred alternative.

Y-004-002 Since 1991, the southwest King County communities of SeaTac, Des Moines, Kent, and Federal Way, as well as the Port of Seattle, Sound Transit, and King County have engaged in a cooperative effort on the Project. Consistently rated at or near the top of the list when comparing benefits to costs of the other large projects in the state, the Project provides vital congestion relief and freight improvement benefits to the Puget Sound region. The Project was integral to the Destination 2030 Plan. Also of note, the Project has completed its required environmental review and permitting requirements. This means it can begin construction and deliver significant benefits to the region quickly.

Y-004-003 Completing the Project will, at long last, provide southern Puget Sound residents with a direct connection to Sea-Tac Airport, reduce congestion on I-5 by and enhance freight mobility among the Duwamish, Sea-Tac Airport, and Green River Valley industrial areas.

Thank you for the opportunity to share my support for including this project in the preferred alternative.

Sincerely,

Julia Patterson

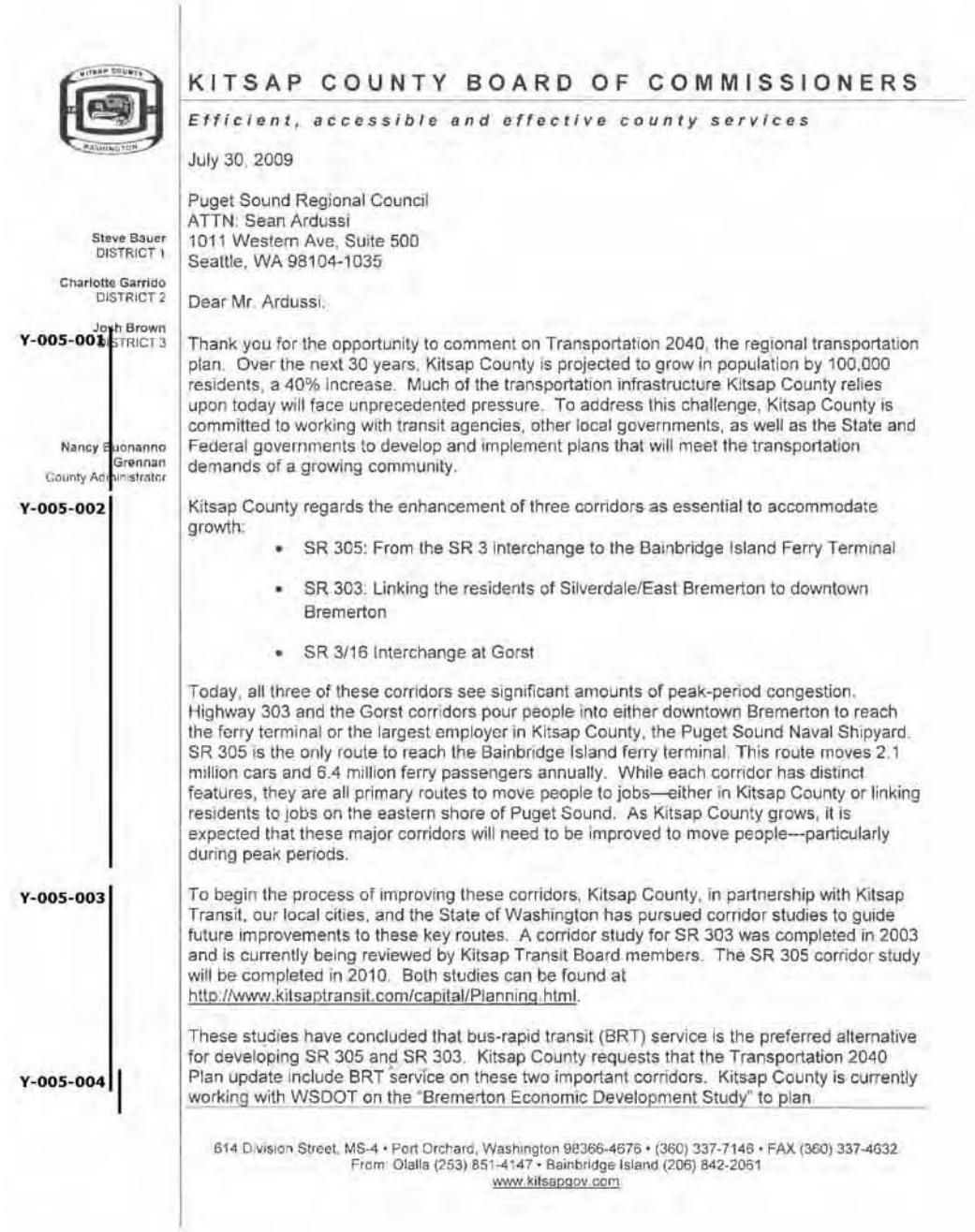
Julia Patterson
King County Councilmember, District 5

King County Courthouse, 516 Third Avenue Room 1200, Seattle, WA 98104
206-296-1005 Fax 206-296-1050 julia.patterson@kingcounty.gov www.kingcounty.gov/patterson

**Y-004-001**
Comment noted.

**Y-004-002**
Thank you for your comment in support of the SR 509/I-5 Corridor Completion and Freight Improvement Project. The Preferred Alternative for Transportation 2040 includes this project.

**Y-004-003**
Comment noted.



KITSAP COUNTY BOARD OF COMMISSIONERS

*Efficient, accessible and effective county services*

July 30, 2009

Puget Sound Regional Council
ATTN: Sean Ardussi
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

Steve Bauer
DISTRICT 1

Charlotte Garrido
DISTRICT 2

Josh Brown
DISTRICT 3

Nancy Buonanno Grennan
County Administrator

Dear Mr. Ardussi:

Y-005-001 Thank you for the opportunity to comment on Transportation 2040, the regional transportation plan. Over the next 30 years, Kitsap County is projected to grow in population by 100,000 residents, a 40% increase. Much of the transportation infrastructure Kitsap County relies upon today will face unprecedented pressure. To address this challenge, Kitsap County is committed to working with transit agencies, other local governments, as well as the State and Federal governments to develop and implement plans that will meet the transportation demands of a growing community.

Y-005-002 Kitsap County regards the enhancement of three corridors as essential to accommodate growth:

- SR 305: From the SR 3 interchange to the Bainbridge Island Ferry Terminal
- SR 303: Linking the residents of Silverdale/East Bremerton to downtown Bremerton
- SR 3/16 Interchange at Gorst

Today, all three of these corridors see significant amounts of peak-period congestion. Highway 303 and the Gorst corridors pour people into either downtown Bremerton to reach the ferry terminal or the largest employer in Kitsap County, the Puget Sound Naval Shipyard. SR 305 is the only route to reach the Bainbridge Island ferry terminal. This route moves 2.1 million cars and 6.4 million ferry passengers annually. While each corridor has distinct features, they are all primary routes to move people to jobs—either in Kitsap County or linking residents to jobs on the eastern shore of Puget Sound. As Kitsap County grows, it is expected that these major corridors will need to be improved to move people---particularly during peak periods.

Y-005-003 To begin the process of improving these corridors, Kitsap County, in partnership with Kitsap Transit, our local cities, and the State of Washington has pursued corridor studies to guide future improvements to these key routes. A corridor study for SR 303 was completed in 2003 and is currently being reviewed by Kitsap Transit Board members. The SR 305 corridor study will be completed in 2010. Both studies can be found at http://www.kitsaptransit.com/capital/Planning.html.

Y-005-004 These studies have concluded that bus-rapid transit (BRT) service is the preferred alternative for developing SR 305 and SR 303. Kitsap County requests that the Transportation 2040 Plan update include BRT service on these two important corridors. Kitsap County is currently working with WSDOT on the "Bremerton Economic Development Study" to plan

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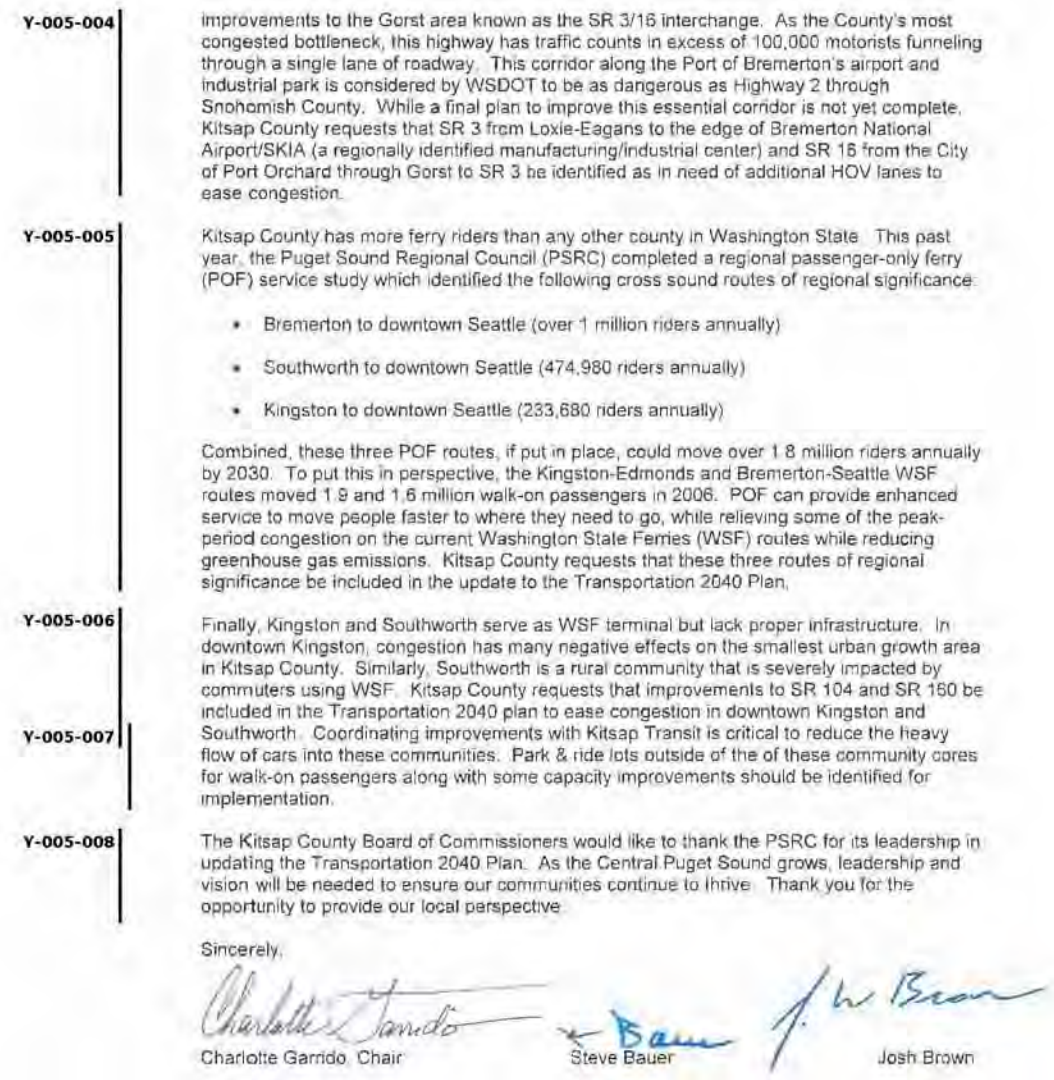
**Y-005-001**
Comment noted.

**Y-005-002**
Comment noted.

**Y-005-003**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**Y-005-004**
The six plan alternatives analyzed in the DEIS, including the Baseline,



Y-005-004

improvements to the Gorst area known as the SR 3/16 interchange. As the County's most congested bottleneck, this highway has traffic counts in excess of 100,000 motorists funneling through a single lane of roadway. This corridor along the Port of Bremerton's airport and industrial park is considered by WSDOT to be as dangerous as Highway 2 through Snohomish County. While a final plan to improve this essential corridor is not yet complete, Kitsap County requests that SR 3 from Loxie-Eagans to the edge of Bremerton National Airport/SKIA (a regionally identified manufacturing/industrial center) and SR 16 from the City of Port Orchard through Gorst to SR 3 be identified as in need of additional HOV lanes to ease congestion.

Y-005-005

Kitsap County has more ferry riders than any other county in Washington State. This past year, the Puget Sound Regional Council (PSRC) completed a regional passenger-only ferry (POF) service study which identified the following cross sound routes of regional significance:

- Bremerton to downtown Seattle (over 1 million riders annually)
- Southworth to downtown Seattle (474,980 riders annually)
- Kingston to downtown Seattle (233,680 riders annually)

Combined, these three POF routes, if put in place, could move over 1.8 million riders annually by 2030. To put this in perspective, the Kingston-Edmonds and Bremerton-Seattle WSF routes moved 1.9 and 1.6 million walk-on passengers in 2006. POF can provide enhanced service to move people faster to where they need to go, while relieving some of the peak-period congestion on the current Washington State Ferries (WSF) routes while reducing greenhouse gas emissions. Kitsap County requests that these three routes of regional significance be included in the update to the Transportation 2040 Plan.

Y-005-006

Finally, Kingston and Southworth serve as WSF terminal but lack proper infrastructure. In downtown Kingston, congestion has many negative effects on the smallest urban growth area in Kitsap County. Similarly, Southworth is a rural community that is severely impacted by commuters using WSF. Kitsap County requests that improvements to SR 104 and SR 160 be included in the Transportation 2040 plan to ease congestion in downtown Kingston and

Y-005-007

Southworth. Coordinating improvements with Kitsap Transit is critical to reduce the heavy flow of cars into these communities. Park & ride lots outside of the of these community cores for walk-on passengers along with some capacity improvements should be identified for implementation.

Y-005-008

The Kitsap County Board of Commissioners would like to thank the PSRC for its leadership in updating the Transportation 2040 Plan. As the Central Puget Sound grows, leadership and vision will be needed to ensure our communities continue to thrive. Thank you for the opportunity to provide our local perspective.

Sincerely,

Charlotte Garrido, Chair  Steve Bauer  Josh Brown

were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**Y-005-005**

Concur. The Preferred Alternative for Transportation 2040 includes these three new cross-sound passenger ferry routes in the financially constrained portion of the plan.

Transportation 2040's Preferred Alternative includes a balance of passenger and auto ferry investments across Puget Sound. The plan recognizes the importance of preserving and maintaining the current auto ferry routes and services, and will seek to develop a sustainable financial plan to close the current funding gap identified in the WSF Long Range Plan for the state ferry system. Transportation 2040 also builds on the findings and recommendations of the 2008 Regional Passenger

Only Ferry Study in two ways: (1) maintain and preserve the existing passenger ferry service operated by Kitsap Transit (service between Bremerton and Port Orchard and Annapolis) and King County Ferry District (service between downtown Seattle and West Seattle and Vashon Island); and (2) provide expanded passenger ferries across Puget Sound and Lake Washington.

**Y-005-006**

Comment noted. Your concerns about the impacts of ferry traffic in Kingston and Southworth are addressed in the Transportation 2040 plan. The Preferred Alternative includes highway improvement projects on SR 160 and SR 104 near the Southworth and Kingston terminals.

**Y-005-007**

The Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**Y-005-008**

Comment noted.

Pierce County

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July 31, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
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Seattle, WA 98104-1035

Re: Transportation 2040 - Draft Environmental Impact Statement

Dear Mr. Ardussi:

**Y-007-001** Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for *Transportation 2040 (T2040)*. The DEIS reflects significant technical work among Puget Sound Regional Council (PSRC) staff, the public, and member jurisdictions. PSRC is to be commended for completing such a large and detailed document within a short time frame. Pierce County's concerns relating to the Plan's assumptions and provisions - as well as ultimately the basis for the actual selection of a preferred alternative - are enumerated below.

**Y-007-002** Pierce County believes that many aspects of the T2040 Plan merit further review and will therefore continue its review and comment on the Plan following its submittal of these formal comments on the DEIS. It is the intent of the Pierce County Council and Pierce County Executive to be actively involved in the regional conversation that will result in the selection of a preferred alternative.

**Y-007-003** **Support the Objectives**

Pierce County supports many of the objectives of Transportation 2040, including*:

- *Improve freight mobility and people-moving capacity in the central Puget Sound region.*
- *Continue to preserve, maintain, and improve the existing urban and rural transportation system.*
- *Focus investments on creating a highly efficient multimodal transportation network that will provide access to, mobility within, and connections between centers.*

*Excerpts from Transportation 2040, DEIS

**Y-007-001**

Comment noted.

**Y-007-002**

Comment noted.

**Y-007-003**

Thank you.

Y-007-004

**Applying Transportation 2040**

While Pierce County supports the greater objectives of Vision 2040 (V2040) and T2040, we are uncertain how we will be able to achieve the objectives of these plans based on certain provisions of Transportation 2040. T2040 looks at the larger regional picture, offering broad strategies and policies that are evaluated in aggregate. This is an appropriate approach in assessing the generalized impacts, but ultimately the regional policies must be addressed by the local jurisdictions in local plans. We would point out a challenge in "translating" regional policy to the local scale of our jurisdiction.

For example, the County will find it challenging, if not impossible, to address: Page 5-23, Question #8, "*What can be done to mitigate the effects of transportation projects upon the region's land uses? Urban Land.*" The paragraph states that, *"enhanced transportation facilities and services would help to enable local jurisdictions to accommodate future growth in existing urbanized areas. Existing urban areas are likely to become more compact in nature and will be served by a greater variety of transportation choices."* This statement clearly does not recognize the dilemma brought upon existing urban areas in unincorporated Pierce County by the policies and strategies of V2040 and T2040. The Regional Growth Strategy in V2040 directs the County to significantly reduce the amount of residential population and job growth within its urban area. This limitation of future growth to seemingly unrealistic levels will greatly impede the County's ability to meet minimum threshold densities needed to support both basic and enhanced transit service and other strategies to reduce vehicle miles traveled within and between Pierce County's communities. We are concerned T2040 will continue to make it extremely difficult for Pierce County to obtain its fair share of regional financial investment (federal funds) necessary to construct the infrastructure to support both basic and enhanced transit service and non-motorized uses. We maintain that these investments are key in efforts to reduce vehicle miles traveled, improve air quality, and reduce greenhouse gases.

The above finding was graphically delivered when the County's staff conducted a GIS analysis that examined housing densities and potential transit corridors within the county. The analysis graphically depicted how population densities along our existing transit lines challenge Pierce Transit to operate financially viable bus service. The analysis also made it more apparent that transit would not be financially viable even with projected population increases in the next twenty years as reflected in our comprehensive planning. Pierce County needs to be able to achieve cost effective, operationally sound, and financially viable service within and between planned sub-regional and regional centers. These centers may be located near or at a number of mixed use areas that have already been designated by our community planning process. Our Transportation Plan Preview (attached) offered this concept as one of five transportation alternatives. The Preferred Alternative needs to reconcile Transportation 2040 with Vision 2040 by recognizing the importance of sub-regional centers that would promote sustainable transportation and stronger economic development. V2040 recognizes the importance of sub-regional centers but T2040 does not. The Preferred Alternative must provide recognition of and funding for sub-regional centers.

We are concerned that V2040 and T2040 do not afford the unincorporated urban areas of Pierce County the ability to attain a critical mass and mix of population and employment that would promote the core concepts and strategies of these two plans. These core concepts and

**Y-007-004**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

Y-007-004

strategies are one means by which Pierce County could focus its development to promote more modal choices. Focusing future development in specific centers and connecting the regional and sub-regional centers could be the means by which the county focuses its transportation investment in services and infrastructure.

Y-007-005

**Transportation Infrastructure Assumptions**

T2040 is designed to support V2040 which targets more population than job growth in Pierce County. Given that in 2000, about 25% of Pierce County's labor force commuted north into King County, and since that time population has been increasing faster than employment. It is Pierce County's objective to grow the local economy and encourage the formation of new businesses and employment. There are two key strategic transportation investments that we highlight below that work towards the above purpose.

*SR-167 and SR-704 (Cross Base Highway)*

It is understood that T2040 will be integrated with V2040 and the Regional Economic Strategy (adopted September 27, 2005). The Regional Economic Strategy cites the need to secure funding for certain projects that support the economic vision of our region. The Regional Economic Strategy recommends that funding be pursued for a number of projects, including the SR-167 and the completion of SR 704 (The Cross Base Highway). These two projects are key to Pierce County's economic strategy and support job creation near areas of population growth and will reduce commuting and per-capita vehicle miles traveled. Because a jobs based economy is an important ingredient to the greater "internalization" of our traffic, we strongly request that these two projects are included in the Preferred Alternative. It is also noted that both of these projects are currently included within the Washington State Highway System Plan.

Y-007-006

**Rail Transit**

We support the concept of cost effective light rail transit that would improve mobility in our county. To this end we would recommend that the Preferred Alternative provide a light rail connection from King County to Tacoma.

Y-007-007

**Tolling**

The concept of congestion pricing and tolling may be attractive in terms of modeled outcome. Charging tolls on many of the major roadways would likely reduce the longer trips on the roadways and have long term impacts on housing location decisions. Further, tolling would likely provide a source of consistent funding for construction, maintenance and operation of regional infrastructure.

How a tolling program would be implemented and how its potentially regressive impacts would be mitigated must be detailed in the preferred alternative should tolling move forward. As stated elsewhere in this letter, we are concerned that V2040 and T2040 perpetuate and increase the jobs/housing imbalance in Pierce County. This leads to more people commuting to King County/Seattle for jobs, thereby creating additional congestion on I-5 and on transit. With tolling, those people who cannot find jobs in Pierce County will be subjected to an additional regressive "tax." And typically these regressive "taxes" and "fees" are placed on people that are the least able to afford them.

**Y-007-005**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**Y-007-006**

Thank you for stating your preference for the type and location of transit service among the alternatives.

**Y-007-007**

The effects of tolling upon environmental justice populations is discussed in the FEIS.

Y-007-008 We also want to make very sure that tolls collected within sub regions of the Puget Sound area remain and are spent within those same sub regions of the Puget Sound area and that they are not used to fund projects outside of those sub regions. The preferred alternative should reflect this concept of expending the toll revenues within the areas collected.

Y-007-009 Further, it is important and prudent to again bring up the issue of tolling "fairness" throughout the Puget Sound Region. Approximately 95% of the total cost of the Tacoma Narrows Bridge is being paid for with tolls. No other project/facility in the Puget Sound Region which is proposed to have future tolls comes close to the 95% level on the Narrows Bridge. We strongly recommend that this fairness issue be reconsidered and that the level of tolls on the Tacoma Narrows Bridge be reduced to the average level of other planned tolled facilities in the Puget Sound Region.

Y-007-010 **Current and Future Financial Realities**
T2040 addresses the concepts and challenges of transportation financing and has analyzed all of the plan alternatives in this context. Pierce County has projected its twenty year transportation needs and financial resources, reflecting the maintenance, operations, and preservation costs (with safety being a component of all services). It has been determined that fulfilling these necessary needs will make it challenging to fund higher levels of transportation improvements and services. Based on these findings, it is recommended that the Preferred Alternative be able to clearly define the total costs for the region and its constituent jurisdiction and the levels of available revenue. PSRC has done commendable work so far in defining the alternatives and their assumptions (via such documents as the *Alternatives Technical Report*). It is important that the jurisdictions continue to understand the "price tag" for the alternatives, the viability of such strategies as enhanced bus service and non-motorized facilities, and the overall financial sustainability of these plans on a regional and local scale.

Y-007-011 **Need for a Supplemental EIS**
The Transportation 2040 DEIS discusses 5 alternatives that are separate and distinct from one another. The Preferred Alternative will be constructed from information in the DEIS and from public comment – new projects, actions, or implementation methods could be considered as part of the Preferred Alternative. As the Preferred Alternative is developed, PSRC should seriously consider conducting a Supplemental EIS in order to properly analyze the environmental impacts of the Preferred and allow jurisdictions across the region to consider and participate in how the Preferred will work in conjunction with local plans.

Y-007-012 **Aligning V2040 and T2040**
In many ways Transportation 2040 is the funding mechanism for Vision 2040; the funding from transportation investments can realistically bring about more 'on the ground' change for implementing V2040 than probably any other single mechanism. To the extent that transportation investments identified in T2040 are not lined up with V2040 or to the extent that V2040 was not lined up with real growth patterns on the ground and the changes necessary to reconfigure that growth - the region will have problems realizing efficient transportation and growth patterns thus causing greater environmental and economic impacts over a longer period of time. It is imperative that the region get these two documents 'right' in

**Y-007-008**
Comment noted. The region has been engaged in a lengthy debate about tolling and pricing, and these discussions have included the use of toll revenues. This discussion will likely be informed by actions by the State Legislature.

**Y-007-009**
Over the next 30 years the State Legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time toward increasingly broader uses.

Decisions on the future toll rates for the Tacoma Narrows Bridge will be made through the Washington State Legislature, and administered by WSDOT.

**Y-007-010**
Concur. Transportation 2040 attempts to balance investments to include preservation and maintenance of our existing transportation infrastructure as well as fund a broad range of improvements. The regional plan's vision of investments and our financial strategy need to translate into local agency plans, projects, and programs they can implement.

Y-007-012

their ability to intertwine land use and transportation patterns in the upcoming years. Economically and environmentally we can ill afford to waste time or resources.

Pierce County is in the process of updating its transportation plan which has been a three year process and one that is not yet complete due to the fiscal realities of supporting growth and development. In our work and analysis we have relied on the iterative process that land use and transportation planning can be and are now looking seriously toward changes in our land use patterns and plans in order to have a fiscally constrained transportation plan that maximizes efficiency in the existing system and improves our air quality. We suggest PSRC also recognize the iterative process of intermingling land use and transportation planning to ensure both planning processes are coordinated in order to meet their respective goals and objectives. We ask PSRC to recognize that revisions to Vision 2040 may be necessary in order to actually reduce vehicle miles traveled, greenhouse gases, and get the most fiscal efficiency in our transportation systems.

One example of where Vision 2040 should be more closely refined through the iterative transportation-land use planning process is its approach to Regional Centers. V2040 assumed existing Regional Centers were appropriately located (despite the fact that many Regional Centers were designated as such very early in V2020 and as of today still do not have the densities and mixed use necessary to achieve modal shifts out of single occupant vehicles or even to be serviced on 15 minute bus headways). While V2040 calls for action and review to ensure these centers function as envisioned (MPP-DP-Action-3) there is no recognition that perhaps some of these centers would take a very long time and significant amount of investment to actually attain the mixed use goals and densities of a Regional Center and perhaps should not be designated as such.

Further, not all regional growth centers align with high capacity transit centers such as bus, rail, or ferry stations/terminals. It is unclear as to whether work has been done at the regional level to ensure that all high capacity transit stations are even within some type of center - regional or sub-regional. However both Alternative 3 and Alternative 5 contain the statement: "This alternative includes incentives for mixed-use development near transit centers and rail stations." Attempting to fund both Regional Centers and high capacity transit stations is inefficient and will leave various jurisdictions vying for a spot on the 'regional centers' map while spreading limited funding too thin by attempting to fund regional centers and high capacity transit centers – which may or may not be the same. Interestingly, contrary to T2040, V2040 does not prioritize high capacity transit stations for 'incentives' for mixed use.

It is important to recognize where regional growth centers are inappropriately located for transportation efficiency or where there are high capacity transit systems but not land uses that call for high density mixed use - will only extend the time to which the region will realize a cost effective and environmentally sustainable transportation system. High capacity transit stations represent costly infrastructure investments that should be maximized through land use. A policy should be added to Vision 2040 that requires high capacity transit stations (and surrounding area) to be designated regional or sub-regional centers with a defined minimum density. Regional growth centers that do not contain high capacity stations or cannot be

**Y-007-011**

The purpose of the FEIS is to evaluate the effects of the Preferred Alternative. Therefore, a Supplemental EIS is not needed.

**Y-007-012**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

Y-007-012

easily / reasonably accessed with high capacity transit should be reconsidered for another designation such as sub-regional centers.

**Recognizing Sub-regional Centers**

Vision 2020 promoted a hierarchy of centers and in 1994 Pierce County adopted a Comprehensive Land Use Plan that was based on that hierarchy of centers. Vision 2040 looks toward putting major funding toward regional centers and sub-regional centers. Transportation 2040 does not include or mention funding for sub-regional centers. It is imperative for Pierce County and other jurisdictions to be able to realize mixed use centers as envisioned in Vision 2020 and our Comprehensive Plan in order to remove local trips off the roads to achieve greater efficiency from our existing system and reduce air quality impacts. Transportation 2040 needs to include actions and funding for sub-regional centers and the Preferred Alternative must provide funding for and prioritization of sub-regional centers.

Y-007-013

**Specific Comments**

Following are a number of comments that address specific provisions of T 2040:

Chapter 2- Vision 2040 Policies – Need for Consistency
Page 2-9 contains the statement: "Growth in the unincorporated urban growth area is prioritized for areas that are identified for annexation into adjacent cities." This is an inaccurate statement and any funding or transportation investment decisions that are based on this assumption must be revised. Vision 2040 does not prioritize growth for city UGAs but rather calls for unincorporated UGAs to become incorporated or annexed over time. It is important for Pierce County that this distinction is clarified because generally cities within Pierce County have had significantly lower densities than the County's unincorporated UGA. Vision 2040 strives to shift the growth to the cities and Transportation 2040 should not express a different direction.

Y-007-014

Chapter 3 - Plan Alternatives
Page 3-9, Consistent Growth Assumptions. The document states that, "each alternative was analyzed using the same assumptions for future land use policies and strategies for growth management as established in V2040." While T2040 needs to be consistent with V2040, a component of a DEIS alternative must d recognize that V2040 provides for future technical amendments that may re-categorize jurisdictions to a higher "regional geography." A re-categorization may or may not have significant impacts to the conclusions of the environment analysis. The DEIS alternative should also reflect V2040's newly adopted Appendix II-B: PSRC "Guidance for Aligning Local Growth Targets with the Regional Growth Strategy" which states, "PSRC will consider whether to revisit the allocations in the Regional Growth Strategy following local plan updates." Since the adoption of V2040, local jurisdictions have voiced strong opinions about the implementation of the Regional Growth Strategy through local county population/housing targets processes. The EIS and the larger development of the final plan must recognize this possibility.

Y-007-015

Chapter 5 - Land Use, Population, Employment, and Housing
Page 5-7, Population, Employment, and Housing. The first paragraph under question #3 states that the amount of population and employment growth does not vary among

**Y-007-013**

This language is consistent with VISION 2040.

**Y-007-014**

The EIS is based on VISION 2040 as it exists today. It is beyond the scope of this effort to foresee how or if the region will decide to modify growth assumptions for the regional geographies.

**Y-007-015**

County-level growth shares were not held constant across the alternatives. The population and employment distributions are not an input but rather a result of the analysis that uses an integrated approach to land use and transportation modeling.

**Y-007-015** alternatives, it further states that, "all six of the alternatives are consistent with V2040." It is unclear if this statement means that the county level growth shares were held constant for all the alternatives, thus the model was not able to redistribute population/jobs between counties, or if the model generated results that are consistent with V2040.

**Y-007-016** Page 5-12, Exhibit 5-6, Population and Employment Growth in Regional Geographies
While the exhibit demonstrates similar model results per geography for the entire region, it is unclear how the alternatives impact the population and employment growth for the regional geography within each county.

**Y-007-017** Page 5-16, Exhibit 5-16, Jobs Housing Balance
The associated table and graphs depict the resulting jobs housing balance generated by each of the alternatives. The table appears to refer to both households and housing units. Households represent occupied housing units. Perhaps "housing units" should be relabeled to "occupied housing units" in each row of each county. If the numbers in the table reflect total housing units, the figures should be reduced to represent only occupied units. This confusion stems from the fact the Regional Growth Strategy in V2040 identifies population and employment figures, it does not include any associated future housing unit information. The documentation of the assumptions for converting V2040 population statistics to housing units is not apparent. Pierce County is currently going through this process of allocating population and employment within its local geography. In preliminary recommendations, the 2030 total County housing units would equal 435,884. This is only a difference of 22,116 between the County's 2030 figure and the DEIS's highest unit number in the alternatives. This would indicate that Pierce County's housing unit stock would only increase by roughly 2,200 units per year for a ten year period, between 2030 and 2040, a highly unlikely scenario.

**Y-007-018** Appendix A, Non-motorized Facilities
In late March, Pierce County submitted early comments on the T2040 Alternatives Technical Report, which included a listing of region-wide bicycle and pedestrian strategies (mostly focusing on proposed regional trails) that were intended to ultimately be incorporated into the final T2040 document. This report was subsequently updated and included in Appendix A of the T2040 Draft Environmental Impact Statement (EIS). However, it appears these early comments on the County's regional trail system were not incorporated into the updated report. We would request that these projects as depicted in Appendix B of this letter be reflected in the Preferred Alternative.

**Y-007-019** **In Conclusion**
Pierce County appreciates the opportunity to review the Transportation 2040 DEIS. Our comments on the DEIS, the plan, and the planning process focus on a wide range of issues. It is clear that the current and future regional planning challenges are complex to define and also to resolve. By definition the regional planning process is large in scale and is rich in its diversity of geography and community. Many of the evaluation criteria or metrics that we use in comparing and evaluating the alternatives are by necessity broad measurements of the expected future. To this end we develop regional strategies that best achieve our broad regional objectives. While Pierce County believes in the larger regional planning objectives, we ask that PSRC include versus preclude planned development patterns and transportation

**Y-007-016**
Comment noted.

**Y-007-017**
Thank you. The graph does represent housing units. The housing unit estimates are a product of land use modeling and not population statistics.

**Y-007-018**
Thank you. We have made these changes.

**Y-007-019**
Comment noted.

Y-007-019 infrastructure that would help our county be economically viable. Pierce County looks forward in continuing the regional discussion in how to proceed in developing a Preferred Alternative and the implementation strategies that will realize the objectives.

Sincerely,

Pat McCarthy
Pierce County Executive

Roger Bush
Chair, Pierce County Council

Y-007-020

Appendix B

1) Foothills Trail (ID# 2835, 2836, 3439) - The project listings for this trail should be consistent with the informational map on the below web page. For further clarification, please contact Grant Griffin (253-798-4049) with the Pierce County Parks and Recreation Department.

http://piercecountywa.org/pc/abtus/ourorg/parks/foothillstrail.htm

2) Cushman Trail (ID# 2851) - This trail extension is being constructed in two phases and should be listed as two projects. The Phase 2 extension is a collaborative effort between Pierce County and the City of Gig Harbor. The limits of the Phase 2 extension should be identified as "Pierce Transit Park & Ride Lot on Kimball Drive NW to Borgen Boulevard NW". The Phase 3 extension is identified as a future trail project in the Pierce County Park, Recreation, and Open Space (PROS) Plan adopted by County Council in July 22, 2008. The limits of the Phase 3 extension should be identified as "Borgen Boulevard to Purdy".

3) Lake Tapps Parkway Bike Path (ID# 2887) - This project has been completed and therefore should be removed from the list. It should be noted that a shared use path is proposed as part of a joint project by Pierce County and the City of Sumner to widen Stewart Road between the Stuck/White River Bridge and Lake Tapps Parkway East.

4) Pipeline Trail (ID# 2827) - As part of a feasibility study completed by the Pierce County Parks and Recreation Department in April 2007, the title for this proposed multi-use trail project has been changed to "Cross County Commuter Connector Trail". The limits should be identified as the "Tacoma Dome/Sounder Station to the Foothills Trail in Orting". The trail would be located on "existing roadways and the existing Tacoma Water Pipeline". The lead agency should be identified as "Pierce County and Tacoma".

5) Scott Pierson Trail & Scott's Way (ID# 2846) - This project has been completed by WSDOT (refer to the web page below) and therefore should be removed from the list.

http://www.wsdot.wa.gov/Projects/PierceCountyHOV/SR16_olympic_union/Trail.htm

6) SR-302 Trail (New) - A recommendation for a "regional multi-use trail" (i.e. shared use path) along State Route 302 (SR-302) was included in the Key Peninsula Community Plan adopted by the Pierce County Council on October 23, 2007. In a scoping comment letter dated February 13, 2009 to WSDOT, the Pierce County has requested that the inclusion of a shared use path be considered as part of the scope for the SR-302 corridor project between Key Peninsula Highway KPN and State Route 16 (SR-16). Therefore, it is recommended that this proposed trail be identified as a possible project/strategy in Transportation 2040 along with a description that reads "Shared use path pending outcome of SR-302 Corridor EIS study".

7) Fennel Creek Trail (New) - The City of Bonney Lake adopted the Fennel Creek Trail Plan in August 2008 to identify a multi-use trail along the riparian corridor of Fennel Creek from Allan Yorke Park in Bonney Lake to the Foothills Trail. This trail corridor is also identified in the Pierce County Park, Recreation, and Open Space (PROS) Plan. It is recommended that this proposed trail be identified as a possible project/strategy in Transportation 2040.

**Y-007-020**

Thank you. These changes have been made.

Y-007-020

8) Tacoma Rail with Trail (New) - The City of Tacoma, Mount Rainier National Park and Pierce County completed a feasibility study in August 2007 to identify a multi-use trail in the Tacoma Rail right-of-way between downtown Tacoma and Elbe. This trail corridor is also identified in the Pierce County Park, Recreation, and Open Space (PROS) Plan. It is recommended that this proposed trail be identified as a possible project/strategy in Transportation 2040.

9) Additional updates and new projects may be identified as part of the preparation of the Pierce County Regional Trails Plan (refer to the web page below):

www.piercetrailsplan.org

CITY OF SHORELINE

July 10, 2009

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

Dear Mr. Ardussi:

C-001-001 I am writing to you today in response to the Transportation 2040 Draft Environmental Impact Statement. Transportation issues are of great importance to the City of Shoreline and we recognize the importance of developing a long-range plan for transportation throughout the region. We appreciate the hard work of the Puget Sound Regional Council in developing this draft document and exploring the options available to keep the Puget Sound region moving now and in the future.

C-001-002 The alternatives outlined as part of this process include a variety of improvements around the region, including improvements to state highways, local arterials, public transit and nonmotorized transportation. Several of the projects listed in the alternatives benefit the City of Shoreline directly, with improvements seen almost immediately upon implementation. One significant example is the completion of the Aurora Corridor Improvement Project North 145th Street – North 165th Street. Travel times for vehicles and transit have been reduced and safety for all users has improved significantly. Since completion of this project, accidents have declined 61 percent and the speed and reliability for buses has also improved.

We believe that construction of local projects, as well as those on large, regional facilities, result collectively in improved transportation for the region. These include improvements that serve vehicles, transit, cyclists and pedestrians, with an eye toward providing people with a variety of safe and reliable options to reach their destinations. The Aurora Project is a strong example of how investment by a local jurisdiction can reduce overall societal costs and improve transit regionally by providing facilities for faster and more reliable bus service. With this in mind, the City of Shoreline asks that the following projects be included in the final alternative selected for the creation of the final Transportation 2040 plan. These projects address and are consistent with the goals of all of the alternatives.

C-001-003 State Highways and Principal Arterials
The state highways identified below serve as the major transportation corridors in and through the City of Shoreline. As growth in both Shoreline and the surrounding communities continues, traffic on these highways will also increase. Improvements to these roadways are vital to keep persons and freight moving through the region.

17544 Midvale Avenue North ◆ Shoreline, Washington 98133-4921
Telephone: (206) 546-1700 ◆ www.cityofshoreline.com

**C-001-001**

Thank you. We appreciate your taking the time to review the Draft EIS and submitting your comments. The success of the T-2040 planning effort relies in part on the willingness of people throughout the region to contribute their ideas to the plan.

**C-001-002**

Comment noted.

**C-001-003**

Comment noted.

C-001-003

- Construction of a southbound auxiliary lane on I-5 from SR 104 to NE 175th Street (Project ID 4199).
- Improvements and BAT lanes to SR 99 from N 165th Street – N 205th Street (Project ID 3569)
- Transit enhancements and improvements to SR 523 from SR 99 to 32nd Avenue NE (Project ID 1776)
- SR 104 from SR 99 to 25th Avenue NE
- Westminster Way N from N 145th Street to N 155th Street
- N 175th Street from Meridian Avenue N to 15th Avenue NE
- 15th Avenue NE from N 145th Street to N 205th Street
- N/NE 145th Street (SR 523) from Greenwood Avenue N to SR 522, including safety and mobility improvements listed under Project ID 5197

C-001-004

Transit Supportive Investments /Park and Ride Strategies
In order for transit to perform in a fast and reliable manner, the roadway infrastructure needs to be adequate to support it. Facilities for buses and light rail must be in place, riders must be able to reach the facilities in a variety of motorized and non-motorized ways and adequate densities must be in place in order to support transit. Completion of the following projects will improve transit for the City of Shoreline and north end communities, resulting in increased opportunities for non-SOV travel in the region.

- Improvements to SR 99 from N 165th Street – N 205th Street (Project ID 3569)
- Improvements at on SR 99 from 244th Street SW to 240th Street SW (Project ID 1630)
- Transit oriented development and construction of a park and ride at the future Link light rail stations at NE 145th Street and NE 185th Street
- Construction of a park and ride at SR 99 and King County/Snohomish County line (Project ID 2631)
- Construction of a transit oriented development and transit hub at the North 192nd Street Park and Ride
- Aurora Village Park and Ride Expansion (Project ID 3597)

C-001-005

Non-Motorized Investments
Facilities that support non-motorized travel should provide people with a safe, accessible alternative to motorized travel. Whether used for the entirety of a trip or to provide access to another mode of transportation, non-motorized facilities assist with the regional goals of improving air quality, minimizes the release of greenhouse gases and reduces contributions to climate change. The non-motorized facilities listed below serve as parts of local and regional non-motorized systems that encourage travel by bicycle or on foot.

**C-001-004**

The Draft Plan contains an aggressive level of investment in transit, walk, and bike facilities to provide a variety of efficient choices to the region's residents. Reflecting numerous comments from across the region, the draft plan also includes roadway improvements designed to support transit.

The Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

Projects 3569, 1630, and 3597 are in the Preferred Alternative. Project 2631 is defined as a concept since a sponsoring agency has not been identified.

**C-001-005**

This project has been included in the Preferred Alternative. The Draft Plan includes significant investments in non-motorized facilities to connect people to other modes (primarily transit). These investments provide travel options which reduce impacts on the environment, and provide direct and indirect benefits to human health.

C-001-005

- Interurban to Burke-Gilman Trail connector
- Improvements to the NE 195th Street/I-5 pedestrian overcrossing

C-001-006

Arterial Improvements
Although the arterials listed below are not principal arterials, they serve a regional purpose, as they are often used as alternative routes to the state highways in Shoreline (I-5, SR 99, SR 104, SR 522 and SR 523). By ensuring these arterials are improved to meet the growth demands, they can assist with the distribution of trips away from state facilities and serve as reliable transit corridors. We are not specifically asking that they be included in the plan, as long as it is acknowledged that they are eligible for Federal funding through the PSRC competitive process.

- Dayton Avenue N from N 145th Street to N 160th Street
- Greenwood Avenue N from N 145th Street to N 160th Street
- Meridian Avenue N from N 145th Street to N 205th Street
- 5th Avenue NE from N 145th Street to N 205th Street
- N 185th Street from Richmond Beach Drive NW to 10th Avenue NE
- N 155th Street from Aurora Avenue North to 15th Avenue NE

Projects listed above that do not include an identification number are currently included in the City of Shoreline's current Capital Improvement Plan, the 6-Year Transportation Improvement Plan or are anticipated for inclusion in our updated Transportation Master Plan, currently scheduled for adoption in 2010.

Thank you for your consideration of our comments. If you have any questions or need additional information, feel free to contact me at 206.801.2401.

Sincerely,

Mark J. Relph, PE
Public Works Director

cc. Robert L. Olander, City Manager
Joseph W. Tovar, FAICP, Director, Planning and Development Services
Dick Deal, Director, Parks, Recreation and Cultural Services
Kirk McKinley, Transportation Services Manager
Alicia McIntire, Senior Transportation Planner

**C-001-006**

The PSRC transportation plan includes a programmatic cost estimate for non-MTS projects and facilities. The MTS designation is only a threshold for what is considered regionally significant and what can be modeled. Within the TIP process, non-MTS projects and facilities are reviewed for consistency with the plan, and as long as the facility is on the federal functional classification system or the project is exempt (e.g. transit and nonmotorized projects), it is considered part of the plan and therefore would be eligible for federal and other grant funding opportunities.

CityofRedmond
WASHINGTON

July 10, 2009

Puget Sound Regional Council
c/o Sean Ardussi
1011 Western Avenue
Suite 500
Seattle, WA 98104-1035

RE: Transportation 2040 DEIS Comments

Dear Mr. Ardussi:

C-002-001 The City of Redmond has long been a supporter of regional land use and transportation planning and strongly supports the efforts to develop the new regional transportation plan - Transportation 2040. We recognize the important information that is contained in the DEIS and also understand that the six alternatives under consideration will lead to a preferred alternative to be evaluated in the Final EIS. We strongly recognize that realistic efforts to resolve our transportation needs require regional cooperation, sound financial strategies and must rely on not just building facilities but supporting land use patterns that facilitate alternative transportation modes that reduce motor vehicle demand on our system.

C-002-002 The DEIS is a strong start in considering a wide range of alternatives, and while each is predicated on supporting Vision 2040 and the concepts of providing mobility options, environmental protection and sustainable funding, certain of the alternatives better emphasize alternative travel modes and effective means to financing the needed improvements.

C-002-003 Consistent with Redmond's established policies and actions, we recommend that the preferred alternative employ the following principles [with those in bold our most critical]:

- **Recognize designated urban centers in all relevant local and regional policy, planning and programming forums, and emphasize in these areas support for transit use, pedestrians and bicycling;**

C-002-004
- **Complete Sound Transit's Long Range Plan at the earliest practical time;**

C-002-005
- Provide convenient, safe and environmentally sustainable transportation connections within jurisdictions and between jurisdictions for the movement of people and goods;

City Hall • 15670 NE 85th Street • PO Box 97010 • Redmond, WA • 98073-9710

**C-002-001**

Thank you for your thoughtful comments. With your help we have achieved a high level of regional cooperation in developing the Draft Transportation 2040 plan. The suggestions you note in your comment letter have been helpful in guiding the creation of the Preferred Alternative contained in the Draft Plan. We respond more specifically to your individual comments below.

**C-002-002**

Comment noted. The Preferred Alternative contained in the Draft Plan includes elements of many of the initial alternatives. These elements were selected with input we've received throughout the planning process, as well using the results of the technical and policy analysis.

**C-002-003**

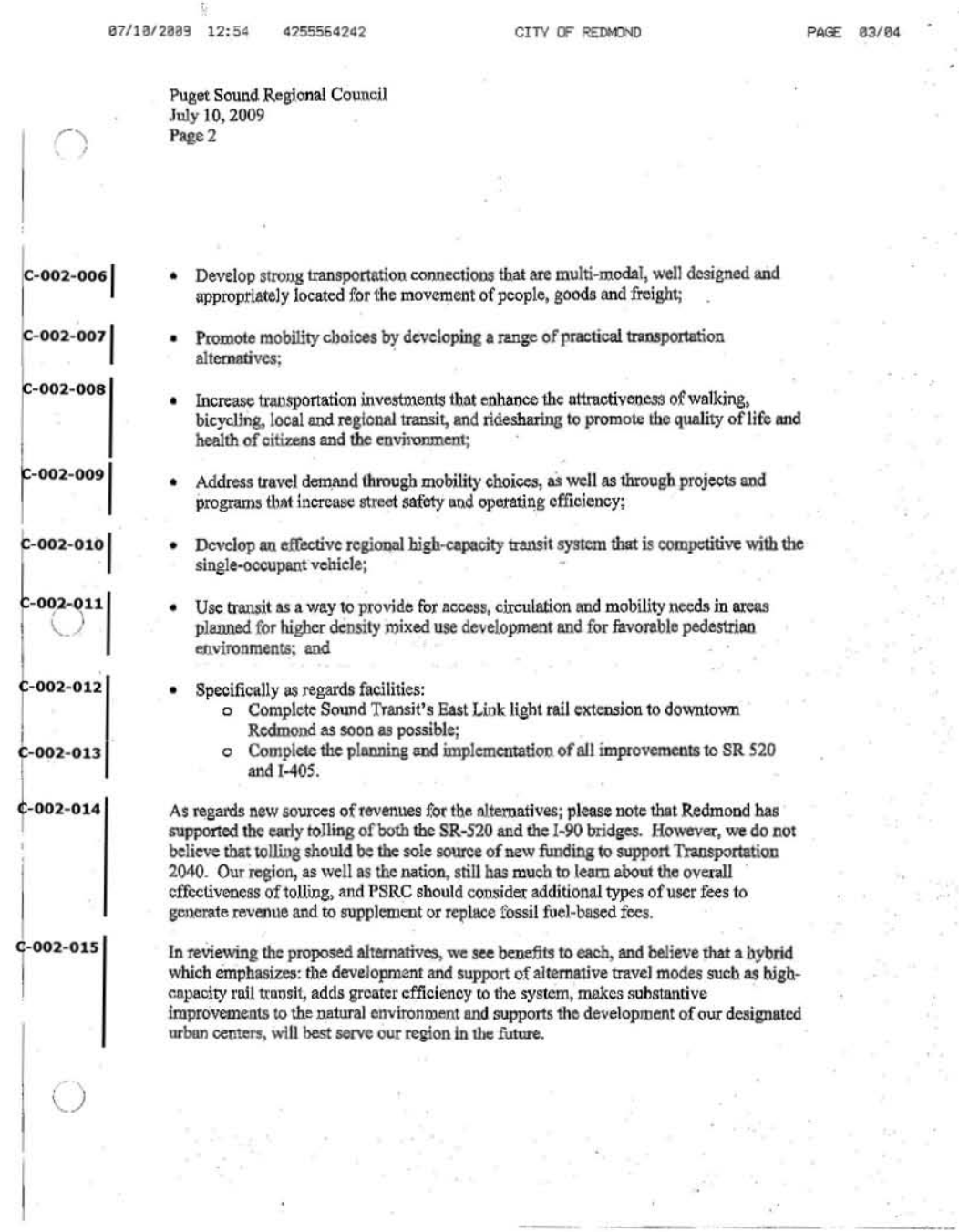
Thank you for stating your recommendation as to the important elements (your ten bullet points) which should be contained in the Preferred Alternative. This guidance, which was also heard from numerous other sources, has been used in developing the Draft Plan.

**C-002-004**

Sound Transit's Long Range Plan is included in the Unprogrammed portion of the Draft Plan. This recognizes the need for additional funding beyond those Sound Transit investments contained within the Constrained part of the plan.

**C-002-005**

Concur. This has been a consistent objective throughout the Transportation 2040 planning process, and reflects regional policy as contained in VISION 2040.



07/10/2009 12:54 4255564242 CITY OF REDMOND PAGE 03/04

Puget Sound Regional Council
July 10, 2009
Page 2

C-002-006 • Develop strong transportation connections that are multi-modal, well designed and appropriately located for the movement of people, goods and freight;

C-002-007 • Promote mobility choices by developing a range of practical transportation alternatives;

C-002-008 • Increase transportation investments that enhance the attractiveness of walking, bicycling, local and regional transit, and ridesharing to promote the quality of life and health of citizens and the environment;

C-002-009 • Address travel demand through mobility choices, as well as through projects and programs that increase street safety and operating efficiency;

C-002-010 • Develop an effective regional high-capacity transit system that is competitive with the single-occupant vehicle;

C-002-011 • Use transit as a way to provide for access, circulation and mobility needs in areas planned for higher density mixed use development and for favorable pedestrian environments; and

C-002-012 • Specifically as regards facilities:
- Complete Sound Transit's East Link light rail extension to downtown Redmond as soon as possible;

C-002-013
- Complete the planning and implementation of all improvements to SR 520 and I-405.

C-002-014 As regards new sources of revenues for the alternatives; please note that Redmond has supported the early tolling of both the SR-520 and the I-90 bridges. However, we do not believe that tolling should be the sole source of new funding to support Transportation 2040. Our region, as well as the nation, still has much to learn about the overall effectiveness of tolling, and PSRC should consider additional types of user fees to generate revenue and to supplement or replace fossil fuel-based fees.

C-002-015 In reviewing the proposed alternatives, we see benefits to each, and believe that a hybrid which emphasizes: the development and support of alternative travel modes such as high-capacity rail transit, adds greater efficiency to the system, makes substantive improvements to the natural environment and supports the development of our designated urban centers, will best serve our region in the future.

**C-002-006**

The Preferred Alternative includes a wide variety of investments in a multimodal transportation system that addresses the movement of both people and goods.

**C-002-007**

Comment noted.

**C-002-008**

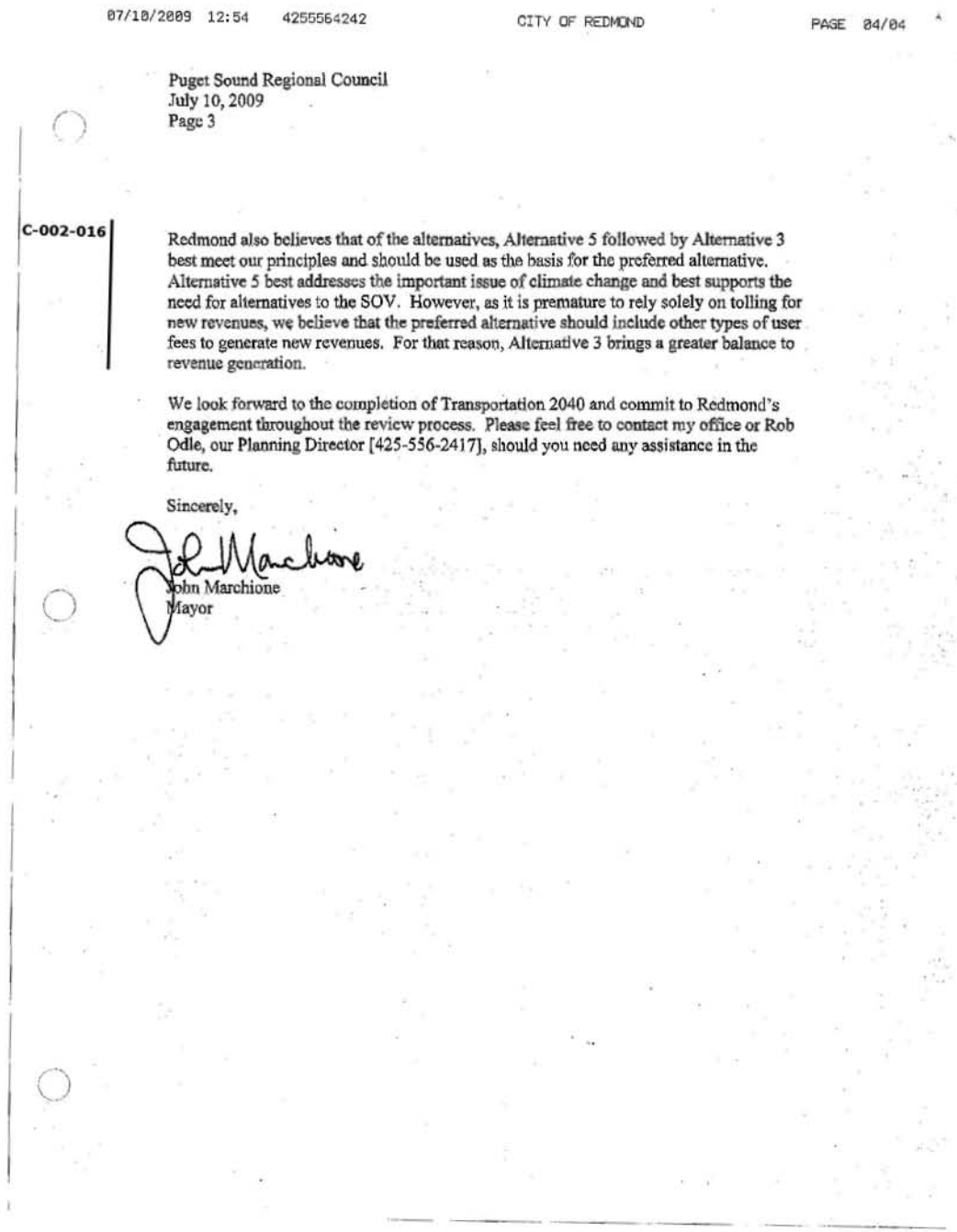
Each of the Transportation 2040 alternatives evaluated in the DEIS would increase transit service, carpools and vanpools, and walk and bike facilities, making these modes more attractive to users. The Preferred Alternative contains transit, bike and walk facilities, and ridesharing programs similar to those contained in Alternative 5.

**C-002-009**

Thank you for your comment. In the Transportation 2040 Preferred Alternative maintenance and operation of the existing system, plus safety and security are top priorities, and use most of the available funding. Mobility improvements include a major emphasis on improving system efficiency with a strategic approach to investing in new capacity. System efficiency includes creating "smart corridors" with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit and nonmotorized facilities, with new roadways limited to a few missing links.

**C-002-010**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to



07/10/2009 12:54 4255564242 CITY OF REDMOND PAGE 04/04

Puget Sound Regional Council
July 10, 2009
Page 3

C-002-016

Redmond also believes that of the alternatives, Alternative 5 followed by Alternative 3 best meet our principles and should be used as the basis for the preferred alternative. Alternative 5 best addresses the important issue of climate change and best supports the need for alternatives to the SOV. However, as it is premature to rely solely on tolling for new revenues, we believe that the preferred alternative should include other types of user fees to generate new revenues. For that reason, Alternative 3 brings a greater balance to revenue generation.

We look forward to the completion of Transportation 2040 and commit to Redmond's engagement throughout the review process. Please feel free to contact my office or Rob Odle, our Planning Director [425-556-2417], should you need any assistance in the future.

Sincerely,

John Marchione
Mayor

test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**C-002-011**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The

Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-002-012**
These projects have been included in the Preferred Alternative. The Constrained part of the Draft Plan includes the Sound Transit LINK Light Rail extension to downtown Redmond, as well as significant improvements to the I-405 and SR 520 corridors.

**C-002-013**
This project has been included in the Preferred Alternative.

**C-002-014**
Tolls will be an important source of future transportation revenues in the PSRC region. However, the financial strategy for Transportation 2040 includes a variety of revenue sources, including tolling and pricing, HOT lanes, VMT fees, parking charges, and other sources of revenue. These fees are primarily levied on auto users of the system. The financial strategy also includes continued use of sales tax to support transit, as well as increased transit and ferry fares to support investments in the transit system.

**C-002-015**
Comment noted.

**C-002-016**
Thank you for stating your preference among the alternatives.

# City of Sultan

July 1, 2009

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

Re: Draft EIS Transportation 2040

The cities of Monroe, Snohomish and Sultan in Snohomish County have reviewed the Draft EIS for Transportation 2040, and would like to offer the following comments:

C-003-001

The DEIS addresses five "action" alternatives in addition to the "baseline" alternative. The alternatives are designed around various funding options, including the use of tolling and transportation demand management to fund various combinations of transportation improvements.

C-003-002

It is not fully clear from the descriptions of the alternatives which one(s) would include all needed safety and capacity improvements to US-2. There are references to US 2 capacity improvements in both Alternative 2 and Alternative 3 (as referenced in Appendix A, Addendum B, page 77 of the Draft EIS). This interstate highway provides a vital link for all three above communities to I-5 and the rest of Puget Sound, and remains the only transportation corridor connecting the greater Puget Sound area to eastern Washington and the rest of the country in the event Interstate 90 is closed (as occurred in 2007and 2008).

The reasons for maintaining, and improving, this highway corridor are numerous, among them freight mobility, homeland security, economic development, and emergency access. Our cities remain supportive of transportation funding alternatives which provide for construction of those improvements identified several years ago in the US-2 Corridor Study, prepared and adopted by the Washington State Department of Transportation in cooperation with the cities along this corridor. In addition, the US-2 Safety Coalition has spent most of last decade educating State and Federal legislators about safety hazards and capacity deficiencies on US-2.

319 Main Street, Suite 200 • P.O. Box 1199 • Sultan Washington 98294
City Hall (360) 793-2231 • Fax (360) 793-3344

**C-003-001**

Comment noted.

**C-003-002**

Several of the alternatives analyzed in the Draft EIS included a mix of improvements on the US 2 corridor. The Draft Plan also includes significant investments on the US 2 corridor in response to numerous comments by groups and agencies concerned about the need for safety and capacity improvements along much of the corridor. A list of US 2 projects can be found in the Final EIS Appendix A.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

C-003-003

As the PSRC moves forward with selection of a Preferred Alternative and preparation of a Final EIS, we urge inclusion of an analysis of the impact of funding alternatives on necessary US-2 safety and capacity improvements.

Sincerely,

Mayor, City of Monroe

Mayor, City of Snohomish

Mayor, City of Sultan

**C-003-003**

SAFETEA-LU requires us to consider safety in developing the region's transportation plan. Safety has been identified as an important consideration for selecting investments to be included in the Preferred Alternative. One of the criteria for evaluating the plan alternatives contained in the DEIS is accident cost savings. This criterion measures the benefits of projects such as those included along US 2. This information was part of our decision framework as we developed the Transportation 2040 Plan.

needs to be scanned C-005

# CITY OF SNOHOMISH

*Founded 1859, Incorporated 1890*

116 UNION AVENUE ▫ SNOHOMISH, WASHINGTON 98290 ▫ TEL (360) 568-3115 FAX (360) 568-1375

RECEIVED
JUL 13 2009
PUGET SOUND REGIONAL COUNCIL

July 9, 2009

Transportation Policy Board
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

RE: Transportation 2040 DEIS Comments

Dear Board Members,

C-004-001 Due to its location at the crossroads of a number of key transportation corridors, the health and well being of the City of Snohomish is dependent on a regional transportation system which provides a reasonable level of service both now and in the future. The City believes that this service needs to be a mix which includes vehicular, transit, and non-motorized options. As a result of the importance of the transportation issue, Snohomish has been interested in the options being explored in the DEIS for the Transportation 2040 Plan. The City's comments with regard to these options are as follows:

- C-004-002 The City sees value in several of the alternatives and would suggest that a blending of Alternative 2 or 3 with Alternative 5 may have some of the broadest positive impacts for the plan.
- C-004-003 In particular, the highway improvements on SR 9 and US 2 need continued focus in order to accommodate population growth and vehicle trips during the interim time while planning, design and construction are underway to improve transit options that may eventually offset the growth of vehicle trips. Both roadways are presently listed as Congested Travel Corridors.
- C-004-004 Highway capacity improvements are especially important for some of our regional highways such as State Route 9 that currently are so congested that bus transit is impractical at this time. Express bus transit is a highly efficient alternative means of commuter transit that should be encouraged and facilitated.
- C-004-005
- C-004-006 US 2 has not only congestion and safety problems, but serves as an important freight roadway and as a primary east/west link to and from the Puget Sound Region. This highway is particularly important during winter storm events when I 90 is closed for avalanche control, then US 2 functions as the main east/west vehicular link.
- C-004-007 Commuter rail use for the Eastside Rail Corridor should be planned and should be designed to connect at the north end not only to Snohomish, but to make the west connection to Everett as well.
- C-004-008 The proposed non-motorized bicycle and pedestrian Eastside BNSF Trail between Woodinville and Snohomish will provide a positive step toward the goal of offering transportation options which reduce greenhouse gasses. This segment would provide a much needed tie between two highly used existing regional trail networks.

**C-004-001**

Each of the Transportation 2040 alternatives includes a mix of roadway, transit, and non-motorized investments intended to provide a balanced network of services and facilities. This mix of investments among the six plan alternatives was crafted to provide decision-makers with a set of clear choices plus information about the benefits and impacts of those choices. This approach to developing the Transportation 2040 plan alternatives is consistent with our Federal mandates (under SAFETEA-LU) to provide a multi-modal transportation plan.

**C-004-002**

Thank you for stating your preference among the alternatives. The Preferred Alternative as contained in the Draft Plan was developed as hybrid among the other alternatives evaluated in the Draft EIS. This hybrid contains many elements from Alternatives 2,3, and 5, as you suggest. In terms of benefits to system users, the Preferred Alternative will generate higher total benefits than any of the other alternatives.

**C-004-003**

Several of the alternative analyzed in the Draft EIS included a mix of improvements on the SR 9 and US 2 corridors. The Draft Plan also includes significant investments on these corridors in response to numerous comments by groups and agencies concerned about the need for safety and capacity improvements along both corridors. A list of SR 9 and US 2 corridor projects can be found in the Final EIS Appendix A. The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the

C-004-009 The City of Snohomish would appreciate your consideration of these comments in you deliberations regarding the DEIS and the preferred transportation option. If you have any questions, please contact either me, City Manager Larry Bauman, or Public Works Director Tim Heydon at 360-568-3115.

Sincerely,

Randy Hamlin
Mayor

modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**C-004-004**

This project has been included in the Preferred Alternative. See also response to Comment C-004-003 above.

**C-004-005**

Express bus service is represented in each of the alternatives. It is one of the three types of fixed-route service the region provides.

**C-004-006**

Improvements to US Highway 2 have been considered in the DEIS and are included in the Preferred Alternative. The importance of this route

for freight has been documented and is covered in Transportation 2040. See also response to Comment C-004-003 above.

**C-004-007**

The Preferred Alternative contained in the Draft Plan includes commuter rail improvements along the BNSF Eastside rail corridor between Renton and Snohomish. This was also true of Alternative 5 as evaluated in the Draft EIS.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-004-008**

Non-motorized improvements (bike and walk trails) are included in the Preferred Alternative, along with commuter rail. The non-motorized improvements are included in the Constrained part of the plan.

**C-004-009**

Thank you. We appreciate your involvement and input during the formulation of the draft plan alternative, as well as in helping us develop the Draft Plan. Thank you for taking the time and effort to participate in our process. Our success depends in large part on your involvement.

CITY OF MUKILTEO

11930 CYRUS WAY • MUKILTEO, WASHINGTON 98275

RECEIVED
JUL 20 2009
PUGET SOUND REGIONAL COUNCIL

July 17, 2009

Puget Sound Regional Council Executive Board
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98204-1035

**RE: 2040 Transportation Plan EIS and Alternatives Comment Letter**

Dear PRSC Executive Board & Mr. Bob Drewel:

On behalf of the City of Mukilteo City Council, I would like to submit the following comments on the 2040 Transportation EIS and Alternatives:

C-005-001 **1) Transportation Alternative Priorities:**

1) The City of Mukilteo prefers a Hybrid Alternative based upon Alternative 3 financing plus, while incorporating more aspects of high capacity transit – light rail to Everett with improved bus service, non-motorized infrastructure, and mode shift improvements. Paine Field should be retained for aviation manufacturing and as a general aviation reliever airport. Reduce SOV ferry ridership with demand management while improving mode shift and transit access to encourage walk-on passengers during peak hours and favor freight movement during non-peak hours.

C-005-002
C-005-003

C-005-004 2) Alternative 3 – Toll Revenues Expand Capacity and Improve Efficiency. This alternative is the next preferred option as the financing of improvements is a combination of traditional and tolling on highways allowing for substantial bus service improvements and improvements to the non-motorized network. Tolls will assist with demand management that is an important technique to create greater efficiency during peak periods.

C-005-005 3) Alternative 4 – Traditional & Tolls to Maximize Efficiency is the third preferred alternative. The key advantage to the region is that light rail is expanded beyond ST2 to Everett, allowing communities to the north access to this high capacity transit system. The other advantages are the increases in bus service and non-motorized corridors.

C-005-006 4) Alternative 5- Reduce Emissions with Limited Highway Investment & Regional Tolling. If the financing were available and did not impact residents of the region significantly, then this would be an option we could consider, since placing tolls

**C-005-001**

Thank you for stating your preference among the alternatives. The Preferred Alternative contained in the Draft Plan contains each major element you list in your comment, including significant investment in non-motorized facilities, LINK Light Rail extension to Everett, and more bus service hours than the other alternatives.

**C-005-002**

Comment noted. Paine Field is contained within the Boeing Everett/Paine Field Manufacturing Industrial Center. As such, both VISION 2040 policy and Transportation 2040 include strong policy direction to preserve this important area for jobs and economic growth. In addition, the Draft Plan continues existing PSRC policy, which designates Paine Field as an important general aviation reliever airport for the region.

**C-005-003**

The Transportation 2040 alternatives incorporated the work of Washington State Ferries (WSF) in planning for the long range ferry system. In addition, the Transportation 2040 plan incorporates the findings and recommendations resulting from the Regional Passenger Only Ferry (POF) Study, completed in 2008. Both the WSF Long Range Plan and the Regional POF study encourage a shift toward increased walk-on passengers on state and regional ferries, as well as improved transit access serving ferry terminals. These findings are consistent with this DEIS comment from the city of Mukilteo.

**C-005-004**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role,

C-005-006 on arterial streets is not a realistic option, then this is not an option that we can fully support.

C-005-007 In developing a hybrid alternative, please base it upon the following:

a. Recognition that additional funding sources are needed for transportation, that funding needs to be reliable and a mix of funding mechanisms, as transportation investments drive land use and are long-term and regional in nature. User based funding with tolls that support added efficiency and a strong transit network should be used sparingly to help manage demand. The local funding option of a Transportation Benefit District has been difficult for local governments to apply. State and regional transportation financing needs to be an on-going reliable source, neither driven by the legislature or voters.

C-005-008

C-005-009

b. Maximizing transit options and high capacity transit. We need to encourage transit ridership and land use that encourages housing options that maximize close to live-work options.

C-005-010

c. Link available or planned transit with areas planned for high density development to maximize infrastructure investments.

C-005-011

d. Improve mode shifts to increase efficiencies to make transit more viable even for longer distance commuters from outer locations within and outside the region.

C-005-012
C-005-013

e. Improve bicycle and pedestrian use within cities and centers, between activity nodes, industrial centers and work sites, and for recreational pursuits to make them safe and an optional form of transportation.

f. Reduce our regional carbon footprint by reducing hydrocarbon fuel use encouraging alternative fuel, reducing vehicle miles traveled, and creating open spaces that provide carbon offsets over the long-term. Open space and transportation carbon footprint needs to be linked with a "system" that buys and retains open spaces as a carbon off-set and pays for management and maintenance.

C-005-014

g. Use demand management and pricing to assist in managing the region over the long-term so that it becomes sustainable, links transportation investments with land use, and maximizes current transportation infrastructure.

C-005-015

h. Link adjacent counties that are part of PSRC's larger region of influence (e.g. Thurston to Clark Counties, Island, Skagit and Whatcom) to manage all transportation modes as a whole in western Washington.

C-005-016

especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**C-005-005**

Comment noted. The Preferred Alternative would expand LINK Light Rail to downtown Everett, plus would provide the greatest increase in bus service of all the alternatives.

**C-005-006**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**C-005-007**

Tolls will be an important source of future transportation revenues in the PSRC region. However, the financial strategy for Transportation 2040 includes a variety of revenue sources, including tolling and pricing, HOT

C-005-017

2) Transportation Modes:

a. **Aviation/Airports:** Paine Field Airport and the surrounding industrial property should be retained as a regional industrial area for aeronautical manufacturing and for general aviation, as the preferred uses, and as needed as a general aviation reliever airport.

C-005-018

b. **Ferries:** Reduce SOV ferry ridership with demand management while improving mode shift and transit access to encourage walk-on passengers during peak hours and favor freight movement during non-peak hours.

C-005-019

c. **Bike and Pedestrian Improvements:** Increase investment and accelerate corridor improvements to make non-motorized a viable commute option to work and educational opportunities, as well as making it more available for recreation.

C-005-020

d. **Transit:** Extend light rail to Everett to provide high capacity transit to more residents in the north and eastern portions of the Puget Sound region. Connect industrial and employment centers east and west and north and south with high capacity transit. Continue to enhance bus service (traditional and "Swift" options).

C-005-021
C-005-022

C-005-023

We appreciate the opportunity to input at this early stage of alternative development to assist in identifying transportation infrastructure improvements that will serve the region out into the future while decreasing impacts to the environment. We look forward to reviewing and commenting on the Draft 2040 Transportation Plan.

Sincerely,

Joe Marine

Joe Marine
Mayor
City of Mukilteo
(425) 263-8000

Pc: City Council
Joe Hannan, City Administrator
Heather McCartney, FAICP, Planning & CD Director
Larry Waters, P.E., Public Works Director
Planning Commission
Planning Staff

lanes, VMT fees, parking charges, and other sources of revenue. These fees are primarily levied on auto users of the system. The financial strategy also includes continued use of sales tax to support transit, as well as increased transit and ferry fares to support investments in the transit system.

**C-005-008**

Comment noted.

**C-005-009**

Over the past two years, during the development of Transportation 2040, the issue of sustainable funding has emerged as one of the most critical issues facing the region. The financial strategy for Transportation 2040 has been developed to address historical and current issues related to the declining revenues from the State gas tax, the volatility of sales tax revenues, and the need for more reliable and predictable sources of transportation funding. These issues were central to the plan's financial strategy, particularly for the constrained part of the plan.

**C-005-010**

All the alternatives are consistent with VISION 2040 policies and increase transit service. Core transit service, represented in every alternative, can include high capacity transit either by bus or rail.

**C-005-011**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that

additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-005-012**

Based on the analysis done for mode share on work, non-work, and all trips, work trips by transit are higher than the 2006 base year, and this share was projected to increase with all alternatives. For non-work trips, transit's share is approximately 2% for all alternatives—the 2006 transit share of non-work trips was 1%. When work and non-work trips are combined, transit's share varies from a low of 4% for the Baseline Alternative and Alternative 2, to a high of 5% for Alternative 5. Transit share of all trips in the base year 2006 was 3%.

**C-005-013**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-005-014**

Transportation is one of many sectors in the state that need to achieve

reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**C-005-015**

Thank you for your comment. In the Transportation 2040 Preferred Alternative maintenance and operation of the existing system, along with safety and security, are top priorities and use most of the available

funding. Mobility improvements include a major emphasis on improving system efficiency with a strategic approach to investing in new capacity. System efficiency includes creating “smart corridors” with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit, and nonmotorized facilities, with new roadways limited to a few missing links.

**C-005-016**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region’s efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region’s future are the transportation system’s users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region’s character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

**C-005-017**

Paine Field is designated as a general aviation reliever airport in the Regional Airport System Plan, prepared in 2001. In addition, Paine Field is designated as a general aviation reliever airport in the Washington State Airport System Plan and in the Washington Long Range Air Transportation Study. Paine Field is located within the Everett/Paine Field Manufacturing Industrial Center, a planning designation which attempts to preserve and maintain the area’s role as both an aerospace

manufacturing employment center and a regionally significant airport. Transportation 2040 retains these designations for Paine Field.

**C-005-018**

The Transportation 2040 alternatives incorporated the work of WSF in planning for the long range ferry system. In addition, the Transportation 2040 plan incorporates the findings and recommendations resulting from the Regional Passenger Only Ferry (POF) Study, completed in 2008. Both the WSF Long Range Plan and the Regional POF study encourage a shift toward increased walk-on passengers on state and regional ferries, as well as improved transit access serving ferry terminals. These findings are consistent with this DEIS comment from the city of Mukilteo.

**C-005-019**

Your suggestion is supported by the policies in VISION 2040, and is embraced to varying degrees in the Draft EIS alternatives. Then compared to the other alternatives evaluated in the EIS, the Preferred Alternative contained in the Draft Plan includes the highest amount of non-motorized investments (in the Full Plan). This reflects VISION 2040 policy and significant public input received during the T-2040 planning process.

**C-005-020**

Investment in a broad range of transit across the region to link residents and jobs is a policy objecting contained in the VISION 2040 multi-county planning policies. This goal found its way into several of the draft EIS alternatives, to varying degrees. The draft plan's preferred alternative includes significant investment in new LINK Light Rail transit, plus additional commuter rail service, as well as the highest level of investment in local and regional bus service (of all the alternatives).

**C-005-021**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-005-022**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**C-005-023**

Comment noted.  Thank you for participating in the planning process. Your input is critical for us to develop a plan that will meet the collective needs of the region.

CITY OF ISSAQUAH

P.O. Box 1307, Issaquah, WA 98027

Ava Frisinger, Mayor
(425) 837-3020 / FAX (425) 837-3029
mayor@ci.issaquah.wa.us

July 10, 2009

Puget Sound Regional Council (PSRC)
Transportation Policy Board
Attn: Sean Ardussi
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Re: Transportation 2040 DEIS

To the PSRC Transportation Policy Board:

**C-006-001** Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement (DEIS). I appreciate the effort of the PSRC to meet the challenge of extending the regional transportation vision to the year 2040. I also appreciate the assistance provided by the PSRC staff to help us gain more insight on the intent of the DEIS alternatives.

**C-006-002** The DEIS alternatives are helpful in demonstrating different transportation visions for the region. The City of Issaquah, however, does not endorse any one as an appropriate basis for a preferred alternative. It is clear that a hybrid preferred alternative will need to be developed, but it is reassuring that the hybrid plan does not require a dramatic departure from Destination 2030. Building on Destination 2030 with the better features of the new alternatives should result in an effective and sustainable regional plan that is more consistent with existing local comprehensive plans.

**C-006-003** **DEIS Concerns**
The mix of projects, modes, and funding methods presented with each alternative may have unintentionally created misleading impressions about their relative benefits and impacts. For example, Alternative 5 exclusively contains many long planned transit and nonmotorized improvements and combines them with a regional, system-wide tolling program. This may lead to a conclusion that the benefits resulting from the transit and nonmotorized investments somehow are a product of system-wide tolling rather than any other funding method.

**C-006-004** In a similar manner, Alternative 2 is described as the closest to Destination 2030 yet omits the long planned High Capacity Transit (HCT) link to Issaquah currently contained in Destination 2030 and other regional transportation planning documents. This is an important HCT link that will benefit Issaquah and will improve system access significantly for other growing Eastside communities, including Sammamish, Snoqualmie, and North Bend.

**C-006-005** **Consistency with Existing Plans**
The alternatives across the board appear to omit a number of improvement projects that have been long planned to implement Destination 2030 which may have further reduced the accuracy of the DEIS comparisons, if not accounted for in the supporting model work.

In Issaquah, the omitted projects enhance existing Metropolitan Transportation System Roadways (MTS) and will support all transportation modes. It is notable that, due to our geographic location and environmental constraints, a significant number of our streets are part of the existing MTS. The hybrid alternative should build more directly on the local transportation improvement plans and programs that have already been certified by PSRC.

For sake of brevity, I will state what the hybrid should include within Issaquah rather than supply a line item review of each alternative or the DEIS Addendums. The following MTS improvements (see the Issaquah 2010-2015 TIP at www.ci.issaquah.wa.us for detail) support Vision 2040 and are our choice for the preferred alternative:

**C-006-001**

Thank you for providing detailed feedback on the Transportation 2040 DEIS. PSRC would like to acknowledge:

- your stated preferences for extension of light rail to Issaquah as well as other listed projects
- your recommendation that the Preferred Alternative reflect the region's most current planning philosophy
- your concerns regarding transportation finance and other policy matters

As noted in the following responses:

- the mode of high capacity transit to Issaquah has yet to be determined, but high capacity transit to Issaquah is included in the Preferred Alternative
- the current views of planners and elected officials from throughout the region are represented on PSRC's boards and committees; consultation with these boards and committees guided the development of the Preferred Alternative
- the discussion regarding transportation finance, project prioritization, and road use policy will continue beyond adoption of Transportation 2040; thank you for contributing to it

**C-006-002**

Comment noted. Your comment captures the actual way we have developed the Preferred Alternative as contained in the Draft Plan. It represents a hybrid which includes many of the contents of the other 6 alternatives. This was done to respond to the many comments from around the region, and in an attempt to create a new plan alternative that would perform better than the alternatives evaluated in the Draft EIS. In many ways we have achieved this goal with the Preferred Alternative.

C-006-005

A. Roadways and Arterials
1. East Lake Sammamish Parkway / SE 43rd Way Roundabout
2. I-90 Crossing Improvements
3. East Lake Sammamish Parkway Improvements (SE 56th to I-90)
4. Issaquah-Pine Lake Road Improvements
5. SR-900/NW Sammamish Road (WB I-90 to 11th Avenue NW)
6. 12th Avenue NW / SR-900 / NW Sammamish Road Improvements
7. NW Newport Way (City Limits to SR-900)
8. Newport Way (Maple to Sunset)
9. Maple Street Extension (SR-900 to Newport Way)
10. Maple Street and Newport Way Intersection Improvements
11. Front Street and Sunset Way Intersection Improvements
12. East Sunset Way Improvements

B. State Highways and Facilities
1. SR-900 Widening (Maple Street. to Gilman Boulevard)
2. Sunset Interchange – Sunset Way Ramp
3. Front Street / I-90 Interchange Improvements

C. Transit and Transit Support
1. HCT Light Rail Extension from South Bellevue to Issaquah

D. Bicycles and Pedestrians
1. NW Sammamish Road - I-90 Regional Trailway Improvement (Lakemont to State Park)
2. Newport Way – I-90 Regional Trailway Improvement (Bellevue to SR-900)
3. SR-900 Nonmotorized I-90 Crossing
4. East Lake Sammamish Trail Grade Separation (at SE 56th)
5. Laughing Jacobs Creek Trail Segment

C-006-006

E. Corrections

Here are some corrections to the existing plans: The DEIS Addendum B incorrectly states that Issaquah is somehow the lead on a system-wide congestion pricing project. This appears to be a typographical error.

At least one DEIS option includes the Issaquah SE Bypass proposal. This project should no longer be included as a future project or part of the MTS. After years of study and community debate, this project has been eliminated by the City of Issaquah and an alternative project, if any, has not yet been determined.

C-006-007

**Surrounding Area**

C-006-008

In regard to the surrounding area, Issaquah continues to support completion of regional trail systems such as the East Plateau trails, the Highpoint Trail and other connecting segments. Issaquah supports continued park and ride capacity increases in surrounding communities. Additional park and ride capacity at Preston, Snoqualmie, and/or North Bend, for example, would benefit residents of those communities and potentially reduce trips to and open capacity at existing park and ride facilities in Issaquah.

Creating park and ride capacity in the outlying communities seems to us to be a more prudent mid-term approach than adding additional park and ride capacity locally, until I-90 HCT options are better defined. For example, a future light rail line to Issaquah may benefit more from higher density, transit supportive land use in the immediate vicinity of the new Issaquah Transit Center than another parking structure.

**C-006-003**

The plan analysis examined a broad array of potential transportation actions combined in different ways into the alternatives tested. Given that each alternative contains a mix of many different actions the analysis results apply to the alternative as a whole rather than to any individual action therein. Staff stated this clearly in many meetings and outreach efforts.

**C-006-004**

The Preferred Alternative (the Full Plan portion) includes a High Capacity Transit extension to Issaquah, recoginzing Sound Transit's long range plan as well as the growing need to provide improved non-SOV options on the east side of Lake Washington.

**C-006-005**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in

C-006-009 Issaquah supports reasonable expansion of SR-18 from Issaquah-Hobart Road to I-90, including an improved I-90 interchange. SR-18 is already an important MTS link for Eastside and South King County communities. Safety and mobility would benefit from such improvement.

C-006-010 Issaquah also generally supports reasonable improvements to Issaquah-Fall City Road, Issaquah-Hobart Road and May Valley Road for the same reasons. Issaquah-Fall City Road (outside Issaquah) has especially suffered from continued land use development without corresponding roadway improvements. Improvement to this road simply would address existing deficiencies.

C-006-011 **Consistency with Pending Plans**

C-006-012 The preferred alternative should reflect the planning that has taken place in the region since work on Transportation 2040 began. For Issaquah, a key document will be the I-90 Corridor Study. This WSDOT study conducted in partnership with the cities on the corridor will outline a number of specific improvements to I-90 that will support general, transit, and freight mobility. We anticipate findings that support reserving use of the remaining center median for HCT development. It should be noted, however, that Issaquah supports completion of planning for ST-3 before any final decisions are made regarding new HOV direct access ramps.

C-006-013 Issaquah has consistently supported rail as the preferred mode for HCT in the I-90 Corridor because it is most consistent with the long term regional growth vision presented in Vision 2040 and the Cascade Agenda. Construction of additional HOV direct access ramps could present significant engineering challenges, redundant public investments, or possibly even preclude rail in the I-90 Corridor. Another important consideration for Issaquah will likely be an additional I-90 multi-modal crossing located in the vicinity of 12th Avenue NW. This crossing would be regionally significant by helping to remove trips from existing MTS roadways, particularly SR-900, and by improving non-motorized access between high employment areas and the Issaquah Transit Center.

C-006-014 Other concurrent planning efforts that should be acknowledged to the degree possible are King County's Issaquah-Hobart Road Corridor Study and Sound Transit's pending ST-3 Study. The ST-3 Study is anticipated to address the I-90 HCT options to Issaquah that will benefit the entire corridor, including surrounding cities such as Sammamish.

**Additional Policy Matters**

C-006-015 **Funding Methods**

C-006-016 The emphasis on funding methods in the DEIS is commended. Sustainable transportation financing is an ongoing regional challenge. Unfortunately, the DEIS alternatives seem unduly structured to generate support for user fees by exclusively linking many desired and long-planned transit and non-motorized projects with the greatest future reliance on user fees. Transportation finance options should be reviewed in greater depth with a constant baseline of projects for more valid comparison.

C-006-017 While new tolling may be part of the answer, it is possible that traditional, region-wide revenue mechanisms could effectively finance the desired improvements with prudent changes and a continued public dialog about system needs. The recent ST-2 vote is an example of success for this approach. One consideration for the near future would be to expand the original RTA tax district to include outlying communities within the UGA that directly or indirectly benefit from the regional transit system. In the I-90 Corridor, this could include cities such as North Bend and Snoqualmie. At the same time, Issaquah has previously expressed concern to the PSRC about converting I-90 to an all-toll facility. While tolls may be necessary on SR-520 to build a new bridge, a combination of free lanes and HOV/HOT lanes are our policy preference for I-90 as it is prepared for future light rail HCT.

C-006-018

C-006-019

VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-006-006**

During the discussion of the draft alternatives and development of the Preferred Alternative we received project specific input from project sponsors from across the region. In response to their comments we crafted a list of projects to be included in the Draft Plan. Please see this list as Appendix A of the Final EIS.

**C-006-007**

This project has been included in the Preferred Alternative.

**C-006-008**

Issaquah has been removed as the sponsor to the congestion pricing project and the Issaquah bypass has been taken out.

**C-006-009**

Investments to improve this section of SR 18 are included in the Preferred Alternative.

**C-006-010**

Comment noted. Transportation 2040 includes several improvement projects on Issaquah-Fall City Road, Issaquah-Hobart Road, and May Valley Road to address congestion and operational concerns.
In addition, the Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders

C-006-020 Another consideration may be that the gas tax effectively serves as a VMT fee now while providing an implicit incentive for more fuel efficient, lower emission vehicles which is a distinction not made by a blanket VMT fee. If the overall vehicle fleet improves fuel efficiency approaching the point of declining gas tax revenue, perhaps that would be the time to revisit the idea of VMT, but it does not seem appropriate for the near to mid term of the proposed plan.

C-006-021 **Federal Stimulus Investments**
The current Federal stimulus programs originated after the DEIS baseline information was established. Given the magnitude of these programs, their current and potential impact on transportation finance in the region should be accounted for in the Preferred Alternative and final EIS in order to accurately reflect current conditions.

C-006-022 **MTS Prioritization**
C-006-023 The Preferred Alternative should also address Vision 2040 implementation and funding via the distribution formulas for the existing, traditional funding sources. The current division of funds between regional center competition and countywide competition leaves room for improvement because it does not adequately address the important role of regionally significant transportation hubs such as Issaquah that provide a number of the existing Metropolitan Transportation System Roadways (MTS). A middle tier of funding competition for MTS communities/facilities is an approach worthy of further consideration.

C-006-024 **Maximizing Efficiency of the Existing System**
Issaquah supports projects that can improve safety and mobility within existing corridors. This is consistent with the focus on the existing MTS system noted above. For example, Issaquah voters approved and now enjoy the benefits of a citywide ITS system which we continue to improve. Issaquah views new corridor proposals as warranting careful study and construction only when absolutely necessary and environmentally sound.

C-006-025 **HOV Assumptions**
Several references to 3+ HOV ridership requirements are made in the alternatives. This would represent a significant policy decision on a system-wide basis. Such a change should occur only as warranted on a segment basis from observation of congestion and/or transit delay in a 2+ HOV facility. Current anecdotal observation does not support a 3+ requirement. Area HOV lanes generally seem to function well with SR-167 even providing the opportunity for the current HOV/HOT shared lane project. I-90 may provide a similar opportunity for a shared HOV/HOT lane. It should also be noted that the current time limit on HOV restriction for I-405 has functioned well and likely helped reduce accidents by allowing through traffic to avoid frequent SR-167 back-ups.

C-006-026 Please continue to provide all relevant information and notification of opportunities to participate in the planning process as Transportation 2040 continues to move ahead. We look forward to continuing to work with the PSRC as the preferred alternative is developed.

Sincerely,

Ava Frisinger

Ava Frisinger
Mayor

cc: Issaquah City Council
Mark Hinthorne, Director of Planning
Bob Brock, Director of Public Works Engineering

believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**C-006-011**

To the extent possible, due to the presence of planners from throughout the region on PSRC's boards and committees, the Preferred Alternative reflects the region's current planning philosophy.

**C-006-012**

The Preferred Alternative includes high capacity transit (mode to be determined) to Issaquah. The Preferred Alternative also includes I-90 HOV direct access ramps at SR-900. Details concerning the mode of high capacity transit to Issaquah and construction of HOV direct access ramps will be the subject of continued discussions in the future.

**C-006-013**

Comment noted.

**C-006-014**

As noted in the response to comment C-006-011, to the extent possible, the Preferred Alternative
reflects the region's current planning philosophy.

**C-006-015**

Comment noted. Developing sustainable funding sources for Transportation 2040 is an important issue, and is included as a key element of the Draft Plan. For more information please see the Financial Strategy - Appendix F of the Draft Plan document.

**C-006-016**

A broad array of traditional and non-traditional revenue sources, in addition to tolling, were looked at in developing the Preferred Alternative. It is also assumed that in the early years of the plan traditional sources of revenue, such as fuel taxes and motor vehicle excise taxes, will be required to implement many of the long-planned roadway, transit, and non-motorized projects.

**C-006-017**

Comment noted. However, our financial forecasts show traditional financing will not meet the region's financial needs in the long term. This is why the Draft Plan includes a Financial Strategy which will shift toward tolls and user fees to finance the plan. This does not mean we will not continue to rely on traditional revenue sources, such as the sales tax, to finance parts of the plan. For a more complete report on finance please refer to Appendix F: Financial Background of the Draft Plan document.

**C-006-018**

Considering the need for the region to develop a more sustainable funding strategy for transportation investments, the region is considering a wide range of options. Your idea of expanding (or creating) funding district boundaries (such as the previous RTA) to include the entire Urban Growth Area is worthy of consideration.

**C-006-019**

Thank you for stating your preference.

**C-006-020**

The current configuration of the gas tax tends to reward improved fuel efficiency, and as a result gas tax revenues have declined. This trend is likely to continue as the fuel efficiency of the vehicle fleet continues to improve. In the short term, gas taxes may need to be increased to

account for this trend. In the medium to long term, VMT charges, tolling and pricing, HOT lanes, parking charges, and other funding strategies will need to be phased in as revenue requirements increase.

**C-006-021**

Comment noted. The ARRA program has changed the short term project funding picture since production of the DEIS. Over the 30-year life of the Transportation 2040 plan, however, the region will still need a financial strategy to fund nearly $200 billion in transportation improvements.

**C-006-022**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-006-023**

Comment noted. PSRC selects projects to receive funding from the Federal Highway Administration and the Federal Transit Administration. By federal law, these funds must be regionally selected and approved by PSRC. The criteria used to select projects are based on regional

transportation, economic, and land use policies adopted by the region's elected leadership. The resulting policy framework that governs the project selection process is subject to review and reauthorization by the PSRC Executive Board prior to each funding cycle. All public agencies, jurisdictions, and tribes are eligible to apply for funding.

**C-006-024**

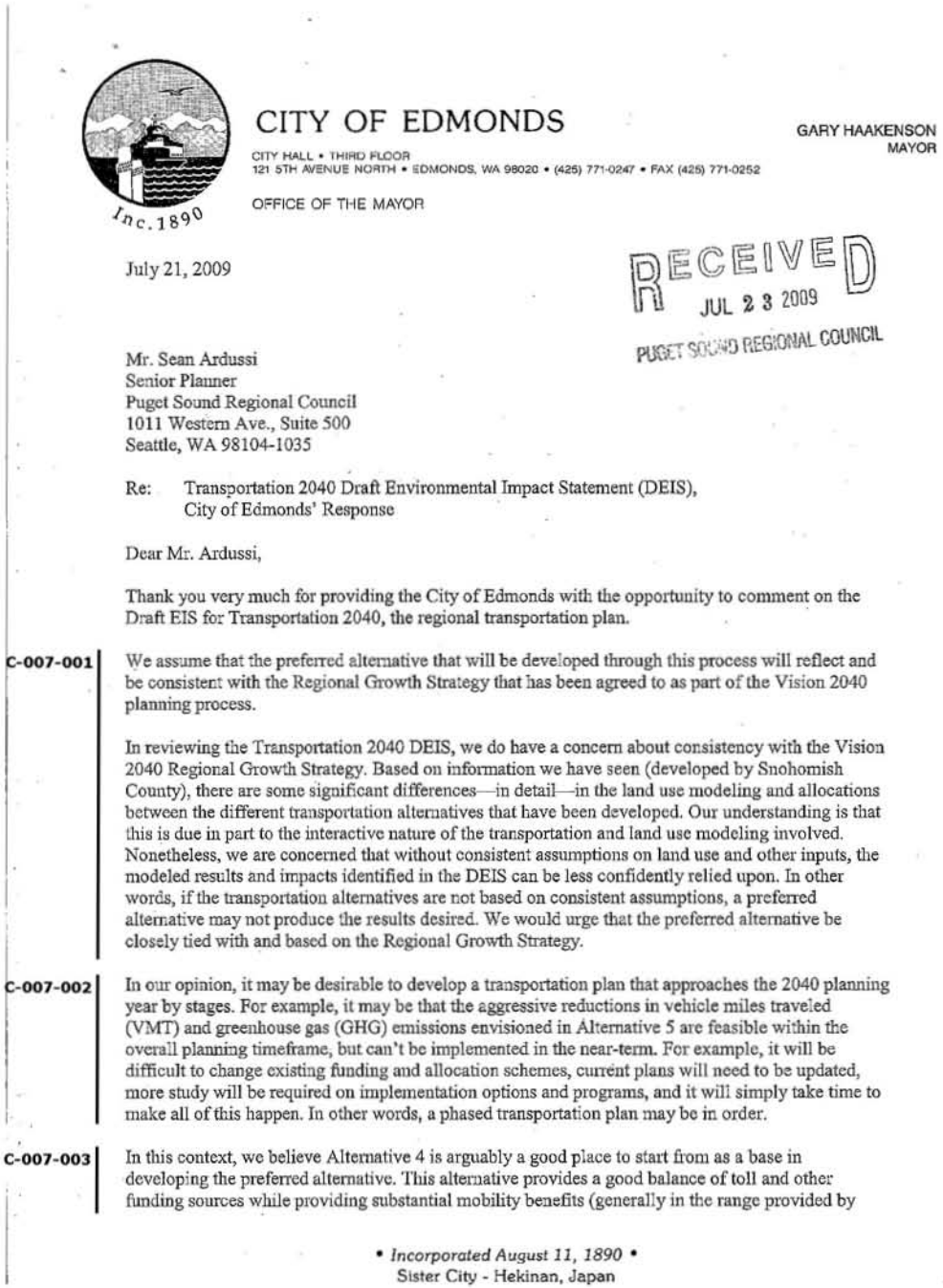
The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability, and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit, and traveler information ITS projects.

**C-006-025**

Thank you for your comment. Detailed information about the assumptions that went into the analysis can be found in Appendix A: Alternatives Technical Report.

**C-006-026**

Thank you.



CITY OF EDMONDS

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GARY HAAKENSON
MAYOR

OFFICE OF THE MAYOR

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July 21, 2009

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JUL 23 2009
PUGET SOUND REGIONAL COUNCIL

Mr. Sean Ardussi
Senior Planner
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

Re: Transportation 2040 Draft Environmental Impact Statement (DEIS),
City of Edmonds' Response

Dear Mr. Ardussi,

Thank you very much for providing the City of Edmonds with the opportunity to comment on the Draft EIS for Transportation 2040, the regional transportation plan.

C-007-001 We assume that the preferred alternative that will be developed through this process will reflect and be consistent with the Regional Growth Strategy that has been agreed to as part of the Vision 2040 planning process.

In reviewing the Transportation 2040 DEIS, we do have a concern about consistency with the Vision 2040 Regional Growth Strategy. Based on information we have seen (developed by Snohomish County), there are some significant differences—in detail—in the land use modeling and allocations between the different transportation alternatives that have been developed. Our understanding is that this is due in part to the interactive nature of the transportation and land use modeling involved. Nonetheless, we are concerned that without consistent assumptions on land use and other inputs, the modeled results and impacts identified in the DEIS can be less confidently relied upon. In other words, if the transportation alternatives are not based on consistent assumptions, a preferred alternative may not produce the results desired. We would urge that the preferred alternative be closely tied with and based on the Regional Growth Strategy.

C-007-002 In our opinion, it may be desirable to develop a transportation plan that approaches the 2040 planning year by stages. For example, it may be that the aggressive reductions in vehicle miles traveled (VMT) and greenhouse gas (GHG) emissions envisioned in Alternative 5 are feasible within the overall planning timeframe, but can't be implemented in the near-term. For example, it will be difficult to change existing funding and allocation schemes, current plans will need to be updated, more study will be required on implementation options and programs, and it will simply take time to make all of this happen. In other words, a phased transportation plan may be in order.

C-007-003 In this context, we believe Alternative 4 is arguably a good place to start from as a base in developing the preferred alternative. This alternative provides a good balance of toll and other funding sources while providing substantial mobility benefits (generally in the range provided by

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**C-007-001**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-007-002**

Comment noted. Your observation on the need for a financial transition strategy is accurate. While the region may rely on tolling and pricing as a long term funding source, the region (within the context of the Transportation 2040 plan) will need to develop a transition strategy to get us there.

**C-007-003**

Thank you for stating your preference among the alternatives. The Preferred Alternative contained in the Draft Plan was crafted as a hybrid of the other alternatives. As such, it includes many of the best aspects of the other alternatives, and achieves the highest level of user benefits among all the alternatives. It also contains the highest amount of bus service, and would extend LINK Light Rail to Everett, Tacoma, and downtown Redmond in the Constrained part of the plan. The Preferred Alternative also includes significant investment in walk and bike facilities.

C-007-003 Alternatives 3 and 4). Alternative 4 also provides more of an emphasis on transit and non-motorized options, including critical high-capacity transit improvements that are not part of Alternative 3. The following highlights why Alternative 4 is a good place to start:

1. It is one of the best alternatives in accomplishing the objectives of maximizing the efficiency of regional and cities' transportation plans (improving congestion / mobility, environmental concerns).
2. It emphasizes alleviating congestion at bottlenecks and chokepoints, which could provide benefits in the near-term.
3. It maximizes efficiency in funding a broad array of projects (freeways, arterials, light-rail, bus service, and non-motorized).
4. It extends the light-rail network beyond ST2, which is important in supporting the Vision 2040 centers approach.
5. It provides more non-motorized transportation improvements.

C-007-004 There are certain aspects of other alternatives—primarily Alternative 5—which we also believe should be included in a preferred alternative. Again, including these in a phased preferred alternative would seem to be the best approach.

A preferred alternative should do as much as possible to reduce VMT and GHG emissions. Part of the basic approach embodied in Vision 2040 is to move in this direction, and Transportation 2040 should build upon and expand this effort.

C-007-005 Improvements and adjustments to the funding and pricing mechanisms for transportation should be incorporated into the preferred alternative. Traditional funding mechanisms and priorities will not serve the region well in meeting VMT and GHG reduction goals. That being said, we do not believe that simply tolling arterials and minor arterials is a viable solution. However, some form of regional
C-007-006 charge or tax that is targeted at reducing VMT and GHG emissions should be explored. In this respect, we strongly recommend that PSRC include a transportation funding mechanism that targets reductions in VMT and GHG emissions in the preferred alternative. Such a mechanism should include features such as the following:

- Seamless implementation, without contributing to congestion.
- Equitable application, providing incentives without penalizing low-income or disadvantaged people who have no choice but to drive longer distances.
- Acknowledge different characteristics and impacts, such as ability to pay, and variation in impact (e.g., GHG emissions) by vehicle type or age.

C-007-007 The innovative approaches to fuel sources and technological advances included in Alternative 5 should be part of any preferred alternative. Transportation solutions will need to rely on a multi-pronged approach, not just improvements in efficiency or reductions in VMT.

C-007-008 It is also clear that transportation and funding on a regional scale should be based on and targeted to improve overall system performance. Tolling for single-purpose projects or improvements may be necessary in isolated cases, but it should not be the norm.

C-007-009 A preferred alternative needs to focus on, and pay close attention to, integrated system management and seamless operation and coordination across multiple transportation modes. There is a statement

C-007-009 that Alternative 4 has this as a goal, but it is unclear how this is accomplished more in this alternative as opposed to the others. Regardless, efficiencies of this type should be a key feature of the preferred alternative.

C-007-010 In addition to the general comments noted above, the City of Edmonds recommends that the following specific *additions* or *suggestions* are incorporated into a preferred alternative.

1. More clearly tied to implementing and expanding long-range transit plans.

C-007-011 2. Include a stronger emphasis on multimodal connections. The Edmonds Multimodal Terminal Project is an example of this and should be included in the preferred alternative (see also item 6 below).

C-007-012 3. Work with stakeholders to create policies and measures to address grade separation between rail operations and other modes of travel such as pedestrian and vehicular.

C-007-013 4. Identify structured parking within the vicinity of the Edmonds Sound Transit Commuter Rail Station, Multimodal Terminal, and Ferry Terminal.

C-007-014 5. Add Project ***ID 1711*** (new connection from SR-104 to terminal) and Edmonds Terminal Project (***ID 2483*** and ***3415***).

   a. PSRC didn't explicitly list the Edmonds Terminal project within Alternative 4 or any other specific Terminal Project in the region, but it is included within Alternatives 2 & 3.

C-007-015 6. Include the following roadway investments within Alternative 4 (that are also identified in other alternatives) directly impacting Edmonds. These would be consistent with the City of Edmonds' Transportation Plan's objectives to increase Transit usage:

   a. Park-n-Ride along SR-99, consisting in 500 new stalls added to the Edmonds / Shoreline Park-n-Ride, mentioned in alternative 2,3, and 5 (***ID 2631***).

      i. For Project ID 2631, please clarify the Edmonds / Shoreline Park-n-Ride since the only Park-n-Ride under both jurisdictions would be Aurora Village which is already mentioned in Project ID 3597.

   b. SR-99 from 244th to 240th: add one lane in each direction to connect Business Access and Transit (BAT) lanes from each side of Hwy. 99 @ SR-104 interchange (ID 1630), only mentioned in Alternative 2 and 5 (***ID 1630***).

   c. Aurora Village - Shoreline Park-n-Ride expansion: 275 new stalls, mentioned in alternative 2,3, and 5 (***ID 3597***).

   d. Bus Rapid Transit along SR-524 – from the ferry terminal to SR 527 (Bothell area), in the year 2020, only mentioned in alternative 5 (***ID 5331***).

C-007-016 7. Add "Innovations" section on shifting to a system offering more travel choices and reducing carbon dioxide emissions (as stated in Alternative 5).

C-007-017 8. Increase level of funding for preservation.

C-007-018 The City of Edmonds also requests that PSRC address the following specific issues during development of the preferred alternative and final EIS:



**C-007-004**

The Preferred Alternative includes numerous projects and programs derived from Alternative 5, including significant investments in non-motorized facilities, transit service, and TDM and TSM programs. One of the objectives of including these investments in the Preferred Alternative is to help meet greenhouse gas and VMT reduction goals.

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions. PSRC is working toward a four part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**C-007-005**

The analysis of plan alternatives shows that traditional funding (gas and sales taxes) would have no significant affect on reducing VMT and greenhouse gases. Our analysis shows tolling and pricing could have a fairly significant impact on reducing VMT and greenhouse gases.

Whether placed only on highways or on highways and arterials, tolls will be an important source of future transportation revenues in the PSRC region. However, the financial strategy for Transportation 2040 includes

C-007-018 Rail

**PSRC Transportation 2040 Draft EIS Chapter 4, Section 9 (page 4-17)**

This section asks, "What existing intercity passenger rail services are in the region?"

City response: Paragraph 1 does not reference Edmonds as one of five Amtrak Stations within the four-county region. The paragraph should be revised to read as follows:

> Amtrak passenger rail trains currently provide service between Eugene, Oregon, and Vancouver, B.C. (Amtrak Cascades), Seattle and Los Angeles (Coast Starlight), and between Seattle and Chicago (Empire Builder). Stations within the four-county region are located in Everett, **Edmonds,** Seattle, Tukwila, and Tacoma……..

Additionally, since ridership demand for Washington State Ferry and Sound Transit Commuter Rail service will create the need to increase transient parking demand for commuters, the City strongly suggests the Transportation 2040 Plan include language supporting a project to construct structured parking within close proximity to the Sounder Commuter Rail/Amtrak Station and Washington State Ferry Terminal. Indeed, the plan should support proposals that encourage transit access to the waterfront.

C-007-019 Aviation

**PSRC Transportation 2040 Draft EIS Chapter 4, Section 27 (page 4-77)**

This section asks, "What effects on the regional airport system are specific to individual alternatives?"

City response: As mentioned in the PSRC Transportation 2040 Draft EIS, strategies being studied in the Long-term Aviation Transportation Study have yet to be formulated in alternatives, and therefore, not undergone the same level of environmental review as elsewhere in the PSRC Draft Environmental Impact Statement. As such, any affected jurisdictions, individuals or corporations/businesses that might be affected by yet-to-be-identified impacts do not have the ability to respond comprehensively at this time. The City of Edmonds presumes and/or understands that the Puget Sound Regional Council will conduct a supplemental EIS analysis of the impacts before issuing any environmental determination related to the LATS Study; please confirm.

C-007-020 Washington State Ferries – Marine Transportation

**PSRC Transportation 2040 Draft EIS Chapter 4, Section 23**

City response: The Baseline Alternative assumes that the state and the region can maintain and preserve existing ferry routes (and service levels), terminals, the fleet, and current passenger-only service. Additionally, Alternative 2 includes a proposal to create a new auto ferry route (page 4-69).

The Washington State Department of Transportation Ferries Division (WSF) Final Long-Range Plan was released to the public on June 30, 2009. The plan guides WSF services and investments for the next 22 years. The plan assumes that current levels of service remain as they are today with minor improvements as new vessels are acquired to replace retiring vessels. Other plan highlights include:



a variety of revenue sources: tolling and pricing, HOT lanes, VMT fees, parking charges, and other sources of revenue.

**C-007-006**

The Transportation 2040 financial strategy is based on a phased approach of transitioning away from current gas taxes toward the implementation of new user fees, including tolls, VMT charges, and other pricing approaches to fund and manage the transportation system. Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system. There should be a nexus between the tax, fee, or toll and the use of the revenues. However, we anticipate we'll continue to rely on traditional funding sources and financial instruments as the region makes a transition to a more sustainable financial strategy.

A primary regional challenge will be to reduce greenhouse gas (GHG) emissions. The plan includes a strategy to address state GHG goals and VMT reduction benchmarks. The four-part strategy is based on land use, transportation pricing, transportation choices, and technology.

**C-007-007**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and

C-007-020

- Purchase 10 new vessels to replace retired and retiring vessels
- Preserve and maintain existing terminals and vessels
- Investigate new technology for vehicle reservations systems at Anacortes/Sidney B.C. and Port Townsend/Keystone, and to look at options to incorporate reservations on other routes
- Make transit supportive investments at select terminals.

With the WSF Final Long-Range Plan identifying a net funding gap of $3.3 billion over the next 21 years with most of that deficit in the capital program, it is unclear why PSRC is assuming "that the state and the region can maintain and preserve existing ferry routes (and service levels), terminals, the fleet, and current passenger-only service." Considering that WSF proposes to continue working with the Legislature to identify a sustainable funding source for the ferry system, the ability to sustain existing ferry operations is uncertain.

C-007-021

Regarding the PSRC Transportation 2040 Draft EIS proposal under Alternative 2 to "add a new auto ferry route between Southworth and Downtown Seattle" (Chapter 4, section 23), the City of Edmonds found no reference about adding "a new auto ferry route" within the WSDOT Ferries Division June 30, 2009 Final Long-Range Plan. There exists only a reference on page 62 of the WSF Long-Range Plan about the possibility of "adding a third boat" to an existing "route to increase the frequency of service and throughput capacity." Please clarify how the addition of a "new auto ferry route across Puget Sound" is consistent with the WSF Final Long-Range Plan.

C-007-022

While Exhibit 4-2 of the PSRC 2040 Draft EIS appears to depict a new commuter rail station (multimodal) within the City of Edmonds at Point Edwards, only Alternative 2 contains project 1711 referencing access/connectivity between SR104 and a new multimodal terminal. Including this project within only one alternative contradicts what is contained within Exhibit ES-1 of the WSF Final Long-Range Plan, which references "Edmonds - Kingston 2029: Edmonds terminal multimodal improvements." Considering that the proposed multimodal terminal is intended to integrate ferry, commuter and intercity rail, and transit services into a single complex, lack of including this project within all alternatives, particularly 4 and 5, seems like an unintended omission. Please confirm whether this is an intended omission, and if so, explain the rationale why Project 1711 is not included in all alternatives.

C-007-023

Accessibility

City response: The City of Edmonds concurs with the Port of Edmonds' concerns that the general transportation improvements referenced in the DEIS do not specifically include provisions for pedestrian, bicycle, vehicle, and emergency access across BNSF rail lines in Snohomish County. While PSRC and BNSF are working to improve freight mobility, the document fails to address how general access across rail lines is to be addressed.

C-007-024

BNSF plans to install a second set of mainline tracks through the City of Edmonds by 2011-12. As the number of trains increases, at-grade conflicts will occur more frequently. According to the SR104 Edmonds Crossing Final Environmental Impact Statement and Record of Decision, the volume of rail traffic is projected to increase from 35 trains per day (year 2005), to 70 trains per day in 2020, and104 in 2030. The increasing volume of rail traffic will create a significant accessibility issue for those traveling between the City's waterfront community, which includes the Port of Edmonds, private business, and public beaches, and Downtown Edmonds. Grade separation for vehicular and pedestrian access and public safety in this extremely busy rail corridor is a must.

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conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**C-007-008**

Thank you for stating your preference.

**C-007-009**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**C-007-010**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees

Again, we appreciate the opportunity to provide comments on the DEIS and plan alternatives, and look forward to further participation as this project proceeds.

If you have any questions, please contact our City Engineer, Rob English, at 425.771.0220 or via email at *robert.english@ci.edmonds.wa.us*.

Sincerely,

Gary Haakenson
Mayor

c: Edmonds City Council
Rob English, City Engineer
Stephen Clifton, Comm Serv's & Econ Dev't Director
Rob Chave, Planning Manager
Bertrand Hauss, Traffic Engineer
Noel Miller, Public Works Director
Robert McChesney, Port of Edmonds Executive Director

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formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-007-011**

Comment noted. The Edmonds Terminal (included in the Draft Plan) also supports passenger connections between the Kingston-Edmonds ferry, providing a non-SOV option for travel between north Kitsap County and downtown Seattle and other destinations on the east side of the sound.

**C-007-012**

The Preferred Alternative includes the remaining FAST Corridor grade separation projects. Grade separations are evaluated routinely as part of the regional project evaluation process.

**C-007-013**
Comment noted.

**C-007-014**
Projects 1711 (the new connection from SR 104 - terminal), 2483 and 3415 (Edmonds Terminal Relocation/Expansion Phases I and II) are all in the Preferred Alternative.

**C-007-015**
Project 2631 is designated as a concept because there is no sponsor identified. However, there are parking stalls planned at the Shoreline light rail station and project 3597 has been changed from the Aurora Village Park-and-Ride to the Shoreline Park-and-Ride at the Shoreline Transit Oriented Development site at 18821 Aurora Ave N. There are also parking stalls planned at the Edmonds Commuter Rail Station and at the relocated station.

Project 1630 (BAT lanes on SR 99) is in the Preferred Alternative.

Project 5331 (BRT on SR 524) is in the Preferred Alternative.

**C-007-016**
Comment noted.

**C-007-017**
Thank you for your comment. In the Transportation 2040 Preferred Alternative maintenance and operation of the existing system as well as safety and security are top priorities, and use most of the available funding. Mobility improvements include a major emphasis on improving system efficiency with a strategic approach to investing in new capacity. System efficiency includes creating “smart corridors” with advanced technology, user information, demand management programs, and

variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit, and nonmotorized facilities, with new roadways limited to a few missing links.

**C-007-018**

Thank you—FEIS language reflects this correction. The Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated. The plan includes language supporting investments that provide access to transit, that include the completion of transit-supportive and efficiency investments in local roads, and that improve access to and within transit centers.

**C-007-019**

As noted in the EIS for Transportation 2040, PSRC is relying on the results of the Washington State Long-Term Air Transportation Study (LATS) to provide direction regarding our region's airport capacity needs. The LATS is just one step in a series of planning processes aimed at identifying alternative ways to meet the state's (and the region's) long term air transportation needs. The LATS process generated findings and recommendations related to airport capacity, airport system funding, and land use. These findings are currently under review by the Governor and the Legislature. PSRC did not take any specific action related to the LATS findings or recommendations, but used the LATS results to help determine additional steps needed to address our airport capacity needs.

**C-007-020**

Transportation 2040 has been developed in close coordination with Washington State Ferries. As such, the Baseline and Preferred Alternatives for Transportation 2040 include the same assumptions outlined in the WSF Long Range Plan: to preserve and maintain existing ferry routes, service, boats, and terminals, including a phased boat replacement program that would provide modest increases in vessel capacity over time. While the Baseline Alternative is not fully funded by current law revenues, the plan is being developed with the assumption that the plan's funding strategy will identify additional revenue sources needed to implement these projects and programs.

**C-007-021**

The Draft WSF Long Range Plan, released for public review on January 31, 2009, contained a list of potential future service additions, which included the following concept: "Create a Southworth to downtown Seattle route" (Draft Long Range Plan, page 83). This concept was evaluated as part of Transportation 2040's Alternative 2. TheWSF Final Long Range Plan released on June 30, 2009 no longer included this concept. The Preferred Alternative for Transportation 2040 does not include this possible new auto ferry route.

**C-007-022**

The alternatives evaluated in the DEIS were developed to provide clear choices to policy makers. Certain projects were included in certain alternatives as part of this approach, which sought to differentiate between investment options and their relative performance against policy and technical evaluation criteria. The inclusion of the Edmonds multimodal ferry terminal (former PSRC project 1711; currently PSRC projects 2483 and 3415) in Alternative 2 only does not prevent us from including this project in the Preferred Alternative. In fact, the Preferred Alternative does include the Edmonds terminal as part of the unprogrammed plan.

**C-007-023**

Comment noted. This issue is addressed at a policy level in the Preferred Alternative's support for improved safety and security. However, improved safety at railroad crossings is an issue that is primarily implemented by project sponsors in their project design and operation. SAFETEA-LU requires PSRC to include planning for improved safety in our transportation planning process, and we have done so. Thank you for your input on this issue.

**C-007-024**

Comment noted. As you know, PSRC has developed a robust grade separation program (the FAST Corridor) as part of our Regional Freight Mobility program. This is included in the Draft Plan, and details can be found in Appendix J of the Draft Plan. The issue of growing railroad traffic and its impact on local access and safety is a different issue, one most appropriately addressed at the local level. Still, SAFETEA-LU requires us to address safety in our planning process. As we move ahead to adopt and then implement Transportation 2040, we will have the policy foundation on which to prepare more detailed plans and identify projects aimed at addressing this issue.

**CITY OF BAINBRIDGE ISLAND**

**Executive Department**

July 24, 2009

RECEIVED
JUL 27 2009
PUGET SOUND REGIONAL COUNCIL

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

Dear Mr. Arducci:

C-008-001 Thank you for the opportunity to comment on the Puget Sound Regional Council's Draft Environmental Impact Statement for the Transportation 2040 Plan. Staff from the City's Planning and Community Development Department and Public Works Department have reviewed the document, with special attention given to Alternative 5, and identified relationships with the City's Comprehensive Plan, Island-Wide Transportation Plan and other City policies. These relationships occur primarily at a very high level due to the broadness of the alternatives and the wide scoping area of the 2040 Plan. However, there are several areas of the Plan that could directly impact the Bainbridge Island community and the City's future planning efforts. Those areas are briefly outlined below:

C-008-002 **Bus Rapid Transit** – According to the 2040 Plan, the primary affected arterial on Bainbridge Island is State Route 305, which is discussed as a potential location for Bus Rapid Transit (BRT). This proposal is primarily in concert with the City's overall planning goals (increase in transit options, lowering of carbon emissions), and we agree that BRT and the associated supporting development most likely has a more limited impact on the environment than expansion of the existing transit network present in the corridor. However, a BRT program may well include operation and facility details that could potentially create significant impacts to the City's traffic operations and future land use development pattern, and implementation of the system without properly coordinating land-use actions could exacerbate environmental impacts above the baseline. Those impacts include the planning for expanded park and ride facilities, and potential neighborhood service-center and transit-oriented development site identification. BRT could also potentially lead to grade separated intersections or access limitations. While this could result in increased safety (for example, by reducing auto/non-motorized turning conflicts), and improved traffic management, these potential benefits must be weighed against the potential for significant visual and physical impacts which could conflict with the City's goal of preserving the corridor as a green, scenic highway.

C-008-003 **SR305 Corridor**
It is our understanding that the Agate Pass bridge is not slated for replacement in the 2040 Plan. Instead, park and ride lots are proposed for both sides of the bridge with

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**C-008-001**

Comment noted. Thank you for your assistance in the Transportation 2040 planning process and for your thoughtful comments. We have used significant amounts of public input in crafting the Preferred Alternative as well as writing the Draft Plan. The plan's success will rely in large part on the continuing involvement and commitment of agencies across the region.

**C-008-002**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

**C-008-003**

Comment noted. Both Alternative 5 and the Preferred Alternative contained in the Draft Plan include significant investments along the SR 305 corridor, including BRT service and improved non-motorized facilities. However, neither alternative would replace or widen the Agate Pass bridge. The issues you mention would still exist with any of the plan alternatives. As we adopt Transportation 2040 and move forward to

C-008-003 special traffic light devices installed to facilitate Bus Rapid Transit (BRT). The narrow, two-lane Agate Pass Bridge is an existing traffic bottleneck, as is the Suquamish Casino intersection just north of the bridge. Given the existing congestion, it's unlikely that the proposed park and ride lots coupled with BRT traffic light devices will adequately mitigate congestion or facilitate safe, non-motorized traffic, as the existing Agate Pass bridge design is not configured for pedestrians and bicyclists to safely "share the road" with buses and cars.

C-008-004 **Ferry Ridership –** Alternative 5 calls for a significant increase above the baseline in ferry ridership along the Seattle-Bainbridge route. Although not specifically identified in the plan, we expect that this ridership increase is the result of potential tolling and transit alternatives on both sides of the route that make ridership more attractive. As ferry traffic and parking congestion directly affects the City's downtown, we would also specifically encourage policies that improve access for pedestrian ridership as well as allowing incentives to increase the use of smaller and/or alternative fuel vehicle ridership. Improved scheduling for ferry-transit connections on both sides of the route will are also encouraged and will assist in meeting the ridership goals.

C-008-005 Vision 2040 recognizes that the State ferry system is both a marine highway and high-capacity transit system. Alternative 5 provides for additional passenger-only ferry runs, including a proposed route from Bainbridge to Des Moines. This new run is linked to the rapid transit corridor proposed on SR 305 in the plan. To reduce potential impacts to traffic volumes on SR 305, this new passenger-only run should not be established until the rapid transit component can support the influx of travelers using this new ferry connection. This new ferry run could provide an alternative route from the Kitsap Peninsula to SeaTac Airport that reduces the use of vehicles, and therefore some type of transit connection should link the Des Moines ferry terminal with SeaTac Airport.

C-008-006 **Non-motorized Transportation –** Alternative 5 directly supports the City's approach to improving transportation choices by proposing maintenance and retrofit of existing routes for motorized and non-motorized transportation, and expanding non-motorized facilities. The City is actively taking the lead in pursuing this same approach by using federal funding through PSRC to retro-fit Winslow Way as a "complete street". That project will improve accessibility and limit environmental impacts through the use of expanded pedestrian and non-motorized facilities as well as sustainable drainage and low energy lighting. We are looking forward to serving the community and the region with this model project, and working with other jurisdictions to further the 2040 plan goals in this area of transportation planning.

C-008-007 Alternative 5 also offers the best opportunity to regionally link non-motorized systems. As such, SR 305 should be included as a major bike/pedestrian link within the region, linking the Winslow Ferry Terminal through the Island to Poulsbo, and connecting to other bike/pedestrian corridors. The City's Island-Wide Transportation Plan and Non-Motorized Transportation Plan promote this corridor as a regional multimodal corridor, while also recognizing that cross-Island connections need to be facilitated (Transportation Element: Goal 6 and supporting policies TR 6.1,TR 6.3, Policy TR 4.8, Non-Motorized

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implement the plan's improvements in Kitsap County we will need to continue to discuss solutions to these issues.

**C-008-004**

The Transportation 2040 alternatives incorporate the work of Washington State Ferries (WSF) in planning for the long range ferry system. In addition, the Transportation 2040 plan incorporates the findings and recommendations resulting from the Regional Passenger Only Ferry Study, completed in 2008. Both the WSF Long Range Plan (June 30, 2009) and PSRC's 2008 Regional Passenger Only Ferry Study encourage a shift toward increased walk-on passengers on state and regional ferries, as well as improved transit access serving ferry terminals. This direction is reflected in the final Transportation 2040 plan.

**C-008-005**

Concur. The proposed new passenger-only ferry (POF) route between Bainbridge Island and Des Moines could increase auto traffic along SR 305 across Bainbridge Island. Timing of the new POF service to coordinate with proposed BRT service on SR 305 would help to reduce auto traffic and provide an alternative to driving. Discussions with the City of Des Moines have also identified the need for some kind of transit connection between any future Des Moines passenger ferry terminal and Sea-Tac Airport.

**C-008-006**

Comment noted. Alternative 5 did contain significant investments in non-motorized facilities. The Preferred Alternative in the Draft Plan contains an equal or greater amount of new walk and bike facilities, including the SR 305 trail between the Winslow ferry terminal and Jefferson County.

**C-008-007**

The SR 305 trail project has been included in the Preferred Alternative.

C-008-008 Transportation Plan Policy NM 1.1). In addition, the proposed passenger-only ferry run from Des Moines to Bainbridge could be better facilitated by linking the bike/pedestrian corridor system from Des Moines to Bainbridge, and into the Kitsap Peninsula.

C-008-009 **Financing**
Alternative 5 proposes to utilize user-fees and tolling through a "complete network tolling system" as the primary funding source for transportation project improvements. Such fees for pedestrian and bicycle facilities should be limited as it is likely to discourage such non-motorized uses. In additions, reductions to such fees should be provided for both non-motorized vehicles and for lighter alternative-fuel vehicles that have a limited impact on the system or do not contribute to emissions.

Again, we appreciate the opportunity to provide these comments, and look forward to reviewing the Final EIS this fall.

Sincerely,

Mark Dombroski
City Manager

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

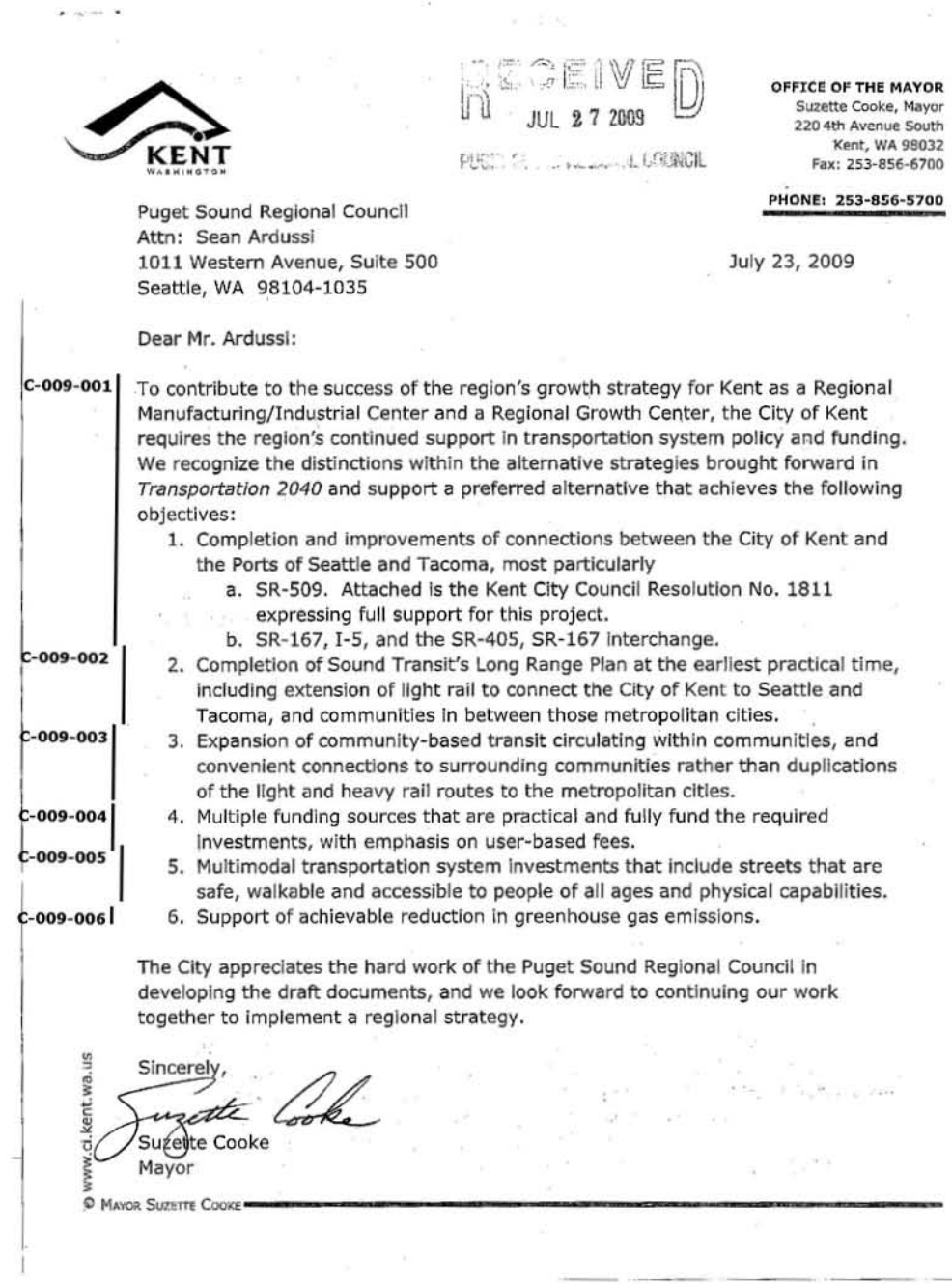
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**C-008-008**

Comment noted. The future success of passenger ferry services will rely on good transit, bike, and walk connections to and from ferry terminals. As the region gets closer to the actual implementation of new passenger ferry service, we should coordinate those ferry investments with appropriate investments in bike and walk facilities.

**C-008-009**

The Preferred Alternative does not propose fees for pedestrian and bicycle use and is flexible enough to allow future decisions on low impact vehicle use fee incentives.



KENT
WASHINGTON

RECEIVED
JUL 27 2009
PUGET SOUND REGIONAL COUNCIL

OFFICE OF THE MAYOR
Suzette Cooke, Mayor
220 4th Avenue South
Kent, WA 98032
Fax: 253-856-6700

PHONE: 253-856-5700

Puget Sound Regional Council
Attn: Sean Ardussi
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

July 23, 2009

Dear Mr. Ardussi:

C-009-001 To contribute to the success of the region's growth strategy for Kent as a Regional Manufacturing/Industrial Center and a Regional Growth Center, the City of Kent requires the region's continued support in transportation system policy and funding. We recognize the distinctions within the alternative strategies brought forward in *Transportation 2040* and support a preferred alternative that achieves the following objectives:

1. Completion and improvements of connections between the City of Kent and the Ports of Seattle and Tacoma, most particularly
   a. SR-509. Attached is the Kent City Council Resolution No. 1811 expressing full support for this project.
   b. SR-167, I-5, and the SR-405, SR-167 interchange.

C-009-002
2. Completion of Sound Transit's Long Range Plan at the earliest practical time, including extension of light rail to connect the City of Kent to Seattle and Tacoma, and communities in between those metropolitan cities.

C-009-003
3. Expansion of community-based transit circulating within communities, and convenient connections to surrounding communities rather than duplications of the light and heavy rail routes to the metropolitan cities.

C-009-004
4. Multiple funding sources that are practical and fully fund the required investments, with emphasis on user-based fees.

C-009-005
5. Multimodal transportation system investments that include streets that are safe, walkable and accessible to people of all ages and physical capabilities.

C-009-006
6. Support of achievable reduction in greenhouse gas emissions.

The City appreciates the hard work of the Puget Sound Regional Council in developing the draft documents, and we look forward to continuing our work together to implement a regional strategy.

Sincerely,

Suzette Cooke
Mayor

www.ci.kent.wa.us

© Mayor Suzette Cooke

**C-009-001**

Thank you for stating your preference among the alternatives. The SR 509 and SR 167 projects have been included in several alternatives, including the Preferred Alternative as contained in the Draft Plan.

**C-009-002**

The Sound Transit Long Range Plan, though not fully funded, was included in Alternative 5, and is also included in the Preferred Alternative within the Draft Plan (unprogrammed portion).

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

C-009-007

**RESOLUTION NO.** 1811

**A RESOLUTION** of the City Council of the City of Kent, Washington, stating the City's support for the State of Washington's improvement plans to link State Route 509 with Interstate 5.

**RECITALS**

A. The Puget Sound Regional Council (PSRC) has prepared a Transportation 2040 Environmental Impact Statement (EIS) covering transportation needs in the Puget Sound Region for the next three decades. The 2040 EIS includes the State Route 509/Interstate 5 Freight and Congestion Relief Project ("Project"). The Project will construct the missing link between State Route 509 and Interstate 5. The comment period for the EIS ends on July 31, 2009.

B. Because State Route 509 is an important uncompleted transportation link that directly benefits the Kent Metropolitan area by reducing traffic congestion on Interstate 5 and other parallel highways and arterials, and reducing travel costs for freight carriers, the Kent City Council adopts this resolution to formally state its support of the Project.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF KENT, WASHINGTON, DOES HEREBY RESOLVE AS FOLLOWS:



**C-009-003**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**C-009-004**

The funding strategy for the Preferred Alternative is federally required to be reasonable and does include a variety of funding sources with increasing reliance on user-based fees over time.

**C-009-005**

Thank you for stating your preference among the alternatives. Safety is a key consideration in all of the Transportation 2040 alternatives. SAFETEA-LU requires us to address safety and security as part of our planning process. The plan alternatives also include a variety of improvements to improve accessibility to the transportation network for all citizens, including those with special needs, people of minorities, and people with low incomes. These concerns are being addressed as part of our Special Needs Transportation program as well as in our Environmental Justice effort.

**C-009-006**

Comment noted. The Preferred Alternative includes a four-part greenhouse gas strategy comprised of land use, user fees/pricing, choices, and technology, all designed to help our region reduce the effects of transportation.

C-009-007

**RESOLUTION**

***SECTION 1.*** – Construction of the missing State Route 509 link from the west side of Sea Tac Airport to South 320th Street on Interstate 5, will positively benefit the parallel State Route 167 and decrease congestion on parallel arterials within the City of Kent such as Highway 99, West Valley Highway, 64th Avenue, 4th Avenue, and Central Avenue by allowing through traffic a more direct route.

***SECTION 2.*** – The project benefits Kent residents and businesses because it improves traffic flow and reduces congestion at the Interstate 5/State Route 516 interchange and along State Route 516, and provides a direct connection into the Kent Manufacturing Center at S. 231st Street.

***SECTION 3.*** – Using data supplied by the Washington State Department of Transportation, the completion of the route would also save over $100 million per year in reduced travel time and would save $60 million per year for freight carriers. The project would also reduce air pollution on other streets in adjoining areas and would provide cleaner storm water runoff through upgraded storm water facilities.

***SECTION 4.*** – The Project has consistently rated at or near the top of the list when comparing benefits to costs of other large projects in the state and provides vital congestion relief and freight improvement benefits to the Puget Sound region. Equally important is the fact that the project has completed its required environmental review and permitting requirements. This means it can begin construction and deliver significant benefits to the region quickly. Finishing the missing State Route 509 link and adding capacity to Interstate 5 will provide significant congestion relief for freight, commuters, transit, and general traffic traveling through South King County.



**C-009-007**

Comment noted. Your Resolution 1811 is a clear statement of the reasons the city of Kent supports the SR 509 / I-5 Freight and Congestion Relief project. This project is included in the Preferred Alternative.

C-009-007

***SECTION 5.*** – The Kent City Council supports the inclusion of the State Route 509/Interstate 5 Freight & Congestion Relief Project as an important transportation link for inclusion in the Puget Sound Regional Council's 2040 Transportation Plan.

***SECTION 6.*** – *Severability*. If any section, subsection, paragraph, sentence, clause or phrase of this resolution is declared unconstitutional or invalid for any reason, such decision shall not affect the validity of the remaining portions of this resolution.

***SECTION 7.*** – *Ratification*. Any act consistent with the authority and prior to the effective date of this resolution is hereby ratified and affirmed.

***SECTION 8.*** – *Effective Date*. This resolution shall take effect and be in force immediately upon its passage.

PASSED at a regular open public meeting by the City Council of the City of Kent, Washington, this 21 day of July, 2009.

CONCURRED in by the Mayor of the City of Kent this 21 day of July, 2009.

Suzette Cooke

SUZETTE COOKE, MAYOR

ATTEST:

Brenda Jacober

BRENDA JACOBER, CITY CLERK

**From:** Rebecca Fox [rfox@ci.tukwila.wa.us]
**Posted At:** Tuesday, July 28, 2009 4:35 PM
**Conversation:** City of Tukwila Comments
**Posted To:** Transportation 2040

**Subject:** City of Tukwila Comments

C-010-001
C-010-002
C-010-003
C-010-004
C-010-005

*The City of Tukwila supports Transportation 2040's Alternatives 3, 4 and 5 to maximize t transportation efficiency, increase revenues and reduce emissions. Tukwila is served by congested roadways, including I-5, I-405, SR 518 and SR 599. As a Core City, Tukwila would like to emphasize the great need to: 1) expand the dedicated non-motorized infrastructure for pedestrians and bicyclists,; 2) to provide increased transit opportunities including additional routes and more frequent service for existing routes,; and 3) to provide linkages among the different modes.*

C-010-006

*Thank you for the opportunity to comment on Transportation 2040. We look forward to working with PSRC to develop the alternatives.*

*Sincerely,*

*Rebecca Fox*
*Senior Planner*
*206-431-3683*

*Bob Giberson*
*Tukwila City Engineer*
*206-431-2457*



**C-010-001**

Thank you for stating your preference among the alternatives. The Preferred Alternative is a hybrid which includes elements alternatives 3, 4, and 5. These elements were selected to achieve the goals you list in your comment: improve efficiency, generate revenues, and reduce emissions. The analysis contained in the Final EIS shows the Preferred Alternative performs quite well against these criteria.

**C-010-002**

Concur. Our Congestion Management Program identifies congested corridors, documents the likely causes of congestion, and evaluates cost effective solutions as required by SAFETEA-LU. This information is contained in Chapter 2 of the Draft Plan, as well as Appendix B of the Draft Plan (Program and Project List).

**C-010-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-010-004**

Comment noted. The Draft Plan includes significant investments in new walk and bike facilities, as well as transit. The Draft Plan would provide more new bus transit service than any other alternative.

**C-010-005**

Comment noted.

**C-010-006**

Thank you.  Your input is an important part of the collaborative process we envisioned as we began the Transportation 2040 plan.

OFFICE OF THE MAYOR

Ray Stephanson
Mayor

July 29, 2009

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

Attention: Mike Cummings, P.E.

Dear Mr. Cummings:

C-011-001 Thank you for the opportunity to provide comments on the DEIS for Transportation 2040. You and your staff are to be commended for a thorough and effective public outreach process and for tackling such a daunting and important task as the plan for the transportation system in our region through 2040. The well-being of our economy and our citizens is directly linked to how effectively our transportation system functions.

C-011-002 A thoughtful regional transportation plan based on clear objectives, priorities and a sound financial strategy is also critical to the City of Everett being able to accommodate the regional growth expectations as stated in Vision 2040. As we have repeatedly communicated with the PSRC, we are not convinced that the significant job and population growth levels of Vision 2040 for Everett can be realized without significant and timely regional investment in transportation infrastructure serving Everett's growth centers. We appreciate your offer for PSRC staff to meet with City of Everett staff to discuss in greater detail how a preferred alternative may impact the City of Everett.

C-011-003 We offer the following comments on the DEIS:

1. We are concerned that the overall presentation of impacts was focused on a regional scale, and the analysis of impacts does not provide the information we need in order to understand how each alternative either supports or does not support the growth called for by Vision 2040 in Everett. The data presented in the DEIS describes differences among alternatives for regional geographies across the four-county region, but the DEIS does not identify how the alternatives differ within subareas of the county, such as with the use of TAZ or FAZ data that is typical with PSRC data analysis.

C-011-004

2. We appreciate your staff providing us the TAZ level data for population and employment for each alternative. This data would have been useful in the DEIS to help us understand impacts among the alternatives to smaller geographic areas. It appears that, despite comments in the DEIS that all five alternatives implement the regional growth strategy, there are some very important differences among the alternatives in how they support population and employment growth for the Everett Planning Area. It appears that none of the alternatives support the

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**C-011-001**

Thank you. We appreciate your comment. Thank you for the time and energy you and your staff have provided to the Transportation 2040 planning process. Meaningful and continuous involvement from agencies across the region will help insure the Transportation 2040 plan reflects the collective interests of the region.

**C-011-002**

Thank you.

**C-011-003**

VISION 2040 identifies the importance of transportation in achieving the land use pattern envisioned in the Regional Growth Strategy. VISION 2040 also recognizes that transportation systems alone cannot be expected to produce the region's desired land use and development patterns. Fine-grained changes to development regulations based on local circumstances and a wide variety of other economic incentives will play equally critical roles.

The land use policy assumptions used in the Transportation 2040 environmental impact statement were developed to facilitate a comparative analysis to learn about the sensitivity of land uses to different transportation networks. Development constraints consistent with VISION 2040 land use policy direction were applied uniformly to regional geographies across the region.

The use of the region's land use model in this analysis is not intended to predict population and employment locations in small geographic areas, but rather to allow the land use model to react to the various transportation plan alternatives to see if resulting land use patterns are consistent with the region's vision at a regional scale. Land use assumptions were not developed to explicitly represent individual policies or land use actions that would be adopted at the local level. These will necessarily differ from more global assumptions used in this analysis.

C-011-004
C-011-005

employment levels for Everett called for by the RGS, and all five alternatives direct substantially more population to Everett than the RGS calls for. It should also be noted that the TAZ level data appears to be inaccurate in a few instances where the population or employment projected in 2040 is actually lower than in 2008, most notably in the TAZ where the Everett Boeing plant is located. We trust that such modeling issues will be explored in more detail for the preferred alternative in order to avoid the potential for erroneous conclusions based on inaccurate assumptions.

C-011-006

3. The DEIS concludes that the transportation alternatives will have little impact on the distribution of growth. Several places in the DEIS include comments to the effect that the regional growth strategy is implemented by each alternative (Chapter 5, Section 1, page 5-2). Differences among alternatives in growth across the region are characterized as "slight" (Chapter 5, Section 4, page 5-11) or "with few appreciable differences" (Chapter 5, Section 5, page 5-17). It would be helpful if the FEIS can show us how the preferred alternative will affect growth at the local level.

C-011-007

4. It appears that the policy analysis in Appendix D identifies the criteria that will be used to select a preferred alternative, based on both policy objectives and fiscal analysis. By nearly all measures used in Appendix D, as stated in the analysis, Alternative 5 (full tolling) is clearly superior to all other alternatives in meeting the policy objectives identified by the policy makers, and with the most beneficial fiscal impact. **We believe that the selection of the preferred alternative should be weighted toward its transportation performance rather than by more general or philosophical policy considerations.** A description of the factors the PSRC considered in recommending the preferred alternative should be included in the FEIS.

C-011-008

5. We understand that the preferred alternative will be crafted through review by PSRC staff, the policy boards and executive board based on comments received on the DEIS and in subsequent public discussions. We strongly urge the PSRC to ensure that feedback and recommendations from local agencies be given serious consideration **prior to the selection of a preferred alternative**. Everett recommends the PSRC consider the following in creating a preferred alternative:

C-011-009

   a) Whatever combination of elements of the various alternatives is proposed for the final preferred alternative, the effects of the transportation system must be modeled at a TAZ level of analysis to determine if the system will actually support the population and job growth of the Vision 2040 regional growth strategy. We are concerned that the significant growth figures for Everett cannot be supported without substantial regional investment in transportation serving the downtown area regional growth center and the Paine Field / Boeing manufacturing and industrial center. We need to know that the transportation investments in the preferred alternative will support the growth figures of Vision 2040.

The user benefits derived from the Preferred Alternative's performance that accrue to each county and to county subareas are discussed in Chapter 4. See the discussion accompanying Exhibits 4-39, 4-40 and 4-41.

For a more detailed description of the representation of land use policy in Transportation 2040 modeling and analysis, see Appendix E.

**C-011-004**

See response to comment C-011-003.

**C-011-005**

While it is conceptually possible for individual TAZs to lose employment or population over time, this particular instance can be reviewed in advance of additional modeling analysis.

**C-011-006**

See response to comment C-011-003.

**C-011-007**

Comment noted. We did not weight the performance criteria during the evaluation of the plan alternatives. The development of the Preferred Alternative was based on a broad range of technical, fiscal, and policy input from a wide range of sources, including the general public and agencies from across the region.

**C-011-008**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these

Puget Sound Regional Council
Attn.: Mike Cummings, P.E.
July 29, 2009
Page 3

C-011-010

b) Light rail to downtown Everett by 2030 is critical for achieving the densities the region has envisioned for us. According to Appendix A (Addendum C, page 164, project 2519), light rail transit is projected to serve Everett in 2040. The preferred alternative must have light rail to Everett as soon as possible.

c) It is critical that the southwest Everett / Boeing / Paine Field MIC be served by a high level of transit service, including the potential for light rail service. The City will initiate discussions to examine how Phase 3 of Sound Transit will best serve Everett as it moves north from the Lynnwood regional growth center. The preferred alternative must not preclude the potential for light rail to serve Boeing and other nearby major employers in the Paine Field / Boeing MIC.

C-011-011
C-011-012

d) Everett's preference is for an alternative that, like Alternative 4, combines traditional revenues with tolls to maximize efficiency. We support a preferred alternative that specifically combines:

- strategic roadway capacity improvements to eliminate bottlenecks and chokepoints;

C-011-013

- improvements that reduce congestion on the regional system so regional through traffic is not diverted to city streets in order to avoid congested regional facilities;

C-011-014

- expansion of local and regional transit services;

C-011-015

- substantial improvements to regional and local bicycle and pedestrian networks;

C-011-016

- substantial improvements to managing the existing roadways more efficiently by synchronizing traffic signals across jurisdictional boundaries;

C-011-017

- efficiencies to be gained through transportation demand management and systems management, including telecommuting and other effective strategies to minimize costly infrastructure needs;

C-011-018

- completion of projects identified in Addendum C as projects 5286, 547, 521, 1879, 1889, 4005, 5315, 4006, 1708, 5324, 5334, 2519 (but completed by 2030), 4063, 621, 1710, 1708, 4006, 1709, 4065, 4007;

C-011-019

- the transit supportive ITS investments in Addendum D

comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**C-011-009**

Outputs from the UrbanSim land use model were aggregated at the TAZ level and used as the land use inputs for the Regional Transportation Demand model. As described in the response to comment C-011-003, actual growth over time in individual jurisdictions and in identified subareas will occur as a result of the zoning and permitting decisions at the local level. If individual jurisdictions and subareas experience less growth than considered in this analysis, impacts to the transportation system will be fewer than those described. The user benefits of transportation system performance that accrue to each county and to county subareas as a result of the Preferred Alternative are discussed in Chapter 4. See the discussion accompanying Exhibits 4-39, 4-40, and 4-41.

**C-011-010**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals

C-011-020 | C-011-021

e) Transit services – the Preferred Alternative should include funding for infrastructure and station area improvements to make BRT and transit emphasis corridors successful. Transit emphasis corridors that support the regional growth strategy to encourage growth in the regional and manufacturing and industrial centers should be identified in the preferred alternative. Transit buses should not be subject to tolling on the regional transportation system.

C-011-022

f) Commuter rail – consider the potential for bi-directional service between Seattle and Everett rather than one-way service that only benefits Seattle's employment centers. In any case, there should be recognition that the northern commuter rail service will not have the potential for productivity of the southern line until there are boarding opportunities established south of Edmonds Station and north of the Seattle BNSF tunnel.

C-011-023

g) Freight mobility – the preferred alternative should include dedicated funding mechanisms to build projects that improve freight access to and from ports and reduce the impacts of freight traffic on local communities.

C-011-024

h) Non-motorized system – the preferred alternative must include adequate funding for acquisition of right-of-way and construction of bicycle and pedestrian facilities to serve growth centers and in corridors that connect centers. Communities and neighborhoods that have been isolated by freeway construction should be re-connected with adjoining communities by non-motorized improvements so automobile travel is not the only option for such communities and neighborhoods.

C-011-025 | C-011-032 | C-011-027

i) Funding – the preferred alternative must include:

- a financially sustainable system for funding the facilities and services that support development and maintenance of an efficient regional multi-modal transportation system;
- sufficient funding for local governments to maintain and improve the local multi-modal transportation system;
- user-based fees paid by those who use and benefit from the transportation system, such as a VMT-based assessment.

C-011-028

j) While tolls would create significant new transportation revenues, tolling of the arterial system would appear to create an impact to businesses located on arterials, as well as neighborhood impacts by encouraging drivers to use local streets in order to avoid tolls. We would prefer a VMT-based system of funding, and to limit tolling to HOT lanes on freeways or other significant facilities such as floating bridges, trestles and viaducts.

ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-011-011**

Thank you for stating your preference among the alternatives. The Financial Strategy for the Draft Plan includes a mix of traditional revenues in the early years of the plan, with a transition to more user fee based revenues later in the plan horizon.

**C-011-012**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all

Puget Sound Regional Council
Attn.: Mike Cummings, P.E.
July 29, 2009
Page 5

C-011-029

k) Jobs/housing balance is critical to Snohomish County. The preferred alternative should support the greatest level of job growth in Kitsap, Pierce and Snohomish Counties to reduce the need for costly improvements to transportation facilities needed to support job centers in King County.

C-011-030

Tremendous capacity already exists in the reverse commute. The Snohomish County projected employment level of Alternative 2 (427,603) does the most to promote job growth in the county, but Alternative 2 also promotes the highest population growth in the county among the five alternatives. Without knowing how this will be distributed, it is not possible to recommend an alternative that accomplishes the best job/housing balance for Everett and Snohomish County. A transportation alternative that best supports concentration of the highest level of employment in existing and emerging job centers that can be efficiently served by regional and local transit would be the most desirable alternative for jobs/housing balance Snohomish County.

C-011-031

6. It is unclear how the reauthorization of SAFETEA-LU will affect our region's ability to implement the regional transportation system with the use of federal funds. While the federal funding our region receives is critical to the system, we need to create more financially sustainable sources of funding for improving and maintaining the system, regardless of the amount of federal funding that is directed to our region. We realize that this will require changes to State law that are beyond the scope of the Transportation 2040 plan, but feel it is important to advance this discussion at the State level.

The City of Everett looks forward to working cooperatively with the PSRC prior to the selection of a preferred alternative for Transportation 2040.

Sincerely,

Ray Stephanson
Mayor

c: Everett City Council
Allan Giffen, Planning Director
Tom Hingson, Transportation Services Director
Dave Davis, Engineering Services Director
Ryan Sass, City Engineer

modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**C-011-013**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix

I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**C-011-014**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**C-011-015**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three

concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-011-016**
The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability, and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit, and traveler information ITS projects.

**C-011-017**
Thank you for your comment. The Preferred Alternative contains the most aggressive packages of both system and demand management strategies identified in the DEIS.

**C-011-018**
Projects 547, 621, 1879, 1889, 2519, 4006, 4006, 5324, 5334, 1708, 4005, 4007, and 4063 are all in the Preferred Alternative.

Projects 5315, 1710, and 1709 are not in WSDOT's list and are considered concepts which are not technically in the plan. Sound Transit removed itself as a sponsor for project 4065 so this is now also a concept. Project 5286 is in the plan under local programs as an exempt project that we don't list explicitly in our project lists. Surface improvements, turn movements, and signal timing projects are all

exempt. The 521 may have been a typo because there is no project by that number.

**C-011-019**
This project has been included in the Preferred Alternative.

**C-011-020**
The updated Transportation 2040 plan will increase local transit service by approximately 90%, while achieving opera-tional efficiencies to reduce long-run costs and emphasizing additional all-day service with high frequencies. The plan also includes the completion of transit-supportive and efficiency investments in local roads that suppport transit service and operations and access to and within centers, with the addition of a limited number of strategic projects.

**C-011-021**
Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**C-011-022**
Due to BNSF operational constraints outside of the four Sounder commuter rail daily round trips, Sound Transit currently provides all-day

hourly bus service that can serve Seattle residents who work in Everett. Amtrak also has a north-bound train leaving Seattle at 7:40 a.m. and arriving in Everett at 8:30 a.m. that stops at the existing Edmonds and Mukilteo stations. Through the Rail Plus program, anyone showing a monthly pass can ride Amtrak between Seattle and Everett at no additional cost.

Alternative 5 and the final plan include additional Sounder commuter rail stations in Seattle in Belltown and Ballard.

**C-011-023**
Comment noted. The plan identifies a variety of funding sources to be used for specific purposes.

**C-011-024**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-011-025**
Over the past two years, during the development of Transportation 2040, the issue of sustainable funding has emerged as one of the most critical issues facing the region. The financial strategy for Transportation 2040 was developed to address historical and current issues related to the declining revenues from the state gas tax, the volatility of sales tax revenues, and the need for more reliable and predictable sources of

transportation funding. These issues were central to developing the plan's financial strategy, particularly for the constrained part of the plan.

**C-011-027**
The Preferred Alternative includes increasing reliance on user fees from those who use and benefit from the transportation system.

**C-011-028**
Thank you for stating your preference. The Preferred Alternative in the Draft Plan proposes tolls on the regional freeway system (in the constrained part of the plan), along with possible VMT or other charges. The Draft Plan includes the possibility of tolls on arterial streets only in the unprogrammed part of the plan.

**C-011-029**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments.
The VISION 2040 Regional Growth Strategy was designed around the concept that additional employment growth in particular should be encouraged and supported outside of King County to improve both regional jobs/housing balance and jobs/housing balance within counties.

**C-011-030**
Comment noted.

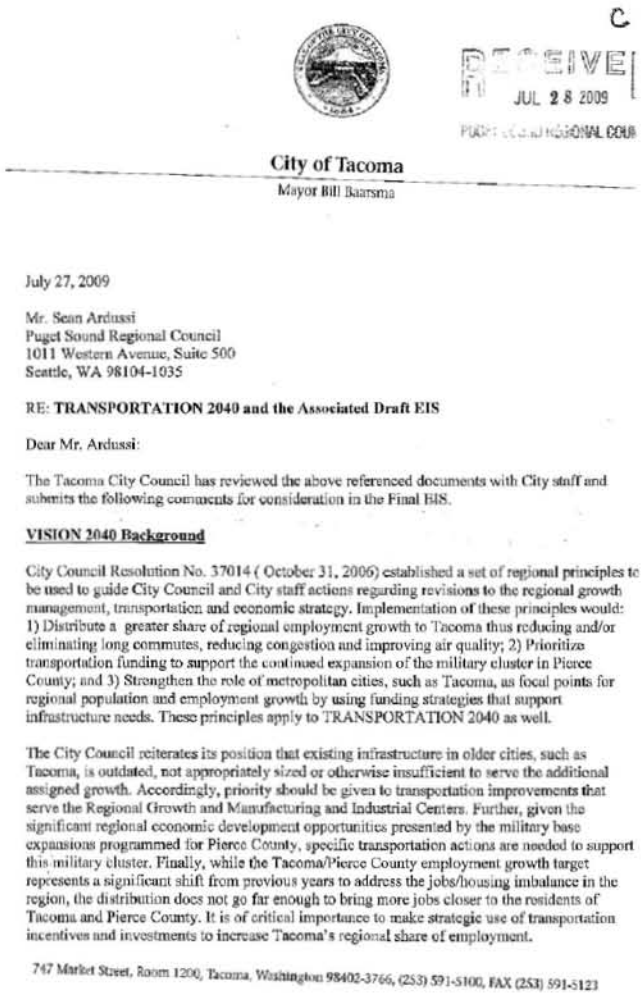
**C-011-031**

Over the past two years, during the development of Transportation 2040, the issue of sustainable funding has emerged as one of the most critical issues facing the region. The financial strategy for Transportation 2040 was developed to address historical and current issues related to the declining revenues from the state gas tax, the volatility of sales tax revenues, uncertainties about the future level of federal funding support, and the need for more reliable and predictable sources of transportation funding. These issues were central to developing the plan's financial strategy, particularly for the constrained part of the plan.

Transportation 2040's financial strategy includes elements (such as tolling and pricing) that require changes to state law. This does not eliminate our obligation to adopt a long range transportation plan that can be implemented from a financial perspective. As with VISION 2040, the new Transportation 2040 plan includes a series actions that will be required for the region to implement our transportation vision.

**C-011-032**

Thank you for your comment. Preservation, maintenance, and operation of the existing system as well as safety and security are top priorities of Transportation 2040 and use most of the available funding. Mobility improvements include a major emphasis on improving system efficiency with limited new capacity through the development of "smart corridors" with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements strategically expand roadway, transit, and nonmotorized facilities, with new roadways limited to a few missing links.



C

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JUL 28 2009
PUGET SOUND REGIONAL COUN

City of Tacoma
Mayor Bill Baarsma

July 27, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

RE: **TRANSPORTATION 2040 and the Associated Draft EIS**

Dear Mr. Ardussi:

The Tacoma City Council has reviewed the above referenced documents with City staff and submits the following comments for consideration in the Final EIS.

C-012-001

**VISION 2040 Background**

City Council Resolution No. 37014 ( October 31, 2006) established a set of regional principles to be used to guide City Council and City staff actions regarding revisions to the regional growth management, transportation and economic strategy. Implementation of these principles would: 1) Distribute a greater share of regional employment growth to Tacoma thus reducing and/or eliminating long commutes, reducing congestion and improving air quality; 2) Prioritize transportation funding to support the continued expansion of the military cluster in Pierce County; and 3) Strengthen the role of metropolitan cities, such as Tacoma, as focal points for regional population and employment growth by using funding strategies that support infrastructure needs. These principles apply to TRANSPORTATION 2040 as well.

C-012-002

C-012-003

C-012-004

The City Council reiterates its position that existing infrastructure in older cities, such as Tacoma, is outdated, not appropriately sized or otherwise insufficient to serve the additional assigned growth. Accordingly, priority should be given to transportation improvements that serve the Regional Growth and Manufacturing and Industrial Centers. Further, given the significant regional economic development opportunities presented by the military base expansions programmed for Pierce County, specific transportation actions are needed to support this military cluster. Finally, while the Tacoma/Pierce County employment growth target represents a significant shift from previous years to address the jobs/housing imbalance in the region, the distribution does not go far enough to bring more jobs closer to the residents of Tacoma and Pierce County. It is of critical importance to make strategic use of transportation incentives and investments to increase Tacoma's regional share of employment.

747 Market Street, Room 1200, Tacoma, Washington 98402-3766, (253) 591-5100, FAX (253) 591-5123

**C-012-001**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-012-002**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**TRANSPORTATION 2040 Draft (May 2009)**

C-012-005 C-012-006 It crucial to us that the final Transportation 2040 strategy must make a major contribution to meeting the State's climate change statutory mandates. The Draft EIS identifies that Alternative 5 goes the furthest in this respect; however, Alternative 5 could, and in our opinion should, be expanded upon with reference to recent federal climate change initiatives and the work of PSRC member jurisdictions. In this latter regard, the City of Tacoma established a Green Ribbon Climate Action Task Force to develop a Climate Action Plan which includes a series of recommendations. The Council followed up by creating an Office of Sustainability and the Sustainable Tacoma Commission on Climate Change. Despite major budgetary constraints, the City's biennial budget funded the Office of Sustainability and the new 11-member Sustainable Tacoma Commission. The duties assigned to these entities officially began implementation of the recommendations of the Green Ribbon Climate Action Task Force.

C-012-007 It would greatly assist our sustainability and climate change work, and that of others in the Puget Sound Region, if there was a greater focus in the evaluation criteria on sustainability and climate change, issues that are now central to our adopted VISION 2040 regional plan. Additionally in our opinion the Final EIS should describe in more detail how local, regional and state resources and efforts can be brought together in the Transportation 2040 strategy to do significantly more than any of the current alternatives to specifically address the State's climate change statutory mandates.

C-012-008 Beyond this, the City is in general concurrence with the Tacoma-Pierce County Chamber's comment letter of July 6, 2009. More specifically, we concur with their statements that the above referenced draft "…reinforces historic transportation patterns rather than attempting to chart a new course for growth, development, and transportation investment in the South Puget Sound…"

C-012-009 In addition, the PSRC should "…reevaluate TRANSPORTATION 2040 giving more attention to the unique employment and environmental concerns and the long-term mobility needs of the South Sound." In this latter regard, we too make reference to the vital importance of making major improvements in support of improved freight mobility, military base expansion and air

C-012-020 quality improvements. We specifically ask that the Final EIS address in greater detail air quality issues and concerns.

C-012-010 Within this overarching context there are some guiding principles that we believe should apply in order to develop a preferred alternative that can gain wide public and regional acceptance.

First, while it is of critical importance to operate the regional transportation system in the most efficient manner possible, strategic road capacity improvements still need to be made in the short term in order to ensure the continued viability and expansion of our local and regional

C-012-011 economies. Port activities, freight mobility and military cluster expansion are of vital importance

C-012-012 in this regard, as well as making our existing urban environments more attractive through good

**C-012-003**

The military cluster is identified as part of the Regional Economic Strategy. Major roadway and other improvements (including the Cross-Base Highway) that will serve the Pierce County military bases are included in the Preferred Alternative for Transportation 2040.

**C-012-004**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-012-005**

Comment noted.

**C-012-006**

Comment noted.

**C-012-007**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions

Puget Sound Regional Council
July 27, 2009
Page Three

C-012-012 C-012-013 urban design, "complete streets", transit-orientated development, and major investments in expanding non-motorized transportation options. Scarce transportation dollars must be prioritized for transit, bike facilities and trails after limited strategic capacity improvements are made.

C-012-014 Second, while we support the principle that revenues raised, including user fees, should be used to support regionally significant projects, we consider that it is of central importance that user fees should be applied in the general area where they are collected. In this latter regard, we also recognize that user fees that are collected should be applied to improvements for the entire corridor and not strictly be limited by jurisdictional boundaries while still attaining regional equity.

C-012-015 Finally, while we recognize that the Transportation 2040 strategy will of necessity need to place increased reliance on user fees such as tolling, we favor an approach that phases these in and does so in a manner that directly ties these fees to local benefits received.

C-012-016 Recognizing the unique Tacoma/Pierce County context and applying these guiding principles, the City Council and I generally favor working to address existing transportation deficiencies through a phasing strategy whereby a blend of Alternatives 3 and 4 are used from 2010-2030 and C-012-017 then transitioning to Alternative 5 that is reworked as described above in 2030-2040. It is our considered opinion that paradigm shifts regarding regional job/ housing balance are needed to squarely address our climate change and sustainability responsibilities and to fully implement C-012-018 VISION 2040. Careful phasing will be essential in order to build the necessary public support to expand alternative transportation modes, including the expansion of light rail in Tacoma.

C-012-019 We appreciate this opportunity to comment and look forward to reviewing the Final EIS and to participating in the PSRC's review and adoption process for TRANSPORTATION 2040.

Sincerely,

Bill Baarsma
Mayor

cc: Tacoma City Council Members
Eric Anderson, City Manager

reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**C-012-008**
Comment noted.

**C-012-009**
Improvement of performance for the entire transportation system

demonstrates some of the strongest benefits for freight user classes in the EIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative.

Expansion of military bases is outside the scope of Transportation 2040.

Air Quality improvements occur under all Transportation 2040 alternatives, relative to the Baseline.

**C-012-010**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these

investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**C-012-011**
All three of these factors are addressed in Draft Transportation 2040 Plan in Appendix J: Regional Freight Strategy.

**C-012-012**
Comment noted. Transportation 2040 builds on VISION 2040, which provides policy support for these types of investments. The Preferred Alternative includes investments in complete streets, support for TOD, and significant investment in bike and walk facilities.

**C-012-013**
Comment noted. PSRC boards have provided guidance for developing the Preferred Alternative. This guidance supports investments in transit, bike, and walk facilities, and focused strategic investment in roadways.

**C-012-014**
Comment noted. The financial strategy for Transportation 2040 attempts to strike a balance between the financial needs of the entire region and using toll revenues to make improvements within the tolled corridors or within jurisdictions affected by tolled facilities.

**C-012-015**
The Preferred Alternative proposes phasing in tolling over time and establishing a nexus between where the tolls are collected and where the benefits accrue.

**C-012-016**

Comment noted. Transportation 2040 will require a number of transition strategies, including phased investments and logical financial approaches, to meet a range of plan objectives. The Preferred Alternative has been developed in a phased approach. In the broadest sense this recognizes a set of investments that are part of a financially constrained plan. This is the constrained part of the plan. In addition, the plan includes an unprogrammed portion. The financial strategy developed to implement the plan would also be phased over time.

The current configuration of the gas tax tends to reward improved fuel efficiency, and as a result gas tax revenues have declined. This trend is likely to continue as the fuel efficiency of the vehicle fleet continues to improve. In the short term, gas taxes may need to be increased to account for this trend. In the medium to long term, VMT charges, tolling and pricing, HOT lanes, parking charges, and other funding strategies will need to be phased in as revenue requirements increase.

**C-012-017**

Comment noted. Implementing VISION 2040 and Transportation 2040 within our region will require us to change the way we view the future, particularly as we collectively seek to address congestion, identify sustainable funding for transportation, and reduce VMT and greenhouse gases.

**C-012-018**

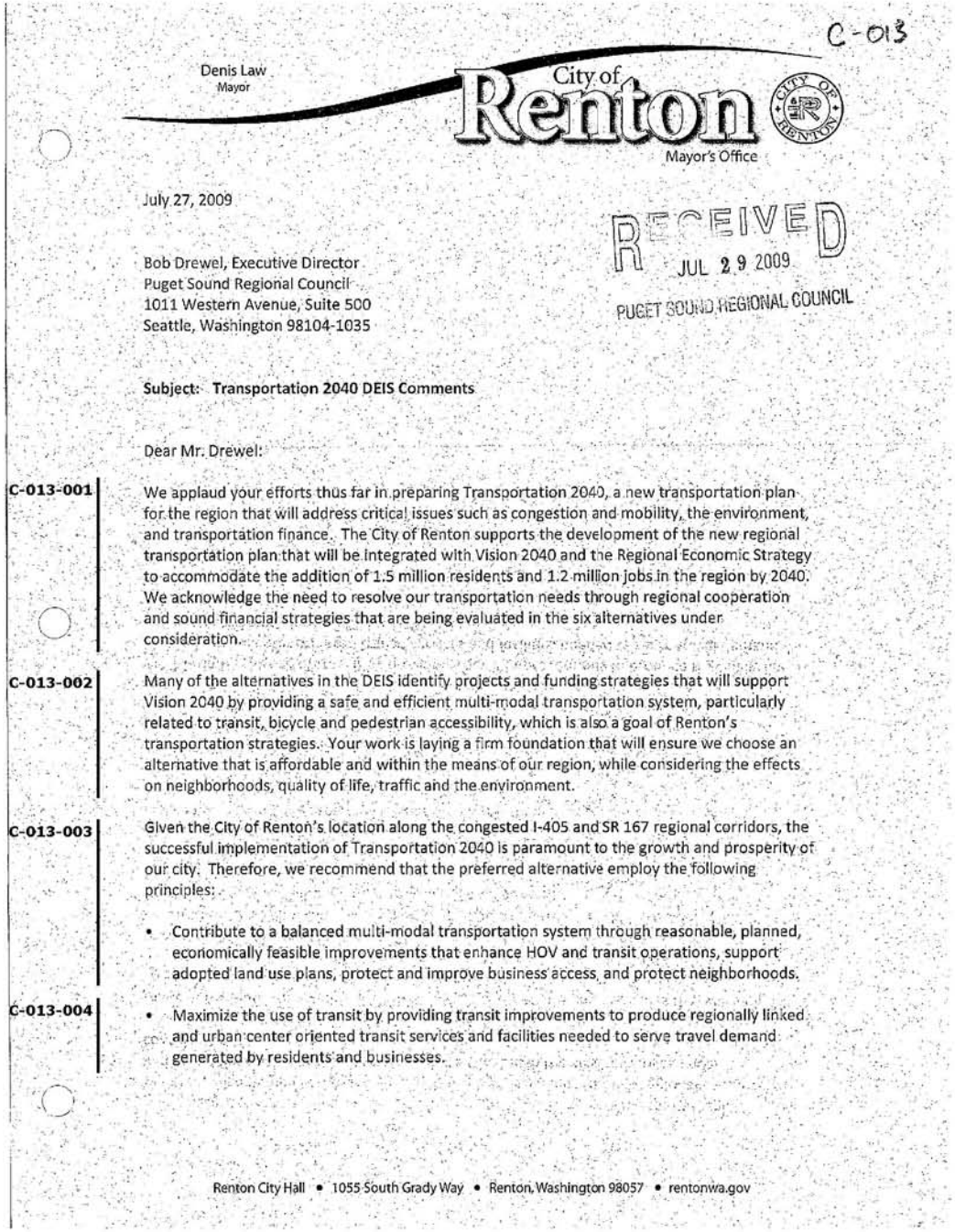
Concur. Realizing the region's goals for reducing VMT and greenhouse gases, achieving greater mode shifts to transit, bike, and walk trips, and implementing tolling and pricing at a regional scale will require public support.

**C-012-019**

Thank you.

**C-012-020**

Please refer to Chapter 6 of the FEIS for details on the current and future air quality issues facing the region. The FEIS reflects any updated information regarding these issues, including the PM2.5 nonattainment status in the South Tacoma area.



C-013

Denis Law
Mayor

City of Renton
Mayor's Office

July 27, 2009

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JUL 29 2009
PUGET SOUND REGIONAL COUNCIL

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

**Subject: Transportation 2040 DEIS Comments**

Dear Mr. Drewel:

C-013-001 We applaud your efforts thus far in preparing Transportation 2040, a new transportation plan for the region that will address critical issues such as congestion and mobility, the environment, and transportation finance. The City of Renton supports the development of the new regional transportation plan that will be integrated with Vision 2040 and the Regional Economic Strategy to accommodate the addition of 1.5 million residents and 1.2 million jobs in the region by 2040. We acknowledge the need to resolve our transportation needs through regional cooperation and sound financial strategies that are being evaluated in the six alternatives under consideration.

C-013-002 Many of the alternatives in the DEIS identify projects and funding strategies that will support Vision 2040 by providing a safe and efficient multi-modal transportation system, particularly related to transit, bicycle and pedestrian accessibility, which is also a goal of Renton's transportation strategies. Your work is laying a firm foundation that will ensure we choose an alternative that is affordable and within the means of our region, while considering the effects on neighborhoods, quality of life, traffic and the environment.

C-013-003 Given the City of Renton's location along the congested I-405 and SR 167 regional corridors, the successful implementation of Transportation 2040 is paramount to the growth and prosperity of our city. Therefore, we recommend that the preferred alternative employ the following principles:

- Contribute to a balanced multi-modal transportation system through reasonable, planned, economically feasible improvements that enhance HOV and transit operations, support adopted land use plans, protect and improve business access, and protect neighborhoods.

C-013-004

- Maximize the use of transit by providing transit improvements to produce regionally linked and urban center oriented transit services and facilities needed to serve travel demand generated by residents and businesses.

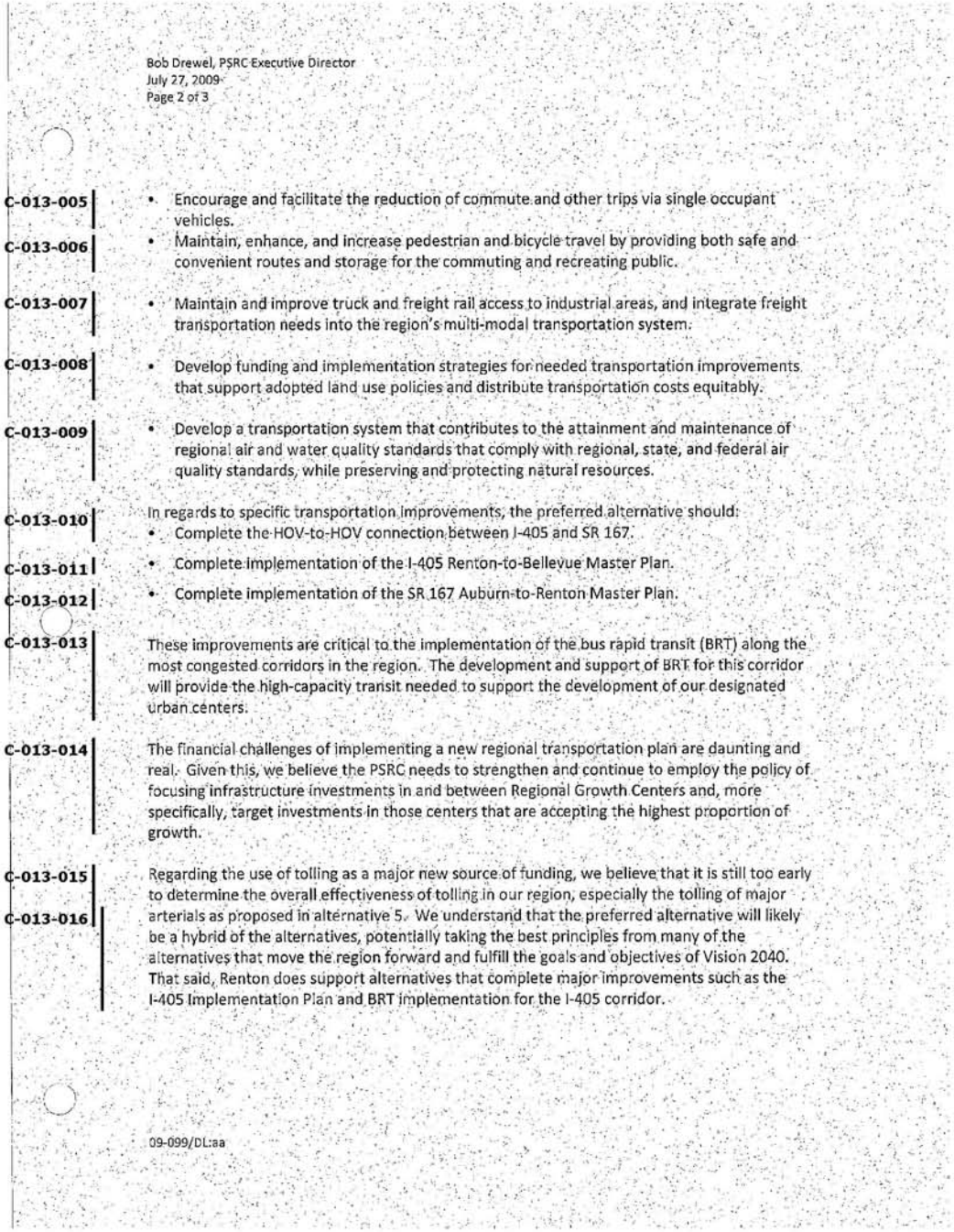
Renton City Hall • 1055 South Grady Way • Renton, Washington 98057 • rentonwa.gov

**C-013-001**
Comment noted.

**C-013-002**
Thank you.

**C-013-003**
Comment noted. Both VISION 2040 and Transportation 2040 share these principles.

**C-013-004**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.



Bob Drewel, PSRC Executive Director
July 27, 2009
Page 2 of 3

C-013-005 • Encourage and facilitate the reduction of commute and other trips via single occupant vehicles.

C-013-006 • Maintain, enhance, and increase pedestrian and bicycle travel by providing both safe and convenient routes and storage for the commuting and recreating public.

C-013-007 • Maintain and improve truck and freight rail access to industrial areas, and integrate freight transportation needs into the region's multi-modal transportation system.

C-013-008 • Develop funding and implementation strategies for needed transportation improvements that support adopted land use policies and distribute transportation costs equitably.

C-013-009 • Develop a transportation system that contributes to the attainment and maintenance of regional air and water quality standards that comply with regional, state, and federal air quality standards, while preserving and protecting natural resources.

C-013-010 In regards to specific transportation improvements, the preferred alternative should:
• Complete the HOV-to-HOV connection between I-405 and SR 167.

C-013-011 • Complete implementation of the I-405 Renton-to-Bellevue Master Plan.

C-013-012 • Complete implementation of the SR 167 Auburn-to-Renton Master Plan.

C-013-013 These improvements are critical to the implementation of the bus rapid transit (BRT) along the most congested corridors in the region. The development and support of BRT for this corridor will provide the high-capacity transit needed to support the development of our designated urban centers.

C-013-014 The financial challenges of implementing a new regional transportation plan are daunting and real. Given this, we believe the PSRC needs to strengthen and continue to employ the policy of focusing infrastructure investments in and between Regional Growth Centers and, more specifically, target investments in those centers that are accepting the highest proportion of growth.

C-013-015 Regarding the use of tolling as a major new source of funding, we believe that it is still too early to determine the overall effectiveness of tolling in our region, especially the tolling of major
C-013-016 arterials as proposed in alternative 5. We understand that the preferred alternative will likely be a hybrid of the alternatives, potentially taking the best principles from many of the alternatives that move the region forward and fulfill the goals and objectives of Vision 2040. That said, Renton does support alternatives that complete major improvements such as the I-405 Implementation Plan and BRT implementation for the I-405 corridor.

09-099/DL:aa

**C-013-005**

Thank you for your comment. The Preferred Alternative includes TDM strategies targeted towards employers, commuters, and residents through a focus on urban centers, education, incentives, requirements, innovative partnerships, and policies that promote ridesharing and efficient land-use. These strategies were developed by an interagency group of stakeholders and recommended by PSRC's Transportation Demand Management Steering Committee. While Transportation 2040 contains specific programs and projects, the plan supports all demand management efforts from both the public and private sectors as they directly support regional environmental and congestion relief goals.

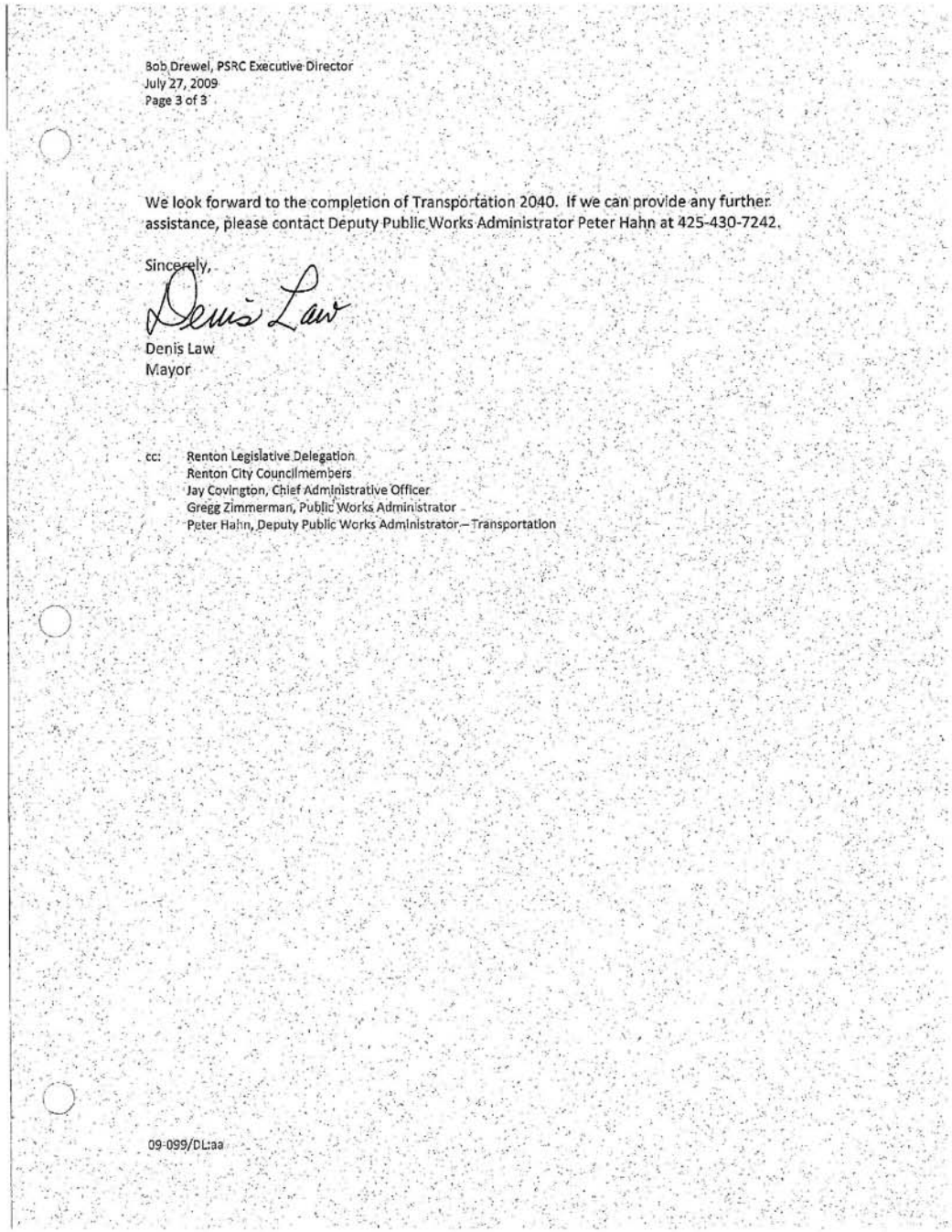
**C-013-006**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-013-007**

Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities.



Bob Drewel, PSRC Executive Director
July 27, 2009
Page 3 of 3

We look forward to the completion of Transportation 2040. If we can provide any further assistance, please contact Deputy Public Works Administrator Peter Hahn at 425-430-7242.

Sincerely,

Denis Law

Denis Law
Mayor

cc: Renton Legislative Delegation
Renton City Councilmembers
Jay Covington, Chief Administrative Officer
Gregg Zimmerman, Public Works Administrator
Peter Hahn, Deputy Public Works Administrator – Transportation

09-099/DL:aa

The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**C-013-008**

Concur. Transportation 2040 has been developed to align with and help implement the regional growth strategy as identified in VISION 2040. In addition, federal planning guidelines require our transportation planning process to address issues of equity. To meet these requirements the plan alternatives contained in the DEIS were evaluated to assess their impacts on environmental justice populations. This information is contained in the DEIS, and in the FEIS for the Preferred Alternative.

**C-013-009**

The Transportation 2040 plan endeavors to fulfill regional planning policies as laid out in VISION 2040 to ensure good environmental stewardship. These measures include practices that will safeguard the natural environment and preserve the beauty and natural ecological functions of the Puget Sound. Some of the measures include:

- Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality and on climate change.
- Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative, environmentally sensitive development practices, including design, materials, construction, and ongoing maintenance.
- Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.
- Preserve and enhance habitat to prevent species from inclusion on the Endangered Species List and to accelerate their removal from

the list.

- Identify and protect wildlife corridors both inside and outside the urban growth area.
- Preserve and restore native vegetation to protect habitat, especially where it contributes to the overall ecological function and where invasive species are a significant threat to native ecosystems.

**C-013-010**
This project has been included in the Preferred Alternative.

**C-013-011**
This project has been included in the Preferred Alternative.

**C-013-012**
This project has been included in the Preferred Alternative.

**C-013-013**
Comment noted.

**C-013-014**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers.

Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-013-015**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**C-013-016**

Thank you for stating your preference among the alternatives. The Preferred Alternative includes significant investments in the I-4050 corridor, including general purpose lanes, BRT, and possible other forms of high capacity transit.

City of Bellevue

Post Office Box 90012 • Bellevue, Washington • 98009 9012

July 30, 2009

Puget Sound Regional Council
Attn: Sean Ardussi, Senior Planner
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

**RE: Staff Comments to Draft Transportation 2040 Environmental Impact Statement**

C-014-001 I am writing to convey the City of Bellevue staff's comments on the PSRC Transportation 2040 Draft Environmental Impact Statement (2040 DEIS). We look forward to working closely with PSRC staff and Boards as a preferred alternative emerges, likely a blend of alternatives. Bellevue's comments are intended to inform forthcoming decisions affecting: 1) specific local Bellevue investment projects; 2) state highway projects; 3) regional transit projects; 4) special needs transportation; and, 5) modeling considerations.

C-014-002 **1) Bellevue's local projects**

In reference to the DEIS: "Alternatives Technical Report (2040 DEIS Appendix A, Addendum B: Roadway Investment Across Alternatives, Part 3: Arterial Investments Cross-Tabulation)":

1. Project ID No.: 3666/Project Title: Bellevue NE 8th Street Widening – As of June 2009, this project is already constructed and open to traffic; however, the 2040 DEIS only indicates the project's inclusion under Alternative 2, not Alternatives 1 or 3 - 5. Due to this projects completion, it should be included in any alternatives advanced for consideration in a Final EIS and in the development of the final Transportation 2040 Plan.

2. Project ID Nos.: 4522, 4523, 4524, 4525, 4526, 4527, 4528/Project Title: Bel-Red Regional Connectivity – The first of these projects (4522) might be characterized as the "Centerpiece Project" to the six project segments listed below it as supporting investments ( 4523 – 4528). The 2040 DEIS only indicates that these projects are included in Alternative 2, not Alternatives 1 or 3 – 5. Bellevue requests that all of these projects be included in any alternatives advanced for consideration in a Final EIS and in the development of the final Transportation 2040 Plan. These projects are integral parts to Bellevue's recent amendments of the Bel-Red Subarea Plan (also reflected in amendments to the City's Comprehensive Plan) and land use code supporting higher densities and a network of streets to complement future light rail operations. The projects noted above are all included in the City's adopted Bel-Red Subarea Plan.

Together, this package of projects will provide a new, and much needed, alternative route between I-405 and SR 520. This new route will bypass two key chokepoints and will significantly improve travel time for passenger cars, transit, freight, and non-motorized

**C-014-001**

Thank you for taking the time to provide your comments. This letter and the comments within have been taken into consideration.

**C-014-002**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

C-014-002

modes. These projects segments, with the exception of the NE 6th Street Extension (Project ID No.: 4524), were assumed in the Bel-Red Corridor Project Environmental Impact Statement (FEIS, July 2007; FEIS Addendum, February 2009) transportation network, and help provide improved mobility between Downtown Bellevue and the Wilburton/Bel-Red areas east of I-405.

The Bellevue City Council approved a "Mobility and Infrastructure Initiative Finance Plan" (MIIP) in January 2009 and has already taken several actions to fund and implement this Plan. Bellevue's MIIP includes full or partial funding for all but one of the segments included in the Bel-Red Regional Connectivity project. The SR 520/124th Avenue NE Interchange Project (Project ID No. 4528), a project component which would likely be implemented by WSDOT, is not specifically included in the Bellevue MIIP. The state legislature, however, has funded through the transportation partnership account (Engrossed Substitute Senate Bill No. 5352, effective May 2009) the Washington State Department of Transportation to conduct engineering design of a full interchange on SR 520 at 124th Avenue NE.

In March 2009, the City of Bellevue issued another Final EIS, prepared for the 2009-2020 Transportation Facilities Plan (TFP), a financially constrained plan. The TFP was adopted by the Bellevue City Council in April 2009. The series of Bel-Red Regional Connectivity projects, excluding the SR 520/124th Avenue NE interchange (ID No. 4528), are included. The City's own analysis of this interchange improvement shows benefits not only on city surface arterials but also to the State highway system as well, particularly the interchange at I-405 and SR 520.

Two project segments are also recommended to receive federal funding through PSRC's 2009 King Countywide STP/CMAQ competition. A segment of the 120th Avenue NE Widening Project (Project ID No. 4525) is recommended to receive King Countywide STP funding for its construction phase, and the NE 4th Street Extension Project (4523) is recommended to be the top STP funding priority on the King Countywide Large Jurisdiction Program contingency list.

**2) State Highway Projects**

In reference to the I-405 corridor projects (project ID #s 4133-4402), we ask that you ensure that projects #s: 4336, 4337, 4338, 4339, 4380 and 4381 be part of any preferred alternative going forward, with Bellevue's highest priority being #4344 – the I-405 Corridor: NE 8th to SR 520 Braided Ramps. This key corridor project should be present in all alternatives and is critical to regional mobility and managing growth in our regional growth center in downtown Bellevue and must be part of any preferred alternative. Moreover, projects #s 4320 through 4330 are significant for the corridor's long-term functionality and we seek inclusion in the preferred alternative as well. One question we have related to these projects: are these segments related to project # 4318: "I-405 Corridor: SR 169 to I-90 (North 3rd Interchange component)"? Please clarify this in the Final EIS. Given the breadth of I-405 commitments per the I-405 Master Plan, we encourage careful scrutiny and inclusion of these projects over time.

C-014-002

With regard to SR 520: we urge that PSRC include the full scope of all of the SR 520 projects identified for future Eastside construction currently totaling $800 million in key projects. Moreover, we ask the final preferred alternative appropriately reflect and include a full interchange at SR 520 and 124th as directed by the state legislature for early design per ESSB 5352 [C 470 L 09].

Concerning I-90: We ask that PSRC include all I-90 highway projects consistent with the 1976 Memorandum of Agreement and the 2004 Amendment undersigned by WSDOT, Sound Transit, King County and the Cities of Bellevue, Mercer Island and Seattle. In addition, we ask PSRC to consider all I-90 projects contained within or consistent with Sound Transit's Sound Move program, including full build-out of the two-way transit/ HOV project and reconstructed bike lane in time to accept light rail, also known as "R8A" that must be in place by 2014. Furthermore, the City recommends that the ST2 recently approved by voters, including light rail extensions from Seattle to Overlake, be affirmed and that future ST2 extensions be considered given that the program is to be completed by 2023. The Transportation 2040 Plan should capture projects twenty years after light rail is to be in place serving downtown Bellevue.

**3) Regional Transit Projects**

In addition to key highway projects, significant increases in regional and local transit service are critical to Bellevue's ability to continue to attract and sustain our growth centers, especially in our downtown regional growth center and the emerging high-density Bel-Red area just east of downtown. In any scenario building towards a preferred alternative, we suggest inclusion of on-going Sound Move projects and service as provided by Sound Transit per voter approval in 1996, the ST2 program approved by voters in 2008 and an assumed ST3 program that could be considered by voters between 2015- 2030 with light rail extensions consistent with Sound Transit's Long-Range Plan adopted in 2005. We request PSRC to clearly depict how the forthcoming preferred alternative will clearly reflect the array of transit priorities and policies as prescribed by the Countywide Growth Policies, VISION 2040 and local comprehensive plans.

C-014-003

**4) Special Needs Projects**

First, we strongly encourage your support of formal comments coming forward from the PSRC Special Needs Transportation Committee (SNTC) and the King County Special Needs Steering Committee. Specially, we are concerned that the Draft DEIS does not adequately reflect the needs of the rapidly growing population of people 65 years and older in the Puget Sound Region. In Bellevue, 2005-2007 estimates from the American Community Survey (ACS) find that 13% of the population are 65 and older, with that percentage expected to grow in the next 10 years. While expanding public transportation system to fixed routes is appropriate for much of the population, it is inadequate for those who no longer drive a car, as is the case with many older adults. Moreover, the fixed-route approach does not meet the needs of this population due to the lack of connectivity between fixed routes and places where people reside and where they need to go. Other options for inclusion in the final EIS should include interim modes, such as Dial a Ride services or

**C-014-003**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

C-014-003 transportation delivered by human services agencies, for those older adults who do not qualify for paratransit, but are not ready/able to ride the bus.

C-014-004 **5) Modeling Considerations**

We understand that the modeling tools and assumptions used to develop the long-range land use plan differ significantly from that being used to develop the Transportation 2040 Plan. We request that PSRC clearly illustrate how the varying planning horizons and modeling tools represent the information pertaining to each alternative, and especially how the modeling approach will be validated for the final EIS.

This issue is a critical one given that this fall policymakers are to develop a preferred alternative drawing in part upon the body of technical analysis as generated by PSRC's modeling runs. In the near term, we encourage this issue to be addressed as part of the special technical review meetings of the Regional Staff Committee scheduled during the month of August.

C-014-005 Thank you for this timely opportunity to provide preliminary feedback. Please feel free to contact Kim Becklund, Transportation Policy Advisor, at kbecklund@bellevuewa.gov or 425-452-4491 if you have questions about these submitted comments or any of the specific project references discussed above. We look forward to participating in the workshops in August and ultimately the work before the Policy Boards this fall.

Thank you for your attention and consideration.

Sincerely,

Goran G. Sparrman, P.E.
Director, Transportation Department

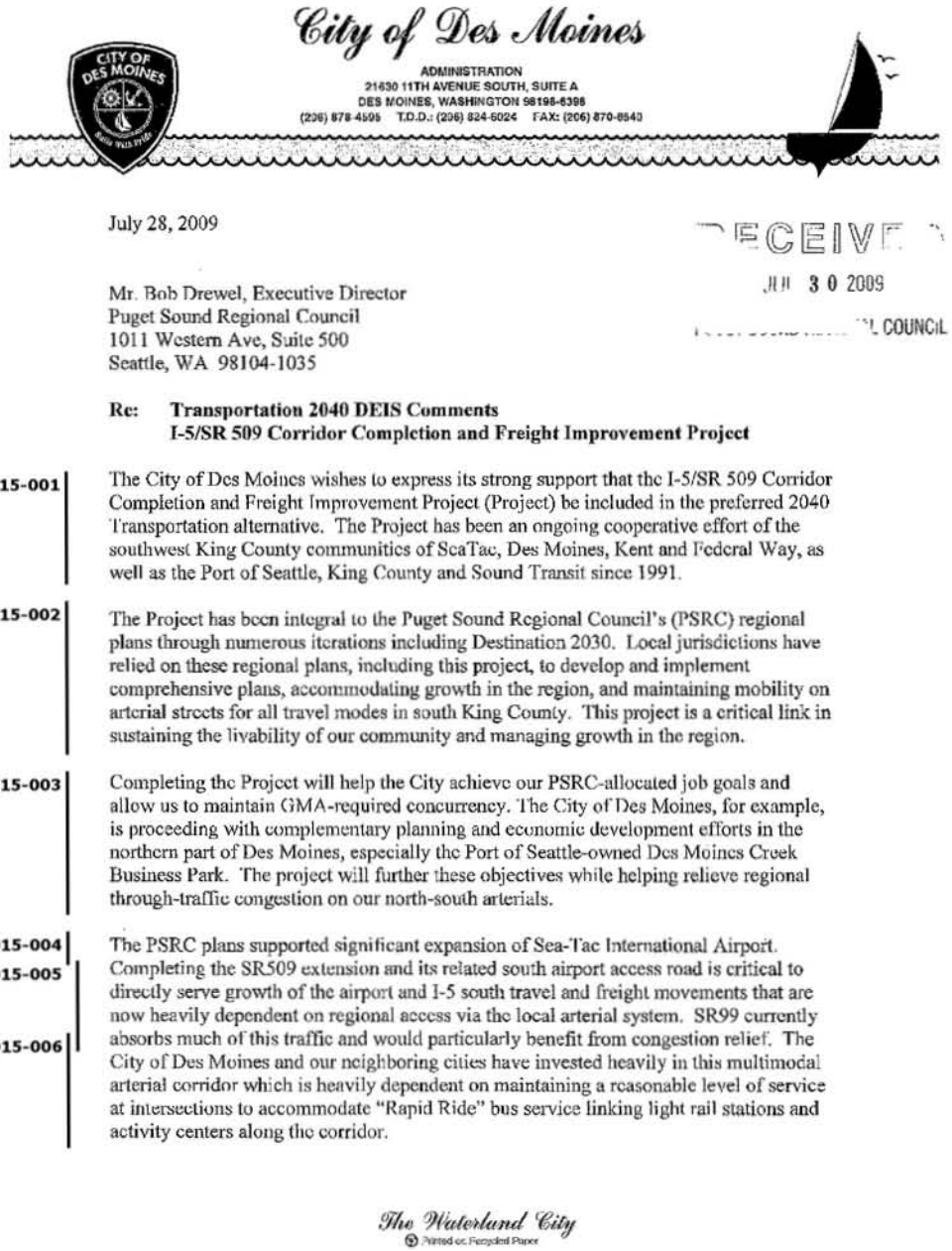
cc: Steve Sarkozy, City Manager
Diane Carlson, Intergovernmental Relations Director
Kim Becklund, Transportation Policy Advisor

**C-014-004**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**C-014-005**

Thank you.



City of Des Moines

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(206) 878-4595 T.D.D.: (206) 824-5024 FAX: (206) 870-6540

July 28, 2009

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JUL 30 2009
PUGET SOUND REGIONAL COUNCIL

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

**Re: Transportation 2040 DEIS Comments**
**I-5/SR 509 Corridor Completion and Freight Improvement Project**

C-015-001 The City of Des Moines wishes to express its strong support that the I-5/SR 509 Corridor Completion and Freight Improvement Project (Project) be included in the preferred 2040 Transportation alternative. The Project has been an ongoing cooperative effort of the southwest King County communities of SeaTac, Des Moines, Kent and Federal Way, as well as the Port of Seattle, King County and Sound Transit since 1991.

C-015-002 The Project has been integral to the Puget Sound Regional Council's (PSRC) regional plans through numerous iterations including Destination 2030. Local jurisdictions have relied on these regional plans, including this project, to develop and implement comprehensive plans, accommodating growth in the region, and maintaining mobility on arterial streets for all travel modes in south King County. This project is a critical link in sustaining the livability of our community and managing growth in the region.

C-015-003 Completing the Project will help the City achieve our PSRC-allocated job goals and allow us to maintain GMA-required concurrency. The City of Des Moines, for example, is proceeding with complementary planning and economic development efforts in the northern part of Des Moines, especially the Port of Seattle-owned Des Moines Creek Business Park. The project will further these objectives while helping relieve regional through-traffic congestion on our north-south arterials.

C-015-004 The PSRC plans supported significant expansion of Sea-Tac International Airport.
C-015-005 Completing the SR509 extension and its related south airport access road is critical to directly serve growth of the airport and I-5 south travel and freight movements that are now heavily dependent on regional access via the local arterial system. SR99 currently
C-015-006 absorbs much of this traffic and would particularly benefit from congestion relief. The City of Des Moines and our neighboring cities have invested heavily in this multimodal arterial corridor which is heavily dependent on maintaining a reasonable level of service at intersections to accommodate "Rapid Ride" bus service linking light rail stations and activity centers along the corridor.

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**C-015-001**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

The SR- 509 Extension project has been included in the preferred alternative based in part on numerous comments, including Des Moines.

**C-015-002**

Thank you for your comment. The SR-509 Extension project has been included in the Transportation 2040 Preferred Alternative based in part on numerous comments, including those from the City of Des Moines.

C-015-007 We note that the SR509 project will accommodate general-purpose traffic and up to 9,000 trucks per day to bypass SR 99, I-5 north, and local streets while providing southern access to Sea-Tac International Airport, the Duwamish Industrial Area, the Green River Valley distribution centers and other regional/interstate destinations. Combined with planned replacement of the Alaskan Way Viaduct, this project will help complete a westside transportation corridor needed to maintain mobility in the region.

C-015-008 The Project has consistently rated at or near the top of the list when comparing benefits to costs of the other large projects in the state and provides vital congestion relief and freight improvement benefits to the central and south Puget Sound region. The Project is the most "shovel ready" of any central Puget Sound project, having completed its required environmental review and permitting requirements. This means it can begin construction and deliver significant benefits to the region quickly. Finishing the missing SR 509 link and adding capacity to I-5 will provide significant congestion relief for freight, commuters, transit and general traffic traveling through region and help unclog our arterials.

The City of Des Moines appreciates the opportunity to express support for maintaining this significant project in the Transportation 2040 Plan.

Sincerely,

Robert F. Sheckler
Mayor

c: I-5/SR 509 Corridor Completion and Freight Improvement Project Executive Committee:
Lloyd Hara, Commissioner, Port of Seattle
David Kaplan, Councilmember, City of Des Moines
Julia Patterson, Councilmember, King County
Hon. Suzette Cook, Mayor, City of Kent
Hon. Ralph Shape, Mayor, City of SeaTac
Craig Stone, UCO Regional Administrator, WSDOT
Des Moines City Council
Sean Ardussi, Senior Planner, PSRC

**C-015-003**
See response to C-015-002

**C-015-004**
See response to C-015-002

**C-015-005**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

Consistency with existing plans including that for "Rapid Ride" was a consideration during development of the Preferred Alternative.

**C-015-006**

Comment noted.

**C-015-007**

Thank you.  See response to C-015-002.

**C-015-008**

Thank you.  See response to C-015-002

July 31, 2009

Puget Sound Regional Council
Sean Ardussi
1011 Western Ave Ste 500
Seattle, WA 98104-1035

Subject: Transportation 2040 DEIS Comments

Dear Mr. Ardussi,

C-016-001 Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement. The City of Lake Stevens recognizes the effort to coordinate the Region's 2040 Transportation infrastructure with the Regional Growth Strategy adopted by PSRC in 2008.

C-016-002 Since this plan will signal a new direction for transportation investments in the Puget Sound Region, it is essential that it support both regional and local land use strategies. The City submits the following comments:

C-016-003
1. **Transportation to support jobs/housing location-Consistency with Regional Growth Strategy**
   According to Vision 2040, the majority of employment centers are located in King County and it is well documented that residents of Snohomish County travel to jobs in King County. Therefore, the transportation strategy should support travel from Snohomish County and show how they are consistent with the Regional Growth Strategy adopted in Vision 2040.

C-016-004
2. **A plan for assessing success at key investment intervals-**
   A clear plan for assessing the success of the preferred alternative at key investment intervals must be carefully outlined in the Transportation 2040 plan. This is an important element to implementing appropriate transportation spending in the region and to be able to make adjustments when warranted and necessary.

C-016-005 We appreciate the opportunity to comment on the Draft Environmental Impact Statement for the Transportation 2040 alternatives and urge PSRC to incorporate the recommendations above. We look forward to continuing to engage your representatives in working with us to ensure the best plan for the region and local jurisdictions.

Sincerely,

Vern Little, Mayor on behalf of the Lake Stevens City Council

cc: City Council
Jan Berg, City Administrator
Rebecca Ableman, Planning Director
Jim Kresge, Interim Public Works Director

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**C-016-001**

Thank you for reviewing the Transportation 2040 DEIS and taking time to provide comments.

**C-016-002**

Thank you, PSRC concurs that the next long range transportation plan must be consistent with land use strategies as detailed in VISION 2040.

**C-016-003**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-016-004**

Comment noted. Assessing the success of the plan at key investment

intervals may be a good idea to assure a balance of investments and revenues.

**C-016-005**
Comment noted.

July 31, 2009

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

Dear Mr. Ardussi:

C-017-001

Thank you for the opportunity to submit comments on PSRC's DEIS for the Transportation 2040 plan. We have the following comments:

**Financing mechanisms**. As we're certain PSRC is aware, the concept of tolling in this region is controversial, and there is not unanimity of political and public opinion on this issue. We have made no effort to evaluate the costs of the stated alternatives or the efficacy of the financing mechanisms provided within the document, particularly where tolling is proposed. With the exception of discussing environmental justice aspects, the comments contained herein focus on technical aspects of the plan irrespective of any financing mechanisms that may be necessary to implement them. We consider funding choices to be strictly within the purview of voters and elected decisionmakers.

C-017-002

**Technical corrections.** P. 3-3, Transit Systems; p. 4-10, What existing transit systems serve the region?. Intercity Transit (Olympia) also provides service connection into Pierce County. Are there other systems emanating from outside the region that provide service within the region that aren't listed here?

C-017-003

P. 3-4, Freight and Goods System, Ports; p. 4-17, Ports. Besides the listed ports, there are a number of other port districts within the region that are not included. See <http://www.washingtonports.org/washington_ports/port_directory.asp>.

C-017-004

P. 4-12, 1st paragraph. Switching the last two sentences in this paragraph would clarify a potential misinterpretation. The manner in which it reads currently sounds as though Amtrak service is currently provided by bus to South Tacoma and Lakewood but rail service is being extended, which of course relates to Sound Transit service discussed prior to the Amtrak reference.

**C-017-001**
Comment noted.

**C-017-002**
Thank you for your comment. The FEIS lists all public transportation providers.

**C-017-003**
The freight and goods system as identified includes ports that are significant for freight movement. Other special purpose districts serve an important regional role, but are not considered essential elements in the movement of goods.

**C-017-004**
Comment noted.

C-017-005

**Substantive comments.** P. 4-18, What existing regional airport facilities are in the region?. The three seaplane bases referenced include American Lake Seaplane Base in Lakewood, which is considered to be a "landing strip" and not a general aviation airport under prior negotiation between the City and WSDOT Aviation Division and interpretation by WSDOT Aviation Division. It remains on pilot charts for the area, but there is no "base" there. As the City's American Lake Park was redeveloped, it included a dock for seaplanes as "vessels" (equivalent with boats) upon the lake, but all other seaplane services and facilities have been discontinued. Transient air usage of the lake is expected to continue, but not as a formal "airport."

C-017-006

P. 4-62, What effects on the transit system are specific to individual alternatives? (last bullet – Alternative 5). It is not clear how commuter rail extension to DuPont is to occur when it outside the scope of ST2, which is discussed earlier within Chapter 4.

P. 4-77, What effects on passenger rail are specific to individual alternatives?. If the referenced WSDOT/Amtrak plans encompass the Pt. Defiance Bypass project, the City of Lakewood does not agree that "no significant negative impacts are anticipated to result from these improvements."

C-017-007

P. 4-99, Are there any significant unavoidable adverse impacts to transportation?. Although environmental justice is discussed prior to this section, it is addressed in such a way that seems to pose a positive influence on "environmental justice populations." However, if tolling and particularly the use of HOT lanes is implemented, we propose that this creates an unavoidable adverse transportation impact in terms of environmental justice, in the sense that it enables those who have more means (i.e., are financially able to pay tolls) to have greater access to public transportation systems. This approach creates a disparity based on economic means – in other words, an economic bias – in how public transportation systems accommodate users. This also has bearing on Chapter 17.

C-017-008

P. 5-21, What can be done to mitigate the effects of transportation projects upon the region's land uses?, Strategies for urban lands, 2nd bullet. We do not necessarily agree that providing for high-density, mixed-use development adjacent to high-capacity transit stations is appropriate. In many cases, transit stations have been placed for optimal relationship to the transportation system – a selection that likely did not consider the same factors that might make for an appropriate or optimal housing location, such as adjacency to services or a positive living environment. While this may be appropriate in some areas, we oppose this as a "one-size-fits-all" policy or practice. Also, this seems to conflict with the noise mitigation measure suggested on p. 7-11 (2nd bullet) which would increase the separation between transportation facilities and noise-sensitive land uses.

**C-017-005**

American Lake Seaplane Base was identified in PSRC's 2001 Regional Airport System Plan (RASP). As such, the seaplane base is considered to be a public use airport facility. The RASP contains no policy guidance about the specific type or amount of seaplane base support facilities (aircraft storage, fueling, etc.) to be provided at American Lake. The plan assumed transient use by seaplanes would continue. From a practical standpoint, some kind of docking facility is needed to support seaplane operations at American Lake.

**C-017-006**

This project has been included in the Preferred Alternative.

**C-017-007**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**C-017-008**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical

**C-017-009**

Chapter 14 (generally). Sewer and water service is discussed within this chapter as though all areas within the region are served by public water supplies and sanitary sewer. This is inaccurate; some areas are not and instead rely upon private wells and septic systems. This may come into play in site-specific situations where, for example, road expansion or extension displaces such private systems.

More importantly, there is a missed relationship between transportation corridors and utility providers in terms of collocation. A linear transportation facility can impair utility extension opportunities. A local example is the need to extend a larger water line across (either over or under) I-5 to deliver higher fire flow, which currently hampers urban-scale development in one portion of the city. Also, Lakewood's current project to extend sewer service southward to the Tillicum/Woodbrook areas relies upon use of the I-5 right of way. Within the "cumulative effects" and "potential mitigation measures" sections within this chapter, it would be optimal to include the early identification of utility crossings and parallel placement in conjunction with any kind of linear transportation facilities that might otherwise tend to sever such opportunities.

**C-017-010**

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

Sincerely,

Deborah Johnson
Senior Planner
Community Development Dept.

part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**C-017-009**

The mitigation measures section of Chapter 14 discusses the importance of coordinating with utility providers during construction.

**C-017-010**

Thank you.

CITY OF
Lynnwood

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AUG 03 2009
PUGET SOUND REGIONAL COUNCIL

July 30th 2009

Mr. Sean Ardussi,
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

**RE: Comments on the Transportation 2040 Draft Environmental Impact Statement**

Dear Mr. Ardussi:

C-018-001 Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Transportation 2040. The City of Lynnwood fully supports the efforts by the Puget Sound Regional Council to adopt principles for transportation and mobility investments. Before commenting specifically on Transportation 2040, the City would like to provide background regarding the City's support for Vision 2040 and the direct relationship this document must have to the alternatives and projects identified in Transportation 2040.

C-018-002 When adopted, Transportation 2040 will establish the fundamental principles for transportation and mobility investments for the Puget Sound region, and it will be one of the key directives for achieving the regional growth strategy and other goals and policies in VISION 2040. It is therefore vitally important that the Preferred Alternative for the Final EIS be fully consistent with and supportive of VISION 2040. Only by aligning Transportation 2040 with the overall goals and the regional growth strategy in VISION 2040 will our region be able to accommodate projected population and employment growth while maintaining and enhancing our quality of life and fulfilling the goals of the Growth Management Act (GMA).

The regional growth strategy in Vision 2040 focuses the majority of the region's future employment and housing growth into the largest cities. More than two dozen designated urban centers have been identified, including Lynnwood. Lynnwood's vision is to accommodate projected future employment and population growth for our city within Lynnwood's adopted subregional center. The Lynnwood City Center Plan was subsequently adopted to address this objective. These actions are supported by Lynnwood's proximity to services and jobs, our variety of housing types, access to regional amenities, local and regional bus service, future LRT service, and transportation connections to state and federal highways. Lynnwood's actions are consistent with Vision 2040 and GMA, and are designed to relieve growth pressure on sensitive environmental, rural and natural resource areas. Lynnwood's commitment to accommodate future growth within its PSRC designated urban center is evident by local land use, transit and transportation policies, and implementing ordinances, actions and projects.

Over the past few years, the City has completed or initiated significant projects and programs to improve transportation and mobility in and around the Lynnwood designated urban center, including

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**C-018-001**
Comment noted.

**C-018-002**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-018-002** expansion of the I-5 / 196th Street SW interchange, pedestrian bridges over I-5 and 44th Avenue W, widening 44th Avenue W, the federally endorsed City Center Access Study, the City Center Street Master Plan, and City Center Mode Split Analysis. Lynnwood has also supported our partner transportation agencies on major transportation projects and programs, including the HOV Direct Access Ramps ("Texas T"), expansion of the Lynnwood Transit Center, Community Transit's Six Year Transit Development Plan, Community Transit's Long Range Service Plan, and planning for expansion of Sound Transit's regional transit system (ST2). These activities support significant infrastructure improvements for all modes of transportation within the designated growth center.

**C-018-003** Promoting the "centers-centric" vision of GMA and VISION 2040 will require investment in transportation infrastructure to serve the designated urban centers. In Lynnwood, the federally endorsed Access Study (see above) concluded that the demand for mobility associated with redevelopment of the Lynnwood designated urban center will substantially exceed the capacity of existing infrastructure. Even with the substantial benefit for mobility from the recently completed

**C-018-004** projects and programs, additional transportation infrastructure will be needed. The federally endorsed Access Study concluded that all of the following regionally significant projects are necessary to support the Lynnwood center:

- Project 1625, Completion of the existing half diamond I-5/44th Avenue W interchange by adding a NB braided on-ramp and a SB braided off-ramp (see project description corrections below);
- Project 1625/4632, Braiding of NB 196th Street SW to I-5 on ramp and NB I-5 to SB I-405 (see project description corrections below);
- Project 4009, Improve SR 524 (196th Street SW) from 48th Avenue W to 37th Avenue W (see project description corrections below);
- Project 4119, Improve 44th Avenue W (SR-524 Spur) from I-5 to 194th Street SW (see project description corrections below); and
- Project 4634, Improve the Interurban Regional Trail in the vicinity of 212th Street SW (see project description corrections below)

All of these improvements are needed to improve access and circulation for all modes of transportation in the region and the Lynnwood designated urban center, therefore, Lynnwood requests that all of these projects be included in the Preferred Alternative.

**C-018-005** The following additional comments are for projects that were either not included or not correctly described in the addenda:

A) Addendum B, Part 2, State Highway Investments, page 81, project 1625, I-5 at SR 524/196th Street SW: The description for this project is outdated and may have been carried over from prior plans for this segment of I-5. In September 2007, the City of Lynnwood in conjunction with FHWA, WSDOT, Snohomish County, and PSRC conducted (and endorsed) a comprehensive City Center Access Study along the I-5 corridor through south Snohomish County. The study concluded that a collector distributor system in itself would not be sufficient to accommodate the projected traffic volumes. The study recommend a series of four different braided ramps (two northbound and two southbound) along I-5 between 44th Avenue W and I-405. In addition to the braided ramps, the study identified that existing

**C-018-003**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**C-018-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of

C-018-005 partial interchange at 44th Avenue W and I-5 (which currently provides access to/from the south only) would need to be improved to include access to and from the north by constructing a new on-ramp and new off-ramp.

C-018-006 One of the four braided ramps identified in the federally endorsed Access Study is currently in design (WSDOT) and is planned to begin construction in early 2010. The City of Lynnwood requests that the remaining three braided ramps and completion of the 44th Avenue W interchange be added to Addendum B, Part 2. The City of Lynnwood recommends that the current description of project 1625 be deleted and replaced with the following two projects:

i) I-5/44th Avenue W Interchange Improvements: Completion of the existing half diamond interchange by adding a NB on-ramp and a SB off-ramp. This will require braiding of the existing NB 196th Street SW off-ramp with the new NB 44th Avenue W on-ramp. It will also require braiding of the existing SB 196th Street SW on-ramp with the new SB 44th Avenue W off-ramp. This project was identified in the federally endorsed Access Study, is needed to support the Lynnwood designated urban center, and should be included in the Preferred Alternative. WSDOT should be listed as lead agency.

ii) Addendum B, Part 3, Arterial Investments, page 118, project 4632, Braiding of NB 196th Street SW to I-5 on ramp and NB I-5 to SB I-405: Replace existing at grade weave by constructing a braided ramp system. This project should be moved from Addendum B Part 3 to Addendum B Part 2, State Highway Investments. This project was identified in the federally endorsed Access Study, is needed to support the Lynnwood designated urban center, and should be included in the Preferred Alternative. WSDOT should be listed as lead agency.

C-018-007 The City of Lynnwood requests that a meeting be held between WSDOT, PSRC and Lynnwood to discuss the improvements identified in the federally endorsed Access Study in order that the appropriate projects supporting the Lynnwood designated urban center are included in the Preferred Alternative for Transportation 2040.

C-018-008 B) Addendum B, Part 2, State Highway Investments, page 82, project 1624, I-5: Is this project mislabeled and intended be southbound? This project was not identified in the federally endorsed Access Study although it may to be a worthy project. There may be an opportunity to potentially combine this project with the full interchange proposed at 44th Avenue W and I-5. Lynnwood requests that the details/history of this project also be discussed at a meeting with WSDOT, PSRC and Lynnwood.

C-018-009 C) Addendum B, Part 2, State Highway Investments, page 101, project 4009, SR 524 (196th Street SW) Widening: In the description, delete "bike lanes". SR 524 is a heavily traveled arterial and bike lanes for this segment of roadway are undesirable and unsafe. The City of Lynnwood, as part of its Non-Motorized Skeleton System, identified the adjacent east-west roadways (200th Street SW and 194th Street SW) as bike corridors to encourage bicycle use on
C-018-015 these "bike appropriate" roadways. Furthermore, this project was identified in the federally endorsed Access Study as needed to support the Lynnwood designated urban center, and should be included in the Preferred Alternative.

recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-018-005**
This project description has been updated.

**C-018-006**
These changes have been applied.

**C-018-007**
The PSRC has worked with Lynnwood to clarify projects included in the Transportation 2040 Preferred Alternative.

**C-018-008**
This project is noted correctly. This is a northbound auxiliary lane. These projects need to be separated at this time since one is sponsored by the City of Lynnwood, and the other is sponsored by WSDOT.

**C-018-009**
Bike lanes have been removed from the SR 524 widening project description.

**C-018-010**

D) Addendum B, Part 3, Arterial Investments, page 118, project 4119, 44th Avenue W Northbound Widening: This segment of 44th Avenue W is a state highway (SR-524 Spur) and therefore this project should be moved to Addendum B, Part 2, State Highway Investments. Change title to: 44th Avenue W (SR-524 Spur). Change description to: Widen roadway to 7 lanes with 8 lanes just south of 196th Street SW. Change project limits to: I-5 to 194th Street SW. This project was identified in the federally endorsed Access Study, is needed to support the Lynnwood designated urban center, and should be included in the Preferred Alternative.

**C-018-011**

E) Addendum G, Part 1, Off-Road Bicycle and Pedestrian Trail Investments, page 229, project 5404, Bicycle Path/Track - Lynnwood: Why is this project included in Transportation 2040, and who submitted it for inclusion? Lynnwood did not submit this project for inclusion and has no record of such project in short or long range plans. Lynnwood requests that this project be deleted.

**C-018-012**

F) Addendum G, Part 1, Off-Road Bicycle and Pedestrian Trail Investments, page 251, project 4634, Interurban Regional Trail – Missing Link: This project is needed to support the Lynnwood designated urban center and should be included in the Preferred Alternative.

**C-018-013**

It is apparent that PSRC staff has invested a significant amount of time developing Transportation 2040 and we applaud your efforts. We also appreciate the opportunity to provide comment.

**C-018-014**

Please include Lynnwood in future mailings and correspondence regarding Transportation 2040. We would also request the opportunity to respond to any questions or comments you may have regarding this letter. The contact person for the City of Lynnwood is Kevin Garrett, Planning Manager, who may be reached at 425-670-5405 or kgarrett@ci.lynnwood.wa.us .

Sincerely,
City of Lynnwood

Don Gough
Mayor

c: William Franz, Public Works Director
Paul Krauss, Community Development Director
David Kleitsch, Economic Development Director

**C-018-010**

SR 3 is planned to be widened to fourlanes from the Kitsap/ Mason county line to SR 16 and to six lanes from SR 16 to Loxie Eagens Boulevard with one HOV lane each direction. Anything beyond Kitsap county on SR 3 is outside of our regional jurisdiction.

**C-018-011**

This project was not included in the Preferred Alternative.

**C-018-012**

This project has been included in the Preferred Alternative.

**C-018-013**

Comment noted.

**C-018-014**

Thank you.

**C-018-015**

The SR 524 (196th Street Southwest) widening project has been included as Project Number 4009 in the Preferred Alternative as part of the financially constrained element of the plan, with a description revised to exclude the bike lanes.

The City of
MAPLE VALLEY

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JUL 31 2009
PUGET SOUND REGIONAL COUNCIL

Mr. Sean Ardussi, Senior Planner
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

**RE: Comment on the Transportation 2040 Draft EIS**

Dear Mr. Ardussi;

C-019-001 The City of Maple Valley supports your agency's planning effort to develop a comprehensive transportation strategy that will be integrated with the regional Vision 2040 Plan. Our hope is that the preferred transportation alternative will address congestion and mobility, the environment (i.e. reduce green house gases), and propose creative transportation financing options. For these reasons, the City of Maple Valley is pleased to offer the following comments on the Transportation 2040 Draft Environmental Impact Statement (DEIS):

C-019-002
- The DEIS describes a general transportation strategy that calls for the creation of Growth and Transportation Efficiency Centers (GTEC). We sincerely hope that this strategy does not overlook the unique transportation needs of cities, like Maple Valley, that are on the outer edges of the urban growth area. Our communities will remain automobile dependent unless the regional transit system is significantly extended and improved. If not, the preferred alterative must be a hybrid that supports transit options and highway and arterial capacity improvements.

C-019-003
- Each of the six alternatives relies on building the Sound Transit plan to extend light and heavy rail options. However, the DEIS does not consider other alternative high capacity systems, including diesel multiple unit (DMU) commuter rail on existing freight rail lines, which are used successfully in Portland Tri-MET area. Specifically, a DMU on the Burlington Northern - Santa Fe freight line, between the cities of Maple Valley, Black Diamond, Covington and Auburn, should be included in the preferred alternative.

**C-019-001**
Comment noted.

**C-019-002**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**C-019-003**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included the Transportation Operators Committee, the Regional Transportation

C-019-004
- The DEIS recognizes the challenge of securing the funds needed to implement the future transportation system. Current funding options such as federal and state grants, gas tax and other financing options are becoming uncertain. However, the implementation of alternative options places too much emphasis on the use of tolls as the source of project funding. While tolls may be beneficial for specified projects, it is not practical or appropriate to be considered for all freeways and arterials as proposed in Alternative 5.

C-019-005
- If tolls were applied to local city arterials, then a mechanism must be in place to ensure that all the tolls collected are returned directly to the city.

C-019-006
- All six alternatives are still heavily auto dependent, whether it deals with mobility issues or with financing issues. The goals of reducing congestion and improving the environment still rely on tolls or taxing vehicle miles travelled to finance alternative modes of transportation. This approach, of encouraging auto use in order to finance the options, seems counter to the stated goals.

C-019-007
- Chapter 6, Air Quality alludes to the use of new technologies to make significant positive contributions to enhancing the air quality in the region. However, the DEIS does not identify what system improvements are needed regionally to implement new technology. For example:
  - How can the use of electric vehicles be encouraged or promoted (e.g. rebates, tax incentives, and new vehicle purchase discount coupons)?
  - What is the plan for establishing charging stations?
  - What incentives can be provided to achieve diesel retrofits?
  - How can alternative fuels be marketed and distributed so as to compete against fossil fuels?
  - How can the use of hybrid transit vehicles be expanded?

C-019-008
- The DEIS alternatives propose converting HOV to HOT lanes which are to be tolled. If the regional goal is to reduce the use of Single Occupant Vehicles (SOVs) and vehicle emissions, the use of HOV lanes as HOT lanes is counter to this objective. Therefore, HOV lanes should only be available for use by transit and carpools. Conversely, if the goal is to improve freight mobility; trucks should be permitted to use the HOV lanes.

C-019-009

C-019-010
- The importance of freight mobility, i.e. truck and rail, to the region is acknowledged, but the DEIS does not discuss specific strategies to support freight mobility. It seems to be assumed that if general congestion is improved, freight mobility will be enhanced. Are there specific projects that must be implemented to enhance freight mobility, e.g. SR 509 Extension, intermodal centers expansion?

Operations Committee, the Freight Action Strategy and Rountable groups, the Special Needs Advisory Committee, the Bicycle/Pedestrian Advisory Committee, the Travel Demand Management committee, PSRC member agencies, PSRC governing boards, and through these venues and other outreach efforts numerous public, nonprofit, and private entities. With PSRC staff assistance all the various suggestions were collated and brought before both the Regional Staff Committee (RSC) and the combined Pricing Task Force/Working Group (PTF/WG) accompanied by the alternative analysis results.

The stakeholders cited above were given several opportunities to review and propose changes to the full details of the plan alternatives. The RSC in particular went through several review cycles; it and the PTF/WG separately forwarded their recommendations from each cycle to the PSRC Transportation Policy Board for ultimate endorsement (the PTF/WG is a subcommitee of the Board). The Transportation Policy Board made its final recommendation on a Preferred Alternative to the PSRC Executive Board which in turn forwarded the plan to the PSRC General Assembly for adoption.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The groups cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives, and the analysis results from alternatives in which the proposal had been tested.

The Transportation 2040 DEIS was published just prior to the Southeast

C-019-011

Once again, thank your for proving this opportunity to comment on the DEIS. We look forward to the completion of Transportation 2040 and commit to City of Maple Valley's involvement in the process. Please feel free to contact David Johnston, City Manager or Stephen Clark, Public Works Director, if you have any questions or need any assistance.

Sincerely,

Laure A. Iddings
Mayor

CC: City Council
David Johnston, City Manager
Stephen Clark, Public Works Director

King County Diesel Multiple Unit (DMU) Study getting started in Summer 2009, so the commuter rail corridor was not included. And the DMU Study is scheduled for completion in June 2010, after the adoption of Transportation 2040 in the Spring of 2010 by the PSRC General Assembly. Should the DMU Study find that a commuter rail connection to Auburn would provide significant ridership benefits, an evaluation can be made on including the DMU corridors into an amendment of Transportation 2040. The southeast King County DMU corridor is currently listed under Emerging Issues for regional transportation.

**C-019-004**

The region is considering a wide range of options to develop a more sustainable funding strategy for transportation investments. The current configuration of the gas tax tends to reward improved fuel efficiency, and as a result gas tax revenues have declined. This trend is likely to continue as the fuel efficiency of the vehicle fleet continues to improve. In the short term, gas taxes may need to be increased to account for this trend. In the medium to long term, VMT charges, tolling and pricing, HOT lanes, parking charges, and other funding strategies will need to be phased in as revenue requirements increase.

**C-019-005**

Under current legislation the Washington State Legislature has the authority to specify were transportation tolling revenue can be spent. The regional council can recommend were these revenues can be spent.

**C-019-006**

The planning process is not based on encouraging automobile use, but does acknowledge that it is likely to occur as the region adds nearly 1.5 million more peolpe and 1.2 million more jobs. The vehicle miles traveled per person is anticipated to decline under all alternatives including the Preferred Alternative, but overall growth in both people and freight travel

will increase the total vehicle miles travel. Tolling allows the facilities to be managed better, thus reducing roadway delay and CO2 emissions and providing revenue to support transportation investments.

**C-019-007**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**C-019-008**
Comment noted.

**C-019-009**
Comment noted.

**C-019-010**
Improvement of performance for the entire transportation system demonstrates some of the strongest benefits for freight user classes in the EIS analysis. Furthermore, specific projects (including the SR 509 extension) that have been identified as having particular importance for freight have been included in the Preferred Alternative.

**C-019-011**
Thank you.

C-020

Gregory J. Nickels
Mayor of Seattle

July 31, 2009

RECEIVED
JUL 31 2009
PUGET SOUND REGIONAL COUNCIL

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

Re: Transportation 2040 Draft Environmental Impact Statement
City of Seattle Comments

Dear Mr. Drewel:

C-020-001 The City of Seattle recognizes The Puget Sound Regional Council's (PSRC) efforts to put together a new metropolitan transportation plan for the Puget Sound region, *Transportation 2040*. Evaluating several different action alternatives to meet the region's growth and transportation goals through 2040 is a complex task that raises challenges of balance among system users and diverse interests.

C-020-002 As you are aware, Seattle is a leader in creating livable communities supported by a multi-modal transportation system. Based on analysis provided in the Transportation 2040 Draft Environmental Impact Statement (DEIS), I find all DEIS alternatives to have unacceptable impacts. I am disappointed that the alternatives are not more aggressive in striving to meet greenhouse gas-reduction targets, improving the region's transit system and building livable and sustainable communities.

C-020-003 My broad policy concerns regarding the *Transportation 2040* DEIS and development of a preferred plan alternative include:

**Vision vs. Implementation:** The preferred alternative needs to support the urban-growth strategies outlined in Vision 2040, meet the state and region's environmental goals and support the region's continued economic prosperity. It is important that building the T2040 preferred alternative starts with setting the region's transportation vision and then discusses how to fund it. The T2040 alternatives appear to have too quickly become a discussion of funding mechanisms, rather than what strategies and projects achieve our region's transportation vision.

C-020-004 **Greenhouse Gas Reduction:** Puget Sound's long-range transportation plan must set a vision of meeting and exceeding the State's target of reducing total greenhouse gas emissions. I am dismayed that none of the current plan alternatives will reach this goal,

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**C-020-001**
Comment noted.

**C-020-002**
Thank you for your comment. Based on input from the City of Seattle and others, the Preferred Alternative for Transportation 2040 includes a proactive greenhouse gas strategy; more transit investment than any other alternative; and a strong commitment to achieving the region's growth strategy including support for livable communities within Seattle and other centers. The Preferred Alternative also recognizes the need for flexibility as federal climate change policies are enacted, and as state climate change goals are set for sectors and for geographic regions of the state. As these state and federal directions become clearer and more specific, PSRC will work with its member jurisdictions to assure that the region meets any requirements that may be set.

**C-020-003**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live.

The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. The Preferred Alternative was built to support the Regional Growth Strategy; the region's land use vision has guided its transportation vision.

C-020-004 but rather, will increase total greenhouse gas emissions. This is unacceptable - the preferred alternative must decrease emissions below current levels. In order to meet this goal, it is important that T2040 reduce total vehicle miles traveled (VMT), not just per capita VMT.

The preferred alternative should use multiple strategies, not just clean technology to reduce emissions. For instance, research has demonstrated that building new capacity, in the form of new-lane miles increases vehicle trips, rather than reducing vehicle trips.
C-020-005 Another action is to consider parking strategies that can be implemented on a regional level as a means to reduce VMT.

C-020-006 **Modal Shifts:** Transportation 2040 should aggressively expand our transit, pedestrian and bicycle systems. This is critical, not only for reaching our goals on emission reductions, but for creating livable communities that can meet the growth targets
C-020-007 outlined in Vision 2040. The alternatives analyzed in the DEIS create minimal changes in overall transit use over the next thirty years. PSRC should explore whether these findings are the result of modeling limitations or transportation strategies that either work at cross-purposes or are not aggressive enough.

C-020-008 The preferred alternative should be designed with a goal of shifting travelers to alternative modes. It must include major increases in rail and bus transit service, as an alternative to additional roadway lane miles. In corridors linking regional growth centers and locally designated centers accepting the most population and employment growth, transit service should run at least every 15 minutes, 18 hours a day, 7 days a week.

C-020-009 **High capacity transit goals:** Of the analyzed alternatives, only Alternative 5 includes full build out of Sound Transit's entire adopted long-range plan. Transportation 2040 should include an aggressive growth in high-capacity transit. The preferred alternative
C-020-010 should include build out of Sound Transit's adopted plan. In addition, the PSRC and Sound Transit should consider whether the region should be looking beyond ST's current adopted plan for a more expansive vision of regional high-capacity transit.

C-020-011 **Growth in Centers:** Vision 2040 directs future growth toward the region's urban centers, where transportation systems, employment opportunities and land use can best accommodate growth needs. However, based on the DEIS analysis, all of the current action alternatives *reduce* employment growth in Seattle's regional and locally designated growth centers from the baseline forecast. This is in stark contrast to Vision 2040 implementation activities at the Growth Management Planning Council, which is distributing additional growth to Seattle's growth centers. The preferred plan alternative must directly support Vision 2040's growth policies, strengthening growth centers, not weakening them.

C-020-012 **Use of Toll Revenues:** Tolls or user fees are likely to be an important source of revenue for our future transportation system. Using these revenues wisely is important to the success of our long-range vision. It is important that toll revenues or user fees be

**C-020-004**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**C-020-005**

Thank you for your comment. The Preferred Alternative includes a new

C-020-012 used to create the most efficient and effective transportation system possible. To accomplish this, toll revenues and user fees should be able to be used for a broad range of transportation improvements, including transit capital and operations, ITS improvements and demand-management strategies.

C-020-013 **Equity:** Finally, it is important that the region's long-range transportation vision serve all segments of our population. I am concerned about the level of analysis of equity and social justice conducted in the DEIS and that this analysis shows that lower-income and minority populations receive lower benefits than higher-income users of the transportation system. As with greenhouse gas reduction, it is unacceptable that the region select an alternative that does not provide equitable benefits for all users. PSRC should conduct a more thorough analysis of equity and social justice on potential preferred alternatives.

C-020-014 I look forward to working with you and PSRC to create a transportation vision for the next 30 years that supports the region's growth and livability while addressing the need to reduce greenhouse gas emissions. In addition to these concerns, technical staff comments on the DEIS are attached. If you have any questions, please contact Andrew Glass-Hastings, Transportation Advisor, Seattle Office of Policy and Management (206) 386-1096. Thank you for your consideration.

Sincerely,

GREG NICKELS
Mayor of Seattle

Attachment: Seattle Department of Transportation T2040 Technical Comments

Cc: Sally Clark, Councilmember
Jan Drago, Councilmember
Bruce Harrell, Councilmember
Richard McIver, Councilmember
Grace Crunican, Director, Seattle Department of Transportation

regional parking pricing and management strategy as a means to reduce VMT.

**C-020-006**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**C-020-007**

The total daily transit mode share forecast for the Preferred Alternative is 5.4% and the work trip mode share is over 19% (see Appendix D). This almost doubles the base year transit shares in both categories. These figures are greater than the current national averages and comparable to those in similar regions' long range plans. The travel model used for these forecasts was calibrated to observed data in the PSRC region and the transit network inputs were crafted with input from many stakeholders including the region's transit agencies. All identifiable prospective route-level transit service changes for major routes (commuter rail, light rail, and bus rapid transit) were incorporated into the model inputs. Local transit routes were treated more generically by adjusting service frequency in three different groups: core, community connector, and specialized service.

As is true with travel demand management strategies, there are other programs in the plan that would affect transit usage to which the models are not sensitive. The plan discusses these qualitatively.

**City of Seattle Technical Comments**
**Draft Environmental Impact Statement**
**For Transportation 2040**

C-020-015

In order to provide adequate opportunity for elected officials and staff to consider T2040 preferred alternative recommendations, please provide additional information as follows to better demonstrate the effectiveness of various strategies. This information should be provided on a timeline that allows adequate opportunity for review input to inform development of the preferred alternative. The requests apply to the five action alternatives and the preliminary preferred alternative identified by PSRC.

***Greenhouse Gas:*** **None of the alternatives meets the state's total emission reduction goals**

C-020-016

- Provide specific information on how many vehicle-miles traveled would have to be reduced for the region to meet state goals for total greenhouse gas (GHG) reduction (50% reduction by 2050), assuming no significant changes in vehicle or fuel technology.
- Provide results of a sensitivity analysis that shows VMT and travel-time changes when the proposed number of new lane miles for each alternative is reduced to the same number as the baseline alternative.

C-020-017

***Mode Share:*** **None of the alternative analyses shows a significant increase in forecast transit mode share**

- Provide detailed discussion of the limitations of the current travel demand forecast model to show increased transit usage with additional investments.

C-020-018

- Provide the results of model analysis for transit mode share unconstrained by market equilibration, and then compare the incremental transit investment costs to incremental change in ridership.

C-020-019

- Provide specific information on how TDM programmatic investments were quantified in the absence of travel demand forecast modeling to measure their influence on mode share.
- Provide a comparison of mode-shift effects between the T2040 analyses of parking pricing conducted for designated centers / GTEC, and a forecast result from implementing a region-wide parking pricing strategy that includes most of the region's parking supply, not just existing areas of paid parking.

C-020-020

***Freight:*** **Differential impacts of alternatives on the freight network are not discussed**

- Provide an analysis comparing the benefits for "through" (not stopping in region) freight trips versus local freight trips, including travel time savings, delay and monetized value.

**C-020-008**

The Preferred Alternative includes the largest expansion of transit facilities and service hours of any alternative.

**C-020-009**

The Preferred Alternative includes build out of Sound Transit's adopted plan.

**C-020-010**

The Preferred Alternative does include the completion of the Sound Transit Long-range Plan. The financially constrained portion of the Preferred Alternative includes light rail extensions to Everett, Tacoma, and Redmond, based on direction from the Sound Transit Board.

**C-020-011**

The FEIS analysis showed strong support for growth in designated regional growth centers. The Preferred Alternative increased growth in regional growth centers.

**C-020-012**

The financial strategy of the Preferred Alternative does assume that, in the long run, freeway system tolling revenue is available for a broad set of transportation investments. This policy decision, of course, will be made by the Washington State Legislature, with the input of the region, the toll payers, and others interested in the outcome of this policy

**C-020-013**

The FEIS contains an expanded discussion of equity and social justice. The Preferred Alternative would result in the greatest benefits to minority and low-income populations and the least disparity between these populations and the entire regional population as a whole.

C-020-020

- Provide travel-time savings and delay for medium and heavy trucks on the State-designated T1 and T2 freight routes for the region, by individual cities and by Manufacturing / Industrial Centers; compare results with overal regional network results.

C-020-021 ***Growth in Centers*: Population and job distribution allocations away from regional growth centers raise doubt about the methodology and results of integrating land use and travel demand forecast models**

C-020-022

- Provide population and employment changes for each action alternative, compared to the baseline alternative, for the region's individual cities and regional growth centers.

C-020-023

- Provide vehicle trip changes, as compared to the baseline alternative, for the region's individual cities and regional growth centers.

C-020-024

- Provide a detailed summary of land use changes, as compared to the baseline alternative, for the region's individual cities and regional growth centers.

C-020-025 ***Tolling*: More information is needed on the effects of tolling on trip-making characteristics and costs to the region**

- Provide a comparison of tolling charges necessary to reduce vehicle-miles traveled and create mode shift with charges needed to achieve maximum user benefit.

C-020-026

- Provide more detail on the likely extent and locations of trip diversion from tolled to untolled facilities under each alternative.

C-020-027

- Provide a sensitivity analysis of full-system pricing on trip generation characteristics.

C-020-028

- Provide a forecast of net tolling revenues (income less initial costs, ongoing administration, maintenance costs and debt service) by 2040 based on timing and scale of each tolling scenario for the alternatives.

C-020-029 ***Equity*: There is limited information on the effects of plan alternatives on overall community health and disadvantaged / special-needs populations**

- Provide information on how transportation investment strategies in each alternative directly or indirectly affect physical and community health, including monetized benefits and costs.

C-020-030

- Provide a summary of the amount and proportion of capital improvements / programs proposed under each scenario for areas with a preponderance of disadvantaged populations (minorities, age and income).

**C-020-014**

Thank you.

**C-020-015**

Comment noted.

**C-020-016**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions. PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

PSRC staff supplied additional information regarding the plan's multi-part greenhouse gas strategy to the PSRC boards and other stakeholder groups. While this material did not include wholesale reformulation and re-analysis of the plan alternatives it does contain useful information and is available as FEIS Appendix L. As outlined in Appendix L, the region is not likely to meet state greenhouse gas reduction goals through VMT reduction alone.

**C-020-017**

The total daily transit mode share forecast for the Preferred Alternative is 5.4% and the work trip mode share is over 19% (see Appendix D). This

almost doubles the base year transit shares in both categories. These figures are greater than the current national averages and comparable to those in similar regions' long range plans. The travel model used for these forecasts was calibrated to observed data in the PSRC region and the transit network inputs were crafted with input from many stakeholders including the region's transit agencies. All identifiable prospective route-level transit service changes for major routes (commuter rail, light rail, and bus rapid transit) were incorporated into the model inputs. Local transit routes were treated more generically by adjusting service frequency in three different groups: core, community connector, and specialized service.

As is true with travel demand management strategies, there are other programs in the plan that would affect transit usage to which the models are not sensitive. The plan discusses these qualitatively.

**C-020-018**

The PSRC travel demand model does not inherently capacity-constrain transit assignments. In other words, it allows buses to carry as many would-be riders as the model's mode choice component forecasts. To properly calculate the service requirement impacts, costs, and benefits PSRC modelers generally equilibrate bus service supply to forecast demand. In this way the evaluation criteria (service frequency, mode share, benefits to transit patrons, ridership, etc.) are all consistent and fully capture the costs of transit service sufficient to meet demand. An unequilibrated forecast could represent a condition that is physically impossible.

**C-020-019**

The PSRC travel demand model directly treats some TDM strategies including vanpool programs and parking charges. Both strategies were explictly specified in the plan alternatives tested (see Addendum E of Appendix A: Alternatives Technical Report for details). Mode share and

other evaluation metrics reported in the EIS documents therefore include effects of these strategies.

PSRC staff have been careful to point out to stakeholders and decision makers that other TDM programs (education, outreach, employer-provided alternate-travel incentives, trip planning services, etc.) are not explicitly quantified in the PSRC analytic toolkit and that any additional investments in such programs beyond the Baseline will not be captured in the quantitative findings. PSRC staff worked with technical and other stakeholders to find a means of quantifying TDM effects outside the model framework and finally concluded that qualitative discussion would be necessary given the state of the practice. The FEIS text reiterates that qualitative discussion of certain TDM programs is therefore necessary to supplement the quantitative findings.

**C-020-020**

The regional-scale analysis of plan alternatives shows benefits for all truck trips (see Section 3.1 of Appendix D: Policy Analysis and Evaluation Criteria Report) and per trip benefits for zones with high concentrations of freight-related employment (see Section 3.4 of Appendix D). In addition, PSRC staff gave raw land use and travel demand model outputs to all entities that requested them, including the City of Seattle.

**C-020-021**

It is unclear how the results cast doubts on the methods. The comment lacks the specificity that would allow a more detailed examination of the methods concerns.

**C-020-022**

PSRC did not focus the analysis in the EIS on city level geography, but

data from the land use models is available to any interested parties upon request.

**C-020-023**
Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. This analysis does not include an accounting of trips at the individual city geographies. Travel model databanks have been made available to interested parties in order to allow unique analysis of the data.

**C-020-024**
Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. This analysis does not include popualtion and employment details at individual jurisdiction geography. TAZ-level summaries have been provided to interested parties in order to facilitate analysis that addresses the interests of those conducting the analysis.

**C-020-025**
The toll rates are designed to achieve a maximum of user benefits under each respective toll strategy (HOT lanes, highway tolls, and full system tolls). To this end the analysis of the alternatives has already answered this question to the extent possible under existing analytical approaches.

**C-020-026**
With more information about the kind of analysis that is desired it is very difficult to provide details on diversion in a network with 16,000 road links and 938 transportation analysis zones. PSRC has made the travel model databases available to interested parties to support their own unique analysis of the model results.

**C-020-027**

Full system pricing is examined in Alternative 5 and the trip level details are displayed in Appendix D of the FEIS.

**C-020-028**

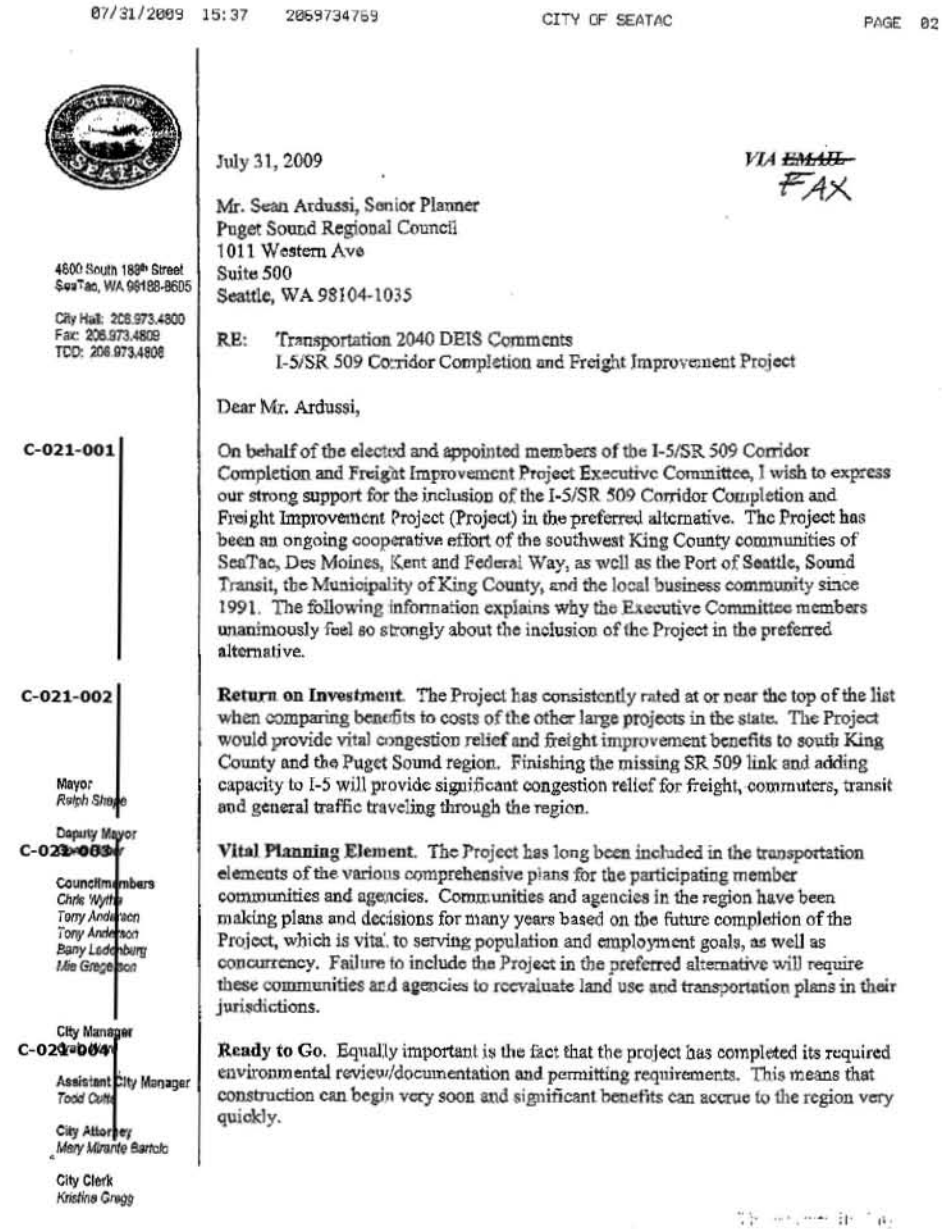
Gross annual toll revenues for the year 2040 are displayed for each alternative in Appendix D.

**C-020-029**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given the PSRC's current understanding of the available literature such quantitative estimates of costs have been included as appropriate. The impact of transportation on human health is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs.

**C-020-030**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given the PSRC's current understanding of the available literature such quantitative estimates of costs have been included as appropriate. The impact of transportation on human health is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs.



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CITY OF SEATAC

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July 31, 2009

VIA ~~EMAIL~~ FAX

Mr. Sean Ardussi, Senior Planner
Puget Sound Regional Council
1011 Western Ave
Suite 500
Seattle, WA 98104-1035

RE: Transportation 2040 DEIS Comments
I-5/SR 509 Corridor Completion and Freight Improvement Project

Dear Mr. Ardussi,

C-021-001

On behalf of the elected and appointed members of the I-5/SR 509 Corridor Completion and Freight Improvement Project Executive Committee, I wish to express our strong support for the inclusion of the I-5/SR 509 Corridor Completion and Freight Improvement Project (Project) in the preferred alternative. The Project has been an ongoing cooperative effort of the southwest King County communities of SeaTac, Des Moines, Kent and Federal Way, as well as the Port of Seattle, Sound Transit, the Municipality of King County, and the local business community since 1991. The following information explains why the Executive Committee members unanimously feel so strongly about the inclusion of the Project in the preferred alternative.

C-021-002

**Return on Investment**. The Project has consistently rated at or near the top of the list when comparing benefits to costs of the other large projects in the state. The Project would provide vital congestion relief and freight improvement benefits to south King County and the Puget Sound region. Finishing the missing SR 509 link and adding capacity to I-5 will provide significant congestion relief for freight, commuters, transit and general traffic traveling through the region.

C-021-003

**Vital Planning Element**. The Project has long been included in the transportation elements of the various comprehensive plans for the participating member communities and agencies. Communities and agencies in the region have been making plans and decisions for many years based on the future completion of the Project, which is vital to serving population and employment goals, as well as concurrency. Failure to include the Project in the preferred alternative will require these communities and agencies to reevaluate land use and transportation plans in their jurisdictions.

C-021-004

**Ready to Go**. Equally important is the fact that the project has completed its required environmental review/documentation and permitting requirements. This means that construction can begin very soon and significant benefits can accrue to the region very quickly.

Mayor
Ralph Shape

Deputy Mayor

Councilmembers
Chris Wythe
Terry Anderson
Tony Anderson
Barry Ladenburg
Mia Gregerson

City Manager

Assistant City Manager
Todd Cutts

City Attorney
Mary Mirante Bartolo

City Clerk
Kristina Gregg

**C-021-001**

Comment noted.

**C-021-002**

Thank you for your comment in support of the SR 509 /I-5 Corridor Completion and Freight Improvement Project. The Preferred Alternative for Transportation 2040 includes this project. Although our analysis in the DEIS did not quantify project-specific economic benefits, the project appears to provide freight, transit, congestion relief, and mobility benefits in southwest King County and for the region as a whole.

**C-021-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board

July 31, 2009
Page 2

C-021-005

In conclusion, we strongly support the inclusion of the Project in the preferred alternative of the Transportation 2040 Plan. Completing the Project will, at long last, provide southern Puget Sound residents with a direct connection to Sea-Tac International Airport, reduce congestion on I-5, and improve freight mobility between the Duwamish, Sea-Tac Airport, and Green River Valley industrial areas. Additionally, local land use and development plans require the completion of the Project in order to achieve their goals of population and job growth as well as concurrency.

Sincerely,

Ralph Shape

Ralph Shape, Mayor
City of SeaTac
Co-Chair of the I-5/SR 509 Corridor Completion and Freight Improvement Project Executive Committee

C:
*Executive Committee Members:*
Lloyd Hara, Commissioner, Port of Seattle
David Kaplan, Councilmember, City of Des Moines
Julia Patterson, Councilmember, King County
Hon. Suzette Cooke, Mayor, City of Kent
Craig Stone, Toll Division Administrator, WSDOT

RS:lke

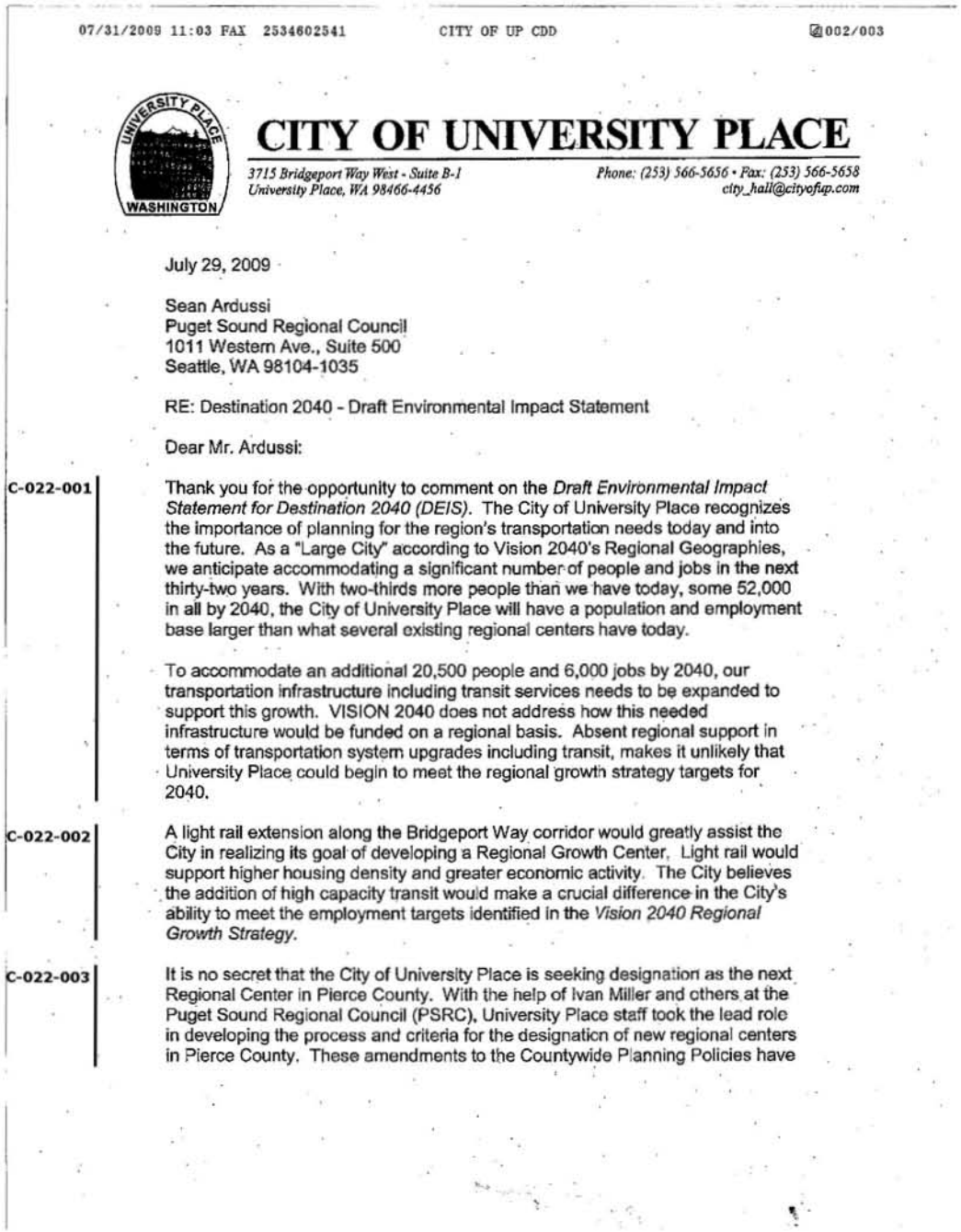
recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-021-004**

Comment noted. In addition, the SR 509 extension project is already included within the Regional Transportation Improvement Program, and as such has been included within the constrained portion of the Transportation 2040 plan.

**C-021-005**

Thank you for stating your preference among the alternatives.



07/31/2009 11:03 FAX 2534602541 CITY OF UP CDD 002/003

CITY OF UNIVERSITY PLACE

3715 Bridgeport Way West - Suite B-1
University Place, WA 98466-4456

Phone: (253) 566-5656 • Fax: (253) 566-5658
city_hall@cityofup.com

July 29, 2009

Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

RE: Destination 2040 - Draft Environmental Impact Statement

Dear Mr. Ardussi:

C-022-001 Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for Destination 2040 (DEIS)*. The City of University Place recognizes the importance of planning for the region's transportation needs today and into the future. As a "Large City" according to Vision 2040's Regional Geographies, we anticipate accommodating a significant number of people and jobs in the next thirty-two years. With two-thirds more people than we have today, some 52,000 in all by 2040, the City of University Place will have a population and employment base larger than what several existing regional centers have today.

To accommodate an additional 20,500 people and 6,000 jobs by 2040, our transportation infrastructure including transit services needs to be expanded to support this growth. VISION 2040 does not address how this needed infrastructure would be funded on a regional basis. Absent regional support in terms of transportation system upgrades including transit, makes it unlikely that University Place could begin to meet the regional growth strategy targets for 2040.

C-022-002 A light rail extension along the Bridgeport Way corridor would greatly assist the City in realizing its goal of developing a Regional Growth Center. Light rail would support higher housing density and greater economic activity. The City believes the addition of high capacity transit would make a crucial difference in the City's ability to meet the employment targets identified in the *Vision 2040 Regional Growth Strategy*.

C-022-003 It is no secret that the City of University Place is seeking designation as the next Regional Center in Pierce County. With the help of Ivan Miller and others at the Puget Sound Regional Council (PSRC), University Place staff took the lead role in developing the process and criteria for the designation of new regional centers in Pierce County. These amendments to the Countywide Planning Policies have

**C-022-001**

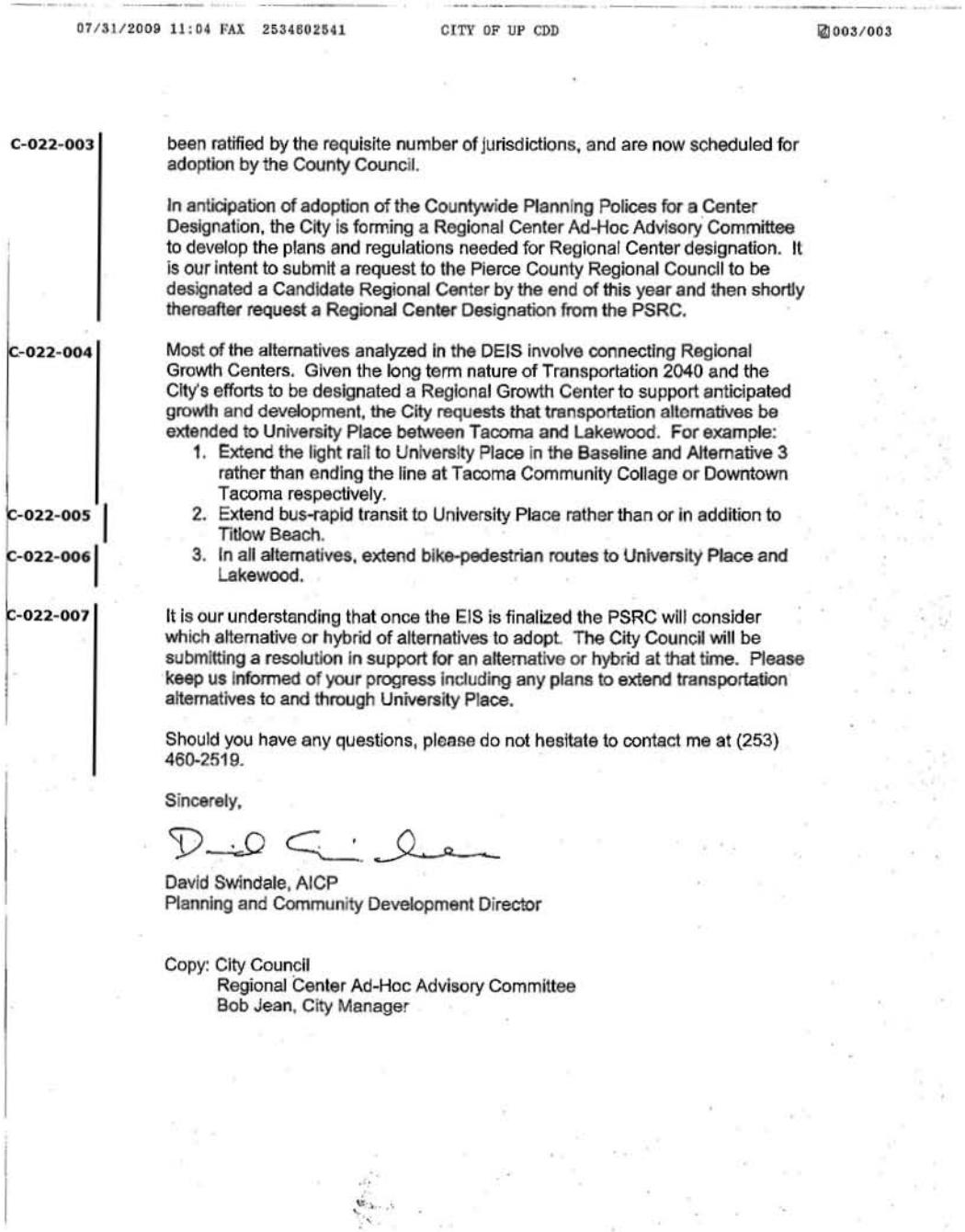
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**C-022-002**

Light rail on Bridgeport Way is not currently part of Sound Transit's plan and therefore not included in Transportation 2040.

**C-022-003**

Comment noted.



07/31/2009 11:04 FAX 2534602541 CITY OF UP CDD 003/003

C-022-003 been ratified by the requisite number of jurisdictions, and are now scheduled for adoption by the County Council.

In anticipation of adoption of the Countywide Planning Polices for a Center Designation, the City is forming a Regional Center Ad-Hoc Advisory Committee to develop the plans and regulations needed for Regional Center designation. It is our intent to submit a request to the Pierce County Regional Council to be designated a Candidate Regional Center by the end of this year and then shortly thereafter request a Regional Center Designation from the PSRC.

C-022-004 Most of the alternatives analyzed in the DEIS involve connecting Regional Growth Centers. Given the long term nature of Transportation 2040 and the City's efforts to be designated a Regional Growth Center to support anticipated growth and development, the City requests that transportation alternatives be extended to University Place between Tacoma and Lakewood. For example:

1. Extend the light rail to University Place in the Baseline and Alternative 3 rather than ending the line at Tacoma Community College or Downtown Tacoma respectively.

C-022-005 2. Extend bus-rapid transit to University Place rather than or in addition to Titlow Beach.

C-022-006 3. In all alternatives, extend bike-pedestrian routes to University Place and Lakewood.

C-022-007 It is our understanding that once the EIS is finalized the PSRC will consider which alternative or hybrid of alternatives to adopt. The City Council will be submitting a resolution in support for an alternative or hybrid at that time. Please keep us informed of your progress including any plans to extend transportation alternatives to and through University Place.

Should you have any questions, please do not hesitate to contact me at (253) 460-2519.

Sincerely,

David Swindale, AICP
Planning and Community Development Director

Copy: City Council
Regional Center Ad-Hoc Advisory Committee
Bob Jean, City Manager

**C-022-004**

We appreciate your interest in supporting improvement in University Place. However, the six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-022-005**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

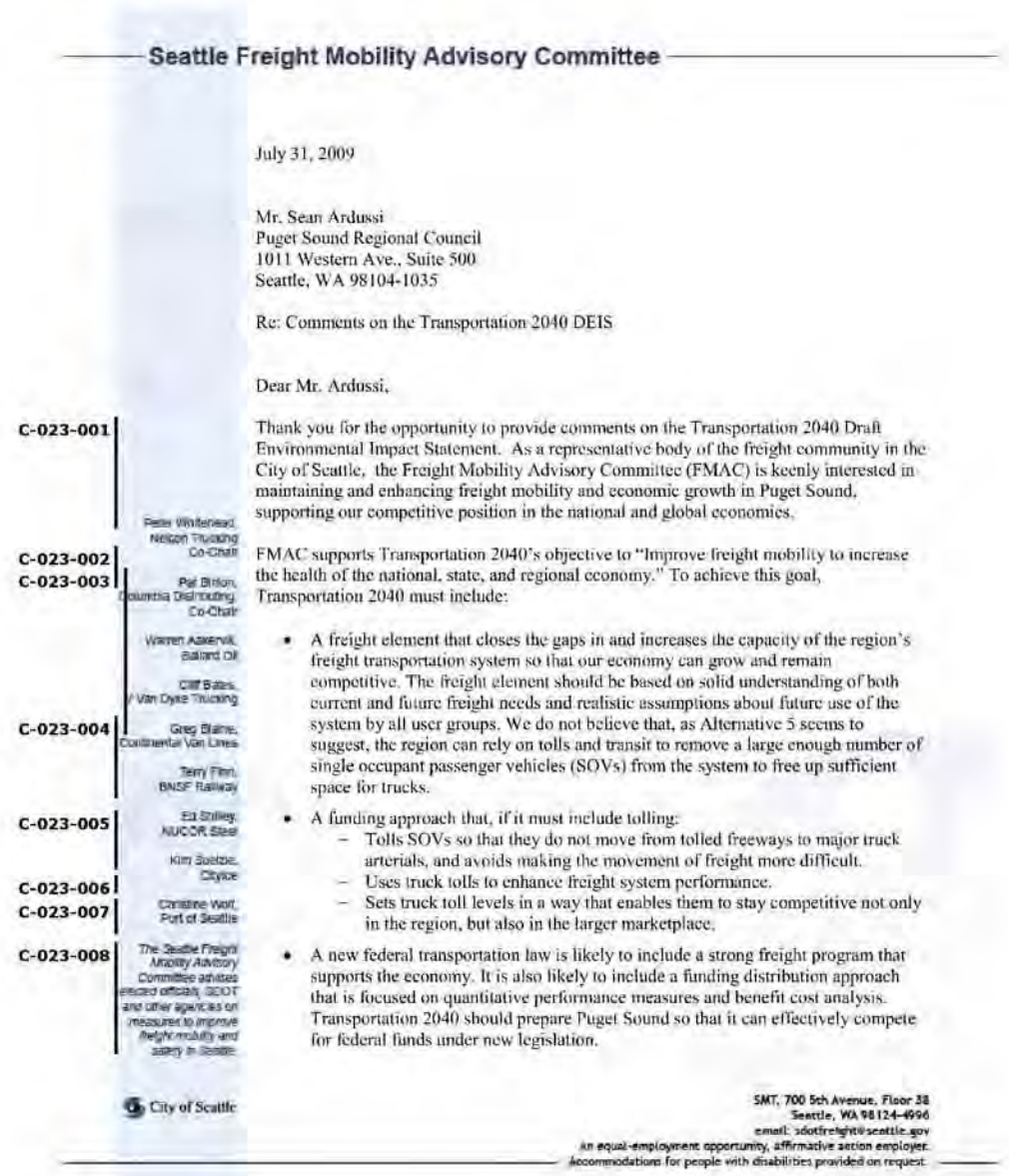
**C-022-006**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of

recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**C-022-007**
Comment noted.



Seattle Freight Mobility Advisory Committee

July 31, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

Re: Comments on the Transportation 2040 DEIS

Dear Mr. Ardussi,

C-023-001

Thank you for the opportunity to provide comments on the Transportation 2040 Draft Environmental Impact Statement. As a representative body of the freight community in the City of Seattle, the Freight Mobility Advisory Committee (FMAC) is keenly interested in maintaining and enhancing freight mobility and economic growth in Puget Sound, supporting our competitive position in the national and global economies.

C-023-002
C-023-003

FMAC supports Transportation 2040's objective to "Improve freight mobility to increase the health of the national, state, and regional economy." To achieve this goal, Transportation 2040 must include:

- A freight element that closes the gaps in and increases the capacity of the region's freight transportation system so that our economy can grow and remain competitive. The freight element should be based on solid understanding of both current and future freight needs and realistic assumptions about future use of the system by all user groups. We do not believe that, as Alternative 5 seems to suggest, the region can rely on tolls and transit to remove a large enough number of single occupant passenger vehicles (SOVs) from the system to free up sufficient space for trucks.

C-023-004

- A funding approach that, if it must include tolling:
  - Tolls SOVs so that they do not move from tolled freeways to major truck arterials, and avoids making the movement of freight more difficult.
  - Uses truck tolls to enhance freight system performance.
  - Sets truck toll levels in a way that enables them to stay competitive not only in the region, but also in the larger marketplace.

C-023-005
C-023-006
C-023-007

- A new federal transportation law is likely to include a strong freight program that supports the economy. It is also likely to include a funding distribution approach that is focused on quantitative performance measures and benefit cost analysis. Transportation 2040 should prepare Puget Sound so that it can effectively compete for federal funds under new legislation.

C-023-008

The Seattle Freight Mobility Advisory Committee advises elected officials, SDOT and other agencies on measures to improve freight mobility and safety in Seattle.

Peter Whitehead, Nelson Trucking Co-Chair
Pat Bitton, Columbia Distributing Co-Chair
Warren Askervik, Ballard Oil
Cliff Bates, J Van Dyke Trucking
Greg Blaine, Continental Van Lines
Terry Flinn, BNSF Railway
Ed Stilley, NUCOR Steel
Kim Soltzie, Cityice
Christine Wolf, Port of Seattle

City of Seattle

SMT, 700 5th Avenue, Floor 38
Seattle, WA 98124-4996
email: sdotfreight@seattle.gov
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Accommodations for people with disabilities provided on request.

**C-023-001**
Comment noted.

**C-023-002**
Comment noted.

**C-023-003**
Comment noted.

**C-023-004**
Comment noted.

**C-023-005**
The approach used in setting the toll rates is designed to provide a benefit to all users of the system whether they use the arterials or highway system. The analysis of the Preferred Alternative shows substantial benefits to medium and heavy trucks that use the transportation system.

**C-023-006**
While the State Legislature determines where toll revenue is spent the assumption in the Preferred Alternative is that there will be a nexus or relationship between where the tolls are collected and where the benefits accrue.

**C-023-007**
The authority to set toll rates is currently the responsibility of the Washington State Transportation Commission. The region can make recommendations on tolling policy and has developed the modeling capability to evaluate the cost and benefits to trucks using tolled roadways.



Seattle Freight Mobility Advisory Committee

C-023-009

We are looking forward to participating in the development of the freight element of Transportation 2040 and the preferred alternative.

Sincerely,

Pat Binion, Co-Chair
Seattle Freight Mobility Advisory Committee

Cc:
Mayor Greg Nickels
Councilmember Jan Drago, Chair, Seattle City Council Transportation Committee
Regional Freight Mobility Roundtable
FAST Corridor Partnership
FMAC Members
Grace Crunican, SDOT Director
Tracy Krawczyk, SDOT Policy and Planning Director

Peter Whitehead, Nelson Trucking Co-Chair
Pat Binion, Columbia Distributing, Co-Chair
Warren Askervik, Ballard Oil
Cliff Bates, V Van Dyke Trucking
Greg Blaine, Continental Van Lines
Terry Finn, BNSF Railway
Ed Shilley, NUCOR Steel
Kim Svetze, Cityloe
Christine Wolf, Port of Seattle

*The Seattle Freight Mobility Advisory Committee advises elected officials, SDOT and other agencies on measures to improve freight mobility and safety in Seattle.*

City of Seattle

SMT, 700 5th Avenue, Floor 38
Seattle, WA 98124-4996
email: sdotfreight@seattle.gov
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Accommodations for people with disabilities provided on request.

**C-023-008**

Comment noted. Our work on the region's benefit-cost model is placing the Puget Sound Region in a strong position to compete for funding under possible new federal transportation funding programs. With our improved analytical tools we can now more accurately identify the economic benefits of transportation investments, including specific benefits to the region's industry clusters (which include logistics and international trade) and to freight users of the region's transportation system. This analytical framework helps us evaluate investment options within the context of regional goals (such as those expressed in VISION 2040), which include supporting the regional economy.

**C-023-009**

Thank you.

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 4:45 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Tom Gut

Address: 4800 S 188th St

City: SeaTac WA 98188

Email: tgut@ci.seatac.wa.us

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

The alternative you think best accomplishes our regional needs out to 2040:

**I-116-001**

Other comments: On behalf of the City of SeaTac, I am writing to express the city's strong support that the I-5/SR 509 Corridor Completion and Freight Improvement Project (Project) be included in the preferred alternative. The Project has been an ongoing cooperative effort of the southwest King County communities of SeaTac, Des Moines, Kent, and Federal Way, as well as the Port of Seattle, King County, Sound Transit, and the Municipality of King County, since 1991. The Project was integral to the Destination 2030 Plan. We request the Project remain in the regional plan update to maintain commitments made by the region and to sustain planning efforts in our community.

The Project has consistently rated at or near the top of the list when comparing benefits to costs of the other large projects in the state and provides vital congestion relief and freight improvement benefits to the Puget Sound region. Equally important is the fact that the Project has completed its required environmental review and permitting requirements. This means it can begin construction and deliver significant benefits to the region quickly. Finishing the missing SR 509 link and adding capacity to I-5 will provide significant congestion relief for freight, commuters, transit and general traffic traveling through region. Right-of-way acquisition for the Project has resulted in the removal of many residential units and some businesses from the City of SeaTac. If the Transportation 2040 plan does not include the Project, the disruption to city residents and businesses and loss of taxable property will have been unnecessary.

Completing the Project will, at long last, provide southern Puget Sound residents with a direct connection to Sea-Tac Airport, reduce congestion on I-5, and enhance freight mobility between the Duwamish, Sea-Tac Airport, and Green River Valley industrial areas. Additionally, local land use and development plans require the completion of the Project in order to achieve the goals of population and job growth as well as concurrency.

The City of SeaTac appreciates the opportunity to express support for maintaining this significant project in the Transportation 2040 Plan.

Sincerely,

Tom Gut, PE
Public Works Director
City of SeaTac
4800 S. 188th St
SeaTac WA 98188

206.973.4741



**I-116-001**

This project has been included in the Preferred Alternative.

July 8, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave.
Seattle, WA 98104-1035

Dear Mr. Ardussi:

C-025-001

Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Statement. We appreciate the efforts of the PSRC to plan for what will be a dynamic time in transportation for our region.

C-025-002

The City of Kirkland applauds the bold direction and aggressive nature of Alternative 5 to alter travel behavior and land use patterns in the region through use of roadway pricing and tolling. However, we have some concerns:

- Our support of Alternative 5 does not imply endorsement of commuter rail in the BNSF corridor. The city has concerns about impacts which must be fully analyzed, reviewed and debated prior to a decision.
- We endorse aggressive near-term measures which yield a significant increase in bus boardings.
- The plan should more aggressively address carbon emission reductions.

C-025-003

While Kirkland's Roadway Pricing policy is supportive of broad tolling, we are concerned it is premature for the region to rely solely on tolling to pay for new capital improvements, while also being expected to address the funding shortfalls we already face in preserving our existing infrastructure. Instead, a mix of funding sources, combined with aggressive mode share goals, should be considered to also address identified shorter term needs. This would allow the additional time to help alter travel behavior and attitude towards such a fundamental change in transportation funding, and would avoid having some shorter term needs go unmet. It would be helpful if the Plan included a funding and implementation strategy that identified how the region would evolve over time from the current very limited tolling situations to tolling on many regional and local facilities.

We are also concerned that the general public, and federal and state policy makers, will have a difficult time setting a toll at a rate that will, by itself, cause drivers to shift from automobiles to other modes. Instead, the City of Kirkland supports an alternative that provides an improved mass-transit system that would be operational sooner than such a bold funding strategy identified in Alternative 5 would likely allow. We encourage you to identify an alternative very similar to Alternative 5 that will include investments in transit that can be implemented sooner. For example, Kirkland still relies on only a handful of local and regional bus routes as their sole transit option and need additional service and facilities to begin to change behavior. We are not able to wait for such a bold shift in transportation funding to take place before transit investments are made in our area.

C-025-004

We also support much more investment in a complete system of bicycle and pedestrian facilities that connect Urban Centers throughout the region as identified in Alternative 5.

123 Fifth Avenue • Kirkland, Washington 98033-6189 • 425.587.3000 • TTY 425.587.3111 • www.ci.kirkland.wa.us

**C-025-001**
Thank you.

**C-025-002**
Thank you for stating your preference among the alternatives. Your concerns have been noted.

**C-025-003**
Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

The Preferred Alternative includes investments in transit that will occur in advance of widespread implementation of tolling.

**C-025-004**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level

Letter to Sean Ardussi
July 8, 2009
Page 2

C-025-004

We believe, as identified in our Active Transportation Plan, that more investment is needed in our pedestrian and bicycle system to better promote healthy living, support increased transit usage, and shape the land use the region desires.

C-025-005

In addition, we noticed none of the alternatives identify what it would take to meet the greenhouse gas emission targets adopted by the City of Kirkland and other cities, in addition to those targets identified by the State of Washington. It would have been useful to evaluate and understand the type of policies and projects necessary to reduce $CO_2$ emissions below 2005 levels.

Thank you for consideration of these comments. The next thirty years will offer not only challenges to our transportation system but exciting opportunities as well.

Sincerely,

Kirkland City Council



By James L. Lauinger, Mayor

- Provide intermodal connections at rail, ferry, and other transit station areas

**C-025-005**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**From:** David Baker [DWB@paratransit.net]
**Posted At:** Monday, June 15, 2009 2:11 PM
**Conversation:** Transportation 2040 survey
**Posted To:** Transportation 2040

**Subject:** Transportation 2040 survey

**Please offer your comments on:**
**1. The various components in the six alternatives.**

B-001-002 Enjoyed reading the Transportation 2040 Draft Environmental Impact Statement, Executive Summary. The information was clear and concise and easy to understand.

B-001-001 **2. The environmental impacts of the alternatives.**
Don't believe that global warming is man caused. This debate is far from over. I do however believe we have a responsibility to be good citizens of the world we live and work in.

**3. Funding strategies, for raising revenue and paying for transportation needs.**
B-001-003 Living on the Peninsula I am for toll roads. Usage on a limited scale is good.
B-001-004 One thing the State of Washington is losing out on is potential revenue from bike registrations. As a boy growing up in California I remember having to get my bicycle license and put it on my frame. I don't understand why this is not required in our state.

If it was only $10/bike as much as $5,000,000 or more for as little as 500,000 bicycles could be raised annually. This would help to fund bike lanes that car owners currently pay for.

B-001-005 **5. The alternative you think best accomplishes our regional needs out to 2040.**
I believe alternative 2 with a limited portion of alternative 3 should be used. Tolling could be a good source of revenue on a limited basis.

**6. Other comments.**
B-001-006 Congestion relief needs to be the 1st priority of transportation. People will continue to
B-001-007 drive their vehicles. Additionally, Non-Emergent-Medical-Transportation will continue to grow as the baby-boomer generation ages and mass transit will not fill the needs.
B-001-008 Needs for better and larger roads will be required.
B-001-009 HOV - Should open lanes during non-rush hour periods. Suggest opening the lanes to HOV traffic Monday - Friday, 5:00am - 10:00am and 2:00 - 7:00pm.
B-001-010 HOT lanes - Don't like this idea at all and should definitely not be part of the HOV program.
B-001-011 CAFE standards - With President Obama's proposal has thought been given to the needs when fuel consumption reduces due to this plan?

**B-001-001**
Comment noted. We appreciate your comments. We've done our best to make the information in the EIS clear, concise, and understandable, notwithstanding the complexity of the topic and the level of analysis we performed.

**B-001-002**
Thank you.

**B-001-003**
Thank you. Although we have not recommended bicycle registration fees specifically, there has been some discussion of this topic during the planning process. The region and the state may want to consider this idea in the future as a way to help fund non-motorized improvements.

**B-001-004**
Transportation 2040 contains a financial strategy that considers a variety of new and existing funding sources, including fees for using the transportation system.

**B-001-005**
Your preference for Alternative 2 with a limited portion of Alternative 3 is noted. The draft plan was developed based on a full range of comments, some of which called for road improvements. As a result, the draft plan contains road investments that are greater than those contained in Alternative 5 but less than those contained in Alternative 2.

**B-001-006**
The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian

infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**B-001-007**

Comment noted. the PSRC's Coordinated Transit-Human Services Plan addresses transportation for those with special needs, which include those who, due to age, income, or physical ability, cannot drive for themselves.

**B-001-008**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts,

roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

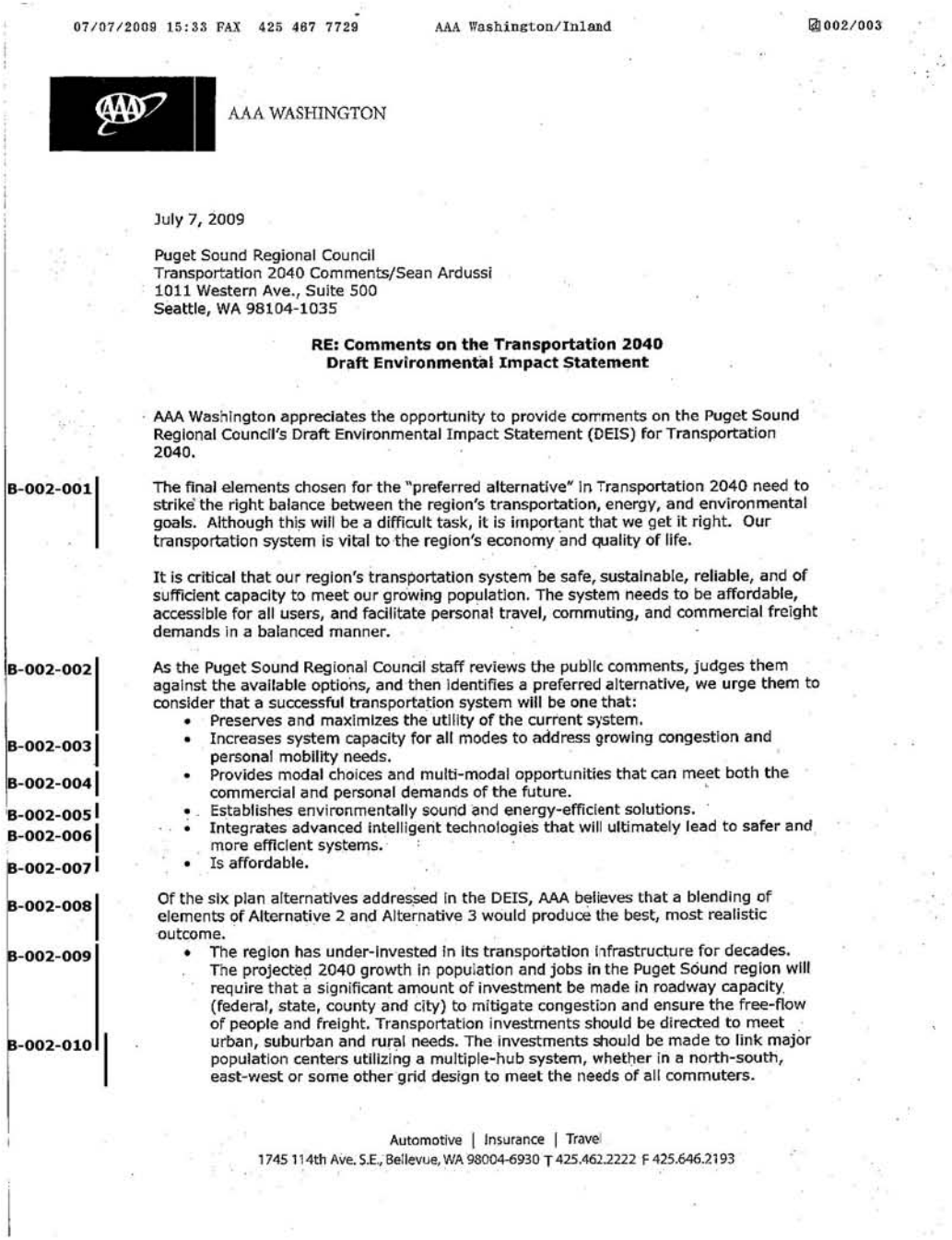
**B-001-009**
Comment noted.

**B-001-010**
Comment noted.

**B-001-011**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.



07/07/2009 15:33 FAX 425 467 7729 AAA Washington/Inland 002/003

AAA WASHINGTON

July 7, 2009

Puget Sound Regional Council
Transportation 2040 Comments/Sean Ardussi
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

**RE: Comments on the Transportation 2040 Draft Environmental Impact Statement**

AAA Washington appreciates the opportunity to provide comments on the Puget Sound Regional Council's Draft Environmental Impact Statement (DEIS) for Transportation 2040.

B-002-001 The final elements chosen for the "preferred alternative" in Transportation 2040 need to strike the right balance between the region's transportation, energy, and environmental goals. Although this will be a difficult task, it is important that we get it right. Our transportation system is vital to the region's economy and quality of life.

It is critical that our region's transportation system be safe, sustainable, reliable, and of sufficient capacity to meet our growing population. The system needs to be affordable, accessible for all users, and facilitate personal travel, commuting, and commercial freight demands in a balanced manner.

B-002-002 As the Puget Sound Regional Council staff reviews the public comments, judges them against the available options, and then identifies a preferred alternative, we urge them to consider that a successful transportation system will be one that:

- Preserves and maximizes the utility of the current system.
- B-002-003 Increases system capacity for all modes to address growing congestion and personal mobility needs.
- B-002-004 Provides modal choices and multi-modal opportunities that can meet both the commercial and personal demands of the future.
- B-002-005 Establishes environmentally sound and energy-efficient solutions.
- B-002-006 Integrates advanced intelligent technologies that will ultimately lead to safer and more efficient systems.
- B-002-007 Is affordable.

B-002-008 Of the six plan alternatives addressed in the DEIS, AAA believes that a blending of elements of Alternative 2 and Alternative 3 would produce the best, most realistic outcome.

- B-002-009 The region has under-invested in its transportation infrastructure for decades. The projected 2040 growth in population and jobs in the Puget Sound region will require that a significant amount of investment be made in roadway capacity (federal, state, county and city) to mitigate congestion and ensure the free-flow of people and freight. Transportation investments should be directed to meet urban, suburban and rural needs. The investments should be made to link major population centers utilizing a multiple-hub system, whether in a north-south, east-west or some other grid design to meet the needs of all commuters. B-002-010

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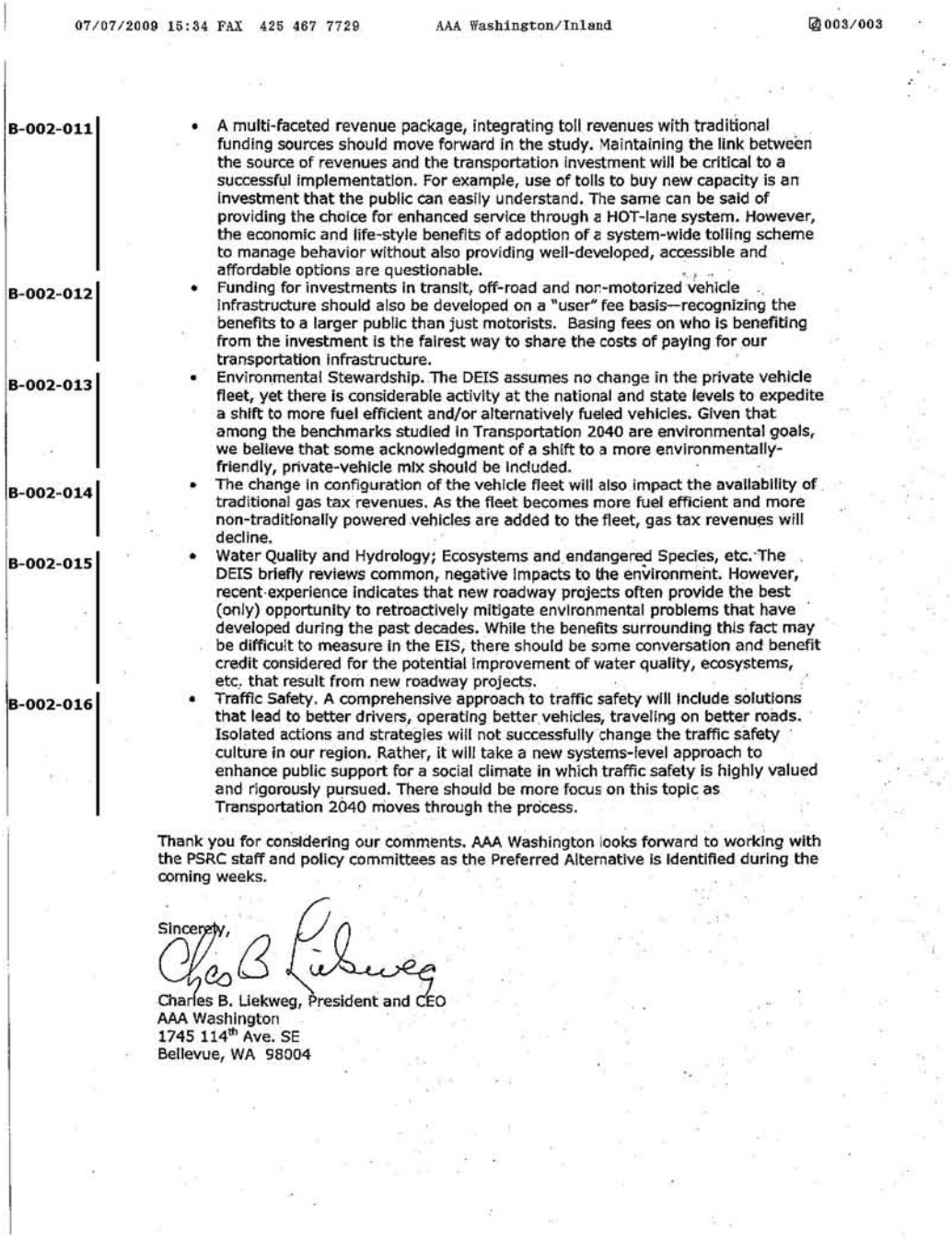
**B-002-001**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**B-002-002**

Thank you for your comment. Preserving and maximizing the existing transportation system is a central objective of Transportation 2040. Each alternative evaluated in the DEIS includes significant investment in system preservation as well as system efficiency measures to maximize the system's existing capacity. The Preferred Alternative was developed with these same goals in mind.



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B-002-011
- A multi-faceted revenue package, integrating toll revenues with traditional funding sources should move forward in the study. Maintaining the link between the source of revenues and the transportation investment will be critical to a successful implementation. For example, use of tolls to buy new capacity is an investment that the public can easily understand. The same can be said of providing the choice for enhanced service through a HOT-lane system. However, the economic and life-style benefits of adoption of a system-wide tolling scheme to manage behavior without also providing well-developed, accessible and affordable options are questionable.

B-002-012
- Funding for investments in transit, off-road and non-motorized vehicle infrastructure should also be developed on a "user" fee basis—recognizing the benefits to a larger public than just motorists. Basing fees on who is benefiting from the investment is the fairest way to share the costs of paying for our transportation infrastructure.

B-002-013
- Environmental Stewardship. The DEIS assumes no change in the private vehicle fleet, yet there is considerable activity at the national and state levels to expedite a shift to more fuel efficient and/or alternatively fueled vehicles. Given that among the benchmarks studied in Transportation 2040 are environmental goals, we believe that some acknowledgment of a shift to a more environmentally-friendly, private-vehicle mix should be included.

B-002-014
- The change in configuration of the vehicle fleet will also impact the availability of traditional gas tax revenues. As the fleet becomes more fuel efficient and more non-traditionally powered vehicles are added to the fleet, gas tax revenues will decline.

B-002-015
- Water Quality and Hydrology; Ecosystems and endangered Species, etc. The DEIS briefly reviews common, negative impacts to the environment. However, recent experience indicates that new roadway projects often provide the best (only) opportunity to retroactively mitigate environmental problems that have developed during the past decades. While the benefits surrounding this fact may be difficult to measure in the EIS, there should be some conversation and benefit credit considered for the potential improvement of water quality, ecosystems, etc. that result from new roadway projects.

B-002-016
- Traffic Safety. A comprehensive approach to traffic safety will include solutions that lead to better drivers, operating better vehicles, traveling on better roads. Isolated actions and strategies will not successfully change the traffic safety culture in our region. Rather, it will take a new systems-level approach to enhance public support for a social climate in which traffic safety is highly valued and rigorously pursued. There should be more focus on this topic as Transportation 2040 moves through the process.

Thank you for considering our comments. AAA Washington looks forward to working with the PSRC staff and policy committees as the Preferred Alternative is identified during the coming weeks.

Sincerely,

Chas B Liekweg

Charles B. Liekweg, President and CEO
AAA Washington
1745 114th Ave. SE
Bellevue, WA 98004

**B-002-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**B-002-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**B-002-005**
Comment noted.

**B-002-006**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040.

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**B-002-007**

Our federal mandates require PSRC to develop a financially feasible transportation plan. We have also received direction from the public and our boards expressing a desire for a sustainable funding strategy to support the plan. The constrained plan contains sufficient sustainable revenue sources to implement it. The financial strategy relies on continued and increased revenues from traditional sources (such as gas and sales tax) in the short term, implementation of tolling on major state highway projects and HOT lanes in the medium term, and tolling the entire freeway system in the long term. In addition, the financial strategy is likely to include full system tolls (on all highways and arterials) as a way to fund all projects and programs contained in the unprogrammed plan.

**B-002-008**

Your preference for a blending of Alternatives 2 and 3 is noted. The preferred alternative contained in the Draft Plan includes attributes of Alternatives 2 and 3, as well as other alternatives. The hybrid alternative which comprises the preferred alternative in the Draft Plan was developed in response to a wide range of input and comments over many months from across the region.

**B-002-009**

The region will require significant investment in a wide variety of transportation modes, including roadway capacity, preservation, and maintenance. The Preferred Alternative includes 958 new roadway lane miles, a 7% increase from the 2006 base year. This compares with 1,208 more lane miles (9% more than the base year) with Alternative 2, 523 more lane miles (4% more than the base year) with Alternative 5, and 348 more lane miles (3% more than the base year) for the Baseline Alternative.

**B-002-010**

Transportation 2040 was developed to align with and help implement VISION 2040 and the Regional Economic Strategy. These plans establish a regional growth strategy that focuses population and employment growth in ou major cities and within regional growth centers (RGCs) and manufacturing industrial centers (MICs). The alternatives in the DEIS was developed to support these regional policy goals, and have been evaluated against policy and technical criteria that assess how well they implement these goals. The Preferred Alternative and the plan for Transportation 2040 are guided by VISION 2040, which calls for us to link major centers with efficient multi-modal transportation investments.

**B-002-011**

The preferred alternative includes a multi-faceted revenue package that integrates toll revenues with traditional funding sources and is designed to provide a nexus between the source of the revenue and where the benefits accrue. It is anticipated that as the region moves toward highway system tolling, affordable non-motorized, transit, and vanpool alternatives will be provided.

**B-002-012**

A variety of user fees are likely to be a foundation of the financial strategy for Transportation 2040. Tolling and pricing, HOT lanes, VMT fees, and parking charges are likely to be included in the financial plan. These fees, however, are primarily levied on auto users of the system. The financial strategy also includes continued use of sales tax to support transit, as well as increased transit and ferry fares to support investments in the transit system. Transit and ferry fares are user fees, and will contribute to addressing the fairness issue.

**B-002-013**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission

reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**B-002-014**

The changing vehicle fleet and increasing fuel efficiency have contributed to historical reductions in state gas tax revenues, and this trend is predicted to continue in the future. The improved average fuel economy of the private vehicle fleet displays how one public policy goal (improved efficiency) can have negative impacts on other aspects of the system (gas tax revenues). The financial strategy developed for Transportation 2040 recognizes these issues, and relies on more sustainable sources of revenue. These will include tolling and pricing, HOT lanes, VMT fees, parking charges, and other new instruments that more directly link revenues to use of the system.

**B-002-015**

The Water Quality and Hydrology Chapter contains a section on mitigation of long-term effects that discusses opportunities during redesign or retrofit of existing facilities to develop better water quality practices.

**B-002-016**

Concur. Improving safety for all modes is critical to improving quality of life and improving access for all the citizens of the region. Transportation safety is a critical component of the regional long range transportation plan. It informs multiple elements of the plan as crash reduction is integral to the congestion management process, bicycle and pedestrian

planning, transit planning, and freight planning. The Transportation 2040 safety component is guided primarily by that of Target Zero, the Washington State Strategic Highway Safety plan developed by the Washington Traffic Safety Commission.

Kemper Development Company

July 31, 2009

Puget Sound Regional Council
Attn: Mr. Sean Ardussi
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

**Re: PSRC Transportation 2040 DEIS** **Sent via email 7/31/2009**

Dear Mr. Ardussi:

B-003-001 Included with this letter are Comments, Questions, and Deficiencies concerning the Puget Sound Regional Council (PSRC) Transportation 2040 Draft Environmental Impact Statement (DEIS) released May 29, 2009 for public comment. Please consider this letter and the Comments as our response to the PSRC DEIS.

B-003-002 Kemper Development Company has studied transportation in the Puget Sound Region since the mid 1990's and followed the planning efforts of the PSRC prior Metropolitan Transportation Plans. Our principles have been to have a transportation system that works for everyone and not just a select few. Also we have come to realize the importance of freight mobility and service vehicles in our State and Region. We have spent several million dollars in our efforts to understand a transportation solution for the region that will make up for current deficiencies and at the same time provide for the projected future growth of population, employment, and travel demand.

Our efforts are market driven and intended to make things better than present by reducing overall traffic congestion and at the same time providing the infrastructure to accommodate the projected growth. Infrastructure inside the Urban Growth Boundary is consistent with the objectives of the Growth Management Act passed by our State Legislature. The cost of these investments is also paramount in our mind.

B-003-003 While attempting to achieve the above principles we are very mindful of the need to protect and improve our economic and natural environments. Further we see the transition in the future from hydrocarbon fuel to other types of propulsion systems. This transition will take longer than we hear talked about today but there will be a transition in our vehicles.

Kemper Development Company, Post Office Box 91180, Bellevue, WA 98009 (425) 646-4000

**B-003-001**

Thank you for your comments.

**B-003-002**

Comment noted.

**B-003-003**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

B-003-004 We do not anticipate any less desire in the public for personal mobility in the future. No one has suggested that people want to travel less. This would be contrary to all prior civilizations and contrary to what we observe in our society today. The cars and trucks will change but the demand factors for travel will remain.

B-003-005 The connection between travel and economy is inescapable. There is data available to demonstrate the correlation between travel and gross domestic products of countries at all levels of economic development. Therefore, the infrastructure for mobility remains paramount in the success of our standard of living not just in travel but many other aspects of our lives.

B-003-006 With regard to the PSRC past and present Metropolitan Transportation Plans there is a great lack of analysis based on performance. The technical study is not only constrained by revenue sources but by political ideology that is contrary
B-003-007 to a performance based plan. We are very much opposed to the direction PSRC has attempted to move the region in the past and in the present plan. The plan fails in all alternatives to make the mobility in the region better than today and to also provide for the mobility people and businesses demand.

B-003-008 Kemper Development Company during 2008 developed a broad multi-modal and intergraded plan for the Puget Sound Region known as Mobility 100 which will provide for all aspects of the traveling public, reduce congestion in 2040 below the 2006 baseline, provide for growth of population and employment to 2040. We believe this plan will also reduce CO2 emissions below the levels of the lowest PSRC proposed Alt. 5. We would be happy to present this plan to the PSRC Transportation Policy Board at your earliest convenience.

B-003-009 Our Company will be working with other citizens, groups and government to adopt a performance based plan that will provide adequate transportation for the people and businesses of the Puget Sound Region as the growth continues.

Your most serious consideration of our comments will be appreciated.

Sincerely,



Bruce L. Nurse, Vice President Transportation
Kemper Development Company
575 Bellevue Square
Bellevue, WA. 98004
Telephone 425-646-3660



**B-003-004**

Concur. Transportation 2040 does not propose that travel demand will decline in any way. In fact, with the projected growth in population it will be more important to provide transportation options that meet the mobility needs of even more people.

**B-003-005**

Comment noted.

**B-003-006**

As a Metropolitan Planning Organization, PSRC is required to prepare a Metropolitan Transportation Plan that meets the following requirements:

- Plans must be developed through an open and inclusive process that ensures public input and seeks out and considers the needs of those traditionally under-served by existing transportation systems.
- Plans must extend for a period not less than 20 years into the future.
- Plans must reflect the most recent assumptions for population, travel, land use, congestion, employment, and economic activity.
- Plans must be financially constrained, and revenue assumptions must be reasonable in that funds can be expected to be available during the time frame of the plan.
- Plans must conform to the Clean Air Act and its amendments, and to applicable state implementation plans for regional air quality.

## TRANSPORTATION 2040 DEIS

### Comments, Questions and Deficiencies

B-003-010

1. **PROGRAM INVESTMENTS** - Pg. 1-7 and 3-8 graphically show program investments, but without numbers. There is no detailed tabulation of investments by program element anywhere in the DEIS, including Appendix A.
   a. The graphics appear to be consistent with page 1-13's investment of $143 billion for the Baseline and $201 billion for Alt. 2.
   b. Scaling suggests that Alt. 5's investment would be about $196 billion.

B-003-011

2. **TRANSIT INVESTMENTS VS. MARKET SHARE** - Scaling the graphics on pages 1-7 and 3-8 indicates that from 48% to 59% of the investments would be for transit. How can this possibly be justified for the minor increases in transit's market share, as shown on page 4-61?
   a. For example, Alt 5 increases transit market share to 5.2% from the Baseline's 4.2% (Exhibit 4-25, page 4-61), and yet would spend 59% of the $196 billion. This 1% shift to transit is equivalent to only one year for the projected growth in travel from 2006 to 2040.
   b. Because increasing trip lengths expand opportunities, both for jobs and other purposes, person-miles would be a better measure than person-trips. Roughly, converting to person miles would reduce



**B-003-007**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

The DEIS alternatives were developed in collaboration with multiple agencies including the Washington State Department of Transportation, Sound Transit, Washington State Ferries and many other local and regional agencies and with public input. The alternatives were presented and discussed with decision makers and were approved by both the Transportation Policy Board and Executive Board. Information on the alternatives has been provided to decision makers through public testimony and distribution of the DEIS comments and no request has been made by either Board to reconsider the configuration of the DEIS alternatives.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional

B-003-011 transit's market share to about 2.1% for the Baseline and about 2.8% for Alt. 5.

B-003-012 3. **New Alternative?** - Why was there no alternative without a major rail and other transit investment, particularly given the embarrassingly small contribution of transit?

B-003-013 4. **Analytical Format** - In general, the DEIS documents do not provide an efficient way to compare the costs of the multiple proposed actions to their performance. For a document that is intended to inform the decision makers, this is a serious deficiency. With information scattered over more than 1,100 pages, it is extremely difficult to see what travel improvements would be achieved and at what cost. The DEIS appears to have been designed to confuse and intimidate, rather than inform. How else can explain alternatives all of which spend half or more of the investments on transit for a transit market-share of 2% to 3%. Obviously, the DEIS strives to justify a pre-selected solution.

B-003-014 5. **Behavior Change** - In general, this appears to be more of a sales document for coercing behavior change and extravagantly funding transit than a careful systems analysis supporting informed decisions.

B-003-015 6. **Alt. 5 Lowest Delay ?** - Exhibit 1-8, page 1-17, and Exhibit 4-20, p. 4-51 both show Alt. 5 to have the lowest delay of all the Alternatives. How can



detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**B-003-008**

Upon receipt of this letter, Kemper Development was contacted regarding the status of the Mobility 100 plan and PSRC was informed that it was not currently available for review. No specific proposals for changes to any of the alternatives, including the Preferred Alternative, have been received from Kemper Development.

**B-003-009**

Comment noted.

**B-003-010**

A detailed financial table can be found in Appendix D: Policy Analysis and Evaluation Criteria Report.

**B-003-011**

The DEIS analysis did not try to justify any specific set of investments based on market share or any other specific factor. The DEIS did provide objective information about the plan alternatives, and specifically reported on how each alternative performs on a variety of policy topics and evaluation criteria. This information can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. It is certainly the case that different transportation investments have varying percentages of their total costs supplied by public investments. This in and of itself is not typically seen as either an advantage or disadvantage.

B-003-015

this be with Alt 5's emphasis on transit? Alt. 5 has about 305,000 fewer vehicle trips or about 475,000 person-trips no longer in cars. Alt. 5 adds only about 130,000 more transit person-trips (about 190,000 boardings). Please provide specific numbers on what happened to the other 345,000 person-trips (475,000-130,000). Were some of these 8± mile automobile person-trips converted to 1 mile pedestrian/bike trip with a drastically reduced set of destination opportunities? What key assumptions were behind this result? Was the added time required for transit trips compared to auto trips, included in the delay estimate? Some skepticism about these results is justified. If PSRC can, with a straight face, propose devoting half of investments for transit with a market share less than 3%, it might well bias the complex calculations to favor transit.

B-003-016

7. **General Capacity -** Page 3-13 indicates that the Nickel and TPA packages are included in the 2040 Baseline, but the small lane-mile additions seem too small (see Exhibit 4-19 on page 4-46). It seems that with some addition general capacity Alternatives 2 and 3 would out perform all other alternatives and the transportation system would work for everyone.

B-003-017

8. **Toll Revenues -** Alt 1 toll revenues would be spent in the tolled corridor (see p. 3-19). This is a hollow statement. Where the toll revenues are spent is a policy decision that the State Legislature will make on a case by



**B-003-012**

In consultation with program area stakeholders, levels of transit (bus and rail) investments for each of the alternatives were intentionally varied to assess performance.

**B-003-013**

Each of the alternatives includes a number of components and responds to a number of policy objectives. A plan-level EIS of this type is inherently somewhat complex. However, the Draft EIS (and Final EIS) present analyses in an objective manner. Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

Summary level results can be found in the FEIS Executive Summary.

**B-003-014**

Comment noted.

**B-003-015**

Much of the delay reduction in Alternative 5 is likely associated with the application of time-of-day tolls of the road network. These tolls result in not only mode shifts but also time-of-day and route shifting to avoid the toll costs. In addition, the PSRC travel models incorporate an activity generator model that estimates trip generation response to changes in travel cost (time and money costs), among other factors. Some additional information on this topic can be found on the agency's web page at http://www.psrc.org/data/models/abmodel/, and specific activity generator details can be found at http://www.psrc.org/assets/1659/ActivityGenerator.pdf

B-003-017

case basis for a corridor under the current law. Could those revenues be spent on transit? Could these revenues be transferred to the State General Fund?

B-003-018

9. **18th Amendment** - Are revenues for tolls imposed on highway users protected by the 18th Amendment? Reference Washington State Constitution, 18th Amendment, Article 2 – 40 which states, "All fees collected by the State of Washington as license fees, for motor vehicles and all excise taxes collected by the State of Washington on the sale, distribution or use of a motor vehicle fuel and all other State revenue intended to be used exclusively for highway purposes. This is a huge issue which must be resolved by the State Legislature before implementing any tolling program as proposed in Transportation 2040.

B-003-019

10. **Network Tolling** - Alt. 4 would impose tolls on the entire roadway network. How would this be done? (See p. 3-27).

B-003-020

11. **Use of Toll Revenues** - Some of the toll revenues of Alts 4 and 5 would be used for transit. Transit needs to more toward a "user fee" concept as is the case with the roads. Otherwise increases in transit are not sustainable due to the increase in taxes on the general public. Highway user's revenues should not be used to further subsidize public transit.



**B-003-016**

The Nickel and TPA packages are included in the Baseline Alternative. Alternatives 2 and 3 were analyzed with the projects and programs outlined in Appendix A. The results of this analysis are presented in Chapter 4: Transportation and Appendix D: Policy Analysis and Criteria Evaluation Report.

**B-003-017**

Currently the State Legislature is responsible for determining what facilities are tolled and where the revenues will be spent. The alternatives were developed to evaluate policy choices that can be used to develop regional guidance that can be transmitted to the Legislature and governor.

**B-003-018**

Comment noted.

**B-003-019**

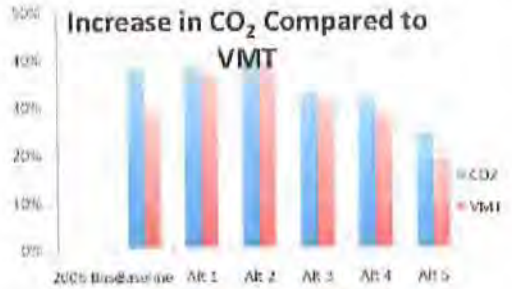
Authorization to implement highway system tolls would require Federal and State approval. Also, there is no technology proposed as part of the preferred alternative, however future versions of the transponder and camera recorder approach currently being used on the Tacoma Narrows Bridge and the SR-167 HOT lane and being developed for the SR-520 Bridge could be used. The region has also tested a GPS version that might be available prior to implementation of a completely tolled highway network.

**B-003-020**

The Preferred Alternative does include substantial increases in transit fares to support proposed service increases. Additional new sources of revenue are likely to be required. Under current authority the Legislature

B-003-020 People in need of Public Transit can be sold special passes as is the case today while keeping total transit user fees revenue neutral.

B-003-021 12. **Climate Change and $CO_2$** - Comparison of Exhibit 1-17 (p. 1-24) and Exhibit 4-20 (p. 4-51) shows that $CO_2$ emissions roughly track VMT changes.




a. This appears not to recognize improvements in fuel economy. By 2040, the U.S. automobile/light truck fleet will have been replaced with post-2016 vehicles, which, by President Obama's program, will be 25% to 30% more fuel efficient. Increasing use of electric vehicles would further reduce $CO_2$ emissions.

b. $CO_2$ emissions per vehicle-mile traveled (VMT) for the 5 action alternatives are highest for Alt. 5 (the alternative with the most-extensive, and wasteful, rail program).



will determine the use of highway user fees and whether or not they can be used to support transit service. Your point of view is noted.

**B-003-021**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

B-003-022

c. It is a deficiency in the DEIS not to have added more general capacity lanes in Alt. 2 or 3 thereby reducing congestion and reducing $CO_2$ emissions. Such an Alternative would answer the question; "Can more general capacity by lowering congestion (delay) actually lower $CO_2$ emissions equal to or below Alternative 5?" If so, there could be a tremendous reduction in transit subsidies.

B-003-023

13. **Increases In VMT** - In spite of the DEIS bias against VMT, increases in VMT represent a benefit to users by providing access to more opportunities.

B-003-024

14. **Person Trip Reductions** - Exhibit 4-20 on page 4-51 shows a reduction in daily vehicle trips compared to the Baseline, but no change in person-trips. How, specifically, was this reduction achieved?

B-003-025

15. **Reduced Delay** - From page 4-22, "It is estimated that this [CTR] reduced delay by 12% during the peak travel period on average mornings in the region." Who estimated this and how?



**B-003-022**

Alternative 2 includes general purpose roadway capacity that represents a sizable state highway investment portfolio, and was developed in close coordination with WSDOT. The capacity investments in Alternative 2 do have some influence over network delay and vehicle speeds. Estimates of vehicle emissions are sensitive to vehicle speeds, but in the specific case of Alternative 2 emission reductions that result from higher speeds (in the case of select pollutants) are offset by increased emissions from additional vehicle use.

**B-003-023**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**B-003-024**

Reductions in vehicle trips can be achieved independently from changes in person trips as a function of mode choice. If more person trips are accommodated through shared ride, transit, bike, or walk modes then vehicle trips will be less.

**B-003-025**

Thank you for your comment. The CTR program analysis was performed

B-003-026

16. **Vanpools** - Vanpool expansion is mentioned on page 4-23. Where are the details? This could be as important or more important than all light rail in serving regional trips.

B-003-027

17. **Congestion Relief** - Page 4-24 describes a four-part congestion relief strategy. How much did each of these four contribute to congestion relief?

B-003-028

18. **Transit Market Share** - Page 4-32 indicates 4.1% transit market share in 2006. However, the sum of work and non-work trips on Exhibit 4-26, page 4-64 indicates 2.9%. Why is there this difference? See also Comment #25 below.

B-003-029

19. **Non-Work Trip** - Exhibit 4-20 on page 4-51 shows a shorter non-work trip length of Alt. 5 compared to the Baseline. What specifically caused this? Does that reduction mean travelers have access to fewer destination opportunities?

B-003-030

20. **Peak Spreading** - Compared to the Baseline Alt 5 shows peak spreading, Alt 2 shows more concentration in peak periods (p. 4-53). How was this determined?

B-003-031

21. **Confusion** - The table portion of Exhibit 4-22 on page 4-54 compares the alternatives to 2006, but the graphic portion compares alternatives to the



by WSDOT and is contained on p. 7 of the CTR Taskforce 2005 Report to the Washington State Legislature. A technical correction has been discovered. The excerpt should read "It is estimated that this (CTR) reduced delay by **11.6%** during the peak travel period on average mornings in the region." The Transportation 2040 DEIS currently indicates a 12% reduction which overestimates CTR's impact on the average morning commute.

**B-003-026**

Transportation 2040 includes approximately 55% more vanpools on the ground every day than are included in the Baseline Alternative. In addition to capital expansion, the Preferred Alternative includes the maintenance and operation of the existing and future fleet, life cycle replacement costs for rolling stock, a small amount of funding for marketing and incentives, and policy language related to rideshare vehicle parking. In addition to these strategies, Transportation 2040 acknowledges the fact that there are emerging markets for vanpooling and that the region should take steps to realize the full potential of this important service in the central Puget Sound region.

**B-003-027**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**B-003-028**

The numbers differ slightly from results of the PSRC regional travel demand model used to evaluate the Transportation 2040 alternatives because transit ridership data in the PSRC Household Surveys are a relatively small sample size. These data are merged with other transit survey data to estimate ridership for the regional travel demand model.

B-003-031 2040 Baseline. Why create this confusion? By what criterion is "Less is better" as shown on the y-axis of the figure? Increased trip lengths represent more mobility and access to more opportunities, a public benefit.

B-003-032 22. **More Confusion** - P. 4-57. Exhibit 4-23 on page 4-57 confuses vehicle hours traveled (listed in title) with delay. The line "Total Delay" is the sum of freeway and arterial "Vehicle Daily Hours", as labeled.

B-003-033 23. **Bus Performance** - Exhibit 4-27 on page 4-66 shows that Alt 5, for example, would increase bus hours by 18% over Baseline, LRT by 144%. What investment would be required and what performance would be achieved?

B-003-034 24. **Transit Performance** - Exhibit 4-26 on page 4-64 appears to mix transit boardings with person trips for the other modes. That incorrectly exaggerates transit performance. See transit boardings on Exhibit 4-29, page 4-68.

a. Actually the values on Exhibit 4-26 exceed the boardings on Exhibit 4-29 by 3% to 6%. This discrepancy further exaggerates transit performance.



**B-003-029**

While it is not possible to isolate specific causes of the alternatives' performance since there are many different actions in each one, there are several factors that likely influence vehicle trip lengths in Alternative 5. For example, the tolling of all freeway and arterial roadways increases the monetary cost of personal vehicle travel.Better roadway performance decreases the time cost (note that relative to other alternatives roadway speeds increase and travel time savings benefits are large in Alternative 5) . Travelers who value their time highly could be making longer trips; those to whom the monetary cost is more influential could be choosing to live closer to their typical destinations, to shorten their trips, or to chain their trips (making several stops as part of one overall trip rather than making many different trips).

**B-003-030**

The regional travel demand model contains a time of day model that spreads the peak vehicle loads to other time periods as a function of increases in time and/or money costs incurred during the peak period. This is a model that is empirically estimated. Alternative 5 includes roadway tolls that are considerably higher in the peak travel periods, thus inducing a time of day shift for some portion of the auto trips as these users attempt to reduce their exposure to the tolls.

**B-003-031**

In the modeling of the plan alternatives all trip purposes are satisfied, so the economic or social activity has been achieved. If this activity can be realized with a shorter trip length, on average, this is considered desirable. It is desirable not just because of the public benefit but also because of the private benefit realized through cost savings to the user. Nonetheless, your point of view is noted.

For most of the analysis done in the DEIS, the five action alternatives are

B-003-034 b. With a transfer rate of 1.49 (see page C-6 Appx. C, ST2, July '08), transit trips would be about 33% fewer than boardings.

B-003-035 25. **Transit Market share – Alt 5 -** If the transit figures on Exhibit 4-26 are boardings, then the 5.2% transit mode share for Alt 5 on Exhibit 4-25 should be reduced to 3.5%.

B-003-036 26. **User Benefits -** Exhibit 4-34 on page 4-76 shows the highest commercial user benefits for Alts 3, 4, and 5. What assumptions led to this result?

B-003-037 27. **Time Saving -** Are the values shown in Exhibit 4-35 on page 4-85 in millions of dollars? The DEIS should explain how those time savings were derived. What were the key assumptions?

B-003-038 28. **Accident Reduction -** Exhibit 4-37 on page 4-88 shows annual accident reduction benefits. What was the basis for these estimates? This issue really opens the discussion to other policy measures that might reduce accidents such as lowering the speed limit 10 miles per hour on all urban freeways.

B-003-039 29. **Population Shifts -** Exhibit 5-6 on page 5-12 shows that Alts 3, 4, 5 move away from small cities to large and Alt 2 reduces population in Metro Cities. How, specifically, were these results determined? Does represent public desire or the bias of the transportation planners? The graphic on



compared against the base year (2006) as well as the Baseline Alternative. This provides readers adequate information to assess the merits of each plan alternative.

**B-003-032**

Thank you for your comment. The FEIS includes the appropriate edits.

**B-003-033**

The plan alternatives are described in detail (including transit information) in Appendix A: Alternatives Technical Report, and the performance is described in more detail in Appendix D: Policy Analysis and Evaluation Criteria Report.

**B-003-034**

Exhibit 4-26 reports person-trips for choices of SOV, carpool, transit, and combined walk and bike modes as forecast by the mode choice component of the travel demand model. The transit category includes transit person-trips made by bus, rail, and walk-on ferry riders. The mode choice component forecasts trip choices for all five time periods (morning, midday, afternoon, evening, and night) of a typical weekday.

Exhibit 4-29 shows transit boardings from the assignment component of the travel demand model. While this includes bus, rail, and walk-on ferry boardings the model does transit assignment only for the AM and MD periods to keep run-time manageable. Total daily boardings are reported by multiplying the AM and PM boardings by factors derived from observed data. The boardings forecasts are therefore not directly comparable to the person-trip forecast. Forecast transit boardings are only comparable to boardings and person-trips are only comparable to person-trips.

B-003-039 page 5-13 does not seem to match the table's results? By what criteria is "More is Better" concluded for the y-axis?

B-003-040 30. **Transit Emissions** - According to page 6-22, transit is not included in emissions estimates. How much would be added if transit were included? It should be clearer that the 26% reduction is from the State's 2020 forecast, not from the State's 2020 benchmark for which the reduction would only be 9%. Why are the VMT/capita values on Exhibit 6-11 different than the values on Exhibit 4-20?

B-003-041 31. **Transit Energy Consumption** - P. 11-6. Exhibit 11-5 on page 11-6 does not include energy required by transit. How much would be added by including transit? What improvements in average fuel consumption were included in the estimates of Exhibit 11-5?

B-003-042 32. **Energy** - P. 11-8. In the section "How can the effect to energy be mitigated", what is the basis of the allegation that public transit saves energy? Bus transit uses more than automobiles per passenger mile. It is not clear that rail transit saves energy, particularly if the energy for manufacture and construction is included.

B-003-043 33. **Park and Ride Lots** - In considering the large expansion of Sound Transit and Public Transit it will be necessary in the Final Environmental Impact Statement it will be necessary to consider the environmental



**B-003-035**

Exhibit 4-26 shows modal shares of daily person-trips for work trips, non-work trips, and all daily trips. The Alternative 5 travel demand model forecast that all transit trips (bus, rail, and walk-on ferry) comprised 5.2% of the daily total person-trips.

**B-003-036**

The measures of user benefit are the result of analysis that is supported by a wide variety of travel demand modeling elements. The benefits are simply an accounting of consumer surpluses (primarily travel time savings) for each class of user vehicles in the modeling. There are two primary reasons why freight benefits are large for Alternatives 3, 4 and 5. First, freight vehicles enjoy significant travel time savings in these alternatives, and second, freight vehicles have higher values of time on average.

**B-003-037**

The details of this analysis are available in Appendix D: Policy Analysis and Criteria Evaluation Report.

**B-003-038**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**B-003-039**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

B-003-043

impacts of expanded and new park and ride lots which support the transit expansion. All environmental areas contained in the DEIS, Chapters 6 – 18, must be considered. This environmental analysis of park and ride lots was carried out in the I-405 Corridor Plan for Transit. There were 7 or 8 environmental areas affected by transit which were analyzed for impacts.



**B-003-040**

The state legislation regarding the VMT reduction benchmarks specifically exempts trucks over 10,000 gross vehicle weight, such as transit buses. Therefore, the calculations performed to compare daily per capita VMT from the Transportation 2040 alternatives to the benchmarks as defined in legislation are somewhat different than the full regional daily VMT per capita for each alternative.

**B-003-041**

The estimation of transit energy usage is an area within the current modeling framework that we were unable to compile to the same degree of accuracy as our other indicators. This is an area that PSRC will continue to strive to improve upon. The analysis as shown is representative of the current vehicle fleet; improvement from technology is included as part of the final plan.

**B-003-042**

As stated in Chapter 11 of the DEIS, "Electric light rail and commuter rail vehicles have a higher rate of energy consumption per mile than do buses, but total ridership and the number of miles traveled by the vehicles may result in lower overall energy consumption." The energy analysis in the DEIS did not include an estimate of manufacturing and construction energy consumption for any of the investments--including vehicle production, road construction, or for the construction of buildings. In terms of a reduction in overall fuel usage, an increased transition to alternative modes of travel as well as improvements to the fuel economy of vehicles is expected to provide overall energy reduction benefits.

**B-003-043**

The Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that

transit operators and many other stakeholders believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

013

Testimony to the PSRC on Transportation 2040
June 17, United Way of Kitsap

O-001-001 President Clinton's 1994 Executive Order 12898 is a clarification of the Civil Rights Act of 1964. Known as Environmental Justice, it prohibits federally funded programs affecting human health or the environment from using practices that discriminate on the basis of race, color, or natural origin.

The Puget Sound Regional Council would have people believe that their smart-growth land use and transportation policies, which receive federal funds, actually benefit low income, minority and disadvantaged people. But exactly the opposite is true.

PSRC policies force new development into tightly-packed urban areas to preserve the rural environment and they impose stringent, costly regulations on the development process. A UW study last year showed these policies severely limit the supply of housing and add $200,000 to the price of the average Seattle house. The increase here in Kitsap is at least $150,000. This makes home ownership unaffordable to an increasingly larger segment of the population. It also force landlords to raise rents. A Seattle University class study clearly showed how these policies are forcing minority and low-income populations out of the cities, using the Seattle Central Area as evidence.

O-001-002 People who sell real estate know that their customers who can no longer afford to live close to where they work will drive until they can afford to buy. But what this means is that many low income, minority and disadvantaged people must now drive a lot further to get to their job--in some cases fifty miles or more.

O-001-003 So what does the PSRC Transportation 2040 plan do to help? The answer is "nothing". In fact, rather than working to eliminate congestion, which involves an emphasis on new lane miles, PSRC is instead actively working to reduce vehicle miles traveled by purposely making it harder and more expensive to drive to work. This has been the policy for several decades -- neglecting road building in favor of public transportation, with the somewhat ironic result that public ridership has actually gone down, from about 6% of trips to less than 3% in the last 20 years--because public transportation simply doesn't work for most people.

O-001-004 In short, there is conclusive evidence that the land use and transportation policies of Vision 2040 and Transportation 2040 are discriminatory and racially biased – in clear violation of the law of the land.

O-001-005 Not all states have enacted smart-growth laws, like the Growth Management Act we have here in Washington that is the basis for the PSRC planning. The problems I have mentioned, by and large, do not exist where there are no such laws. Slick presentations can't mask these problems. The facts speak for themselves.

Bob Benze
Kitsap Alliance of Property Owners

**O-001-001**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**O-001-002**

Comment noted.

**O-001-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

http://www.city-journal.org/2009/19_2_carbon.html

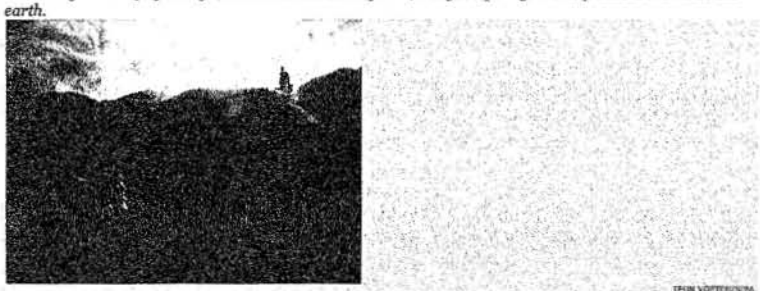
**CITY JOURNAL**

Spring 2009

PETER W. HUBER

## Bound to Burn

*Humanity will keep spewing carbon into the atmosphere, but good policy can help sink it back into the earth.*



Cheap coal, like that extracted from this Chinese mine, is essential to the developing world's economic growth. TEUN VOETEN/SIGNA

Like medieval priests, today's carbon brokers will sell you an indulgence that forgives your carbon sins. It will run you about $500 for 5 tons of forgiveness—about how much the typical American needs every year. Or about $2,000 a year for a typical four-person household. Your broker will spend the money on such things as reducing methane emissions from hog farms in Brazil.

But if you really want to make a difference, you must send a check large enough to forgive the carbon emitted by four poor Brazilian households, too—because they're not going to do it themselves. To cover all five households, then, send $4,000. And you probably forgot to send in a check last year, and you might forget again in the future, so you'd best make it an even $40,000, to take care of a decade right now. If you decline to write your own check while insisting that to save the world we must ditch the carbon, you are just burdening your already sooty soul with another ton of self-righteous hypocrisy. And you can't possibly afford what it will cost to forgive that.

If making carbon this personal seems rude, then think globally instead. During the presidential race, Barack Obama was heard to remark that he would bankrupt the coal industry. No one can doubt Washington's power to bankrupt almost anything—in the United States. But China is adding 100 gigawatts of coal-fired electrical capacity a year. That's another whole United States' worth of coal consumption added every three years, with no stopping point in sight. Much of the rest of the developing world is on a similar path.

Cut to the chase. We rich people can't stop the world's 5 billion poor people from burning the couple of trillion tons of cheap carbon that they have within easy reach. We can't even make any durable dent in global emissions—because emissions from the developing world are growing too

**O-001-004**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**O-001-005**

Comment noted.

fast, because the other 80 percent of humanity desperately needs cheap energy, and because we and they are now part of the same global economy. What we can do, if we're foolish enough, is let carbon worries send our jobs and industries to their shores, making them grow even faster, and their carbon emissions faster still.

We don't control the global supply of carbon.

Ten countries ruled by nasty people control 80 percent of the planet's oil reserves—about 1 trillion barrels, currently worth about $40 trillion. If $40 trillion worth of gold were located where most of the oil is, one could only scoff at any suggestion that we might somehow persuade the nasty people to leave the wealth buried. They can lift most of their oil at a cost well under $10 a barrel. They will drill. They will pump. And they will find buyers. Oil is all they've got.

Poor countries all around the planet are sitting on a second, even bigger source of carbon—almost a trillion tons of cheap, easily accessible coal. They also control most of the planet's third great carbon reservoir—the rain forests and soil. They will keep squeezing the carbon out of cheap coal, and cheap forest, and cheap soil, because that's all they've got. Unless they can find something even cheaper. But they won't—not any time in the foreseeable future.

We no longer control the demand for carbon, either. The 5 billion poor—the other 80 percent—are already the main problem, not us. Collectively, they emit 20 percent more greenhouse gas than we do. We burn a lot more carbon individually, but they have a lot more children. Their fecundity has eclipsed our gluttony, and the gap is now widening fast. China, not the United States, is now the planet's largest emitter. Brazil, India, Indonesia, South Africa, and others are in hot pursuit. And these countries have all made it clear that they aren't interested in spending what money they have on low-carb diets. It is idle to argue, as some have done, that global warming can be solved—decades hence—at a cost of 1 to 2 percent of the global economy. Eighty percent of the global population hasn't signed on to pay more than 0 percent.

Accepting this last, self-evident fact, the Kyoto Protocol divides the world into two groups. The roughly 1.2 billion citizens of industrialized countries are expected to reduce their emissions. The other 5 billion—including both China and India, each of which is about as populous as the entire Organisation for Economic Co-operation and Development—aren't. These numbers alone guarantee that humanity isn't going to reduce global emissions at any point in the foreseeable future—unless it does it the old-fashioned way, by getting poorer. But the current recession won't last forever, and the long-term trend is clear. Their populations and per-capita emissions are rising far faster than ours could fall under any remotely plausible carbon-reduction scheme.

Might we simply buy their cooperation? Various plans have circulated for having the rich pay the poor to stop burning down rain forests and to lower greenhouse-gas emissions from primitive agricultural practices. But taking control of what belongs to someone else ultimately means buying it. Over the long term, we would in effect have to buy up a large fraction of all the world's forests, soil, coal, and oil—and then post guards to make sure that poor people didn't sneak in and grab all the carbon anyway. Buying off people just doesn't fly when they outnumber you four to one.

Might we instead manage to give the world something cheaper than carbon? The moon-shot law of economics says yes, of course we can. If we just put our minds to it, it will happen. Atom bomb, moon landing, ultracheap energy—all it takes is a triumph of political will.

Really? For the very poorest, this would mean beating the price of the free rain forest that they burn down to clear land to plant a subsistence crop. For the slightly less poor, it would mean beating the price of coal used to generate electricity at under 3 cents per kilowatt-hour.

And with one important exception, which we will return to shortly, no carbon-free fuel or technology comes remotely close to being able to do that. Fossil fuels are extremely cheap because geological forces happen to have created large deposits of these dense forms of energy in accessible places. Find a mountain of coal, and you can just shovel gargantuan amounts of energy into the boxcars.

Shoveling wind and sun is much, much harder. Windmills are now 50-story skyscrapers. Yet one windmill generates a piddling 2 to 3 megawatts. A jumbo jet needs 100 megawatts to get off the ground; Google is building 100-megawatt server farms. Meeting New York City's total energy demand would require 13,000 of those skyscrapers spinning at top speed, which would require scattering about 50,000 of them across the state, to make sure that you always hit enough windy spots. To answer the howls of green protest that inevitably greet realistic engineering estimates like these, note that real-world systems must be able to meet peak, not average, demand; that reserve margins are essential; and that converting electric power into liquid or gaseous fuels to power the existing transportation and heating systems would entail substantial losses. What was Mayor Bloomberg thinking when he suggested that he might just tuck windmills into Manhattan? Such thoughts betray a deep ignorance about how difficult it is to get a lot of energy out of sources as thin and dilute as wind and sun.

It's often suggested that technology improvements and mass production will sharply lower the cost of wind and solar. But engineers have pursued these technologies for decades, and while costs of some components have fallen, there is no serious prospect of costs plummeting and performance soaring as they have in our laptops and cell phones. When you replace conventional with renewable energy, everything gets bigger, not smaller—and bigger costs more, not less. Even if solar cells themselves were free, solar power would remain very expensive because of the huge structures and support systems required to extract large amounts of electricity from a source so weak that it takes hours to deliver a tan.

This is why the (few) greens ready to accept engineering and economic reality have suddenly emerged as avid proponents of nuclear power. In the aftermath of the Three Mile Island accident—which didn't harm anyone, and wouldn't even have damaged the reactor core if the operators had simply kept their hands off the switches and let the automatic safety systems do their job—ostensibly green antinuclear activists unwittingly boosted U.S. coal consumption by about 400 million tons per year. The United States would be in compliance with the Kyoto Protocol today if we could simply undo their handiwork and conjure back into existence the nuclear plants that were in the pipeline in nuclear power's heyday. Nuclear power is fantastically compact, and—as America's nuclear navy, several commercial U.S. operators, France, Japan, and a handful of other countries have convincingly established—it's both safe and cheap wherever engineers are allowed to get on with it.

But getting on with it briskly is essential, because costs hinge on the huge, up-front capital investment in the power plant. Years of delay between the capital investment and when it starts earning a return are ruinous. Most of the developed world has made nuclear power unaffordable by surrounding it with a regulatory process so sluggish and unpredictable that no one will pour a couple of billion dollars into a new plant, for the good reason that no one knows when (or even if) the investment will be allowed to start making money.

And countries that don't trust nuclear power on their own soil must hesitate to share the technology with countries where you never know who will be in charge next year, or what he might decide to do with his nuclear toys. So much for the possibility that cheap nuclear power might replace carbon-spewing sources of energy in the developing world. Moreover, even India and China, which have mastered nuclear technologies, are deploying far more new coal capacity.

Remember, finally, that most of the cost of carbon-based energy resides not in the fuels but in the gigantic infrastructure of furnaces, turbines, and engines. Those costs are sunk, which means that carbon-free alternatives—with their own huge, attendant, front-end capital costs—must be cheap enough to beat carbon fuels that already have their infrastructure in place. That won't happen in our lifetimes.

Another argument commonly advanced is that getting over carbon will, nevertheless, be comparatively cheap, because it will get us over oil, too—which will impoverish our enemies and save us a bundle at the Pentagon and the Department of Homeland Security. But uranium aside, the most economical substitute for oil is, in fact, electricity generated with coal. Cheap coal-fired electricity has been, is, and will continue to be a substitute for oil, or a substitute for natural gas, which can in turn substitute for oil. By sharply boosting the cost of coal electricity, the war on carbon will make us more dependent on oil, not less.

The first place where coal displaces oil is in the electric power plant itself. When oil prices spiked in the early 1980s, U.S. utilities quickly switched to other fuels, with coal leading the pack; the coal-fired plants now being built in China, India, and other developing countries are displacing diesel generators. More power plants burning coal to produce cheap electricity can also mean less natural gas used to generate electricity. And less used for industrial, commercial, and residential heating, welding, and chemical processing, as these users switch to electrically powered alternatives. The gas that's freed up this way can then substitute for diesel fuel in heavy trucks, delivery vehicles, and buses. And coal-fired electricity will eventually begin displacing gasoline, too, as soon as plug-in hybrid cars start recharging their batteries directly from the grid.

To top it all, using electricity generated in large part by coal to power our passenger cars would lower carbon emissions—even in Indiana, which generates 75 percent of its electricity with coal. Big power plants are so much more efficient than the gasoline engines in our cars that a plug-in hybrid car running on electricity supplied by Indiana's current grid still ends up more carbon-frugal than comparable cars burning gasoline in a conventional engine under the hood. Old-guard energy types have been saying this for decades. In a major report released last March, the World Wildlife Fund finally concluded that they were right all along.

But true carbon zealots won't settle for modest reductions in carbon emissions when fat targets beckon. They see coal-fired electricity as the dragon to slay first. Huge, stationary sources can't run or hide, and the cost of doing without them doesn't get rung up in plain view at the gas pump. California, Pennsylvania, and other greener-than-thou states have made flatlining electricity consumption the linchpin of their war on carbon. That is the one certain way to halt the displacement of foreign oil by cheap, domestic electricity.

The oil-coal economics come down to this. Per unit of energy delivered, coal costs about one-fifth as much as oil—but contains one-third more carbon. High carbon taxes (or tradable permits, or any other economic equivalent) sharply narrow the price gap between oil and the one fuel that can displace it worldwide, here and now. The oil nasties will celebrate the green

war on carbon as enthusiastically as the coal industry celebrated the green war on uranium 30 years ago.

The other 5 billion are too poor to deny these economic realities. For them, the price to beat is 3-cent coal-fired electricity. China and India won't trade 3-cent coal for 15-cent wind or 30-cent solar. As for us, if we embrace those economically frivolous alternatives on our own, we will certainly end up doing more harm than good.

By pouring money into anything-but-carbon fuels, we will lower demand for carbon, making it even cheaper for the rest of the world to buy and burn. The rest will use cheaper energy to accelerate their own economic growth. Jobs will go where energy is cheap, just as they go where labor is cheap. Manufacturing and heavy industry require a great deal of energy, and in a global economy, no competitor can survive while paying substantially more for an essential input. The carbon police acknowledge the problem and talk vaguely of using tariffs and such to address it. But carbon is far too deeply embedded in the global economy, and materials, goods, and services move and intermingle far too freely, for the customs agents to track.

Consider your next Google search. As noted in a recent article in *Harper's*, "Google . . . and its rivals now head abroad for cheaper, often dirtier power." Google itself (the "don't be evil" company) is looking to set up one of its electrically voracious server farms at a site in Lithuania, "disingenuously described as being near a hydroelectric dam." But Lithuania's grid is 0.5 percent hydroelectric and 78 percent nuclear. Perhaps the company's next huge farm will be "near" the Three Gorges Dam in China, built to generate over three times as much power as our own Grand Coulee Dam in Washington State. China will be happy to play along, while it quietly plugs another coal plant into its grid a few pylons down the line. All the while, of course, Google will maintain its low-energy headquarters in California, a state that often boasts of the wise regulatory policies—centered, one is told, on efficiency and conservation—that have made it such a frugal energy user. But in fact, sky-high prices have played the key role, curbing internal demand and propelling the flight from California of power plants, heavy industries, chip fabs, server farms, and much else (see "California's Potemkin Environmentalism," Spring 2008).

So the suggestion that we can lift ourselves out of the economic doldrums by spending lavishly on exceptionally expensive new sources of energy is absurd. "Green jobs" means Americans paying other Americans to chase carbon while the rest of the world builds new power plants and factories. And the environmental consequences of outsourcing jobs, industries, and carbon to developing countries are beyond dispute. They use energy far less efficiently than we do, and they remain almost completely oblivious to environmental impacts, just as we were in our own first century of industrialization. A massive transfer of carbon, industry, and jobs from us to them will raise carbon emissions, not lower them.

The grand theory for how the developed world can unilaterally save the planet seems to run like this. We buy time for the planet by rapidly slashing our own emissions. We do so by developing carbon-free alternatives even cheaper than carbon. The rest of the world will then quickly adopt these alternatives, leaving most of its trillion barrels of oil and trillion tons of coal safely buried, most of the rain forests standing, and most of the planet's carbon-rich soil undisturbed. From end to end, however, this vision strains credulity.

Perhaps it's the recognition of that inconvenient truth that has made the anti-carbon rhetoric increasingly apocalyptic. Coal trains have been analogized to boxcars headed for Auschwitz.

There is talk of the extinction of all humanity. But then, we have heard such things before. It is indeed quite routine, in environmental discourse, to frame choices as involving potentially infinite costs on the green side of the ledger. If they really are infinite, no reasonable person can quibble about spending mere billions, or even trillions, on the dollar side, to dodge the apocalyptic bullet.

Thirty years ago, the case against nuclear power was framed as the "Zero-Infinity Dilemma." The risks of a meltdown might be vanishingly small, but if it happened, the costs would be infinitely large, so we should forget about uranium. Computer models demonstrated that meltdowns were highly unlikely and that the costs of a meltdown, should one occur, would be manageable—but greens scoffed: huge computer models couldn't be trusted. So we ended up burning much more coal. The software shoe is on the other foot now; the machines that said nukes wouldn't melt now say that the ice caps will. Warming skeptics scoff in turn, and can quite plausibly argue that a planet is harder to model than a nuclear reactor. But that's a detail. From a rhetorical perspective, any claim that the infinite, the apocalypse, or the Almighty supports your side of the argument shuts down all further discussion.

To judge by actions rather than words, however, few people and almost no national governments actually believe in the infinite rewards of exorcising carbon from economic life. Kyoto has hurt the anti-carbon mission far more than carbon zealots seem to grasp. It has proved only that with carbon, governments will say and sign anything—and then do less than nothing. The United States should steer well clear of such treaties because they are unenforceable, routinely ignored, and therefore worthless.

If we're truly worried about carbon, we must instead approach it as if the emissions originated in an annual eruption of Mount Krakatoa. Don't try to persuade the volcano to sign a treaty promising to stop. Focus instead on what might be done to protect and promote the planet's carbon sinks—the systems that suck carbon back out of the air and bury it. Green plants currently pump 15 to 20 times as much carbon out of the atmosphere as humanity releases into it—that's the pump that put all that carbon underground in the first place, millions of years ago. At present, almost all of that plant-captured carbon is released back into the atmosphere within a year or so by animal consumers. North America, however, is currently sinking almost two-thirds of its carbon emissions back into prairies and forests that were originally leveled in the 1800s but are now recovering. For the next 50 years or so, we should focus on promoting better land use and reforestation worldwide. Beyond that, weather and the oceans naturally sink about one-fifth of total fossil-fuel emissions. We should also investigate large-scale options for accelerating the process of ocean sequestration.

Carbon zealots despise carbon-sinking schemes because, they insist, nobody can be sure that the sunk carbon will stay sunk. Yet everything they propose hinges on the assumption that carbon already sunk by nature in what are now hugely valuable deposits of oil and coal can be kept sunk by treaty and imaginary cheaper-than-carbon alternatives. This, yet again, gets things backward. We certainly know how to improve agriculture to protect soil, and how to grow new trees, and how to maintain existing forests, and we can almost certainly learn how to mummify carbon and bury it back in the earth or the depths of the oceans, in ways that neither man nor nature will disturb. It's keeping nature's black gold sequestered from humanity that's impossible.

If we do need to do something serious about carbon, the sequestration of carbon after it's burned is the one approach that accepts the growth of carbon emissions as an inescapable fact of the twenty-first century. And it's the one approach that the rest of the world can embrace, too,

here and now, because it begins with improving land use, which can lead directly and quickly to greater prosperity. If, on the other hand, we persist in building green bridges to nowhere, we will make things worse, not better. Good intentions aren't enough. Turned into ineffectual action, they can cost the earth and accelerate its ruin at the same time.

*Peter Huber is a Manhattan Institute senior fellow and the coauthor, most recently, of* The Bottomless Well. *His article develops arguments that he made in an Intelligence Squared U.S. debate in January.*




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July 10, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
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**RE: Comments on Transportation 2040 Draft Environmental Impact Statement**

Dear Mr. Ardussi:

**O-002-001** Thank you for the opportunity to comment on the DEIS for Transportation 2040. These comments are being submitted from the Bicycle Alliance of Washington (BAW), a roughly 2,800-member, statewide bicycle-advocacy organization with our office in downtown Seattle.

**O-002-002** The DEIS reflects an impressive amount of well documented technical analysis of the draft Transportation 2040 Plan alternatives, and is commendable for being presented in a reader-friendly format with good data, graphics and charts for elaboration of the evaluation for key criteria.

**O-002-003** As one might expect, the BAW is particularly interested in supporting the extensive list of positive bicycling and pedestrian improvements, especially those contained in the Alternative 5 of the draft DEIS. However, our comments are not limited to just bike-pedestrian projects since the BAW's primary mission is to advocate for creating more bicycle and pedestrian friendly communities for the primary purpose of seeing bicycling become a serious "mainstream" transportation mode, but also to achieve greater personal safety for and significant public health benefits for those biking and walking. Needless to say, major increases in biking and walking also help reduce our dependency upon automobiles. Our comments go well beyond supporting bicycle and pedestrian projects as we believe such projects won't happen and will continue to be treated as "second class" or insignificant modes of transport (unlike most of the rest of the developed world) unless we all (and this clearly includes Transportation 2040) pay much more careful and strategic attention to how we shape communities and how we invest in our communities and carefully consider how those investments are financed in our many diverse communities throughout the region.

**O-002-004** *We have attempted to provide our comments along the lines of the six categories noted in the DEIS for solicitation of comments.*

**O-002-001**
Comment noted.

**O-002-002**
Thank you.

**O-002-003**
Comment noted. The Preferred Alternative expands bike and walk infrastructure to fully connect the bicycle network to, within, and between regional centers (3 mile access) and provide full sidewalks and pedestrian networks in all cities (1 mile access). It includes more than 580 miles of additional off-road regional trails and focuses bike and walk improvements in regional growth centers, along facilities with one terminus in a center or within ¾ mile of transit passenger facilities, and on locations that overcome a barrier (such as crossing I-5) or provide a missing link. It would complete approximately 350 miles of the envisioned regional off-road trails. A key goal is to improve pedestrian and cyclist access to transit with improved terminal access, terminal facilities, and bike racks on transit vehicles. The plan would also add online regional nonmotor trip planning services, fund education/outreach programs, and make roadside investments to improve bicycle and pedestrian safety. The plan will promulgate both a "no net loss" policy to ensure that construction or modification of other transportation facilities does not diminish the supply or connectivity of the bicycle and pedestrian networks and a new way of thinking about the use of public right-of-way that gives full attention to the needs of all users. Finally, the plan proposes to explore the concept of a regional bike sharing program.

**O-002-004**
Comment noted.

O-002-004

**1. Various components in the six alternatives.**

The tolling components in the various plan alternatives have much to be commended as a positive strategy. While challenging to implement it can begin to address possibly the most critical and potentially devastating environmental issue of our times, climate change as a consequence of greenhouse gases, with the major component being transportation emissions. The tolling strategies are also highly beneficial in that they also demonstrate the potential to positively deliver on important concerns to all the citizens of our region - reduced congestion, improved mobility and sustainable financing. However, as you will see in our explanatory comments further below (#3 Funding Strategies) for both political and technical reasons we do not believe there is a need or benefit to propose tolling beyond freeways and onto arterials.

O-002-005

**2. Environmental impacts of the alternatives**

Alternative #5 deserves strong support as it provides the many benefits in terms of quality of life, social justice, mobility, addressing Climate Change through emissions/VMT reductions and reducing energy demands. However, the "tolling of arterials" element of Alternative 5 should be seriously reconsidered or dropped, as it makes this Alternative an unnecessary lightning rod for negative public reactions and could cause the region to loose the good elements this alternative offers. There are other ways to accomplish these desirable VMT reductions, and we speak more to this below.

O-002-006

**3. Funding strategies for raising revenues and paying for transportation needs**

We sincerely believe that proposing to go beyond proposing a regional level of tolling for freeways (as shown in Alternatives 3 & 4, where it's at least more feasible to envision) and introducing arterial tolling is neither advisable nor necessary. The tolling of arterials would likely push the envelope of political and public tolerance such that it could generate such broad political opposition (please recall talk radio opposition to even alleged arterial tolling in PSRC's draft 1995 transportation plan) that it could scuttle and set the region back for even considering the still challenging but more feasible freeway tolling. While the vehicle- miles-traveled (VMT) reductions associated with this extension of tolling to the arterials may be technically positive in providing, at least on paper, the most VMT reduction and revenue generation of any alternatives, we also believe and would advocate for other much more publicly palatable and feasible strategies. One such strategy that should be much further explored would be a modest VMT fees. VMT fees can still be beneficial for congestion reduction (especially in concert with freeway tolling) and revenue generation, regardless of vehicle technology, and it would also most directly address, for the foreseeable future of gasoline engines, user-pays, user-benefits approach for emissions and revenue generation. VMT fees can also be tailored to achieve a greater sense of "fairness and equity" in the applications of user fees. For example, fees should be seen as a means to recover the burden vehicles place in wear and tear on local and state roadways by employing a vehicle-weight component beyond some base level to reflect a vehicle's burden on the roadway. Such fees could also

**O-002-005**

Thank you for stating your preference among the alternatives. PSRC will continue to research the viability of a variety of user fees, including their impacts on both travel behavior and transportation finance.

**O-002-006**

Comment noted. The idea of extending tolling to arterials was evaluated in the Transportation 2040 EIS. Public acceptance of new funding options will be an important issue to address as we move toward adopting the new transportation plan. As part of a suite of funding options being considered to help implement the plan, we're also looking at a VMT charge, as you have suggested. Such fees could help reduce VMT, reduce emissions, and achieve congestion goals. Your suggestion of including a weight component as part of a VMT charge may merit consideration.

O-002-006 incorporate an incentive for emissions reductions by providing much lower rates for low or no-emission vehicles.

O-002-007 Finally on funding strategies, it is really important for the future success of transportation in our region to start moving away from "silo-revenue" streams wherein only certain types of fees or charges are used for certain modes (e.g., gas tax restrictions for roads, or sales tax for transit). The growing dependence on sales tax for transit is ridiculous and not only counterproductive for a vibrant economy, but it is contrary to adopted regional policies that promote moving towards more logical and sustainable user-oriented revenues. The positive opportunities offered by moving toward tolls and VMT fee revenues should enable, over time, reductions in sales tax rates for transit as such user-oriented revenues can and should be argued as essential to support transit, as this is likely the primary mode that can offer additional travel capacity and mobility as travel demand is slowly shifted from autos to other alternatives due to tolling and VMT fees. Regionally generated and collected revenues, especially user-oriented revenues, should be allocated to support the greatest needs of those transportation projects and operational services that provide the greatest public and environmental benefits for, hopefully, the lowest cost. It's pretty clear that bicycle and pedestrian projects offer an enormous bang for the buck in terms of creating highly beneficial travel networks for the lowest cost.

O-002-008 **4. Information contained in the analysis (Or, that's not but should be)**

How far do people travel and why is this relevant? While there is some data on averages about personal travel, it's relatively lost in the ocean of so much data. Its' potential relevance to more cost-effective decision making is never brought out anywhere in any of the plan alternatives. We bring this up because a better understanding of personal travel (current and future) relates to BAW's recommendation for a clearly beneficial strategy for any hybrid alternative that is finally selected. If it needs a name, call it the *"Biggest Bang for the Buck", or a "Low-hanging-fruit" strategy* that goes after shifting lots of trips from autos without the more onerous effect of arterial tolling. In reviewing the plan alternatives and the associated strategies for each, there is a significant lack of particularly key information about personal travel behavior. It is critical to establishing a context and understanding for the public and regional decision makers about how to better address climate change (VMT reductions), and create safer and healthier communities with much more politically viable and less expensive travel options. Understanding the length of typical daily personal travel trips, and the trends for such, is very key to beginning to achieve voluntary travel behavior change by offering very low-cost travel options for the citizens of the central Puget Sound region, especially those in the core urban area. While the length of average regional work trips has consistently grown each decade, such work trips have only grown from about 9 to 11 miles over 40 years. Maybe not as much as one might have imagined. And the length of work trips, according to forecasts in the plan analysis, shows they will likely continue to grow, on average, a couple more miles by the year 2040 (up to about 13 miles). And averages, by definition, contain both shorter and longer trips. However, perhaps even more importantly and little realized, these work trips amount to less than 20% of the roughly 13 million total daily travel trips in our region, while non-work trips are over 80% of daily travel. Both are important and deserve great

**O-002-007**

Thank you for your comment. We have reached many of the same conclusions related to the need move away from funding silos and create a more flexible, balanced and sustainable financial strategy to support Transportation 2040. Our current direction seems to be headed toward the use off tolling and pricing as well as VMT and parking charges as major new sources of revenue to finance the transportation plan.

**O-002-008**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

O-002-008

attention, but a laser-focus on traffic congestion, mostly related to work trips, overlooks the majority of our region's total daily travel. Travel surveys in our region and other major urban areas around the US have actually been showing that these 80%+ daily non-work trips are getting slightly shorter over the past many decades, going from an average of 6-7 miles back in the 1960s & 70s to now 5-6 miles in length. PSRC's own quite thorough and most recent 2006 Household Survey travel data showed that nearly 68% of daily personal travel trips (that equates to over 8 million daily trips out of 13 million total) are under 6 miles in length. To break this down further, PSRCs survey showed that: 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.

Why is this travel data so relevant? One should recognize that a trip of less than one mile can be walked in about 15 minutes and covered by bike in only about 5 minutes, even at a leisurely 12 mph, non-sweating pace where one can wear regular clothing. This is a norm often seen in so many European cities where as bicycling (for work and non-work) continues to grow and now constitutes as much as 30% of daily travel in the larger cities. A trip of 3 miles can be walked in one hour or biked in 15 minutes. And a trip of even 6 miles, while certainly a long 2-hour walk will not be done very often, is easily done at a leisurely pace by bike in 30 minutes. PSRC's survey data shows that current averages for bike trips are about 4 miles, which is an easy 20 minute bike trip.

These shorter non-work trips in our relatively vast region - over 80% of daily travel – are due to the extensive distribution around the urban area of diverse but very handy regional and community centers which offer so many concentrated opportunities for jobs, essential services, shopping, recreation, entertainment, etc. We need to take better advantage of these concentrated land use centers and better focus transportation investments that can attract and divert from autos a higher proportion of short trips (from the 8 million trip market).

O-002-009

With a better understanding of the potential travel market that could be tapped and shifted from autos to biking and walking, the BAW advocates that PSRC develop a conscious and well focused regional strategy that better focuses transportation investments in a manner that goes after this enormous 8 million short-trip travel market. If it needs a name, call it the *"Biggest Bang for the Buck", or a "Low-hanging-fruit" strategy,* for that's what it is. In Sweden it's called "No Ridiculous Rides." Such strategy could be undertaken almost immediately and would be very popular among our many communities, as it offers a positive manner by which we can help shape communities. It should begin with a focus that examines and improves more comprehensive and complete walking networks within 1-3 miles of our regional centers and would develop complete biking networks up to 6 miles around all regional centers.

O-002-010

**5. Alternative that best accomplishes regional needs to year 2040**

The BAW strongly supports the merits and benefits of Alternative 5, though, as explained above, we would advocate substituting other user-benefit/user-fee

O-002-010 strategies in lieu of arterial tolling to accomplish the positive air quality and environmental benefits of this alternative.

**6. Other comments**

O-002-011 We feel our recommendations described above are both reasonable and feasible. With nearly 48% of all personal daily travel (currently 6.2 million personal trips) in our metropolitan area in the under 1 mile and up to 3 miles in length, it is quite possible to envision improved networks. They can be developed at much lower costs than other modes, and could readily shift perhaps at least 15% of auto vehicle trips to walk-bike trips. But to do so our communities need to have extensive well-designed and well connected sidewalks and bicycle facilities (lanes on roads or dedicated

O-002-012 paths if no roads available). We recommend implementing a "complete streets" policy at the regional level and mandating that all cities and counties develop such as a minimum set of policies By doing so their GMA required bike-ped components of their transportation elements could go a long way to raise public awareness for the opportunities to make positive change.

O-002-013 The additional benefit beyond addressing Climate Change for such an improved emphasis on walking, bicycling and transit is that it puts people on their feet (and/or on personal clean-air wheels) in their communities and creates an environment for active living in our communities. This can be a start in turning the tide away from an increasingly obese auto-dependent culture into a much healthier culture that can be more fit and save hundreds of billions of dollars annually on public health costs dealing with obesity ($117 billion in year 2000 according to US Surgeon General's report).

Sincerely,

Dave Janis

Dave Janis, Acting Executive Director
With concurrence of Bicycle Alliance of Washington Board

cc: Board, Bicycle Alliance of Washington

**O-002-009**

All of the Transportation 2040 Alternatives include investments in the regional nonmotorized transportation system. The following three concepts guide the development of this system:

- Link communities at the regional level.
- Substitute walking and bicycling trips for vehicle trips at the local level.
- Provide intermodal connections at rail, ferry, and other transit station areas.

**O-002-010**

Thank you for stating your preference among the alternatives. The analysis of plan alternatives shows that traditional funding (gas and sales taxes) would have no significant affect on reducing VMT and GHG. Our analysis shows tolling and pricing could have a fairly significant impact on reducing VMT and GHG.

**O-002-011**
Comment noted.

**O-002-012**
A multicounty planning policy addressing the issue of complete streets was adopted in VISION 2040. See VISION 2040, p. 85, MPP-T-14.

**O-002-013**
Comment noted.

July 10, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Re: Transportation 2040 DEIS

Dear Mr. Ardussi:

O-003-001 I commend the work of the Puget Sound Regional Council (PSRC) on the Transportation 2040 Draft Environmental Impact Statement (DEIS) and I would like to acknowledge the hard work of the PSRC staff in crafting the scenarios and the advanced modeling to support their conclusions. I appreciate the opportunity to comment on the DEIS and shape the preferred alternative that is ultimately developed.

O-003-002 The Cascade Agenda envisions a region that combines spectacular landscapes, a vibrant economy and great places to live that will sustain us for the next 100 years. The Agenda sets two goals for the region: conserving 1.3 million acres of farms, forests and natural areas as well as making our cities vibrant and livable. We work to achieve this vision by partnering with cities, business groups, environmental organizations, developers and landowners to identify innovative, market-based tools that shape future growth in a way that preserves and enhances our quality of life. Transportation infrastructure is one of the leading drivers of growth, both well and poorly planned.

O-003-003 To meet the goals of the Cascade Agenda, the transportation investments made over the next thirty years must increase choices for how people get to the places they need to go, when they need to go there and enable the creation of complete, compact and connected communities.

O-003-004 The region is at a critical moment in its history; population is expected to increase by an additional 1.4 million people and 1.1 million jobs by 2040. Globally, climate change threatens the natural environment, economy and our standard of living. Locally, changing demographics, increasing congestion and a lack of affordable homes are coalescing to create unintended patterns of growth.

Carefully planned transportation policy shapes the economic investments in our communities, health of our citizens and the design of our built environment. In June 2009, the federal departments of transportation, housing and urban development and the environmental protection agency signed a special agreement that, " the three agencies will work together to ensure that the nation's housing and transportation goals are met while simultaneously protecting the environment, promoting equitable development, and helping to address the challenges of climate change." Likewise, linking land use and transportation policies provides the key to achieving Vision 2040, state and local climate goals along with the successful

O-003-005 implementation of the Washington Growth Management Act. The Transportation 2040 DEIS

**O-003-001**
Thank you.

**O-003-002**
Comment noted.

**O-003-003**
The Preferred Alternative was designed to support and implement the VISION 2040 Regional Growth Strategy, which was adopted as a description of the development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live.

**O-003-004**
The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**O-003-005**
Comment noted.

O-003-005 should make the connections between land use, transportation and the environment more transparent.

O-003-006 PSRC has been recognized for its forward looking and comprehensive approach to planning. Furthermore, PSRC demonstrated strong leadership and transparency this spring in convening stakeholders around project selection for transportation and transit funds under the American Recovery and Reinvestment Act (ARRA) as well as working to strengthen the competitiveness of the region by facilitating development of coordinated funding proposals for competitive ARRA funds. I urge you to continue to be bold and creative in moving forward on

O-003-007 Transportation 2040. Likewise, I offer for your consideration the following suggestions to strengthen and enhance the plan.

- Of the five alternatives offered in the Transportation 2040 DEIS, alternative 5 offers the bold vision that is needed over the next 30 years in the region.

O-003-008
- Exhibit 1.4, "Evaluation Criteria Analysis Results" in the DEIS shows no significant change to Job to Housing Balance and Population and Jobs in Centers. Carefully planned Transit Oriented Development (TOD) coupled with the investments in transit as envisioned in alternative 5 is a viable strategy that can focus job and population growth around regional growth centers and transit hubs, making a direct linkage between the Transportation 2040 plan and PSRCs Vision 2040. TOD strategies positively address congestion, VMT and GHG targets.

O-003-009 Strategic transportation investments that facilitate compact growth serve to improve quality of life throughout the region and make the best use of limited transportation funding. The Center for Clean Air Policy recently released a report entitled, "Cost Effective GHG Reductions through Smart Growth & Improved Transportation Choices," which shows that compact land use forms and wise transportation investments can reduce infrastructure costs, household transportation costs, increase walking and cycling and reduce GHG emissions. The Urban Land Institute's groundbreaking report, "Growing Cooler" shows that land use is a critical component of slowing VMT growth and recent studies show compact growth can reduce GHG emissions by 20-40%. The DEIS should lay out a clear plan to link transportation investments with land use policy and regulations. This will require a re-evaluation of Vision 2040 to link land use with transit. After the adoption of Transportation 2040, PSRC should revise Vision 2040 to further focus new growth (both jobs and housing) in areas planned for major transit investments. The DEIS must address how linking land use to transportation in the five alternatives will affect the jobs-housing balance.

O-003-010
- Currently, none of the five proposed alternatives evaluated in the DEIS will make a significant contribution towards achieving the state's climate goals. With transportation accounting for nearly 50% of Washington's GHG emissions, the EIS must address how the preferred alternative plays a part in meeting a) Executive Order 07-02: Washington Climate Change Challenge, requiring significant reductions in greenhouse gas emissions between now and 2020, 2035, and 2050; b) RCW 70.235.020(1)(a) which limits greenhouse gas emissions to no more than the 1990 levels by 2020, to 25 percent below the 1990 levels by

**O-003-006**

Thank you.

**O-003-007**

Thank you for stating your preference among the alternatives.

**O-003-008**

Comment noted.

**O-003-009**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**O-003-010**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

O-003-010 2035, and to 50 percent below the 1990 levels by 2050; c) RCW 47.01.440, requiring goals and benchmarks for decreasing annual per capita vehicle miles traveled by 18 percent by 2020, 30 percent by 2035, and 50 percent by 2050. To better understand how transportation investments will impact greenhouse gas emissions and VMT, PSRC should develop an "Alternative 6" that achieves transportations' share of the GHG and VMT targets identified in the state's goals.

O-003-011
O-003-012
O-003-013
O-003-014 • Aggressive investments in mass transit as well as non-motorized transportation infrastructure are required to serve the future needs of our region. These investments will be costly and will require new funding mechanisms. Alternatives 3, 4 and 5 rely heavily on toll revenue as a funding source. Ambitious tolling strategies may not be politically, financially or technically viable in the short term. As of 2009, Highway 167 is currently the only road in Washington State with high occupancy toll (HOT) lanes while alternative 5 currently proposes tolls and/or user fees on all freeway and arterial roads. The EIS must address an alternative funding scheme for Alternative 5 (and an "Alternative 6") that provides interim funding as tolling strategies are refined and implemented. Additionally, in the current economic climate, all tolls should be closely examined to make sure they are equitable and do not limit economic opportunities in the region. I recommend that PSRC explore an equitable, economically realistic combined funding mechanism for alternative 5

O-003-015
O-003-016
O-003-017

O-003-018 • Large expansions of vehicle capacity (alternatives 2, 3) can have the unintended consequences of promoting low-density leapfrog development patterns, which will be difficult and costly to serve with transit, infrastructure and services, while facilitating development of exurban areas and accelerating conversion of rural and resource lands. This pattern of development will continue to erode quality of life in our region in addition to increasing greenhouse gas emissions, VMT and impervious surfaces.

O-003-019 Once again, I would like to thank you for the opportunity to comment on the Transportation
O-003-020 2040 DEIS. The choices we make about transportation will have a dramatic effect on whether we are able to continue to attract business and economic development along with maintaining
O-003-021 the quality of life in the region. Transportation is fundamental to achieving The Cascade Agenda goals of conserving great lands and creating great communities. Please feel free to contact me at, gened@cascadeland.org or 206.905.6900, if you have any questions regarding the comments above.

Sincerely,



Gene Duvernoy
President,
Cascade Land Conservancy

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-003-011**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**O-003-012**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**O-003-013**

Concur.

**O-003-014**

The Preferred Alternative guidance proposes that tolling would be

implemented in phases over the next 30 years. Currently tolling also exists on the Tacoma Narrows Bridge and is proposed to be implemented on the SR-520 bridge as early as 2011. The Washington State Legislature has also authorized a number of tolling studies to support improvements on SR-167, SR-509, I-405, and the Alaskan Way Tunnel.

**O-003-015**

Comment noted. The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge. Whatever we ultimately adopt as our long range financial strategy, we will need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

**O-003-016**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of

the revenues.

- The use of toll revenues should also evolve over time, becoming increasingly broad.

**O-003-017**

The financial strategy being developed for Transportation 2040 will need to rely on more sustainable sources of revenue than those used in the past. These will likely include tolling and pricing, HOT lanes, VMT(vehicle miles traveled) fees, parking charges, and other new instruments which more directly link revenues to use of the system.

**O-003-018**

Comment noted.

**O-003-019**

Thank you.

**O-003-020**

Comment noted.

**O-003-021**

Comment noted.

1

**TO: Transportation 2040 Staff, Puget Sound Region Council**
**7/16/09**
**RE: PSRC's Transportation 2040 Plan DEIS Comments**
**FROM: Virginia Gunby, Representing the Ravenna/Bryant Community Association (RBCA)—E-mail-vgunby@aol.com**
**(A North Seattle Community of 25,000)**

*Thanks to the PSRC Transportation Staff for your diligent work on T-2040.*

O-004-001

***Introduction:*** Today the National Resources Defense Council just announced that Seattle is rated first in the US as the most sustainable city over 250,000 in population that is addressing nine major environmental challenges of our time from global warming to clean water and air. PSRC is also a regional leader for the largest most urbanized Regional Planning Council in our state. In the past the development of its long-range regional Transportation Plans like Destination 2030, has been a model. The proposed and preferred T-2040 should not only be consistent with PSRC's adopted Vision 2040, but must describe the specific ways that it will support and reinforce the policies in Vision 2040, and requirements of relevant existing and new State and Federal policies. It is expected that the PSRC staff will provide high quality, thoughtful plans, policies and strategies to inform and guide our state, other regions and local governments.

O-004-002

***Public Process*** *In October 1989, the Seattle times commissioned Neil Pierce's Regional report discussing the1990's regional challenges of growth, the cost of sprawl and the danger of failing to act and our state and region took the warning seriously, passing the state 1990 GMA. The recent T-2040 public outreach program was substantive and helped to inform and involve the regional public officials and some of their constituents about the uncertain future conditions affecting our transportation systems. We urge a broader regional wake-up call is needed. How can the PSRC work to get more information for the regional media and the many publics about T-2040, throughout the entire process?*

Our region, country and the world are living during a transformative era, challenged by major shifts in policies at the national level and uncertainties in the direction of our regional growth. Population, employment, our economy and the reduction in public funds for many infrastructure projects and programs are challenging. Pro-actively informing the region on T-2040 progress is important to reduce the impacts of our current transportation systems on related global warming trends, increasing construction costs, peak oil and options for developing new clean, carbon–free energy transportation. The unfortunate history of our region is that many times the public groups gets focused on specific projects with prolonged debates over specific details, with little knowledge or discussion of the overall project implications on regional policies for regional growth and/or transportation alternatives. *The historical financial "silos" that earmark expenditure of transportation funds from broader multimodal choices, limits our real long term Plan alternatives.*

For a few regional watchers, Transportation 2040's 30-year transportation plan provides a great update of regional information, including inventories of the existing public and private transportation systems and choices of six draft Transportation alternative plans. PSRC role and the public's involvement need to be given more emphasis, to those not familiar with the process. The T-2040 DEIS is a first step toward developing a "Preferred Alternative" with prioritized Projects, Programs and Funding. After T-2040 is adopted in 2010, according to PSRC Transportation staff reports, a T-2040 Action Plan will be developed and Measures and Targets to Oversee a Future Performance Implementation Strategy. This program needs more public exposure.

The next steps will include Budget and Grant Criteria, Legislative Activities, Plan Oversight, Monitoring the Congestion Management Plan, Safety Reports, preparing Annual Minor updates and 4 year Reviews are planned**. A 10- year major update will help to keep T-2040 current with the challenging and changing economic, land-use/development, transportation, energy and climate change, during these uncertain times.** Monitoring and assessment of the T-2040 plan outcomes needs more emphasis. We urge that the PSRC provide an annual State of the Region to update the media and public on the Vision 2040, the T-2040 Plan and future actions.

*Todd Littman, Director of the Victoria (BC) Transport Policy Institute refers to this era as the new transport planning "Paradigm". It assumes a new direction with changing goals and assumptions from the historical, traditional promotion of auto-oriented movement. It includes reducing vehicle miles traveled and SOV trips, encouraging behavioral changes that will increase personal mobility with new alternatives. PSRC's updated and integrated regional policies should support increasing the use of alternative modes, revising current land-uses to meet clean energy goals and an adopted Vision 2040 and T-2040. We support revision of T-2040's DEIS that really includes more emphasis on including the public on the significant shifts and unknowns in our national, state and regional transportation planning.*

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**Comments on the various components of the 6 alternatives:** Which of the current Alternative best accomplishes our regional needs out to 2040 comes closest to our view of the preferred alternative for the 2040 Plan?

O-004-003

1..**None of the six alternatives** are moving the plan toward a 2040 regional transportation Vision of the future. All of them have very little differences to distinguish between them. They have similar costs and all depend primarily on a risky source of new funding, primarily Tolls. (I prefer Jack Opiola', a Booz/Allen consultant, who has a more marketable name for "pricing" or "tolls", which is *Transportation Improvement Funds*-TIFs)

**O-004-001**

An analysis of the consistency of Transportation 2040 alternatives to VISION 2040 multicounty planning policies is included in FEIS Appendix D.

**O-004-002**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**O-004-003**

Comment noted. There are, indeed, significant differences between the alternatives evaluated in the DEIS. These differences relate to their basic philosophy, the types of investments included in each, and the proposed funding strategies included within each alternative. While tolling was included in Alternatives 3, 4, and 5, the tolling strategies, geographic distribution of tolled facilities, and the level of toll revenues varies significantly among these three alternatives. This differentiation was done explicitly, to allow the DEIS to analyze a range of investment approaches and funding strategies.

O-004-004
O-004-018

The # 5 Alternative tries to get there, but needs components from the other options, such as new funding sources in addition to tolls, discussed below, and delete *tolls on arterials unless analysis indicates real benefits to costs and little public opposition*. *Fresh* thinking is needed on strategic multimodal investments and on new non-CTR/TDM programs, like sustainable Corridor Management Agreements. Focus is needed on the large number of regional trips that are less than 3 miles that can be served by less polluting, more integrated healthful transit, bike-riding and/or walking in the vicinity of designated Vision-2040 centers. None of the 6 except 5 meets the state climate reduction goals. We found that the preparers are really looking through a "rear view Transportation Plan mirror" not at 30 years in the future. Projecting the past into the future should be one option, but the PSRC staff should be informing local public officials and should be using the current public funding limits, and the GHG crisis and the need to use clean energy, as an opportunity to make long-term land-use linked with transportation progress by emphasizing policies that promote transit friendly, compact, walkable cities and neighborhoods, served by transit, to help reduce costly auto-dependent suburban sprawl.

O-004-005

**We urge greater evidence in T-2040 for new ways that there can be reduced environmental impacts by any of the alternatives: We commend the proposals that promote the quality of life in cities, rural areas and communities, reduce auto dependent urban sprawl, promote improved air quality, energy conservation, increased protection of our water quality particularly from roadway surface water run-off and urban street drainage into our streams, lakes, and major bodies of salt water. *Increased smog and traffic-related noise and regional cut-through traffic on local arterials are issues that many Seattle communities find are impacting their homes, quality of life and "sense of place. Tell us how, with examples how T-2040 could make a difference?***

O-004-006

Meeting the 5/21/09 Governor's Executive order "Washington's Leadership in Climate Change" and proposed Federal laws should be a very high new priority in the 2040 plan. In the Executive Order the Governor required the DOT to work with the PSRC to cooperatively develop and adopt regional transportation alternatives and choices, reduce annual per capita vehicle miles traveled in counties with populations greater than 245,000 by December 1, 2011, and WSDOT is to report which strategies appear to have the greatest potential to achieve the benchmarks and what policy or funding issues need to be resolved to ensure implementation of the reduction in VMT strategies.

**All of the T-2040 plan must be consistent with the current state law, and the Governor's Executive Order relating to the reduction of GHG, or it is not possible for the PSRC Committees to make a choice on the proposed 2040 Alternatives.**
All of the alternatives proposed are too similar in costs and appear to offer little change in the assumptions of Vision 2040's population, employment, growth and development of urban centers. Vision 2040 was adopted before the recession. Increasing the efficiency of the regional transportation system through a greater emphasis on energy efficient alternatives such as transit, walking and biking, should be a higher priority and would reduce trips and GHG, and improve the performance of the existing system.
**The PSRC policies should be far more aggressive in reducing GHG from mobile sources.** 50% of GHG pollution today in our region is from mobile sources. The T-2040 staff-work needs to examine new ways for reducing the impacts on growth of regional GHG from the current levels to meet state and federal goals.

O-004-007

**2. What should the T-2040 Financial Strategy be for Raising Revenue in the six Alternatives**- Alternative funding sources and planning will need to be more flexible and sustainable, and provide support during the transition to a cleaner energy and alternative powered vehicles future. This includes a reduction, or at least no increase of SOV trips, even with the projected growth in population. *Supporting Tolling as the major source of future revenue is inadequate.* It is a risky regional funding policy to rely primarily on one option. There should be a number of sustainable revenue sources discussed and objectively analyzed, that could meet the significant alternative 2040 regional revenue multi-modal costs, and still keep the desired historic maximum share of 2% of the total regional income for transportation revenue.

O-004-008
O-004-021

First step is to have trial Tolled corridors as with SR 167, then 520 and I-90. Moving on to urban system-wide tolling will be a difficult sell and needs a sharp, informative marketing plan. Transponders that are usable out of this state needs to be used. **It is very important that the PSRC adopt a policy that a share of the Tolls collected be available to support transit operations on the corridor urban areas. (Allowed under current state law, if the state DOT Commission accepts this policy)**

O-004-009

The Federal Gas tax is still 18.4 cents after 20 years of no increases, and recommendations for new Federal Transportation funds are stalled-out in Congress for maybe 18 months. The direction for PSRC is unknown until there is agreement on the 6 year Federal Transportation Funding Authorization Bill. Another increase in the statewide gas tax is not likely to be approved, since it was increased in 2003 and 2005. Because of increases and fluctuations in oil prices, projected state and local gas tax revenues have been declining and will continue to decline, due to the increased cost of gas and the transition from-gas to electric and/or hybrid vehicles that are slowly replacing the current vehicle fleet. The regional financial future for transportation really needs more public discussion and input.
**Options:**
*The PSRC's 2009 Legislative position for retaining state gas tax as an interim step should be maintained, while seeking more sustainable funding alternatives such as:

*A Vehicle Miles Traveled Tax would need a new state law. It is being researched at Oregon State University in Corvallis.

**O-004-004**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**O-004-005**

Please refer to FEIS Chapters 4: Transportation, 6: Air Quality, and 7: Noise for information on arterial traffic, smog, and noise, respectively.

**O-004-006**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on

O-004-009

*A statewide or Regional Vehicle Insurance Tax law based on the Value of the Vehicle, with reduced rates as an incentive for hybrids and electric vehicles, has been discussed in recent Federal Transportation financing studies.

*If the Feds approve one, and administer it, a state/regional shares of new non-earmarked federal Cap and Trade funds.

*Revising the state sales tax law to permit a regional sales tax on gas that would not be earmarked for only highways, could be a weak short-term transitional measure. The increase price of gas and the decline in its use make future revenues difficult to predict. (A July 2009 Sightline Report finds that Northwesterners are using less gas, a 5% drop in one year and riding more transit )

*Any new Federal State and/or Regional transportation taxes based on the value of the vehicles or other sources for the region should be carefully allocated based on policies and priorities adopted in **Vision 2040 and T-2040 Plans** for highway, transit, air, rail and ferry capital/operations and maintenance. At the Federal level there is a more intent to reduce ***modal earmarking of new transportation fund for greater flexibility in transportation planning and funding and to promote improved performance.***

*There is substantial **support in this region for a new state source for local and urban transit system revenues,** possibly from one of the above **sources, like a share of the Tolling funds**. A less preferred option is a new county MVET for the support of transit. Many states with urban Transit Systems assume a share in the local Transit costs. PSRC should support a new State share to fund local Transit services.

*New short-term funding for local governments could come from using an existing state law that allows the counties, after a vote of the people to levy a percent of the state gas tax, or seek a simplified revision of state legislation to allow a sales tax on gasoline/and/or electricity. They would bring in revenue for the state, but are inconsistent with SOV trip reduction policies.

O-004-022

**Tolled "HOT" Lane proposals for State highways should be opposed; because they increase SOV capacity** in HOV reserved lanes at the peak hours and are counter to a policy to reduce regional SOV trips. We oppose alternative powered vehicles using free HOV lanes in Washington...

O-004-010

**3. How should revenues be spent? Before deciding how the revenues are spent, a** revised PSRC cost/benefit study process needs to be prepared that makes it more equitable, and inclusive, and maximizes the benefits to ALL transport consumers within our region.

T-2040 Final preferred alternative Plan should be prepared with policies that emphasize the reduction of SOV trips and funding for an increase in transit and non-motorized trips, *not assuming an overall stagnant 5% in transit trips by 2040, the same percentage as today.* Discussion is needed on how to provide for a significant increase for transit, with the public benefits and costs compared. **The current PSRC's cost benefit analysis appears to be biased and inequitable.** It gives preferential weight to the high income users (drivers) and a decreased value/weight for the transit user (lower income) in the analysis. What you do not monetize in your least-cost planning analysis does not get considered in other ways. Therefore many important considerations like Vision 2040's "Complete Streets", with users of transit and non-motorized modes are not given equal weight to SOV users.

O-004-011

**4. There is a challenging increase needed for new sources of state or regional funding for Transit/HOV, non-motorized operations' services and programs, that are consistent and support adopted regional state and local land-use policies.** The reduction or at *least maintenance of the existing level of SOV regional trips, despite the predicted growth,* must be included as wise public policy objective. A revised T-2040, more responsive to implementing the PSRC' s adopted Vision 2040 regional Growth Management Plan and for the implementation of future improved federal and state public policies and grant programs, needs increased emphasis on new strategies to support increased transit services and use.

O-004-012

**5. T-2040's TDM, Mobility/Accessibility policies continue to primarily promote commute trip reduction and do not broaden them with new ideas, thoughtful tools or alternatives.**, PSRC should review other region's TDM programs and previous PSRC/WSDOT TDM studies of the 1990's. They included **a wider range of minor, moderate and maximum regional** TDM programs that could be included in T-2040. The TDM in the DEIS includes current Commute Trip Reduction programs, many of which have been ongoing since the state passed the CTR law. New more comprehensive, integrated and multi-modal strategies should be included to meet trip reduction objectives, such as strategies for using transit, marketing rideshare and transit programs, transit supportive land use, taxing VMT and new policies for implementing transit friendly land-uses and other supportive programs. Another is initiating TDM monitoring and reporting on the outcomes to the public for improving the overall performance of major state highway corridor's in the region and reducing congestion by testing and revising operations when needed, to achieve more sustainable, cost-effective, efficient and multimodal results..

In 2002/03 WSDOT received a Federal TDM Grant that was named TEEM (TDM, Effectiveness, Evaluation Methodology) for a SR 520 Translake study for a Mobility Demand Management Corridor. It resulted from a Final Recommendation from the 1997-2000 Translake Study, when I was a Translake study member. The former PSRC's TDM Committee was assigned to oversee the implementation of the study results, *but the PSRC disbanded the TDM Committee, and the*

cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-004-007**

Comment noted. The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge. Whatever we ultimately adopt as our long range financial strategy, we will need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

O-004-012

*WSDOT TDM staff-member was reassigned to Construction Oversight before she retired. This research needs to be updated and applied.*

The project included research on proposed SR 520 **Corridor Management Agreements** between the major corridor adjacent cities, major employers and transportation agencies. "Pilot Studies" such as the current WSDOT/PSRC's SR 520 HOV/Bridge rebuild TDM project is proposing new methods to quantify and evaluate results. The process includes adopted Performance Improvement Objectives, such as moving more people not cars, active traffic monitoring and management and recommending ways to revise to improve outcomes inconsistent with the adopted Corridor Agreement objectives. Objective and careful monitoring of the corridor plan strategies is an important step toward developing a more efficient and effective corridor and should result in new sustainable and measurable state corridor performance results...

New, more comprehensive and integrated with local land-use policies in PSRC's Transportation Mobility Management or TDM planning are needed. The T-2040 plan should have revised comprehensive TDM policies and public investment plans, for implementing the adopted policies of VISION 2040 and consistent with regional growth management. The PSRC should increase its oversight role on local land-use transportation goals, objectives and plans. In the past the problem in the U.S. and our region is that highway building and use has been given too much priority and funding emphasis on projected historic trends. T-2040 has an opportunity to change future regional policies for moving people and goods.

**Other Related Issues, Not Included in T-2040**:

O-004-013

a. **Jobs/Housing Imbalance Increases SOV Trips**--There is also the issue that some of the counties in this region are not adhering to or meeting the current state GMA policies, and Urban Growth Boundaries. **There is a need for the PSRC to be more pro-active in coordinating and improving the regional jobs/housing policies to improve the balance, as required in GMA to reduce the increase in inter-county trips** Many of their plans are not consistent with Vision 2040 and GMA goals for preservation of rural agricultural, forest or open spaces, and/or meeting targets for new multi-county employment or job/housing balance. Those trends increase SOV trips between counties significantly, particularly into King County, due to the lack of low-cost housing near jobs and/or extensive efforts made for new economic job stimulus in the other three counties. Those county policies need to be evaluated by the PSRC, and strategies should be developed that that could reduce the lack of job/housing balance, in order to be consistent with regional policies and to reduce the SOV trips from home to new jobs, between the four counties. This issue could be a joint assignment for the PSRC's regional Transportation and Economic staff to strengthen local land use policies and integrate them with regional transportation improvements. .

O-004-014

b. **Need for 'Worst Case Scenario T-2040 should include an example of a "worst case regional transportation/economic, GHG scenarios" that would help to inform our regional population and the elected officials about long term impacts of their avoidance, denial, inconsistency of county policies and/ lack of action.** To not to include any option that projects the worst case scenario with increased economic impacts from the recession, little or no growth in the economy and lack of support from some communities to reinforce of the PSRC's Vision 2040, is not short or long range planning. Corrective action and oversight from the PSRC is needed to improve policies in T-2040. PSRC needs to strengthen and pursue efforts to support a T-2040 that integrates and reinforces the planned growth in designated Activity Centers, and seeks to reduce any current negative and inconsistent county land- use policies. Changes would evolve through the adoption of strengthened local plans integrated with the T-2040 Preferred Alternative Plan.

O-004-015

c. **Parking Management- Parking policies can encourage increased SOV trips.** The T-2040 plan should be a resource and advise regional and local governments on methods to coordinate their parking policies, and develop new parking/travel information systems that would reduce the amount of driving around in urban centers looking for a parking lots or street space. Meters in the region could also be coordinated to cost more during the peak daytime hours and to encourage the use of people-moving systems. City housing and employers parking policies, including shared parking can also focus on reducing SOV trips.

O-004-016

d. **Rail, Freight, Air Transportation and Ferries-** More T-2040 study and information is needed on the impact of a federally proposed West Coast high-speed rail corridor along I-5, on Freight movements of over 200 miles to use the rail system, on I-5 users and/or Sea-Tac Airport passengers. It is another challenging change for future travel that needs some foresight. It may impact the T-2040 Plan and aid future travelers and freight movement, because of the proposed faster and improved rail passenger service and/or revisions in the freight movements.

O-004-017

The **new 2009 state WSF Ferry System Plan was released at the end of June 2009** and should at least be summarized in theT-2040 Plan, including the routes that are in the PSRC's region, along with any new King and Kitsap County Ferry Plans. Over the next 20 years the state Ferry system projects a $3.2 billion budget deficit. Their budget will be competing in Olympia for funds for other regional transportation systems. WSF has been increasing fares to finance some of the operations, but increases in user fees are reducing the number of users and projected revenue will to cover projected capital and operating costs. With Kitsap County planning to operate some Passenger Ferry trips and King County also taxing the residents of King County for a new Passenger Ferry Plan and services, there appears to be a lack of integrated long-range planning, that the PSRC could help to coordinate between the counties and state Ferry and Road systems.

**O-004-008**

Comment noted.

**O-004-009**

Comment noted. The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. This would require support from the Legislature. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge, and perhaps adding a sales tax on gasoline. Whatever we ultimately adopt as our long range financial strategy, we will need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues, including the need to garner public support.

**O-004-010**

As shown in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**O-004-011**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-004-012**

Thank you for your comment. The Preferred Alternative includes TDM strategies targeted towards employers, commuters, and residents through a focus on urban centers, education, incentives, requirements, innovative partnerships, and policies that promote ridesharing and efficient land-use. These strategies were developed by an inter-agency group of stakeholders and recommended by PSRC's Transportation Demand Management Steering Committee. While the plan contains specific programs and projects, it also supports demand management efforts from both the public and private sectors as they directly support regional environmental and congestion relief goals.

PSRC's congestion managment process will be the primiary method for monitoring both Transportation 2040 implementation and system performance. As a part of this effort the region will examine ways in which to better incorporate system efficiency strategies such as TDM. As issues arise, new solutions and needs will be identified that can be used as guidance in the project development and prioritization processes.

**O-004-013**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should

receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-004-014**
PSRC is required by law to prepare alternatives that are reasonably foreseeable.

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority the development of designated centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-004-015**
Thank you for your comment. The Preferred Alternative includes a new section on establishing and implementing a regional parking pricing and management strategy as a means to reduce VMT. While the full scope of this program has yet to be developed, elements could include parking cash-out, market pricing for both on- and off-street parking, unbundling of parking, and establishing appropriate parking minimum and maximum thresholds by geography and facility type. A TDM implementation plan to be developed subsequent to to Transportation 2040 adoption could be a

resource for a variety of implementation guidance including parking policy and meter coordination.

**O-004-016**

Many of the track and signal improvements within the central Puget Sound region associated with the Pacific Northwest rail corridor are already in the Baseline as they are primarily funded or jointly funded by Sound Transit's commuter rail program. The transit ridership associated with the enhanced Amtrak service provided by the incremental WSDOT high speed rail program is focused on intercity connections outside of the PSRC region, primarily to Portland, Oregon and Vancouver, British Columbia. As a result, they are not reflected in PSRC's modeling, although the reduction in air and SOV travel between Seattle and these cities because of the switch to passenger rail is noted.

**O-004-017**

As of the writing of the Transportation 2040 DEIS (May 2009) the WSF Long Range Plan was still in draft form. The final WSF Long Range Plan was published on June 30, 2009, after the release of the Transportation 2040 DEIS. The planning being done by WSF and PSRC related to the Washington State Ferries and possible future passenger ferries was well coordinated. With the completion of the Final Long Range Plan by WSF there is more certainty about the future of the state ferry system. This information allowed PSRC to fully incorporate plans for the state ferry sytem into Transportation 2040. In addition, planning for passenger ferries continues by King County Ferry District, Kitsap Transit, and the Port of Kingston. These efforts have also been coordinated with PSRC's work on Transportation 2040.

**O-004-018**

Thank you for your comment.  The Preferred Alternative includes TDM strategies targeted towards employers, commuters, and residents

through a focus on urban centers, education, incentives, requirements, innovative partnerships, and policies that promote ridesharing and efficient land-use. As a new element to the regional TDM toolkit, Preferred Alternative includes a residential-based marketing, education, and incentive program designed to encourage healthier transportation alternatives for both commute and non-commute trips.

**O-004-019**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

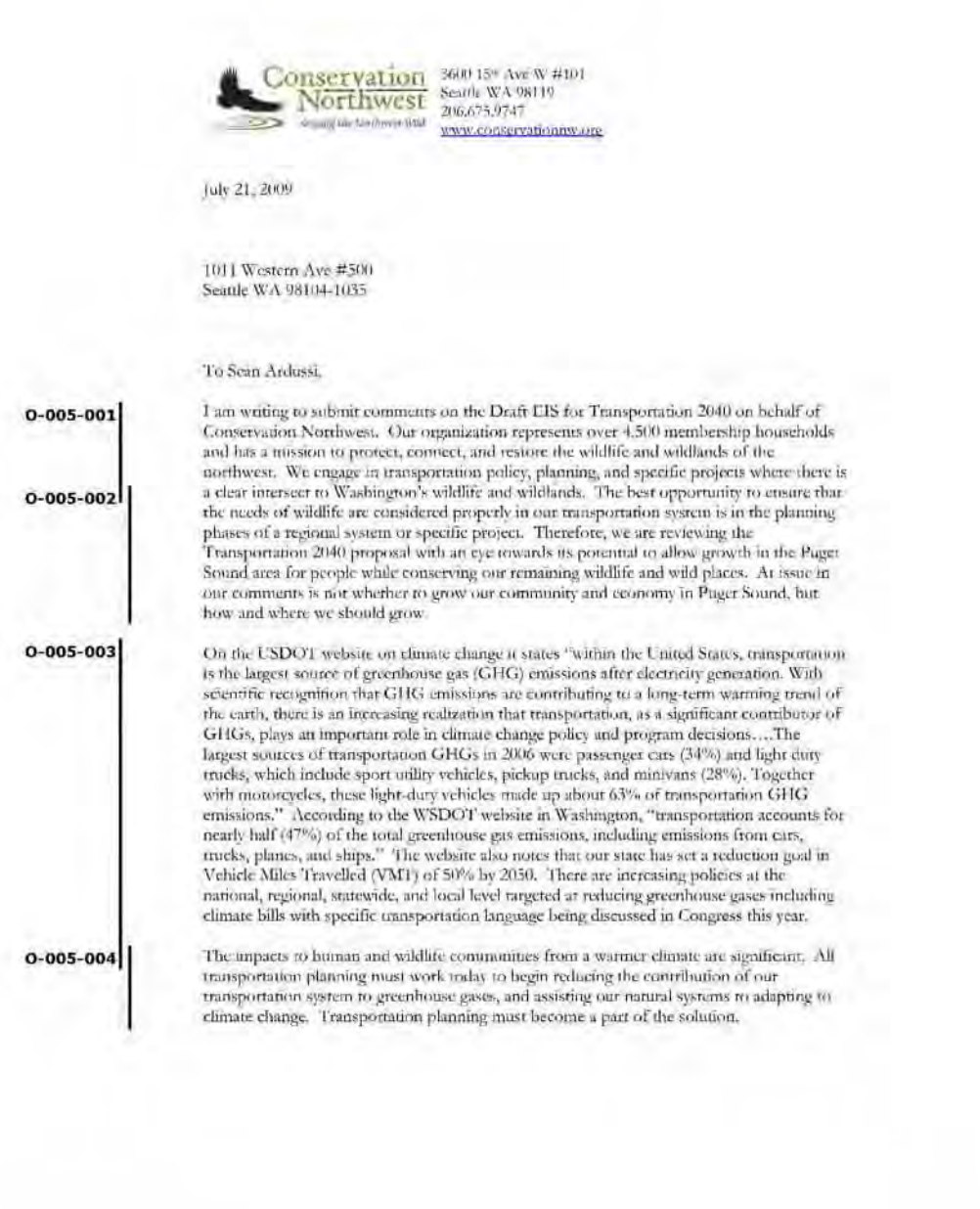
PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide

greenhouse gas reduction goals.

**O-004-020**
The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**O-004-021**
Comment noted.

**O-004-022**
Comment noted.



Conservation Northwest
3600 15th Ave W #101
Seattle WA 98119
206.675.9747
www.conservationnw.org

July 21, 2009

1011 Western Ave #500
Seattle WA 98104-1035

To Sean Ardussi,

O-005-001 I am writing to submit comments on the Draft EIS for Transportation 2040 on behalf of Conservation Northwest. Our organization represents over 4,500 membership households and has a mission to protect, connect, and restore the wildlife and wildlands of the northwest. We engage in transportation policy, planning, and specific projects where there is

O-005-002 a clear intersect to Washington's wildlife and wildlands. The best opportunity to ensure that the needs of wildlife are considered properly in our transportation system is in the planning phases of a regional system or specific project. Therefore, we are reviewing the Transportation 2040 proposal with an eye towards its potential to allow growth in the Puget Sound area for people while conserving our remaining wildlife and wild places. At issue in our comments is not whether to grow our community and economy in Puget Sound, but how and where we should grow.

O-005-003 On the USDOT website on climate change it states "within the United States, transportation is the largest source of greenhouse gas (GHG) emissions after electricity generation. With scientific recognition that GHG emissions are contributing to a long-term warming trend of the earth, there is an increasing realization that transportation, as a significant contributor of GHGs, plays an important role in climate change policy and program decisions….The largest sources of transportation GHGs in 2006 were passenger cars (34%) and light duty trucks, which include sport utility vehicles, pickup trucks, and minivans (28%). Together with motorcycles, these light-duty vehicles made up about 63% of transportation GHG emissions." According to the WSDOT website in Washington, "transportation accounts for nearly half (47%) of the total greenhouse gas emissions, including emissions from cars, trucks, planes, and ships." The website also notes that our state has set a reduction goal in Vehicle Miles Travelled (VMT) of 50% by 2050. There are increasing policies at the national, regional, statewide, and local level targeted at reducing greenhouse gases including climate bills with specific transportation language being discussed in Congress this year.

O-005-004 The impacts to human and wildlife communities from a warmer climate are significant. All transportation planning must work today to begin reducing the contribution of our transportation system to greenhouse gases, and assisting our natural systems to adapting to climate change. Transportation planning must become a part of the solution.

**O-005-001**

Comment noted.

**O-005-002**

Comment noted.

**O-005-003**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

O-005-004

There is strong regional and statewide guidance to our transportation planners to consider how our current and all future transportation efforts will address how help wildlife to adapt to climate change.

- Western Governors' Association Wildlife Corridors Initiative, June 2008 Report. Sections of this report were dedicated to climate change and transportation. As a follow-up to this effort the WSDOT is a co-lead of an effort to identify and prioritize opportunities in Washington State for maintaining and improving wildlife connectivity.
- WSDOT Executive Order 1031, July 23, 2007, *Protections and Connections for High Quality Natural Habitats.* This order recognizes the current need to maintain wildlife connectivity in Washington State, which is also a critical piece of facilitating wildlife's ability to adapt to changes in our climate. The order recognizes impacts that our highways can have on biodiversity, and measures WSDOT can take to address this in planning and implementation.

O-005-005

All alternatives estimate an increase in person and vehicle trips, as well as total vehicle miles traveled. Alternative 5 is estimated to have the fewest daily person trips, and the lowest CO2 emissions (approximately 6% lower than the baseline). **Alternative 5 of the DEIS is the only alternative that attempts to mitigate for climate change by designing programs and investments to "reduce carbon dioxide emissions".** It would include limited highway investments and focus on transit and non-motorized programs.

O-005-006

**We do not support, Alternative 2 and 3 which include the construction of the proposed Cross Base Highway.** The DEIS states under "Ecosystems and Endangered Species Act Issues" that "habitat loss/fragmentation, pollution, and alternation of ecological processes would be similar for all alternatives", which we disagree with. The two alternatives that include the construction of the Cross Base Highway have a much greater degree of impact to wildlife and native habitat in Puget Sound than those do not. The Cross-Base Highway is a brand new, four-lane highway development through the last and best remaining oak-woodland prairie left in our state—home to many threatened wildlife and plants. The Puget Sound lowland oak-woodland prairies once covered more than 150,000 acres in Washington. Today it is the rarest form of habitat. Agriculture, development, and invasive species have shrunk the native prairie habitat to just 3 percent. Construction of the proposed highway endangers this habitat which is home for nineteen state and federal listed bird species and four prairie dependent species including streaked horned lark, Taylor's checkerspot butterfly, Mazama pocket gopher, and water howellia. While destroying important remaining habitat within Puget Sound critical to the survival of species such as the western grey squirrel, the project would increase miles traveled by individual drivers. In the words of the environmental impact statement for the project, "Overall, people would travel a little farther to use the new Cross-Base Highway project to avoid other congested highways and arterials; this would increase miles driven" (Cross-Base Highway FEIS, p. 4-201)." The Cross Base Highway's environmental assessment did not consider its contribution to greenhouse gasses into account, and cannot mitigate its direct impacts to the remaining habitat that it will destroy. It is time to remove this project from the region's vision and move forward with projects that help us grow while conserving our resources.

**O-005-004**

Comment noted.

**O-005-005**

Thank you for stating your preference among the alternatives.

**O-005-006**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board

O-005-007

**We support the selection of Alternative 5** with the addition of language that states as additional best available science on wildlife connectivity, road ecology, and climate change becomes available it will be taken into consideration of the plans outlined in the region's vision.

Sincerely,



Jen Watkins
Conservation Northwest
206.675.9747 ext 203
jwatkins@conservationnw.org

recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**O-005-007**

Thank you for stating your preference among the alternatives.

July 27, 2009

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Mike Cummings
Program Manager, Transportation Planning
Puget Sound Regional Council
1011 Western Avenue, #500
Seattle, WA 98104-1035

Dear Mr. Cummings,

O-006-001 Thank you for presenting the Puget Sound Regional Council's Transportation 2040 plan alternatives to the Greater Seattle Chamber's Transportation Committee. We appreciate being included in your outreach effort. Although the Chamber has not yet taken an official position on these alternatives, we would like to provide some general thoughts that we hope can inform your thinking.

O-006-002 The Chamber is committed to advocating for a comprehensive statewide and regional solution to our transportation challenges. The considerable investments made in the last decade have laid a great foundation that we can build on, and we encourage PSRC to continue the progress we've made in recent years toward ensuring the Puget Sound region's economic and transportation needs are met.

O-006-003 Going forward, we believe a successful plan will recognize our region's future safety and economic health is fundamentally linked to an efficient transportation infrastructure that enhances the movement of people and goods. This efficiency is critical for our region to realistically compete for jobs over the next thirty years and beyond.

O-006-004 As you move towards finalizing the Transportation 2040 plan, we ask that you recognize the need for an effective multi-modal investment strategy that uses an integrated approach and

O-006-005 provides a balance between roads, highways, transit, and freight mobility. We also encourage you to prioritize "at risk facilities" for funding and completion, and request that the Transportation 2040 plan support increased capacity in—and a balance between—roads, highways, and mass transit.

O-006-006 In closing, we ask that you continue to keep us informed as the plan progresses. We will also do our best to actively follow PSRC's 2040 efforts.

Thank you for your consideration.

Sincerely,

Mark Weed
Chair, Greater Seattle Chamber of Commerce Transportation Committee

Cc: King County Councilmember Julia Patterson
Bob Drewel, Executive Director, PSRC

**O-006-001**
Comment noted.

**O-006-002**
Comment noted.

**O-006-003**
Improvement of performance for the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative.

**O-006-004**
VISION 2040 provides the policy framework for long-range transportation planning in the region by calling for a multimodal transportation system that integrates freight, ferries, highways, local roads, transit, bicycling, and walking. The Preferred Alternative respondes to this policy direction, and includes a balanced mix of a variety of transportation investments.

**O-006-005**
One of the regional transportation strategies of Transportation 2040 is to improve efficiency and strategically expand capacity of the existing system. The plan focuses on several areas for expansion, including regional and local transit, improvements to existing highways and local roads, improvements in nonmotorized transportation, special needs transportation, ferry transportation, aviation, intercity passenger rail, and completion of major projects in the region. Major projects include the replacement of two vulnerable structures — the SR 99 Alaskan Way Viaduct and the SR 520 floating bridge.

**O-006-006**

Comment noted.

**Municipal League Foundation**
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O-007-001

July 25, 2009

RECEIVED
JUL 27 2009
PUGET SOUND REGIONAL COUNCIL

**VIA U.S. FIRST-CLASS MAIL**

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

**Re: Transportation 2040**

Dear Mr. Cummings:

The Municipal League Foundation thanks the Puget Sound Regional Council for spending time with us recently to explain its efforts to update its regional transportation plan. Our Transportation Committee discussed the PSRC's Draft Policy Direction, and offers the enclosed comments on the same. We look forward to following the PSRC's further progress in this area.

Very truly yours,

Jill D. Bowman
Co-Chair, Municipal League
Transportation Committee

cc: Robert Klein, Municipal League Foundation Chair
Kathy Elias, Municipal League Issues Committee Chair
William T. Roach, Municipal League Transportation Committee Co-Chair

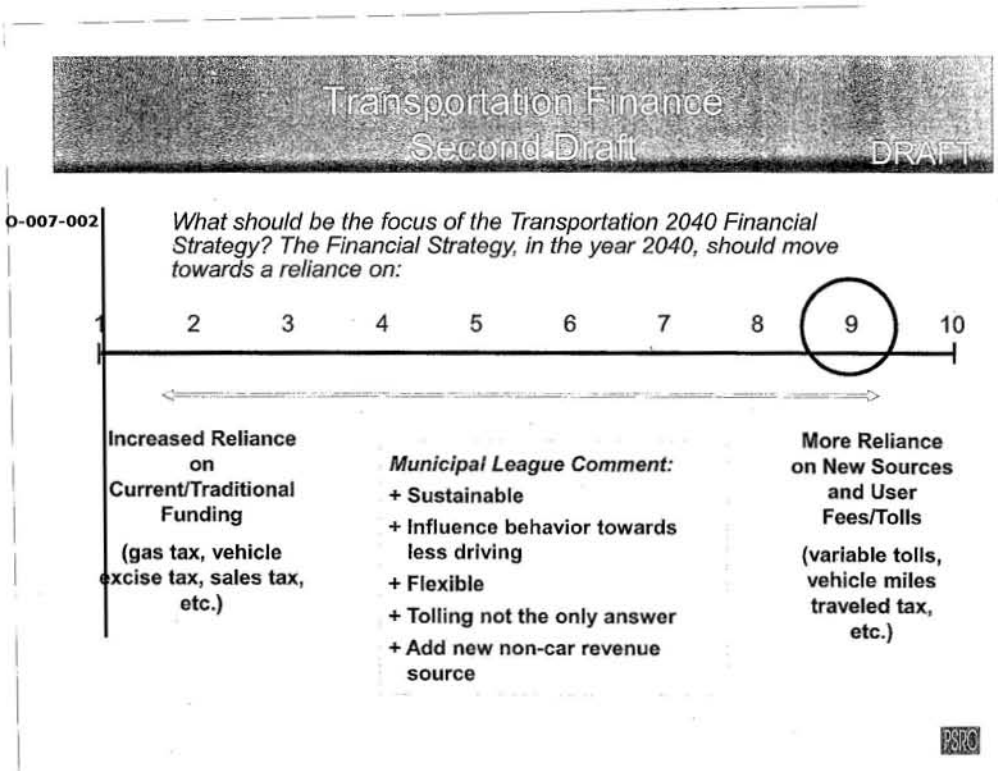
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**O-007-001**
Thank you.

DRAFT

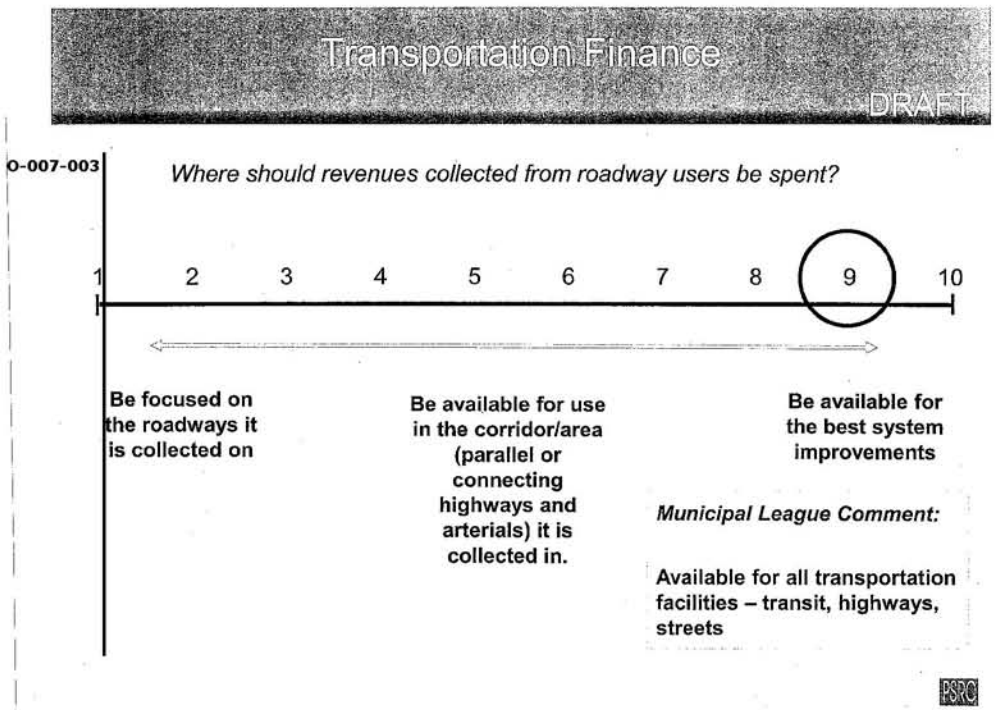
# Draft Policy Direction

*Municipal League Comments*



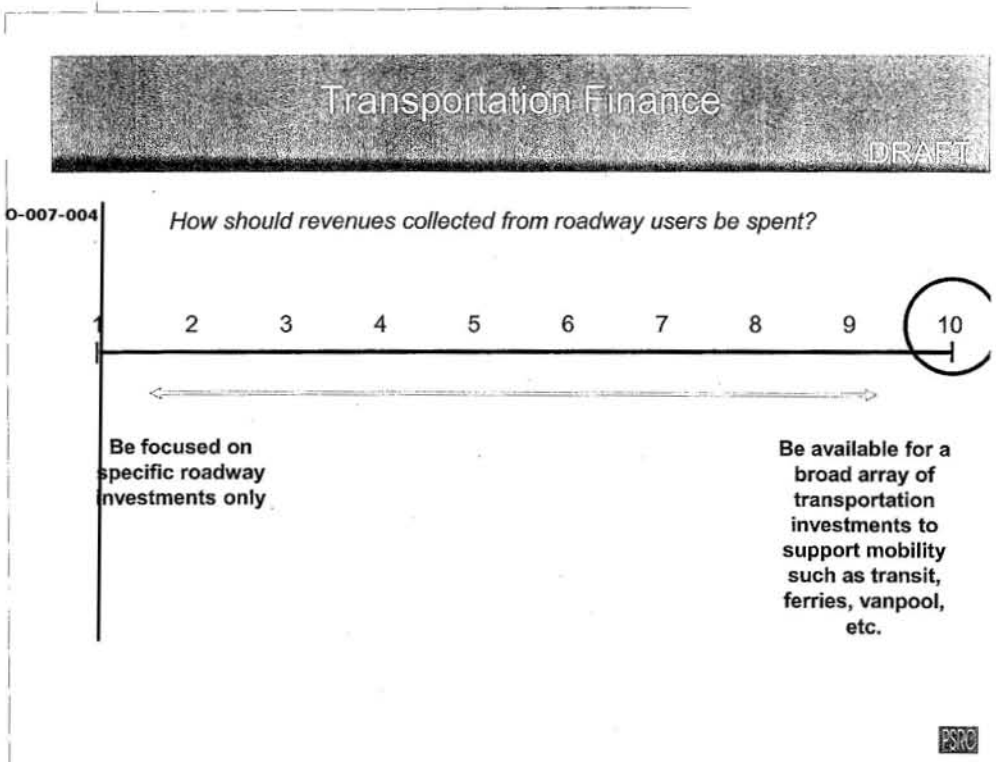

**O-007-002**

Comment noted. Transportation 2040 includes a discussion of new revenue sources, such as variable tolling/pricing, VMT charges, and parking charges.



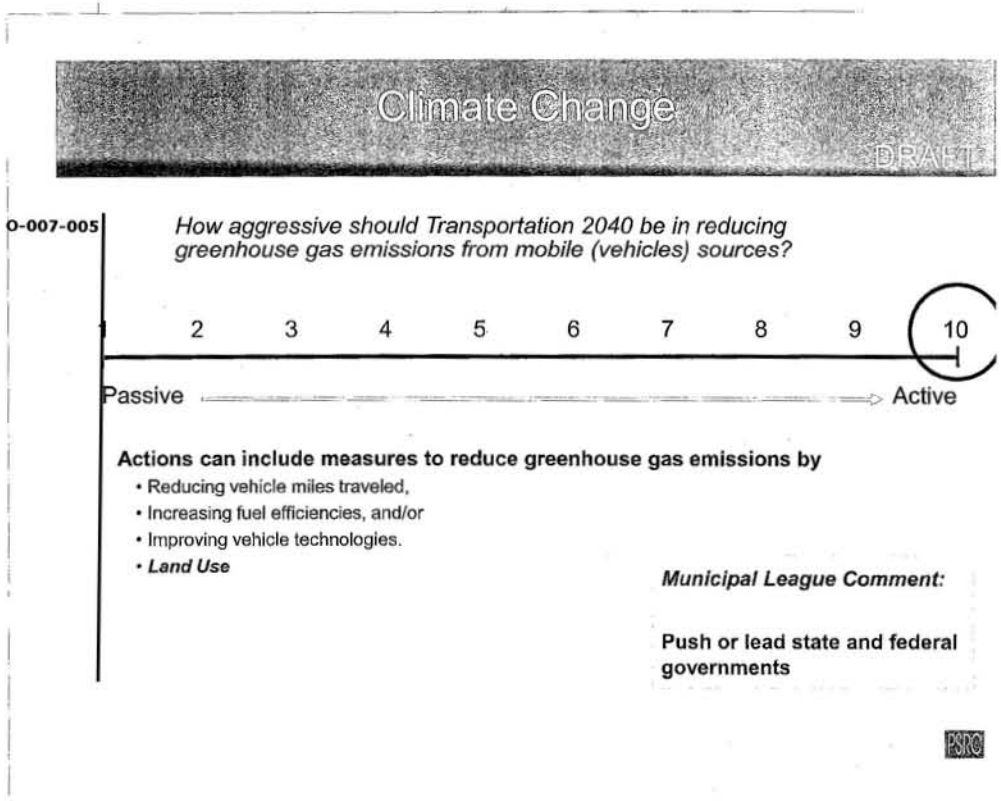

**O-007-003**

Comment noted.



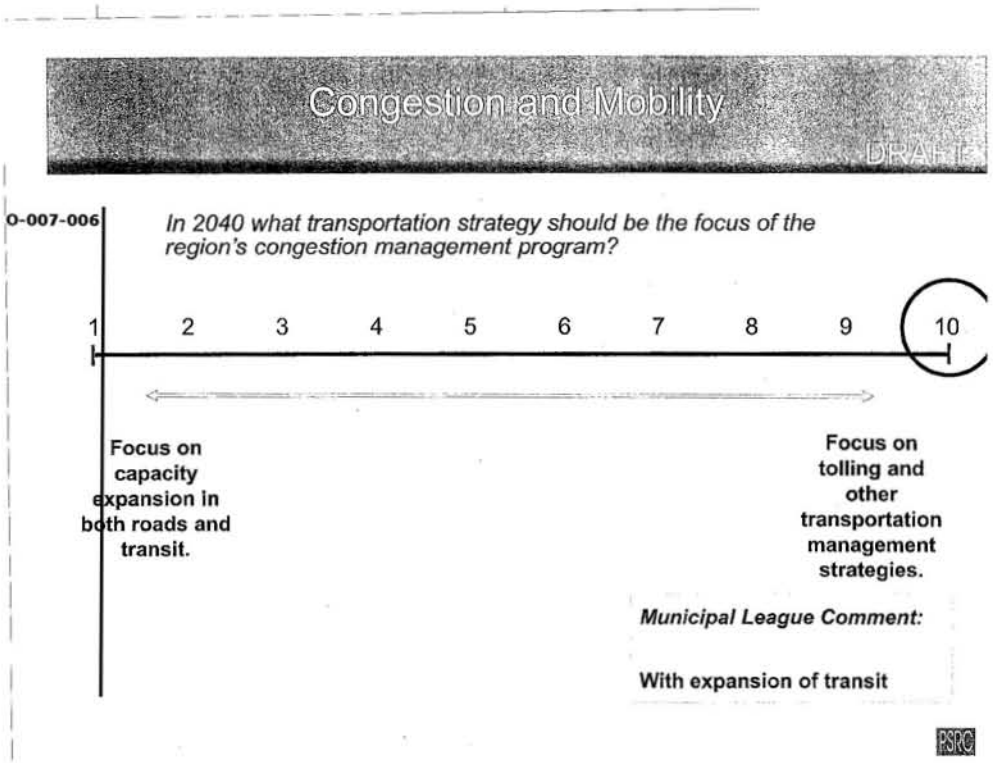

**O-007-004**

Comment noted. We are seeing similar opinions expressed across the region, calling for roadway and other user fees to be available more broadly, to help fund transit and non-motorized improvements.




**O-007-005**

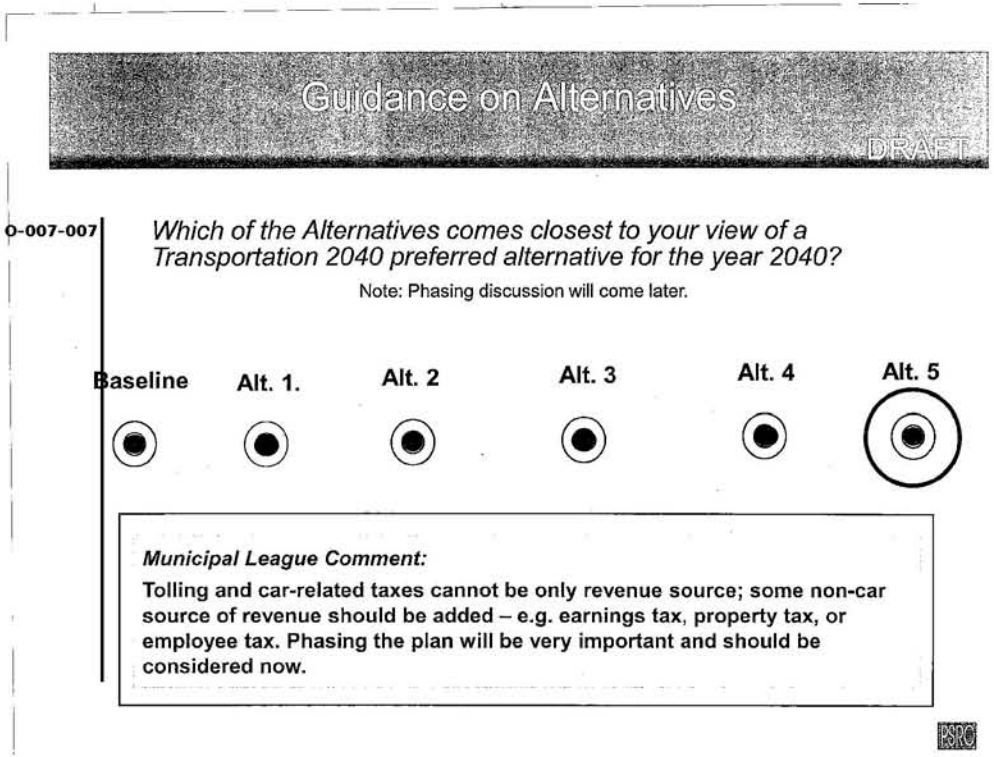
Comment noted.




**O-007-006**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.




**O-007-007**

The Transportation 2040 financial strategy is based on a phased approach of transitioning away from current gas taxes toward the implementation of new user fees, which could include tolls, vehicle miles traveled charges, and other pricing approaches to fund and manage the transportation system. There should be a nexus between the tax, fee, or toll and the use of the revenues. However, we anticipate we'll continue to rely on traditional funding sources and financial instruments as the region makes a transition to a more sustainable financial strategy. Many transportation projects in the region already receive federal and state funding which is comprised in part of revenue received from taxpayers.

KITSAP ALLIANCE OF PROPERTY OWNERS

July 27, 2009

Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035
Attn: Sean Ardussi

Subj: Kitsap Alliance of Property Owners Comments on the PSRC Transportation 2040 Draft Environmental Impact Statement (DEIS)

O-008-001 Dear Mr. Ardussi:

This letter transmits our comments on the Transportation 2040 DEIS. It is requested that this submittal be included in its entirety in the DEIS SEPA record.

O-008-002 We believe that our assessment demonstrates sufficient deficiencies and failures in the planning to require that the current version of the DEIS be abandoned and a new document prepared which addresses the actual transportation needs of the region's citizens – specifically a plan which will eliminate highway congestion while allowing people the freedom to choose to drive their vehicles where and when they want without punitive tolling, excessive fuel taxation, or other purposely-intended restrictive controls.

O-008-003 It is significant that the DEIS bases much of its planning on the underlying assumption that greenhouse gasses, particularly carbon dioxide, must be severely reduced to protect society from the effects of climate change. This assumption actually drives the planning, which mandates major reductions in vehicle miles traveled and fuel consumption – goals which are incompatible with a growing region's actual transportation needs.

A large body of hard scientific data refuting this global warming theory is now in the literature. It is unconscionable for the PSRC to remain silent on this relevant scientific evidence, much of which comes from government sources and other respected institutions – all of which would completely invalidate the PSRC planning approach.

Sincerely,

Tim Matthes

Tim Matthes, President
Cell Phone: 360-440-6483
Email: timcm@wavecable.com

*"The small landholders are the most precious part of a state."* - Thomas Jefferson

Post Office Box 1861, Poulsbo, Washington 98370 • www.kapo.org

**O-008-001**

PSRC appreciates your organization's comments on the Transportation 2040 DEIS.

**O-008-002**

We disagree with your assessment of deficiencies. The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

O-008-004

**Summary**

The Draft EIS is generally unresponsive to the transportation needs of the region and should be abandoned. Lacking this, at a minimum, it must be revised to add an alternative that evaluates the cost and impacts of constructing the new lane miles actually needed to relieve traffic congestion in the region over the next 25 years. The Draft EIS must also be revised to reflect the latest information on man-made carbon dioxide and climate change.

O-008-005

The Puget Sound Regional Council has taken upon itself the task of planning the region's transportation infrastructure out to the year 2040. Unfortunately, what the public actually wants and needs in its transportation system is not what the plan provides in any of its various alternatives. Instead, the PSRC presents a planner's utopian vision that assumes people can be forced to abandon the convenience of their automobiles, be forced to live in dense urban areas, and made to ride public transportation. The PSRC has the arrogance, in plans increasingly disconnected from reality, to dictate that people must change their very way of living to conform to the PSRC's vision of this new, government-controlled future.

O-008-006

This is a direct affront to the Washington State constitution which holds that: "All political power is inherent in the people, and governments derive their just powers from the consent of the governed, and are established to protect and maintain individual rights."

O-008-007

When the people of the region are asked what they personally need in transportation infrastructure, the predominant answer is *congestion relief*. None of the Transportation 2040 alternatives provides this. Even Alternative 2, which builds the most new lane miles, does not come close to providing the capacity necessary to relieve congestion over the next twenty-five years. This, despite the fact that studies by the Reason Foundation and by Kemper Freeman Jr. show that the needed lane miles can be built at a fraction of the cost being spent on public transportation projects such as light rail.

For example, the Reason study shows that the Seattle area could actually *reduce* congestion by adding as few as 704 lane miles to the existing roadways over the next 25 years, at a cost of $4.8 billion in today's dollars. The report noted that that this investment would save 200 million hours of delay per year that would otherwise be spent stuck in traffic.

O-008-008

But the PSRC is on a different track. They believe that the solution to congestion is to get people out of their cars. The goal is to reduce vehicle miles traveled by 50% by 2050. To do this they propose to make it very difficult to drive anywhere. Major roads will be electronically tolled, with higher rates to discourage driving at peak traffic hours. Gasoline will become very expensive with the imposition of increased taxation or Cap-and-Trade costs. Cars will cost thousands more due



**O-008-003**

The State of Washington has adopted legislation calling for greenhouse gas emissions reductions to 50% below 1990 levels by 2050. Since transportation is a significant contributor to these emissions, PSRC has been called upon to address the state legislation and pursue opportunities to reduce emissions as part of the Transportation 2040 update. The State of Washington has also passed legislation setting VMT reduction benchmarks, and Executive Order 09-05 calls for PSRC and other agencies to work with the Washington State Department of Transportation on reducing VMT and greenhouse gas emissions as part of transportation planning.

**O-008-004**

We believe that the Transportation Plan is responsive to the needs of the region. The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1.208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which

O-008-008 to ever increasing mileage and emissions requirements. City parking will be eliminated. New bridges and tunnels will have no more capacity than the infrastructure they replace.

O-008-009 But will any of this work? History resoundingly says no. The region, like much of the country, has neglected road building for the last 30 years. The funds have been diverted, instead, toward public transportation. The somewhat ironic result is that public ridership has actually gone down, from about 6% of trips to less than 3% in the last 20 years. And studies show that the failure to upgrade the highway system hasn't achieved the goal of fewer cars on the roads, it has simply induced congestion on major highways and forced cars onto secondary streets. PSRC seem to be having a hard time understanding that public transportation simply doesn't work for most people.

O-008-010 The draft EIS also needs to include new, credible information that questions the need to reduce man-made carbon dioxide. Over 30,000 reputable scientists have signed a petition saying: "There is no convincing scientific evidence that human release of carbon dioxide, methane, or other greenhouse gases is causing or will, in the foreseeable future, cause catastrophic heating of the Earth's atmosphere and disruption of the Earth's climate." The latest IPCC data shows the worldwide temperature to actually have decreased over the last decade, with no end in sight, in direct relationship to solar activity, not the rising carbon dioxide levels. And, in any case, the developing countries are producing carbon dioxide at a rate that makes U.S. reduction attempts meaningless. It is completely irresponsible for the Draft EIS to ignore this information. (likewise, contrary to the conventional wisdom of the EIS, there is little hard science to connect stormwater runoff with actual biological harm to Puget Sound.)

O-008-011 In the light of evidence that the PSRC planning process is actually working against its stated purpose of promoting the well-being of people, it would be reasonable to request that the entire PSRC planning process be completely reevaluated. But, for the purpose of commenting on the Drat EIS, at a minimum it is necessary that the document be revised to include an alternative that will actually relieve congestion; and be revised to include credible, readily available information that shows that the conventional view of carbon dioxide causing climate change may well not be valid.

O-008-012 This summary addresses only two of the many problems inherent in the Transportation 2040 DEIS. The main body of comments which follows discusses how the incomplete and biased premises assumed by the PSRC in the logic of their planning process lead to wrong conclusions about the transportation system needed for the future. Comments are then provided on the individual sections of the DEIS document that evaluate each of the wrong conclusions reached by the PSRC.



include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-19, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**O-008-005**

Comment noted.

**O-008-006**

Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and (4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.

Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

**O-008-007**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of

**Comments on PUGET SOUND REGIONAL COUNCIL (PSRC) TRANSPORTATION 2040 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)**

***Prepared by Kitsap Alliance of Property Owners***
**July 21, 2009**

**O-008-013**

The comments provided herein are applicable to the DEIS for Transportation 2040 and are formatted in a general overview response to the general philosophy inherent in Transportation 2040 followed by an item specific set of comments on the plan. The two segments are complimentary in that they address both the philosophy behind Transportation 2040 and the specifics of the implementation of that philosophy. The two comment sections should not be taken to be in conflict with one another on any itemized comment or to be contradictory in any manner.

**O-008-014**

**General Overview of Transportation 2040 from a historical Transportation Planning viewpoint.**

The decisions about the transportation infrastructure being introduced in Transportation 2040 will determine the region's ability to support a vibrant economy and provide people with the mobility essential to a high quality of life over the span of the next 30 years and beyond.

Experienced economists and pragmatists know how difficult it is to look three decades into the future and how few predictions actually become reality. Nevertheless, transportation planning in the U.S. and in Washington State was reasonably successful in meeting society's needs in the not too distant past. However, more recent planning efforts, which deemphasized building new highways, have not achieved the same success and have, instead, resulted in major traffic congestion problems. Thus, it is essential to examine the parameters and assumptions underlying the current Transportation 2040 analysis to see if they will support a successful planning effort, or whether they will result in a continuation of unsatisfactory outcomes. The reality of any valid planning requires that a specific problem definition be determined so that a proper solution may be crafted.

**O-008-015**

A review of the Transportation 2040 Draft EIS suggests that the underlying premises are incomplete and are strongly biased to ensure a predetermined range of outcomes that continue to favor public transportation over the construction of highways. Based on the results of a similar planning approach,

4

these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**O-008-008**

We disagree with your statement. PSRC is planning for a balanced transportation system that is designed to meet the needs of a growing population.

**O-008-009**

Comment noted.

O-008-015 in the more recent past, it is not clear how the current PSRC plans will produce a different outcome.

O-008-016 In planning, it is essential to incorporate some basic principles and realities involving our culture and the needs of the people of the region. The overwhelming majority of citizens in this region favor traditional modes of transportation (Private automobiles) and continue to drive to their destinations. People also are comfortable with traditional transportation funding methods. Thus, it would seem clear that there needs to be an EIS alternative plan that represents a continuation of these basics. Such an Alternate is not evident in the proposal.

O-008-017 The EIS assumes that the growth strategy of PSRC's Vision 2040 will prevail and that its land use policies will influence or mandate the transportation plan. Vision 2040 has a number of assumptions such as: The region's population will increase from 3.5 million residents in 2006 to nearly 5 million by 2040. Employment will increase from 1.9 million jobs in 2006 to over 3.1 million by 2040. Housing stock will increase fro 1.5 million units in 2006 to 2.3 million units by 2040. There was no factual basis presented for those estimates and assumptions when Vision 2040 was drafted. The population, employment, and housing projections, critical to the success of Transportation 2040, do not gain validity just because they are written in to Vision 2040. Those projections remain highly questionable.

All the EIS alternatives assume that the land use planning policies of VISION 2040 will become reality and be continued into the future. These policies direct a major portion of new development into communities with regional growth centers; substantially reduce new development in rural areas and on the urban fringe; and allocate the majority of the region's employment and housing growth to metropolitan cities and core cities. However, as history shows, there is no certainty that these policies will actually come to pass. It is likely that economic and societal pressures beyond the control of PSRC will work to shape the region much differently than envisioned by the EIS and Vision 2040.

History has clearly demonstrated the unique ability of humans to resist and then thwart the best laid plans of politicians when those plans conflict with personal desires. Social engineering has yet to succeed in the United States. Therefore, there needs to be a broader vision of the future of transportation, one which is based more realistically on what is actually occurring in the region rather than what is hoped for. A transportation plan alternative is needed that reflects this more traditional evolution of growth.

O-008-018 Flexible planning should also allow for unanticipated change. Decisions that are essentially political in nature, that is to say bedded in one political philosophy or another are subject to major and unexpected reversal. Planning must recognize the political component of policies. For example:



**O-008-010**

Comment noted.

**O-008-011**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

HB 2815 sets benchmarks for reducing statewide annual per capita vehicle miles traveled (VMT). Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 as well as the state's greenhouse gas reduction goals.

**O-008-012**

Comment noted.

**O-008-013**

Comment noted.

**O-008-014**

We agree that it is difficult to plan three decades into the future. That is

O-008-018

- Petroleum based energy use may increase rather than decrease over time.
- The cost of oil-based energy may decrease rather than increase over time.
- Local air quality in the region may continue to improve over time using traditional fuel sources and clean emissions technology.
- Air quality may be more impacted by the prevailing air flow from developing economies along the Asian rim than from local emissions.
- CO2 may not be appreciably affecting climate change (this is what recent scientific evidence indicates).
- Washington's poor business climate may not support the EIS growth projections. The anticipated jobs and attendant population may likely go elsewhere where conditions are more favorable. (WA has a B&O tax that is found nowhere else; there is no "right to work" legislation enjoyed in 22 other states; WA resists frivolous lawsuit tort reform; WA has overreaching environmental regulations not found in many states, such as the Growth Management Act (GMA)--and the threat of new regulations such as Cap-and-Trade; WA has complicated, expensive and time-consuming permitting requirements unlike many other states.)
- Assume future planned extensions of the Light Rail System are shelved and the billions that would have been spent in cost and debt service are redirected into adding Capacity to the Freeways, Principal Arterials, and Urban Arterial systems. (Adequate parallel arterial capacity is lacking in all current Alternatives).

O-008-019

The various alternatives presented in the EIS propose to manage congestion through Demand Management, System Management, and Congestion Management strategies. But this isn't the only solution. There needs to be an alternative that solves the congestion problem by building the needed lane miles in a future that doesn't have these onerous highway controls. Such a road building approach (assuming a Level Of Service "B") will likely turn out to be the best alternative to achieve the Vision 2040 goals that envisions a safe and efficient transportation system essential to the quality of our lives; one that supports the regional growth strategy and serving as the backbone of the region's economy. A system that improves mobility while growing to a region of 5 million people.

O-008-020

All the EIS alternatives assume that gas tax funding will be replaced by a regional electronic toll system. This is primarily based upon the argument that climate change will benefit from non-carbon based vehicular energy systems.

O-008-021

However, such an assumption is not applicable to an alternative that builds the lane miles needed to reduce congestion and anticipates future growth in conventional vehicle miles traveled. Under this alternative, the revenue stream would be based upon how much of his/her fair share of the cost each citizen pays to use the transportation grid – under a scheme that could resemble the following:

6

why the plan is updated every 4 years.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**O-008-015**

Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in

O-008-021

- Mass transit users pay a tax for PMT (personal miles traveled) calculated on origin and destination ticket sales.
- Electronically toll alternative energy vehicles only to make up for the fuel tax they are not paying, or be assessed PMT charges based on DMV (Department of Motor Vehicles) calibrated electronic odometer 'flyby' sensors similar to etoll technology.
- Abandon HOT lane systems. (These being unnecessary with Level Of Service "B" capacity for generally unimpeded traffic flow on arterial roadways).
- To compensate for increased fuel efficiencies and lower fuel prices, increase gas tax charges to reflect the traditional 3% average annual household budgetary cost for gasoline fueled automobile users.
- Re-establish the gas tax revenue expenditures for infrastructure use only.

O-008-022

It would seem obvious that the transportation system of the future should be based on the preferences of the people using the system and the advantages actually offered by technology improvements that occur over time. With respect to technological breakthroughs, it will be the free market system and the opportunity for reasonable return on investment that drives those changes. While there have been significant technological advances in some government programs the cost of those programs is prohibitive for the end results desired. The profit motive will prevail and provide sufficient incentive for research and development of promising technologies. Transportation 2040 must not direct or mandate the implementation of specific technology, such as electric vehicles, but, instead, anticipate customer-driven technology.

Plans that propose to dramatically convert our transportation system into one that tightly constrains personal mobility should be resisted. There are lessons to be learned from other experiments that emphasized highly-subsidized mass transportation over personal vehicle travel. The results have generally proved to be neither economical or beneficial.
Our culture is largely one of personal freedom and the automobile is symbolic of the freedom of mobility. It is a fact of life that public transportation simply doesn't work for most people. It is important to recognize that tax subsidized mass transit cannot provide for the routine transportation needs of most people under the best of circumstances. In time of economic hardship, as we are experiencing now, transit service cuts are the norm and that would leave large parts of the population without service and basically isolated in their homes. That is not a valid social or economic policy. An alternative that more closely matches public needs and our current transportation culture would clearly seem to be required.

O-008-023

**Detailed comments on the specific contents of Transportation 2040 DEIS**

The comments that follow are the result of a detailed review of the subject Transportation 2040 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS),

7

the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and (4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.
Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

**O-008-016**

The Baseline or no action alternative represents a continuation of past trends.

**O-008-017**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.
PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

O-008-023

Destination 2030, Vision 2040, RCW 36.70A GMA and other associated legislative and Executive actions taken during the 2009 Legislative session.

1. The Transportation DEIS offers itself as a strategic planning document to answer the question "*How can the region best provide the mobility required to support a growing population to the year 2040, sustain the region's environment and economic vitality, improve system safety and efficiency, and enhance the region's overall quality of life?*" In fact, the content and process undertaken to prepare Transportation 2040 may be directed by STATE ENVIRONMENTAL PROTECTION ACT (SEPA) but the subject matter and content of the DEIS is not. The creation of the transportation plan that will be set forth in Transportation 2040 is to be developed under the parameters of RCW 36.70A Growth Management Act. Transportation 2040 is not intended to be an overriding strategy or plan that guides land use decisions but to satisfy only one of 14 goals and priorities guiding those decisions. Simply put, land use development decisions under GMA will determine the overall composition of a coordinated transportation plan, not the other way around.

O-008-024

2. Essential to any strategic plan development and to this DEIS is a preliminary statement of facts and assumptions upon which the plan will be built. There is no clear statement of either facts or assumptions that could be located in the DEIS. Lacking a clear statement of these foundation elements, there is no clear manner to properly "test" and analyze the options being presented. If it is the understanding of the planners that the population growth and job growth estimates of OFFICE OF FINANCIAL MANAGEMENT (OFM) are to be considered as fact, there is no analysis of past predictive accuracy to substantiate that position. If the planners are operating with the understanding that "climate change" is a certainty and that the ongoing legislative actions and agency regulatory efforts are valid as long range certainties, there is no documentation as to the specific impacts on economic development, energy provision for the area, and transfiguration of transportation vehicles or modes that would impact the plan. In fact the plan appears to be devoid of much imagination or planning aside from automobile trip reduction, increased biking and walking, and increased use of mass transit.

O-008-025

3. During the 2009 legislative session several bills were enacted that have major impact on the transportation planning within the horizon of Transportation 2040. For example:

**SECOND SUBSTITUTE HOUSE BILL 1481**– Electric Vehicles. This Law requires certain higher population areas of the state, including the PUGET SOUND REGIONAL COUNCIL region, to plan for, seek funding, and install and operate infrastructure that will support electric cars. The first targets are government facilities followed by commercial and residential areas. Roads, starting with I-5, I-90, I-405 and 520 and the towns and cities along those routes, will fall under the requirements. The State fleet will have to complete a rather

8

**O-008-018**

There are assumptions in any analytical tool or model that provide a framework for understanding and interpreting the results.

More information about the assumptions used in the Transportation 2040 analyses can be found in Appendix K: Data Analysis and Forecasting at the PSRC, New Tools Within an Integrated Modeling Framework.

**O-008-019**

This plan is not just about demand management. Road capacity is also part of the plan, and congestion is addressed.

**O-008-020**

Comment noted.

**O-008-021**

Comment noted.

**O-008-022**

Comment noted.

**O-008-023**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and

O-008-025

rapid turnover to electric or bio-fuel vehicles. Where the technology comes from, who produces the equipment required, and how this is all paid for is not addressed in Transportation 2040. There is no proposal in the Plan that has electric vehicle support as its focal element. The pertinent portions of the legislation are included below:

*NEW SECTION.* ***Sec. 1.*** *The legislature finds the development of electric vehicle infrastructure to be a critical step in creating jobs, fostering economic growth, reducing greenhouse gas emissions, reducing our reliance on foreign fuels, and reducing the pollution of Puget Sound attributable to the operation of petroleum-based vehicles on streets and highways. Limited driving distance between battery charges is a fundamental disadvantage and obstacle to broad consumer adoption of vehicles powered by electricity. In order to eliminate this fundamental disadvantage and dramatically increase consumer acceptance and usage of electric vehicles, it is essential that an infrastructure of convenient electric vehicle charging opportunities be developed. The purpose of this act is to encourage the transition to electric vehicle use and to expedite the establishment of a convenient, cost- effective, electric vehicle infrastructure that such a transition necessitates. The state's success in encouraging this transition will serve as an economic stimulus to the creation of short-term and long- term jobs as the entire automobile industry and its associated direct and indirect jobs transform over time from combustion to electric vehicles.*

*NEW SECTION.* ***Sec. 2.*** *(1) A regional transportation planning organization containing any county with a population in excess of one million in collaboration with representatives from the Department of Ecology, the Department of Community Trade, and Economic Development, local governments, and the Office of Regulatory Assistance must seek federal or private funding for the planning for, deployment of, or regulations concerning electric vehicle infrastructure. These efforts should include:*

*(a) Development of short-term and long-term plans outlining how state, regional, and local government construction may include electric vehicle infrastructure in publicly available off-street parking and government fleet vehicle parking, including what ratios of charge spots to parking may be appropriate based on location or type of facility or building;*

*(b) Consultations with the State Building Code Council and the Department of Labor and Industries to coordinate the plans with state standards for new residential, commercial, and industrial buildings to ensure that the appropriate electric circuitry is installed to support electric vehicle infrastructure;*

*(c) Consultation with the Workforce Development Council and the Higher Education Coordinating Board to ensure the development of appropriate educational and training opportunities for citizens of the state in support of the transition of some portion of vehicular transportation from combustion to electric vehicles;*

*(d) Development of an implementation plan for counties with a population greater than five hundred thousand with the goal of having public and private parking*

9

local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**O-008-024**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**O-008-025**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006

O-008-025

*spaces, in the aggregate, be ten percent electric vehicle ready by December 31, 2018; and*
*(e) Development of model ordinances and guidance for local governments for siting and installing electric vehicle infrastructure, in particular battery charging stations, and appropriate handling, recycling, and storage of electric vehicle batteries and equipment.*

O-008-026

**SUBSTITUTE SENATE BILL 5921** - Clean Energy Leadership Initiative – This law declares, by simple statement, that Washington is the leader in clean energy and then establishes a "commission" to make that "fact" reality. The population of the Governor's commission is such that the intrusion of opposing viewpoints is improbable. More significant, the impact on economic growth and energy production in the state, short term and long term, will be significantly controlled by this policy. The ability to execute any of the "options" under Transportation 2040 must recognize the impacts of this policy and meet the basic energy related requirements of this policy. It is not apparent that this law has been considered as a primary controlling factor in creation of the 2040 options. The pertinent portions of the law read as follow:

***Sec. 1.*** *The legislature finds that Washington is recognized as a leader in sustainability and climate change and has the foundation to become a leader in the clean energy technologies, products, and services that will be required throughout the world to provide reliable and reduced-emission energy. However, to become a leader, Washington will need policies and strategies to develop new clean energy technologies, attract federal and private investments, attract and grow clean energy companies, and create green jobs. The legislature further finds that positioning Washington to be competitive for federal and private sector clean energy investments will require collaboration between Washington's state agencies, clean energy technology companies, research institutions, national laboratory, and workforce development system to identify our strengths and develop the requisite policies and strategies.*

*It is the intent of the legislature to create a clean energy leadership initiative that will set the path to leverage Washington's energy infrastructure and make Washington a hub for clean energy technology and a leader in the creation of green jobs and the development, deployment, and export of clean energy technologies and services.*

O-008-027

**SB 5735** Reducing Greenhouse Gas Emissions – This is the cap and trade bill that is little more than a "ponzi" scheme under which the state sets standards and then acts as the bank for the carbon trade. The primary issue is that under this bill there is no actual reduction in emissions. This is only a mandated revenue stream for government with the bill being passed to the consumers. In most cases the cost effect will be unavoidable (electric power generation, oil refinery) and the consumer will bear the direct cost of the program. If any part of the



levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-008-026**

Comment noted.

**O-008-027**

Comment noted.

O-008-027 revenue generated by this "Cap and Trade" process is devoted to transportation improvement, it is not clear.

O-008-028 **ENGROSSED SECOND SUBSTITUTE SENATE BILL 5560** Agency Climate Leadership – In this law, every state agency is tasked to demonstrate positive leadership in the climate change area. They are responsible for actions within the agency and for those areas under the agency responsibility. They need an action plan/strategy, monitoring and reporting. The emissions reductions placed on agencies are more restrictive than for the general public but, as PSRC is dealing with mass transit systems that are effectively government agencies, those limits should be factored into the plan. There is no clear evidence that the provisions of the law have been properly considered in the plan. The pertinent portions of the law are detailed as follows:

***Sec. 1.*** *The legislature finds that in chapter 14, Laws of 2008, the legislature established greenhouse gas emission reduction limits for Washington state, including a reduction of overall emissions by 2020 to emission levels in 1990, a reduction by 2035 to levels twenty-five percent below 1990 levels, and by 2050 a further reduction below 1990 levels. Based upon estimated 2006 emission levels in Washington, this will require a reduction from present emission levels of over twenty-five percent in the next eleven years. The legislature further finds that state government activities are a significant source of emissions, and that state government should meet targets for reducing emissions from its buildings, vehicles, and all operations that demonstrate that these reductions are achievable, cost-effective, and will help to promote innovative energy efficiency technologies and practices.*

***Sec. 2.*** *A new section is added to chapter 70.235 RCW to read as follows:*
*(1) All state agencies shall meet the statewide greenhouse gas emission limits established in RCW 70.235.020 to achieve the following, using the estimates and strategy established in subsections (2) and (3) of this section:*
*(a) By July 1, 2020, reduce emissions by fifteen percent from 2005 emission levels;*
*(b) By 2035, reduce emissions to thirty-six percent below 2005 levels; and*
*(c) By 2050, reduce emissions to the greater reduction of fifty-seven and one-half percent below 2005 levels, or seventy percent below the expected state government emissions that year.*
*(2)(a) By June 30, 2010, all state agencies shall report estimates of emissions for 2005 to the department, including 2009 levels of emissions, and projected emissions through 2035.*
*(b) State agencies required to report under RCW 70.94.151 must estimate emissions from methodologies recommended by the department and must be based on actual operation of those agencies. Agencies not required to report under RCW 70.94.151 shall derive emissions estimates using an emissions calculator provided by the department.*



**O-008-028**

Comment noted.

O-008-028

*(3) By June 30, 2011, each state agency shall submit to the department a strategy to meet the requirements in subsection (1) of this section. The strategy must address employee travel activities, teleconferencing alternatives, and include existing and proposed actions, a timeline for reductions, and recommendations for budgetary and other incentives to reduce emissions, especially from employee business travel.*

O-008-029

**HOUSE BILL 2129** Greenhouse Gas Emissions – This act reinforces the Utilities Commission role in approving development of electrical generation plants or purchase of generated electricity. The act reinforces the citizen actions of I-937 regarding definition of renewable energy sources. The ability of electricity generation companies in the state to employ other than clean and renewable energy sources is severely restricted. In that approximately half of the state's power is hydroelectric (classed as non-renewable), and about forty percent is from nuclear or hydrocarbon fired plants, the opportunity to significantly expand power generation may be questionable. The ability to make that expansion near term is highly unlikely considering the lack of storage capacity and the lack of transmission facilities to reach "renewable" energy target development areas.

O-008-030

**SENATE BILL 5540** High Capacity Transportation Service - It would appear that PSRC would benefit from this law. However, the recent lack of interest by voters in King County to support transportation bond issues (one of the actual driving factors behind the creation of Transportation 2040) it is not certain how this authority might be used. It should be noted that, as the result of other legislation, Kitsap County is not included in the King, Pierce, Snohomish MTPO and that, according to US Bureau of Census, Kitsap is not a part of the Seattle/Everett or Seattle/Tacoma metropolitan areas. There is significant doubt that citizens of Kitsap would tolerate a bond issue to pay for "transportation" projects in either of those districts or a PSRC High Capacity Transportation Corridor. The pertinent portions of the law are as follows:

*(1) "High capacity transportation corridor area" means a quasi-municipal corporation and independent taxing authority within the meaning of Article VII, section 1 of the state Constitution, and a taxing district within the meaning of Article VII, section 2 of the state Constitution, created by a transit agency governing body.*
*(2) "High capacity transportation system" means a system of public transportation services within an urbanized region operating principally on exclusive rights-of-way, and the supporting services and facilities necessary to implement such a system, including interim express services and high occupancy vehicle lanes.....*

Although not passed by the legislature, the elements of **SENATE BILL 5735** Reducing Greenhouse Gas Emissions were implemented by the Governor through Executive directive. The actual implementation of the actual cost (tax)



**O-008-029**

Comment noted.

**O-008-030**

Comment noted.

O-008-030

system will require legislative action but that will not be far behind. This is the cap and trade bill under which the state sets standards and then acts as the bank for the carbon trade. The primary issue is that under this bill there is no actual reduction in emissions, this is only a mandated revenue stream for government with the bill being passed to the consumers. In most cases the cost effect will be unavoidable (electric power generation, oil refinery) and the consumer will bear the direct cost of the program. In view of the problems already associated with providing for the energy needs to support both Vision 2040 and Transportation 2040 (all options) this action needs to be clearly addressed in Transportation 2040.

O-008-031

4. A simple analysis of the energy related issues as required by emissions standards established by law, requirements for electric vehicles, and the increase in region transportation needs appropriate to the projected population and economic growth produces a conundrum not addressed in the Transportation 2040 plan.

Population data (US Census Estimates 2008)

| | |
|---|---|
| King | 1,875,519 |
| Kitsap | 239,769 |
| Pierce | 785,639 |
| Snohomish | 683,655 |
| Total | 3,584,582 |

Miles per person (2007) = 8,697 (WADOT Figures)
Miles in PUGET SOUND REGIONAL COUNCIL - 31,175,109,654 miles per year

Gasoline consumption @30 MPG =1,039,170,321 gallons per year (US CAFÉ standards)

Assuming no major scientific breakthrough to reduce the outcome of the hydrocarbon oxidation process, the equivalent gasoline quantity that would support the reductions required by law in year 2020 (about 16 percent) and 2035 (about 36 percent)would lower miles driven to 26,187,092,109 (2020) and 19,952,070,178. That reduction, in turn relates to removing 537,533 vehicles by (2020) and about 1,290,450 vehicles by 2035. Unfortunately, while the reduction from the 2007 base is in progress, population increases continue and with them the need for vehicles. With a growth of 1.5 million people in the horizon period and using the same PRIVATELY OWNED VEHICLE (POV) to individual ratio existing today, the numbers are much higher. Using a straight line growth estimate within the horizon period an additional 50,000 cars per year would have to be entirely eliminated to meet the emissions reduction criteria.



**O-008-031**

Comment noted.

O-008-031

The effective elimination of approximately 115,000 emission creating vehicles per year and replacing their transportation capability with non-emitting vehicles is not addressed. The number of electric or hybrid vehicles required, on an annual basis, is approximately one-half the current world production of those vehicles that might serve as substitute vehicles. The current and forecasted availability of the raw materials for Lithium-Ion batteries, the current power storage devices for electric and hybrid cars, does not support a massive increase in production of either batteries or vehicles. In addition, the current supply of those materials on the world market is primarily from China and Argentina, not necessarily strong trade or defense allies of the United States. How PSRC is to meet the objectives and at what cost, while in competition with the rest of the state and the rest of the nation, is not identified in the plan.

In addition to the simple logic of direct vehicle replacement there is the issue of a replacement energy source. One gallon of gasoline equates to 33.4 KWH of electricity. To replace the approximate 33 millions of gallons of gasoline saved each year will require about 1,113,000,000 KWH of electricity (1,113,000 MWH) In 2007 the entire electricity production for the state was 106,990,217 MWH with less than 3 percent from wind, solar, or similar non-emitting sources. (Hydro power was not considered because it is already classified non-renewable). The bottom line is that to replace energy for transportation needs, the PUGET SOUND REGIONAL COUNCIL region will need an increase of non-emitting energy sources that essentially exceeds current capacity. In that the same time frame electricity sources will be required for general population support and economic development, it is difficult to comprehend how the energy needs will be met to sustain any of the 2040 options.

Finally there is the issue of personal choice as demonstrated over the past 30 or so years. The US automotive market has always had available one or more lines or models of cars that traded size for fuel economy. In the mid-1970's during a major oil supply curtailment, a significant effort was made to shift the American car driver from "gas guzzler" to fuel efficient, high mileage vehicles. It did not work. The Ford Pinto, Chevy Vega, Pontiac Tempest, Fiats and Datsun's of all stripe, followed by Saturn, Honda, KIA, Hundai and a complete variety of fuel efficient vehicles from major manufacturers has not significantly modified the American choice for size, comfort, and safety on the road. The continued effort by planners to bring about a change in personal behavior is not only a continuing study in frustration, but a major divergence from the authority and responsibility delegated to our government. PSRC may be able to justify, in some manner, the ability to decide if roads will or will not be provided for citizens to use for personal transportation. PSRC does not have the moral imperative or the authority to decide what type of cars citizens will purchase and drive or how frequently or how far citizens will drive their cars.

O-008-032

5. Each of the options provided by Transportation 2040, except Alternate 5, requires a significant increase in road miles to meet future transportation needs.



**O-008-032**

Comment noted.

**O-008-032** Numerous studies conducted outside the auspices of PSRC have estimated an additional 700 lanes miles are required to relieve road congestion in the Puget Sound Region. There is no mention of other studies of the congestion problem. Ignoring solid fact based data because it is inconvenient with an agenda or inconsistent with a desired outcome is not appropriate. The only valid reason to exclude other study results is hard evidence of major inaccuracy. That is not the case in this instance.

**O-008-033** 6. Chapter 3, Par. 2 – Ferry System. While the paragraph describes the system in generic terms it does not note the importance of the system to Kitsap County and the economic well being of the east Sound region. The ferry system provides the vital link for a highly trained and professional work force to commute daily between Kitsap and businesses in the east Sound. The ferry system is also a vital link for recreational activities of east Sound residents visiting the Kitsap and Olympic peninsulas.

**O-008-034** 7. Chapter 3, Par. 2 - Freight and Goods Systems. Ports – The port facilities in Sinclair inlet and bordering Rich Passage provide major economic benefit for Kitsap County and the Region. Puget Sound Naval Shipyard and Manchester fuel depot are major government facilities that clearly overshadow similar facilities in the region. Additionally the port facilities at Bangor and Keyport are of appropriate significance to be included in the list.

Airports – The extensive variety of small airports in the region should not go without notice. While there can be no doubt that SEATAC airport is a major facility and deserves appropriate attention, failure to identify the smaller facilities means that they will be overlooked in the transportation planning effort . By 2040 those smaller "local" airports will probably play a major role in transportation in the area and in the nation.

Railways – Kitsap Peninsula is served by the Puget Sound and Pacific Rail Road with trackage to South Kitsap Industrial Area (SKIA), Puget Sound Naval Shipyard, Bangor and points in between. The rail, owned by the US Navy is Class 1 or better trackage and offers significant opportunity for economic expansion in the area. Extension of trackage to North Kitsap could support Rail Diesel Cars (or similar) commuter trains in the county. The opportunity to provide cost effective service to North Mason and North Kitsap could reduce travel loads on local roads.

**O-008-035** 8. Chapter 3 Par. 2. – Transportation Demand Management Systems. While commendable, the concepts of shift scheduling, car pooling, bicycling, and walking as a means to make appreciable reductions in POV travel is not supported by a 15 year history of pushing those programs. As of yet, no government agency has made the case for the alternate means so strongly as to modify the behavior of a significant number of commuters. To continue to consider the same failed concepts as a meaningful part of an effective program meets the definition of insanity. Short of physically denying people the ability to travel by POV, a simplistic, "appeal to reason" management system will not work.

15

**O-008-033**

The purpose of Chapter 3, Paragraph 2 is to describe all elements of the region's Metropolitan Transportation System in generic terms.

**O-008-034**

Improvement of performance for the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative.

**O-008-035**

Comment noted.

O-008-035 People like and desire to maintain the transportation flexibility and completeness offered only by a POV and no other means of travel.

O-008-036 9. Chapter 3, Par. 3. – What Changes……? As a side bar to this section there is a note that identifies a number of funding methodologies that are considered in the options. Among those are tolling, user fees, ferry fares. Of note, there is no indication that any effort will be made to reduce the capital project cost or the operation and maintenance cost of any of the transportation elements under consideration in the options. The ability to fund through increasing the taxpayer "contribution" to the planned system assumes that first the taxpayer will stand still for the increased cost and second that the taxpayer will support the plan. Based on the overall fiscal awareness of taxpayers and their general rejection of placing additional funds in the hands of government, the rationale of plucking more dollars from taxpayers needs close reconsideration. If you maneuver so as to hold taxpayers hostage to the system, you may find an unusual and unpleasant reality in their reaction. In the previous comment on lack of assumptions, the assumption that funding would be available, not addressed until this section, is clearly not a valid or supportable assumption.

O-008-037 10. Chapter 3, Par. 5. – The listed "assumptions" for continued service in various categories or maintenance of capacity are not consistent with either plans already approved or working or plans on the drawing boards. Additionally, the funding to implement that maintained level of service is not identified. Since current funding levels are not sufficient to adequately maintain roads, bridges, and ferries, how will those funding requirements be met in the future? Please also note that there is no indication that increased capacity can be gained by elimination of off hour HIGH OCCUPANCY VEHICLE (HOV) restrictions. To the contrary, it appears that the restrictions will be continued so as to provide a future opportunity for tolling or user fees.

O-008-038 11. Chapter 3, Alternatives

-Alternative 1 System Efficiency. Reading between the lines on this option it appears that either legislative effort or other negative incentive will be employed to coerce employers to force employees into a less than optimal commute methodology. It is reasonably clear that jurisdictions will either eliminate core parking areas or make them effectively not available to workers. The offshoot will be a very large "underground" parking business that allows employees to park close to work. It is interesting that, in Kitsap, the single largest employer was so concerned about supporting the employees that the Navy constructed a major parking garage in close proximity to the yard in downtown Bremerton. Under this alternative that garage would not be allowed.

O-008-039 - Alternative 1 System Management. Intelligent technology and "system management" practices are only successful when the capacity of the road systems is adequate for the traffic load being managed. Otherwise the IT system



**O-008-036**

Comment noted. An important element of our Transportation 2040 planning process has been to identify and evaluate investment and funding options and solicit public feedback on those options. The plan contains clear explanations of our financial assumptions.

**O-008-037**

We have elected to develop the transportation plan in an overlapping but sequential manner, such that we identify the region's transportation needs early (but with some thought given to the costs and possible funding mechanisms available to finance the improvements) and then develop a financial strategy to implement the planned investments.

The Draft Plan includes a Financial Strategy that continues to rely on current funding sources in the early years, and then transitions increasingly to HOT lanes and tolls and user fees in later years. This strategy would generate sufficient revenues to fund all projects and programs in the Constrained part of the Draft Plan. This includes some $110 Billion needed to preserve, maintain, and operate the current transportation system. For more details please see Appendix F of the Plan document.

As you mention in your comment, the Draft Plan recognizes that moving to a 3-plus occupant requirement on the region's HOV system may not achieve our long range goals. As we transition from our current freeway operating system (HOV lanes) to freeway system tolls our HOV lanes will no longer function as they do today.

**O-008-038**

Comment noted.

O-008-039 is little more than a "traffic delay" process that may give an appearance of efficiency but delivers none. The current IT and management systems have not resolved or relieved congestion to any noticeable degree. More of the same will result in more of the same.

O-008-040 - Alternative 1 Strategic Expansion

- Roadways. Turning all of the HOV lanes in the region into HIGH OCCUPANCY TOLL (HOT) lanes does not increase effective road miles. That the primary recommendation is to charge taxpayers for continued inefficiency and delay is something only a planner could dream of.

O-008-041 - Transit. Once again the time honored but proven ineffective answer is brought to the fore. The use of transit in core areas with major penetration by routes and frequent service will provide an answer to some of the needs. However, as soon as the population begins to disperse by either origin or destination, the ability of transit to support actual needs falls off rapidly. Portland tried and failed to build a "transit centered" city as a major revitalization project. PSRC is trying to jam a similar failed effort into an area that is not being revitalized but just growing and growing. Bus systems and light rail cannot provide the required service in a cost effective manner. Consideration of federal funds to support inappropriate system expansion for the sake of having a transit system is also poor stewardship of taxpayer funds.

O-008-042 - Bicycle and Pedestrian. You can build all the bike trails and pedestrian walks you may desire without making a substantive impact on the transportation solution. However, if Seattle, Tacoma, Bellevue, Everett, and Bremerton are prepared to declare core areas as "no private vehicle" areas, make appropriate modifications to support major increases in transit, taxis, delivery vans and such, there could be a chance. Who wants to go first?

O-008-043 Alternate 2 The 2030 Reflection.

- Roadways. This plan, like its parent, is little more than a revenue generation scheme with considerable added cost to use existing roads with little benefit. Count this one as dead as Proposition 1 with the taxpayers.

- Transit. Once again, funding that should be dedicated to relieving congestion on roads or maintaining basic infrastructure is diverted to light rail. If light rail is such a good investment, why does it not enjoy a larger percentage of ridership in areas where it exists? If light rail is good, why are not busses better?

- Bikes and trails. Here we go again. Take a survey of the first 1000 people that you meet in South Center to determine how many arrive there by bike or walking and for how many that is the preferred way to shop. Then go to Boeing and ask the same question. If walking is so neat, why do ferry system personnel have reserved parking spots at each of the terminal facilities? The



**O-008-039**

Comment noted.

**O-008-040**

Comment noted.

**O-008-041**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-008-042**

Comment noted.

**O-008-043**

Comment noted.

O-008-043

alternate makes the following statement: "*Combining bicycle and pedestrian options with the expanded transit systems and more efficient roadways would provide significant improvements in access to housing and jobs*" Where is the specific proof for that statement? If we can't make it work at a High School how do we make it work with grownups?

-Funding, Kudos to the planner who wrote "*Alternative 2 would rely on significantly more traditional funding (gas tax, etc.)"* What a nice way to say we need to raise taxes to make this dream come true.

O-008-044

Alternate 3 – The Toll Road System. At least this option pulls no punches; 'Drive your car and pay". There would be little or no opportunity to leave the driveway without completing a transfer of wealth to the government. Have to read real close though to find out what happens to the existing funding stream. *"Traditional revenues would fund other efficiency and management programs, including substantial bus service investments, strategic arterial roadway expansion, and new off-road trail infrastructure in the corridors connecting the regional centers to form a non-motorized Network"*. Unfortunately, there is no mention of the Constitutional amendment necessary to squander gas tax and license fee dollars on trails and bike paths. How is that to be handled?

- Demand efficiency. At least the planners were honest enough to realize that if every road is a toll road, people might drive less. Of course they (and their businesses) might just decide to go somewhere else. That would also work to further reduce demand and congestion but might be a heavy hit in other areas.

- Transit. Not surprisingly, transit busses would be increased and flow along arterials (probably left vacant by drivers refusing to pay tolls). There is no assurance that the system will work however. In numerous instances where similar approaches have been tried, resourceful drivers have explored the potential of secondary roads and city streets and blazed entire new "routes" to overcome apparent government stupidity. The most recent case was in Poulsbo when POV commuters found a way around a congested HOV constrained Highway 305. Now the downtown area has stop signs bringing unnecessary congestion and traffic jams to downtown.

- Bikes and "Boots". *"Bicyclists would benefit from a completed network along the corridors that connect regional growth centers. Bicycle and car-share programs would offer more travel choices"* At this juncture it might be appropriate to fire either the planner who was raised and educated in Denmark/Sweden or the one who has stock in a bicycle company. It is time to take another survey to determine how many employees are actually going to ride a bike to work in the winter. You might also want to determine how many over the age of 40 plan to use a bike as their primary means of transportation. If bikes are such a good idea, can we start by ending school bus service in metropolitan areas and requiring children 12 and older to ride bikes to school? Want to try that on the



**O-008-044**

Comment noted.

O-008-044

UW campus? It will be interesting to see the reaction to the "ride your bike" suggestion made by WADOT as a way to avoid the congestion created by the shut down of normal traffic lanes on the I-90 bridge for expansion joint replacement.

O-008-045

Alternate 4 - the "Why Bother" Plan. This one says it in a nut shell, Pay more get less and buy more busses and light rail. "*Roadway expansions in Alternative 4 would be limited to projects that relieve congestion at bottlenecks and chokepoints by using some of the revenue generated by tolls. Alternative 4 Transit New revenue (including some toll revenue) would be invested in transit service. Alternative 4 would implement ST2 plus extend light rail to Everett, Tacoma, and downtown Redmond. These expansions, and the better use of shared rights of way for Bus Rapid Transit (BRT), would combine to make the entire transit system more convenient for users and better integrated with roadway systems. Alternative 4 proposes to increase transit services on tolled corridors, including core and specialized service on routes where the use of tolling improves transit travel times.*" In short, this plan is drive less, pay more and buy busses. Just how this works to the benefit of taxpayers is not apparent.

- Ferries. To the planner that does not commute by ferry, a message. Car ferries carry large number of passengers. Passenger only ferries carry small numbers of passengers and, in general are not a value added for the system. A specific example of a value added passenger only ferry is Kingston to Seattle where no service exists and provision of commuter service could actually reduce congestion on Highway 305 on Bainbridge Island. Instead of Passenger only boats to Bremerton (the big driver) how about increasing boat capacity and rotating boats to provide 40 minute departures during rush hour. (Of course if Seattle makes downtown a no car zone the problem is solved. Another idea is to move a ferry terminal to Blakely harbor and provide direct rail service from Illahee or Manette to the ferry terminal.

- Bikes and Pedestrians. "*Toll revenues would be spent to complete bicycle and pedestrian connections to transit centers, rail stations, and ferry terminals. These investments would provide better access to arterial transit service, complete sidewalk systems and bicycle networks along corridors that connect regional growth centers, and provide more safety features at crosswalks. Cities with regional growth centers would work to provide better "end-of- trip" facilities such as locker rooms, storage, and secure bicycle racks.*" This idea is so bad that it barely deserves comment. The ultimate insult is to force a taxpayer out of their car or make them pay heavily for the "privilege" of using that car so they can pay for bike paths and locker rooms. Would someone please identify the exact section of the state constitution that delegates authority to the Legislature or any other jurisdiction to spend in this manner? If bike paths are essential to the health of our community, let "Parks and Rec" foot the bill. How long will it be before we have to have skate lanes for high speed commuters?



**O-008-045**

Comment noted.

O-008-046

Alternative 5 –The "Climate Change" Option. In reality, this is the preferred option for PRSC and will, considering recent legislation, be the only option that could even come close to meeting ENVIRONMENTAL IMPACT STATEMENT requirements. As noted in paragraph 3 of these comments, the stringent requirements of legislation regarding emissions reductions will require removal of approximately 115,000 emission producing vehicles from the road each year of the planning period. This is the only alternate that forces that change in behavior and enables the region to meet emission standards.

- Roadways. This alternate does nothing for roadways over the next 25 years. The plan to increase or finish HIGH OCCUPANCY VEHICLE (HOV) lanes and resolve certain "bottlenecks" would be more than offset by the forced reduction of vehicles using the roadways. The sole purpose for roadways is to force those without viable transportation options to subsidize non-self sustaining transportation for all others.

- Transit. Virtually all effort would be directed toward mass transit of one type or another. Rider ship would be forced. People would have no choice but to use what ever transit service was available regardless of price or time commitment. This alternate is predicated on a mandated behavior modification. There is a high probability that the adoption of this alternate will result in significant out migration of skilled professionals and business.

- Bikes and Pedestrian. This manner of transportation will now become a major element of the overall transportation plan. The time lost by commuters and the probable decrease in public safety will not be accepted willingly by consumers. Those who suffer mobility disabilities or who are very young or elderly will become a burden on the community and pose new challenges for the community at large. The actual loss of mobility of mothers with children will have a net negative effect on both the work force and parental involvement in community activities.

- Funding. The alternate requires replacing current funding sources and methodologies with an entirely new revenue generation stream. That action will require a constitutional amendment. The probability that a combination of tolling and revenue generated from user fees is unlikely to actually support the capital development and the out year operation and maintenance funding requirements. Mass transit has yet to demonstrate operation with a positive or, at least, break-even revenue to cost balance. Those systems have been and remain highly subsidized. Of course, once mass transit is the only real option available, user fees and tolls can be increased to the level necessary to make any fiscal balance necessary. How that is beneficial is not clear.

- Innovations. This alternate requires innovation in fuel sources and technological advances in order to achieve the objectives of the plan. The alternate does not explain what those "innovations" or "technology"



**O-008-046**

Comment noted.

O-008-046

breakthroughs might be or who is to bring them to fruition. It is difficult to perceive how these miracles of science will occur while industries are being restricted in both the energy availability and skilled labor that are an inherent part of this alternate.

O-008-048

12 Missing Alternates. At least two other alternate plans are missing. Either is viable, would resolve the problem postulated, and appear to be within the unwritten assumptions of the plan

Alternate X – Construct the necessary 700 lane miles on major arterials to relieve congestion. The studies are complete and the locations for additional lane miles have been identified. Funding for the alternate would come from existing taxes and fees with exceptional limitation on funds diverted to mass transit, walking paths, and bicycle lanes and facilities. This alternate appears to be most consistent with the authority delegated to government by the people, as set forth in the Constitution.

O-008-049

Alternate Z – Eliminate POV in major metropolitan areas. The Spokane area appears to be leading in this approach, at least in being truthful about the desired outcome. Their current plan to eliminate cars is clearly identified as such. This alternate would use Seattle as the "poster child" for the project. All POVs (less delivery vehicles and some strictly routed through traffic) would be eliminated from surface streets from Lake Union to SODO District and from 6th Avenue to the waterfront. Additional mass transit service would be provided. Current streets would be converted to boulevards with appropriate center landscaping, bike lanes, and pedestrian walks. Moving sidewalks should be considered for the longer walks in the area. Escalators to facilitate the "hill climb" from Alaskan Way to 6th Avenue should also be considered. This alternate would require major "park and walk/bike/ride" lots on the fringes of the area. Those lots could provide major revenue for the "car-less core" project. Limited through transit lanes for ferry vehicular traffic, to move between Coleman Dock and PRIVATELY OWNED VEHICLE accessible areas would be necessary. Perhaps the current Spring Street route to access I-5 and the existing I-5 access to the terminal would suffice. This alternate has the attraction of facilitating the transfer of transportation from PRIVATELY OWNED VEHICLE to other "more desired" means. It also provides an early opportunity to assess the acceptance of the ultimate goal of a "car free" system with those who live, work, and shop in downtown Seattle as well as compatibility with the business plans of the many businesses located in that area.

O-008-047

13. Chapter 3, Par. 11. How the alternates were developed.
Reading this section might lead one to believe that any and all parties or groups that had been involved, over time, in PSRC transportation planning might have been involved in this current work. That is not the case. This organization, KITSAP ALLIANCE OF PROPERTY OWNERS (KAPO), has been deeply interested in the entire PSRC planning process and has made significant



**O-008-047**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**O-008-048**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**O-008-049**

Comment noted.

O-008-047

comment and input on Destination 2030, Vision 2040 and associated documents. KAPO was unaware of the Transportation 2040 alternate development and the preparation of the DEIS. It is reasonably clear that this document and the underlying effort is a staff creation assisted by associates selected by staff. This document cannot be represented as a product of open public development.

O-008-050

14. Chapter 3, Alternate Testing
That the PSRC staff conducted some level of alternate testing using an in-house developed modeling system does not give great credence to the process or the results. Because the integrated land use and travel model effort has a predetermined outcome of favoring mass transit, walking, bicycling, and virtually any other transportation method other than PRIVATELY OWNED VEHICLE/SINGLE OCCUPANCY VEHICLE (POV/SOV) there should be little doubt as to the end result. In that the land use plans employed are those directed by Vision 2040, a set of policies that were essentially created to support mass transit, it would be incredulous that any other result was achieved. The system of metrics and measurements to be used to determine the "effectiveness and achievement" of Transportation 2040 selected alternate are in fact, the ability of that plan to continue the forced land development policies of Vision 2040. That is hardly an unbiased "testing" procedure. The system did not properly consider the actions of the legislature. It is highly likely that not one of the alternates offered and "tested" will satisfy the actual requirements of current law.

O-008-051

15. Alternate Analysis results Chart.
This is one of the finest examples of manipulation of a data set to achieve a desired result. Take for example under Alternate 5 there will be a massive "Travel time saved" as compared to Alternate 1. With Alternate 1 most closely resembling today and Alternate 5 representing a future of bliss in mass transit. If total commute travel time today by mass transit is approximately twice that for travel by SOV, and if there are no major road improvements under Alt 5 which is mainly a mass transit expansion, how can that figure be real? Also interesting is that Alternate 5 accrues the best benefit for stationary vehicle emissions which has to be a marvel of science unless all vehicles are non-emitting. Finally, several alternates appear to have a positive benefit in the category vehicle and building energy use. Since that is not quantified there is some doubt that the finding is actually objective in nature. The total presentation by the chart is bewildering in that there is no explanation of the elements used for testing, the relative values assigned to each element, and a manner in which to assess the outcome of the testing process.

O-008-052

16. Potential impacts on delay of Transportation 2040.
The opening statement certainly strikes fear into the heart on any solid citizen. Imagine that not approving this overarching government plan timely and as presented might hamper completion of not only this plan but also another plan that was adopted a year ago. The first question must be "if last years plan needs



**O-008-050**

We disagree with your statement that the PSRC modeling system has a predetermined outcome.

**O-008-051**

Thank you, comment noted. The travel time savings and emissions reductions in Alternative 5 are in some large measure a result of roadway time-of-day tolling. The PSRC Web site contains methods reports for the travel demand and land use models and the benefit-cost analysis procedures.

**O-008-052**

WAC 197-11-440 Section 5(c)(vii) requires that an EIS discuss the benefits and disadvantages of reserving for some future time the implementation of the proposal, as compared with possible approval at this time.

Chapter 3 fulfills this requirement.

O-008-052

this plan, why is it so late and holding up the effort of the previously adopted plan? To be more specific, the following "impacts" make little or no sense:

"*Failure to implement a key component of VISION 2040, the region's long-range vision for managing growth"* Vision 2040 is a comprehensive set of planning policies that are available as guidance and not mandatory for adoption by any jurisdiction within PSRC. It is not clear how a delay in or not adopting Transportation 2040 would result in "failure to implement Vision 2040.

*"Delays in implementing transit, nonmotorized, and other project types that have environmental benefits"* The policies in Vision 2040 include encouragement for individual jurisdictions to incorporate these types of transportation projects in their land use planning. With or without Transportation 2040, that planning can go forward.

*"Impacts on achieving economic development goals including affordable and convenient housing opportunities."* The planners may be able to demonstrate through their modeling how Transportation 2040 will, near term, have impact on either economic development or affordable housing but it is doubtful. This process has been ongoing for over 20 years with little or no measurable positive impact directly attributable to either land use or transportation planning. To the contrary, there are considerably more instances on record that document loss of business opportunity and regulatory impact on housing that resulted in artificial inflation of home prices out of the affordable range.

*"Risk in delaying or receiving a reduced amount of federal funding"* Finally there is a reason that is clear and honest. If the Plan is not allowed to move forward promptly the potential loss of funding is increased. That it might be better to actually permit detailed study of the problems we are trying to solve and to permit open debate on potential solution is apparently not as important as getting the almighty federal funding.

*"Higher construction costs due to inflation"* This reason is enough to make almost any taxpayer chuckle. The same bureaucrats that consistently use sales tax on road construction projects to move funding from the road account to the general fund are worried about inflation. How quaint.

O-008-053

17. Chapter 4, Transportation
Chapter 4, Par 1- The following statement, included in the introductory section of this chapter is the key to the success of both Transportation 2040 and Vision 2040. *"The multicounty planning policies serve as the "Regional Principles and Guidelines" for local comprehensive plan review and certification required for regional transportation plans under the Revised Code of Washington (RCW) 47.80.026. Hence, these policies guide Transportation 2040."* In fact, as determined in the review and adoption of Vision 2040, that document was based on land use provisions incorporated to satisfy predetermined transportation



**O-008-053**

We disagree with your statement that characterizes our approach as "dishonest."

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

O-008-053 parameters. To attempt to now justify Transportation 2040 as a result of or in support of Vision 2040 is blatantly dishonest.

O-008-054 Chapter 4, Exhibit 4-1. The deep water ports in Bremerton and Manchester are not identified. The regional airport at Bremerton (Bremerton National Airport) is not identified. These omissions are significantly surprising as a Bremerton Port Commissioner is a voting member of PSRC.

O-008-055 Chapter 4, Exhibit 4-3. The explanation is misleading. The national Interstate Highway system was created as a national Defense Highway System and continues in that role. The priority for maintenance and expansion of the system in Washington must naturally be directed toward the movement of defense related materials and personnel to meet national emergencies. The roads linking Ft Lewis, McCord, Puget Sound Naval Shipyard, NSB Bangor, NUWC Keyport, Port of Seattle, Naval Base Everett, and by extension, NWS Indian Island, and the portions of I-90 from Seattle to the Yakima complex are key elements of that system. The defense nature of the nuclear complex at Hanford would also include interstate system links to that facility. Unfortunately, the priority for defense use is not reflected in the Plan.

O-008-056 Chapter 4, Exhibit 4-4. The "Freeway High Occupancy Vehicle (HOV)" lane system was initially intended to encourage carpooling. In virtually every state that has HOV Lanes on the Interstate highways (not all do have HOV lanes), those lanes are restricted use only during peak commuter hours. At all other times the lanes are open to all traffic. That is consistent with the initial purpose of the lanes, as explained and justified to the American taxpayer when they were forced to pay for those lanes. Of note, several states have "turnpikes" or other toll roads that were paid for by state funds, operated and maintained by state funds. Washington has the same opportunity but the proposal never seems to receive approval from the voters. To "convert" the interstate system to a set of toll roads in the name of improved service is contrary to the initial purpose and funding of those roads and is little more than an attempt to coerce and mislead the taxpayers.

O-008-057 Chapter 4, Par. 5. This section intends to provide a description of the existing "transportation providers and services in the region". The language is complimentary where the service is appropriate to the designs of the Plan but less than complimentary when the service is not consistent with the predetermined outcomes. For example, there is no information on the actual use of transit systems and the cost per operational mile for the systems. The only way that transit systems can be considered fairly as part of the mix is by understanding the cost to move people over actual system miles traveled and then to include the time, cost of money and other costs associated with moving people in areas not served. There can be no doubt that a bus, filled to capacity, will probably be more cost effective than a SOV covering exactly the same route. However, if the bus takes twice as long to cover the route, the cost of rider time



**O-008-054**

Comment noted. The Transportation 2040 plan addresses the region's ports and airports.

**O-008-055**

Comment noted.

**O-008-056**

Comment noted.

**O-008-057**

Detailed information about cost by alternative can be found in Appendix D.

O-008-057

must be properly factored into the overall cost equation. In addition the cost of the bus to run empty to the start of the run from the barn and to return to the barn must also be considered. Because bus service is limited with respect to area coverage and times of service, every opportunity lost because of not providing a service must also be factored against the bus system. If a person is required to use an alternate means of commuting, because transit is not reasonably available that is not a cost associated with using the alternate but a cost charged, at least in part, to the transit system for not being available.

Of note, the park and ride capacity of 38,000 spaces, without regard to location is a clear indicator that the POV use is essential to the successful operation of the mass transit systems. If the number of cars required to be removed from service for commute is correct, the number of park and ride (P&R) slots will need to increase by about 100,000 per year. That cost does not appear to be factored into the Plan. In addition, the number of transit units and the frequency of service will also have to increase. It is not clear how that is provided for in any of the alternates. Finally, because of the "electric vehicle" mandate, all P&R facilities will have to include direct support for electric vehicles. That does not appear to be included in the plan.

The discussion of the "rapid transit" corridors, as provided for in recent legislation, does not clearly indicate how those corridors will be established. If the transit vehicles dedicated to those corridors are required to use existing road or rail lines, it is difficult to understand how "rapid" can be achieved on roadways already congested to gridlock. If the intent is to segregate and designate specific "transit only" roads and streets to support "rapid" that must be at the cost of further congestion and delay for all non transit users. How is that process explained in this plan?

O-008-058

Chapter 4, Par. 6. The discussion of ferry service is one that will always peak the interest of taxpayers on the west side of the Sound. The manner in which the system is addressed in this Plan does a disservice to the ongoing ineffectiveness of the current service and, if possible, makes it worse. The implication that restoring license tab fees to a reasonable level hampered ferry revenue is not only in error by an outright lie. The continued implication that the only funds available for roads and ferries must come from gas tax, license fees, and road tax is not correct. The Constitution requires that the funds collected from those sources be dedicated to specific uses but does not preclude use of other revenues to provide and sustain this basic service to the citizens of the state. Further, the state has a long history of using sales tax on transportation projects to divert transportation dollars to the general fund. Additionally, the WSF is operated under and is the responsibility of WA State Dept. of Transportation (WADOT) . There is no reason for PSRC to waste additional taxpayer funds in the conduct of "studies" and analysis of ferry system needs. When PSRC is incapable of arranging for the system to actually support service appropriate to start and finish times of major events or to provide reliable service for daily



**O-008-058**

Thank you for your comment. You mention the limitations on the use of gas tax revenues, and imply that the only feasible source of revenues available for highway or ferry improvements are the gas tax, license fees, or road taxes. We're aware of the limitations of the 18th Amendment. We also are aware that there are numerous other revenue sources available to support investments in ferries, transit, and the non-motorized system. Your comment mentions ferry system planning between PSRC the WSF. The planning being done by WSF and PSRC related to the Washington State Ferries and possible future passenger ferries has been strongly coordinated. With the completion of the Final Long Range Plan by WSF there is more certainty about the future of the state ferry system. This information will allowed PSRC to fully incorporate plans for the state ferry system into Transportation 2040. In addition, planning for passenger ferries by King County Ferry District, Kitsap Transit, and the Port of Kingston was also coordinated with PSRC's work on Transportation 2040.

O-008-058 commuters, it is improbable that PSRC will be able to find or enable a real solution to the ferry question.

O-008-059 Chapter 4, Par. 7. The effort to force walking and bicycles as a primary means of transport continues without logic and reason. For over 25 years, throughout the state, major roads and arterials have included designated and restricted "bike" lanes. The associated increase in use of bikes by commuters has been miniscule to the point of questioning the logic of spending further limited resources on those lanes. The program, based on the concept of "build it and they might come" has proven a failure. It is time to stop the madness. As a specific example of the failure of the system one need look no further than Kitsap County. State Highway 16 and Highway 3, extending from Pierce County Line to Poulsbo are bike lane roads. All of the other state highways, upgraded or improved over the last 10 years also include bike lanes. The Clear Creek bike trail, installed at a cost of well over $1 million dollars, links Silverdale to Naval Submarine Base, Bangor. Notwithstanding the availability of extensive bike lane miles in the county that support commuter traffic, the use by commuters is so low as to be virtually insignificant. That the various trails and bike lanes may see use for recreational purposes is not a consideration in this plan. If it is a consideration, then the recreational and non commuter use of roads and highways must also be included as a planning factor. Put simply, the effort to justify walking and bicycles as meaningful alternates to SOV or other means of commuting has gone on for over 20 years without developing one shred of evidence that the underlying assumption has any factual basis. If King County has one of the largest trail systems in the US, why does road congestion continue to be a major problem? It's time to let it go and concentrate on using tax dollars more wisely.

O-008-060 Chapter 4, Par. 8. The freight movement provisions appear to consider the west side of Puget Sound as some sort of leper colony when it comes to industrialization. That may be an objective of the overall PSRC effort but it certainly does not meet with the needs or desires of the citizens of Kitsap. The deepwater port of Bremerton, currently providing major ship repair and maintenance facilities for the US Navy, has significant potential for commercial development and use as a gateway to the Kitsap and Olympic Peninsulas. The Facility at Manchester, also a naval facility has similar, if not greater, potential. The airport located in South Kitsap Industrial Area (SKIA), has great commercial development capacity. The availability of class 1 rail facilities in close location to the industrial area and with a potential for expansion to west coast ports must be considered in this plan with its' 30 year horizon. PSRC may not recognize the opportunities and capacities for economic development in Kitsap but the citizens of Kitsap do.

O-008-061 Chapter 4, Exhibit 4-5. It is interesting to note that not one single major transportation corridor linking the major employment areas of the region escapes designation as a congested corridor. This condition appears contrary to the fact that the land use and transportation planning that have been ongoing for the last



**O-008-059**

This plan does not force walking and biking as a primary means of tansportation. The plan attempts to offer choices of walking and biking as healthy and inexpensive ways to accomplish short trips.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-19, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**O-008-060**

The South Kitsap Industrial Area is one of eight designated manufacturing industrial areas as identified in VISION 2040, which was

O-008-061 20 years were specifically intended to resolve the congestion issue. It would be appropriate to conclude at this juncture that the policies and plans implemented to date have not been effective and that a different approach must be considered. Unfortunately, this version of the transportation policies and plans does little more than continue previous effort by increasing restriction, regulation, and cost. Is it not time to step back and make sure that our collective efforts are actually addressing a real problem and that the problem has been correctly defined. It does appear that most of the efforts to date have been to deal with symptoms of a perceived or created problem rather than an actual problem.

O-008-062 Chapter 4, Exhibit 4-8. This is another example of statistical data that does not recognize a fact. Computed travel times have increased yet POV use continues to grow. The conclusion is not that commuters need better transit service but that commuters, despite the failures of WADOT, continue to prefer an exchange of some personal time for the freedom of personal mobility offered by a POV. Not considered in the data set is the time differential (time saved by the commuter) when using POV as opposed to a transit system opportunity. Almost, without fail, the actual time to commute by transit will be far longer than the "delay" time incurred by POV. A wise person will always place significant value on their personal time.

O-008-063 Chapter 4, Exhibit 4-11. This data set is intended to demonstrate an increase in transit system ridership. Unfortunately, the data are from a "household" survey and lack certain credibility. Additionally, comparing "data" from 1988 and 1998 to that of 2006 is inappropriate because it does not factor in additional service offered. Finally, the actual cost for the service is more critical to this discussion than the number of persons using the system. The fact that transit system costs to users are highly subsidized by non-user taxpayers must be a consideration. If a transit system is not fiscally self sustaining, it is not appropriate to compare it to a POV mode that must be, by definition, self sustaining.

O-008-064 Chapter 4, Exhibit 4-14. This exhibit alone is sufficient to negate the continued offering of transit as the solution to our transportation needs. The people, through their choices of where to live and work, have made it clear that they are willing to trade some time and distance to live where they want and can afford the housing cost. Because transit use has not skyrocketed over the same period of time is a clear indication of the personal choice of POVs over transit. Your own data tells the story. Please read what you offer.

O-008-065 Chapter 4, Exhibit 4-17. The exhibit is misleading. The issue at hand is the PSRC region and not the entire WA State Ferry system. More significant data for individual runs concentrating on commuter periods would be more appropriate. There should be no doubt however that commuter use has increased. That is just one more indication that where people chose to live is a decision that is only partially impacted by where they work. Increased rider numbers indicates that more employees have chosen to trade off a commute for the more enjoyable



one of the screening criteria used for selection of the Transportation 2040 Preferred Alternative.

**O-008-061**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**O-008-062**

The regional travel models represent travel times for all modes across all possible origin and destination zone combinations. These models conform to standard travel modeling practices, and typically transit times will be longer than auto times. As is evident in the real world and the travel surveys that support regional modeling, travel time is not the only

O-008-065 living conditions on the west side of the Sound. Perhaps there is both a land use and a transportation message in those personal decisions.

O-008-066 Chapter 4, Par. 16. In this paragraph the response is actually the result of circular logic. Earlier in the DEIS the rationale for the Plan is to be in compliance with and support land use regulations at the state level. The concept being that land use decisions are made with transportation in mind but not as the overriding factor. Now it is made clear that transportation is the overarching consideration. The ability of PSRC using Regional Transportation Planning Organization (RTPO) authority to grant or withhold federal and state transportation funds based on compliance with and implementation of PSRC land use planning policies strengthens the argument that transportation planning and fund allocation override any land use considerations. Consequently, urban land use planning is corrupted in order to best fit desired transportation planning elements and factors.

O-008-067 Chapter 4 – Analysis. The lengthy and detailed information supporting analysis of the various alternates and the conclusions reached fails to recognize the necessity for basic factual data, directly applicable to the analysis, to validate the results reported. Assumptions are not clearly stated. Base data is so generalized as to have little real meaning in the analysis of individual alternates. Analysis does not clearly differentiate between commute and non-commute travel. The analysis does not clearly differentiate between land use considerations under GMA and RTPO considerations. That difference is critical to final decision since GMA deals with requirements or matters under state law while the RTPO deals with policies that are not binding in the final decision and not subject to review by Growth Management Act Hearing Boards (GMAHB).

O-008-068 Chapter 4, Par. 34. This paragraph is fully inappropriate. The very concept that "transportation" requires mitigation ranks right alongside the concept that people living in the Puget Sound region require mitigating action by government. The assumption that "transportation" has impacts that are negative in the main is so contrary to the common train of thought as to require detailed question. How is the movement of a person from home to place of employment or enjoyment not appropriate to the freedom of the individual and the basic concepts of choice? How does the determination of how an individual may spend their time, as may be associated with transport, not a decision of the individual but a decision of the state? Which of the transportation related alternates and the resulting decisions will be in compliance with the rights of individuals and the sworn duty of every elected official to maintain and protect those rights?

O-008-069 18. Chapter 5, Land Use, Population, Employment, and Housing
Chapter 5, Par. 1. The introductory paragraph provides the following statement concerning regional growth and this Plan. *"This analysis also does not consider what effect, if any, the plan alternatives could have on the overall levels of future growth in the region."* Unfortunately, the statement acts upon an assumption as

28

determinant of mode choice, and is not the primary determinant for all choosers.

**O-008-063**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**O-008-064**

Thank you for your comment. As you noted, there are factors other than transit service that are contributing to the slightly longer average commute distances in 2006 over 1999 shown in Exhibit 4-14. Although commutes have grown longer, transit ridership has grown steadily over the same time period. Growth in transit ridership is more closely related to employment growth than to commute distance growth.

**O-008-065**

Comment noted.

**O-008-066**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and

O-008-069

fact and the end result is false conclusions. Each of the alternates in this Plan will result in a variation in the growth pattern within the region. After all, that was one of the key considerations in developing the alternates – provide and select an alternate that will result in the growth pattern considered most desirable. Consider the impact of the choices in deciding where to live based not only on commute time but cost of tolls and fees associated with selected road use. Consider the decision on where to live based on the availability of electric and hybrid vehicle support facilities on only certain roads and arterials. Consider the entire transportation plan on cost of business for those either currently located in the region but with relocation mobility or those businesses considering a startup in the region. To continue the planning effort without a clear understanding that each alternate acts as a primary driver for land use, different from other alternates, is inappropriate and dangerous.

O-008-070

Chapter 5, Par 2. This discussion concerning Vision 2040 is revealing in that it contradicts the information in paragraph 1, as discussed above. *"At the same time, the Regional Growth Strategy anticipates a decreased role for smaller cities, unincorporated urban growth areas (UGAs), and rural areas." This p*rovides a clear delineation that transportation focus will be to the major metropolitan areas (read the Tacoma, Seattle/Bellevue, Everett corridor) while leaving the rest of the region by the wayside. The very fact that Vision 2040 has policies that are prejudicial to transportation development and improvement in rural areas, effectively locks UGA boundaries, and isolates future economic development to identified "centers" make it absolutely clear that transportation considerations will drive land use and that those land use determinations are already in place and binding on PSRC members.

The entire association of Transportation 2040 and Vision 2040 is the classic example of circular logic. Vision 2040 addressed land use with specific emphasis on increasing use of mass transit, walking and bicycling as the primary means of transportation for people in the region. The specific goal of getting people out of their cars was basic to Vision 2040 land use policy decisions. Now Transportation 2040 is being developed with the argument that it supports the policies of Vision 2040 and the only effective way to do so is with increased emphasis on mass transit, walking and bicycling and major reduction in use of POV.

O-008-071

Chapter 5, Par. 5. The statement *"Both the Growth Management Act and regional policy prohibit the extension of urban levels of service into rural areas."* appears to be in error. Please identify the specific section and item of GMA that makes this prohibition.

O-008-072

Chapter 5, Par. 8. After long and apparent "detailed" analysis of the alternates and a detailed discussion of the "positive" impacts of the various plans, we are offered a simplistic "hard to tell" when it comes to unintended or unforeseen consequences. One of the specific objectives of proper testing of alternates is the



environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

**O-008-067**

Comment noted. Appendix D contains much detailed information about the performance of the alternatives.

**O-008-068**

This EIS informs the public, agencies, and decision makers about the environmental impacts (both positive and negative) of the actions proposed in the Transportation 2040 plan alternatives. In November 2007, PSRC concluded that the development of a transportation system to accommodate projected population and employment growth would likely result in significant impacts on the environment. Chapter 4 discusses the possible effects of the plan alternatives and potential mitigation measures for these effects.

**O-008-069**

As stated in Chapter 5, the land use analysis does not consider what effect, if any, the plan alternatives could have on the *overall levels* of future growth in the region, as these totals are held constant across all alternatives. However, *growth patterns* are discussed throughout Chapter 5.

O-008-072

determination of negative impacts and unknowns. That testing also identifies the sensitivity of outcome to individual assumption. It appears that the UrbanSim modeling process is data sensitive and delivers results that may be preconceived as to positive and negative outcomes and assumption credibility. That the modeling process is the "latest and greatest" does not assure proper results. The fact that the actual discussion under the category of "unavoidable impacts" stresses positive outcomes rather than potential negative outcomes and does not add validity to the analysis.

O-008-073

19. Chapter 6, Air Quality and Climate Change

Chapter 6, Par. 1. Data provided in this paragraph locates concentrations of "pollutants of concern" but does not identify the source of the data or the overall sampling program that supports comments like *"Areas of high CO concentrations are usually localized, occurring near congested roadways and intersections."* A statement of that significance, especially when related to major policy decisions, would lead the reader to believe that a widespread and well documented, long-term sampling program has been undertaken. The program would have to include a large number of sample sites, cover all periods of day and night, all conditions of weather, and be conducted over a number of years to eliminate anomalous data. Has such a study been done in the case of each of the "pollutants of concern" identified in this chapter?

Of note and continuing concern is the failure to include the most significant "greenhouse gas" by weight and volume; water vapor. With the weather patterns of the Pacific Northwest and the marine climate of the Puget Sound region, it is difficult to understand any rationale discussion about either climate or weather that does not include water vapor as a major consideration.

O-008-074

Chapter 6, Par. 3. The real question that should be answered in this section is "Does the Puget Sound region meet the air quality standards established by the federal government and the state? If the answer is yes, all remaining discussion is self serving and moot for planning considerations. In fact, as the paragraph later notes there are no federal standards for greenhouse gases. The state legislation mentioned earlier in this review places specific reduction goals on the state that can only be met by elimination of vehicles and emission producing industries. Lengthy discussion of the matter is inappropriate and misleading.

O-008-075

Chapter 6, Par. 7. A "box" within this paragraph shows an electric vehicle with the caption "*Greater electric vehicle use would reduce greenhouse gas emissions*" The statement has no data to support the validity of the statement. In fact, unless the electric vehicle is supported by non-emission creating electrical generation sources and general manufacture and maintenance sources, the statement may actually be false. Please make sure that simplistic statements are supported by clear fact or otherwise state the criteria of the statement.



**O-008-070**

VISION 2040 and its policies were vetted through an extensive outreach process that included all levels of government, representatives from the private sector, and individual citizens. It is the approved long-range strategy for guiding development, environmental planning, and the provision of transportation and services in for the central Puget Sound region.

**O-008-071**

36.70A.110 Comprehensive plans—Urban growth areas.

(4) In general, cities are the units of local government most appropriate to provide urban governmental services. In general, it is not appropriate that urban governmental services be extended to or expanded in rural areas except in those limited circumstances shown to be necessary to protect basic public health and safety and the environment and when such services are financially supportable at rural densities and do not permit urban development.

**O-008-072**

Comment noted.

**O-008-073**

The U.S. Environmental Protection Agency, the Washington State Department of Ecology and the Puget Sound Clean Air Agency coordinate an extensive air quality monitoring program in the State of Washington. Carbon monoxide has been monitored in the Puget Sound region since 1990.

**O-008-074**

Comment noted.

O-008-076

Chapter 6, Par. 10. This paragraph is the ultimate in planner doublespeak. *"Future project-level environmental review would determine if applicable air quality standards would be exceeded at specific locations. Where this occurs, potential mitigation for such impacts would be evaluated and implemented as appropriate to address the impact. If all mitigation measures required as part of subsequent project-level actions are implemented, no significant unavoidable adverse air quality impacts are expected under any of the alternatives."* In plain English, the paragraph says "We do not know if this plan will achieve the objectives set forth. If it does not we will come up with another idea that surely will work". That answer does not pass the rigid alternate testing standards that should be required for planning at this level. Considering that government has been planning transportation to fix the problem for over 20 years without success, why is this answer any different?

O-008-077

20. Chapter 7, Noise
Chapter 7. While there may be some need to consider noise as a function of urban life style, it is highly unlikely that transportation related noise need be a major consideration. If the intent is to isolate people from the noise created by surface traffic how far behind can the effort to reduce the overpowering abundance of sound created at sporting events or simply by people walking on a street. How far away can we be from volume "governor" on radios and TV sets?

O-008-078

Chapter 7, Par. 8. Noise mitigation measures identified include "*Quietstone panels*". Not mentioned here is the cost to install the panels including the additional "right of way" requirements and the continuing maintenance costs. In addition, the panels create a barrier to future expansion and tend to artificially limit choice when addressing future transportation problems. That impact would of course be an "unintended consequence" of panel use and would qualify as a potential negative impact. That was not listed as a consideration for any alternate.

O-008-079

21. Chapter 8, Visual and Aesthetic Resources
Chapter 8. This entire chapter should be eliminated. Roads are supposed to serve the primary purpose of allowing people to move from one location to another efficiently. The scenic quality of major arterials is not properly a consideration for transportation planners. The use of limited resources to provide "high quality visual arterials" is unwarranted. Nowhere in the Constitution or law is there provision for use of road funds to plan or install landscaped dividers. Please stick to hard engineering solutions and leave the aesthetics to the Parks Department.

O-008-080

22. Chapter 9, Water Quality and Hydrology
Chapter 9. What does Puget Sound Partnership (PSP) have to do with this plan? Other than proper installation of bridges and culverts (not addressed in this plan) and control of rainwater runoff from roads (not detailed in this plan) there is no link between the PSP and PSRC. The entire chapter is little more than another

31

**O-008-075**

Comment noted.

**O-008-076**

Comment noted.

**O-008-077**

This EIS informs the public, agencies, and decision makers about the environmental consequences (both positive and negative) of the actions proposed in the Transportation 2040 plan alternatives. Future transportation noise will be affected by the future roadway networks proposed in Transportation 2040. Chapter 7 discusses these effects.

**O-008-078**

This EIS is a plan-level (rather than a project-level) EIS. Accordingly, alternatives are defined and environmental effects are evaluated at a relatively broad level. More detailed project-specific environmental review will be developed as appropriate in the future for projects identified in the Transportation 2040 plan. These would be projects that are selected for implementation by their respective sponsors; for example, WSDOT, transit agencies, and local jurisdictions. The effects of noise panels would be discussed in future project-level environmental review.

**O-008-079**

WAC 197-11-444 requires that an EIS address:

- Section (1)(e)(v) Scenic resources
- Section 2(b)(iii) Light and glare
- Section 2(b)(iv) Aesthetics

Chapter 8 fulfills this requirement.

O-008-080

dissertation on the evils of man and his impact on nature. This document is supposed to deal with issues directly related to the alternates proposed. Please stick to that matter. With respect to potential negative impacts during construction, current technology and regulation have that consideration under control. A greater problem is created annually by municipal sanitary sewage spills but that is not addressed here. There is no material addressing the potential hazard from vehicle collisions, railroad accident, plane crash, or volcanic ash plume. Why is this paragraph included?

Once again in the negative impact section is a statement without substantiation and generally without meaning.. *"New impervious surfaces, new pollutant-generating impervious surfaces, and increases in (Vehicle Miles Traveled)VMT would result in some adverse impacts to water quality and hydrology, but at different levels among the alternatives. Minimization and mitigation measures for specific projects, if properly designed and implemented, would be able to largely offset these adverse impacts."* Impervious surface does not automatically result in loss of infiltration to an aquifer or increase polluting runoff. The term "pollutant generating impervious surface" seems to indicate that some magic chemical reaction occurs with some "impervious" surfaces. What is this thing called a "pollutant generating impervious surface"? Of course there is the entire question of what is impervious and is it the same in King County and Kitsap. Finally, if the intent is to transition to a significant number of electrical vehicles over the planning horizon, the good old VMT has to go and a new culprit will need to be identified.

O-008-081

23. Chapter 10, Ecosystems and Endangered Species Act Issues
Chapter 10. Again the planners could not avoid the opportunity to drag out a "soapbox" to bang the environment drum. When it is common practice for salmon to swim across major highways, it is difficult to be overly concerned about a set of plans that would not significantly increase road footprints or create new roads over a 20 year period. Do cars run over deer, raccoons, squirrels, and hit an occasional bear? Of course they do. Cars, trucks, busses, trains, planes, and ships occasionally run into people and each other and people get hurt. Do we invoke the Endangered Species Act (ESA) to protect people? Hardly. Do we have our priorities a bit out of wack?

O-008-082

24. Chapter 11, Energy
Chapter 11. The energy equation for the state and the region is clear and overriding in consideration of future planning. Our energy production, as detailed in Exhibit 11-3 makes it abundantly clear that making the change from conventional technology to new technology will be difficult and costly. With less than 4 percent (at best) of our energy created by "renewable" sources after a number of years of subsidized development, the ability to grow that production capacity by over 600 percent short term is questionable. Because the demand for electrical power will be increased by industrial, residential, and transportation



**O-008-080**

WAC 197-11-444 requires that an EIS address:

- Section (1)(c)(i) Surface water movement/quantity/quality
- Section (1)(c)(ii) Runoff/absorption
- Section (1)(c)(iii) Floods
- Section (1)(c)(iv) Ground water movement/quantity/quality
- Section (1)(c)(v) Public water supplies

Chapter 9 fulfills this requirement.
Impervious surfaces prevent rainfall from infiltrating into the soil and groundwater and increase the volume and rate at which water runs off the surface into wetlands, streams, lakes, and the Sound. The greater volume of runoff increases the frequency of flooding, erodes channel banks and streambeds, increases sediment movement, increases the amount of pollutants carried into waterbodies, and damages aquatic life. By reducing the amount of water that infiltrates, impervious surfaces can decrease aquifer recharge and reduce summer baseflow to streams. Examples of impervious surfaces:

- Paved roadways, driveways, and sidewalks
- Parking lots
- Building/roof surfaces
- Roads crossing streams
- Lawns with compacted soils

**O-008-081**

Comment noted.

**O-008-082**

Transportation is one of many sectors in the state that need to achieve

O-008-082

growth, a balance of priorities will be required. Recent discoveries that certain biomass fuels, heavily subsidized and championed for development, are more detrimental to the climate than normal hydrocarbon fuels, does not support a promising outlook on alternate fuel solutions. Technology may offer a significant breakthrough but betting the farm on that potential is not appropriate. Energy independence does not mean independence from energy. The continued reluctance to explore and exploit the natural resources of the country while complaining about dependence on foreign sources of energy makes no sense at all. It should be evident that continued research and development should be pursued in concert with development of existing energy resources.

O-008-083

25. Chapter 12. Earth
Chapter 12. The need for consideration of geological factors is appreciated. To dedicate 14 pages to the topic might be a bit of overkill. Of note, there is no mention of evacuation route sustainability in the event of earthquake or volcanic activity.

O-008-084

26. Chapter 13, Environmental Health
Chapter 13. This chapter is another begging for a reason in being. The concept that a road or transportation system presents an "environmental health" problem is questionable. As long as you are at it, did you consider that concrete has radioactive characteristics?

O-008-085

27. Chapter 14, Public Utilities and Services
Chapter 14. The majority of the reasons identified in support of proper transportation networks have existed for the past 20 years without corrective action. Since Transportation 2040 is an update of the 2020 version that made the same kinds of arguments, where is the certainty that any of the considerations will actually be addressed or the problems solved?

O-008-086

28. Chapter 15, Parks and Recreation
While it is appropriate that some effort be made to provide transportation service to parks and recreational facilities, there is some conflict with the basic issue. Parks and recreational facilities in urban area are supposed to be located within easy walking distance of residential areas, supporting the concept of community character. While larger multi-community facilities might need additional transportation support, it is appropriate that such support be event related and not continuous unless actually fiscally supported by users. Major regional parks and facilities are most often located in rural or near rural areas and not generally served by mass transit on a continuing or frequent basis. If the concept is to build bike trails in rural parks, there has to be some way for riders to access the parks. Transit busses cannot handle reasonable number of users and thus PRIVATELY OWNED VEHICLE remains the normal transportation means. The disconnect between facility users, user residence location, and facility location needs to be addressed in more definitive terms in order to properly address this issue in planning.

33

reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-008-083**

This EIS informs the public, agencies, and decision makers about the environmental consequences (both positive and negative) of the actions proposed in the Transportation 2040 plan alternatives. Chapter 12

O-008-087

29. Chapter 16, Historic and Cultural Resources
While the need for understanding impacts on actual historical sites is appreciated, the need to consider sites that qualify for listing but which are not listed is not clear. In addition, since the alternates proposed in the plan deal with major highways and arterials and do not deal with individual city streets, it is not clear why significant effort has been devoted to potential historical sites that are not directly impacted by the proposals. It is not the intent of STATE ENVIRONMENTAL PROTECTION ACT or the ENVIRONMENTAL IMPACT STATEMENT to visit or revisit every possible site within the geographic area of a proposal. If that were the case, to do justice to potential historical sites or potential archeological sites would require years of research and volumes of data and analysis. The visual depiction of "sites" provided in Exhibit 16-1 provides essentially no information of any value and certainly does not assist in understanding the potential impact created by any of the alternates. Other than providing "fluff" to satisfy a requirement in the "ENVIRONMENTAL IMPACT STATEMENT elements" list, that chapter adds no real value to the analysis effort.

O-008-088

30. Chapter 17, Environmental Justice
Environmental justice is a determination that is to be considered under certain circumstances for a limited scope of federal projects. There is no requirement for any consideration of "environmental justice" under GMA.

O-008-089

This chapter makes the all to common and insulting assumption (without stating it as such) that a person who is classed as a "minority" by virtue of government decision requires or desires some sort of special consideration to gain personal fulfillment and enjoyment in life. To the contrary, most people, regardless of ethnic origin or history, want little more than for government to get out of the way and to allow them to live their lives free of unwanted and unnecessary "assistance". There are more instances of government directed or created problem conditions for minority groups than there are positive outcome government programs. The failed system of government constructed and operated "low income" housing projects provide the best single example of what government can and will do, given the opportunity. Class mobility is a fact of life. Providing a means to stifle individual incentive for improvement or, worse yet, establishing impediments to that improvement in the name of "environmental justice" is the least desirable role for government. This entire chapter with its failed assumptions, failed political approaches of "assistance", and its historical demonstrated ineptitude of government involvement is the classic example of using a political agenda to sell a flawed proposal. Not one of the alternates in the Plan will make any significant difference in the life outcome of any citizen identified as a minority. To the contrary, the cost of each of the alternates to individual citizens will be heaviest on low and moderate income families who will have no personal options for transportation and will be forced to comply with "baseline conduct" parameters. They will not only pay the monetary price but will

34

discusses the geologic and seismic risks associated with the Transportation 2040 plan alternatives. Evacuation route planning is an important process, but is not part of Transportation 2040.

**O-008-084**

WAC 197-11-444 requires that an EIS address:

- Section (2)(a)(iii) Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials

Chapter 13 fulfills this requirement.

**O-008-085**

This EIS informs the public, agencies, and decision makers about the environmental consequences (both positive and negative) of the actions proposed in the Transportation 2040 plan alternatives. In November 2007, PSRC concluded that the development of a transportation system to accommodate projected population and employment growth would likely result in significant impacts on the environment. Chapter 14 discusses the possible effects of the plan alternatives on public services and utilities and explains potential mitigation measures for these effects.

**O-008-086**

This EIS informs the public, agencies, and decision makers about the environmental consequences (both positive and negative) of the actions proposed in the Transportation 2040 plan alternatives. In November 2007, PSRC concluded that the development of a transportation system to accommodate projected population and employment growth would likely result in significant impacts on the environment. Chapter 15 discusses the possible effects of the plan alternatives on parks and

O-008-089

also lose opportunity for advancement because of limited transportation choices. The time cost of the "transportation choices" they are offered will further reduce the time for family involvement and parental oversight of children. The plan has all of the earmarks of either expanding the rolls of the "less fortunate minority members of our community" or continuing those already in that group for generations to come.

Of course, if the intent of the "environmental justice" concept is to reduce the common denominator for transportation so that all suffer equally under the plan it can be argued that in a relative perspective, minority populations will "improve" their standing in the community. Unfortunately, that approach would appear to be contrary to other goals such as economic development and community sustainability.

The information provided in Chapter 17, paragraph 10 substantiates the comments above and further condemns the approach taken by PSRC in the development of this plan. "*The additional environmental justice analysis described in the response to Question 7 in this chapter will help to identify whether there will be significant adverse impacts to minority and low-income populations. The public outreach process to minority and low-income populations described in the response to Question 4 in this chapter will also help to identify the most important issues for these populations. These findings will be documented in the ENVIRONMENTAL IMPACT STATEMENT.*" In essence, the chapter takes 23 pages to describe major considerations that are offered and very significant to the testing and analysis of the alternates. The chapter then concludes by saying that we really don't know if there is a problem, we have no real information on the potential impact of any of our planning on the populations in question, and that we need to do more work. That is not the kind of input required to make a logical decision on the alternates proposed or any other possible courses of action. Either do the work necessary to support analysis or remove this section from the DEIS.

O-008-090

31. Chapter 18, Human Health

This chapter, similar to the previous chapter, is not required by SEPA and adds little or no data of value to the analysis process. It appears that an underlying assumption of the information in the chapter is that this transportation proposal, or perhaps this plan in concert with Vision 2040, will bring about a major revision to the personal life styles of the people of the region. How this is to happen, short of exercise of ultimate police power of the state, is not made clear. All of the transportation options discussed in the Plan have been reasonably available for more than 40 years. People have simply elected to not use the "more healthy" options presented to them. How that changes by adoption of one of the alternates in this plan is not clear.



recreation facilities and explains potential mitigation measures for these effects.

**O-008-087**

WAC 197-11-444 requires that an EIS address:

- Section (2)(b)(vi) Historic and cultural preservation

Chapter 16 fulfills this requirement.

**O-008-088**

The EIS was been prepared pursuant to Washington State's State Environmental Policy Act (SEPA), which does not require analysis of environmental justice. However, existing regional and local policies support the concept of environmental justice, and many of the projects implemented through Transportation 2040 will need to comply with federal environmental justice regulations during their individual project-level environmental review processes. PSRC prepared the environmental justice chapter to promote the principles of environmental justice, continue current environmental justice efforts, and facilitate any future environmental justice analysis on projects identified in the Preferred Alternative.

**O-008-089**

The FEIS contains an expanded discussion of equity and social justice. The Preferred Alternative would result in the greatest benefits to minority and low-income populations and the least disparity between these populations and the entire regional population as a whole.

**O-008-090**

A growing body of research has begun to document correlations between dispersed development patterns and health. The central Puget

O-008-091 Chapter 18, Par. 2. This discussion of exposure to "toxic" materials is clearly out of place in this plan. There is another unspoken assumption in the presentation that, when treated as fact, presents a situation that is not known to exist and which has no factual basis for inclusion. Acquisition of property for right of way does not automatically present a "toxic material" hazard or consideration. If that were the case, every project regardless of size or scope in which disturbing earth is involved would require pre-consideration of the presence of "toxic materials." If the consideration is the cumulative ineptitude of government jurisdictions in handling potential hazardous materials runoff from existing roads, disturbed during road upgrade or expansion projects, that consideration should be properly identified and addressed.

O-008-092 Chapter 18, Par. 3. The subject of "noise" is addressed in detail in Chapter 7. There is no need to revisit that subject here.

O-008-093 Chapter 18, Par. 4. The subject of air quality is discussed in Chapter 6 and need not be revisited here.

O-008-094 Chapter 18, Par. 5. The subject of water quality is addressed in Chapter 9 and need not be revisited here. Of note, there is no section in Chapter 19 addressing the negative impacts or outcomes of the plans on human health. There is no mention of the potential for depression caused by inability to gain better employment because of the limits of transportation opportunities. There is no mention of the individual or family stress that would be caused by significant increases in commute times and cost. There is no mention of the potential impact on the school performance or behavior of children forced to live in crowded urban conditions and without reasonable access to parks and open areas. There is no mention of the potential increases in risk to personal safety that are associated with walking in crowed urban neighborhoods during periods of darkness. Perhaps it would be worthwhile for some few members of the PSRC staff to subscribe to local newspapers and read them. Although the Post Intelligencer is no longer available, other papers actually document the less than utopian conditions that actually exist in the "urban areas" that PSRC would transform by these policies.

O-008-095 32. Appendices review.
A preliminary review of the appendices offered revealed no immediate reason for concern beyond that already expressed with respect to the content of the report. A significant review of the "references" is appropriate to validate that the information used is both pertinent and applicable to the matter at hand. While the 'endangered and threatened species" listing is interesting, it is somewhat amusing to find that species with no historical habitat within a given county are listed for that county. In addition, the inclusion of "sensitive" species that frequently appear on the dinner plate and for which harvest seasons exist is confusing.



Sound area is one of the first urban regions in the United States where detailed research examining the linkage between health and the built environment has been conducted. Through a grant from the Federal Transit Administration, King County, along with the Cities of Kent and Redmond and other partners, including PSRC, engaged in a two year study of the relationship of land use, transportation, air quality, and health. The summary of this study states that low-density separated land uses and disconnected street networks are associated with the following conditions:

- Increased automobile use, per capita air pollution, greenhouse gas emissions, and energy consumption
- Reduced transit ridership, walking, and physical activity
- Increased obesity and likelihood of cardiovascular disease, type II diabetes, and colorectal cancer

Forecasts of future walking and bicycling trips are affected by the provision of walking and bicycling facilities, the existence of other transportation investments that may either compete with or facilitate walking and bicycling, and other factors. Compared to the Baseline Alternative, all Transportation 2040 alternatives forecast an increase in the percentage of walk and bike trips.

**O-008-091**

WAC 197-11-444 requires that an EIS address:

- Section (2)(a)(iii) Releases or potential releases to the environment affecting public health, such as toxic or hazardous materials

Chapter 18 references the discussion in Chapter 13 that fulfills this requirement.

O-008-096

Significant additional detail must be devoted to Appendix K dealing with the methodology for data consideration and analysis. The various statistical divisions used in the process and the data associations will need to be better understood to properly understand the "results" reported in the DEIS. For example, the decision to employ regional level economic forecasting rather than county level forecasting has significant potential to produce outcomes not appropriate for smaller counties or other jurisdictions within those counties. The overarching assumptions leading to that decision are not clarified other then "it's too hard". As with the overall DEIS content, the ability to understand the reliability of the process depends heavily on the process by which assumptions were made and weighted in the analysis. That is not clear in the appendix.

O-008-097

Some examples of questionable "assumptions" and failure to provide adequate explanation are:

a. Type of travel – There is no apparent category for traffic flowing through the region for any purpose. Because of the use of major north-south and east-west arterials and freeways for general commerce, regardless of time of day, that traffic is a major consideration for congestion.

O-008-098

b. Family Income – The limitation of income consideration at $90,000 is not appropriate. The exceptional costs associated with two family workers (such as day care at $1,500 per month) and the inflated cost of housing do not allow the family at the $90K level the full range of residence and transportation options and opportunities. A more appropriate top income level would be $150,000 with an additional bracket at the $120,000 level

O-008-099

c. Age demographics and employment characteristics – Certain areas of the region are experiencing a significant change in the age demographics of the population and thus the workforce and transportation "habits" of the population. Further, recent and projected economic conditions indicate that many who would have moved from the work force (and the commuter pool) in the near term are going to remain employed. The result will be an artificial expansion of the transportation needs not consistent with OFFICE OF FINANCIAL MANAGEMENT projections or economic forecasts.

O-008-100

d. Vehicle classes – There is no inclusion of motorcycles in the classes.

O-008-101

e. General – There is no clear indicator of water transport vehicles. In turn, the failure to list ferries or foot ferries limits the potential for consideration of personal watercraft or commercial cross sound barge traffic for industrial or commercial movement.

O-008-102

f. Because Bremerton National Airport, the port facilities at Bremerton and Manchester, and the rail facilities at SKIA were not included in the considerations of alternates, no analysis of development and use of those facilities was completed. That oversight can not be considered in the best interest of Kitsap or the region.



**O-008-092**

Comment noted.

**O-008-093**

Comment noted.

**O-008-094**

Comment noted. Many of the growth distribution issues that you discuss were resolved with the adoption of VISION 2040. These issues are not revisited in the transportation plan.

**O-008-095**

"Priority species" are fish and wildlife species requiring protective measures and/or management actions to ensure their survival. A species identified and mapped as a priority species fit one or more of the following criteria:

Criterion 1. State-Listed and Candidate Species:

State-listed species are native fish and wildlife species legally designated as Endangered (WAC 232-12- 014), Threatened (WAC 232-12-011), or Sensitive (WAC 232-12-011). State Candidate species are fish and wildlife species that will be reviewed by the department (POL-M-6001) for possible listing as Endangered, Threatened, or Sensitive according to the process and criteria defined in WAC-232-12-297.

Criterion 2. Vulnerable Aggregations:

Vulnerable aggregations include species or groups of animals susceptible to significant population declines, within a specific area or statewide, by virtue of their inclination to aggregate. Examples include heron rookeries, seabird concentrations, marine mammal haulouts, shellfish beds, and fish spawning and rearing areas.

Criterion 3. Species of Recreational, Commercial, and/or Tribal Importance:

Native and non-native fish and wildlife species of recreational or

33. Overall Comments:

O-008-103
1. The DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) is a professionally produced document with construction and graphics overshadowing actual factual content. The document is not easy to read or understand because of the manner in which information is presented and the redundant nature of some information.

O-008-104
2. The ability to clearly understand the assumptions used in the preparation of the DEIS, the alternates, and the analysis model up front is not presented. The reviewer is not able to consider the information presented in light of assumptions and frequently finds that challenge to "facts" presented is not feasible.

O-008-105
3. While there is no requirement for a "cost/benefit analysis" within the DEIS, there are numerous instances in the DEIS when cost is either alluded to or directly mentioned as a consideration. Family income and other transportation cost factors are also used in the DEIS. In order to make reasonable analysis of the alternates available, the cost of each alternate in terms of facilities construction cost (taxpayer dollars) and direct personal cost to individuals (tolls, fees, etc) is essential information.

O-008-106
4. It is somewhat disconcerting that Transportation 2040 had to be written to the level of detail demonstrated. The essentials of the plan are matters of policy in Vision 2040 and the supporting arguments for those selected policies are included in that document. It appears that Transportation 2040 was created either to place an iron clad binder on Vision 2040 or to provide an opportunity for PSRC to further expound a political agenda. In either case the benefits derived from this document are questionable as compared to the taxpayer cost.

*The End*



commercial importance, and recognized species used for tribal ceremonial and subsistence purposes, whose biological or ecological characteristics make them vulnerable to decline in Washington or that are dependent on habitats that are highly vulnerable or are in limited availability.

**O-008-096**

Thank you for the comment. It is standard practice to model the regional economy at the top of the modeling hierarchy. The regional model represents individually each county in the four-county central Puget Sound region.

**O-008-097**

Thank you for the comment. External to external trips are a small percentage of all travel in the region.

**O-008-098**

The top income category is $90,000 and above.

**O-008-099**

Comment noted.

**O-008-100**

Correct. Motorcycles are not explicitly included in the modeling.

**O-008-101**

Ferry routes are modeled as either an auto link in the network, a transit line, or both, depending upon which classes of users are permitted to use the route.

**O-008-102**

Comment noted. Long range development at the Port of Bremertion, Manchester, and Bremerton National Airport is strictly the province of the Port of Bremerton and the Kitsap community. The regional long range transportation plan (Transportation 2040) does not include specific policy or projects for port facilities. Regarding Bremerton National Airport, PSRC has prepared a Regional Airport System Plan and the Regional Airport Ground Access Plan, which articulate the shared regional and local vision for the airport. The findings and recommendations contained in these plans are incorporated by reference into the Metropolitan Transportation Plan. In addition, Transportation 2040 recognizes the need for efficient transportation connections to Bremerton National Airport to meet Kitsap County's mobility needs for moving people and freight. VISION 2040 (as well as Kitsap County, the city of Bremerton, and other communities) recognizes the South Kitsap industrial area (SKIA) as a regional manufacturing and industrial center (MIC). In part due to its MIC designation, SKIA has a slightly higher priority for regional transportation investments through the Regional Transportation Improvement Program (RTIP).

**O-008-103**

Comment noted.

**O-008-104**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**O-008-105**

It is not possible to determine the incidence of the cost burden across members of society given available data and methods. Such analysis is

potentially feasible when examining a single change in tax or investment policy. In the case of broad transportation alternatives there are multiple changes in policy that are tested simultaneously, making such analysis meaningless absent more advance equilibrium models of the entire economy.

**O-008-106**

As a Metropolitan Planning Organization, PSRC is required to prepare a Metropolitan Transportation Plan that meets the following requirements:

- Plans must be developed through an open and inclusive process that ensures public input and seeks out and considers the needs of those traditionally under-served by existing transportation systems.
- Plans must extend for a period not less than 20 years into the future.
- Plans must reflect the most recent assumptions for population, travel, land use, congestion, employment, and economic activity.
- Plans must be financially constrained, and revenue assumptions must be reasonable in that funds can be expected to be available during the time frame of the plan.
- Plans must conform to the Clean Air Act and its amendments, and to applicable state implementation plans for regional air quality.

futurewise

*Building communities*
*Protecting the land*

July 29, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, Washington 98104-1035

Dear Mr. Ardussi:

**Subject:** **Comments on the Transportation 2040 Draft Environmental Impact Statement**
Sent via e-mail and U.S. Mail

O-009-001 Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement (DEIS). Futurewise is a statewide non-profit organization with many members in the Central Puget Sound counties, cities, and towns that comprise the membership of the Puget Sound Regional Council. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations.

Overall, we appreciate that the DEIS has addressed the key issues facing our region as we plan for our preferred future. In particular we appreciate the attention to the land use, greenhouse gas emission, and environmental impacts of the alternatives. We do have some concerns about the alternatives and some of the conclusions. We will address those concerns using the questions from the Puget Sound Regional Council's DEIS internet response form.

O-009-002 1. **The various components in the six alternatives**

As the analysis in the technical supporting documents and the DEIS makes clear, the world is changing dramatically as it affects transportation and transportation facilities. The continuing declines in gas tax revenues and the need to reduce greenhouse gas emissions, recover Puget Sound, and meet our mobility needs have the following implications for transportation planning:

- Our scarce transportation funds need to prioritize safety improvements, maintenance and restoration, transit, and freight mobility.

O-009-003
- We need to invest in projects that allow us to maximize our existing investments. These include making our existing general capacity facilities operate better and more efficiently and better using our transit investments.

O-009-004
- We lack the funding for a significant expansion of general purpose capacity in the Central Puget Sound while meeting our other needs. And a significant expansion in general purpose capacity would hinder our ability to meet our region's goals.

814 Second Avenue Suite 500 Seattle, WA 98104 www.futurewise.org phone 206 343-0681 fax 206 709 8218

**O-009-001**
Thank you.

**O-009-002**
Comment noted. The purpose statement of Transportation 2040 reflects concurrent goals: *How can the region best provide the mobility required to support a growing population to the year 2040, sustain the region's environment and economic vitality, improve system safety and efficiency, and enhance the region's overall quality of life?*

**O-009-003**
Thank you for your comment. Preservation, maintenance, and operation of the existing system as well as safety and security will be top priorities and will use most of the available funding. Mobility improvements will include a major emphasis on improving system efficiency with limited new capacity. System efficiency includes creating "smart corridors" with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit and nonmotorized facilities, with new roadways limited to a few missing links.

**O-009-004**
Comment noted. With limited funds the region will need to prioritize our investments, to preserve the existing infrastructure, improve system efficiency, offer more environmentally sound options for the traveling public, and achieving a sustainable funding strategy to implement our plan.

O-009-004 including reducing greenhouse gas emissions and recovering Puget Sound to name just two.

O-009-005 We agree that Transportation 2040's "core investments" recognize many of these realities. Alternative 5 comes closest to fully addressing these concerns, but even

O-009-006 Alternative 5 needs to focus more transit. Alternative 5 also needs a funded program to provide bus routes, pedestrian improvements, and bicycle improvements so that we can use our expanding investments in commuter rail, light rail, and regional and local transit more efficiently.

O-009-007 We need to revisit the land use plan on which Transportation 2040 is based if we are to achieve the goals the region has for mobility, environmental protection, and social justice. We recommend the following changes:

- The land use plan behind Transportation 2040 needs to increase the proportion of the population living in transit-oriented developments. This will decrease people's need to drive alone, and increase the proportion of the trips made by walking, biking, and transit. This will decrease greenhouse gas emissions. This will also reduce water pollution and aid in the recovery of Puget Sound.
- We need a better balance between jobs and housing within the region and within communities. This will reduce commute lengths and allow more people to walk and bike to work.
- We need to increase residential densities so that all urban growth area neighborhoods can support bus service at half hour headways. This will increase the likelihood that people can use transit for their daily travel needs and increase development capacity within our urban growth areas.
- We need to maintain our close-in industrial and manufacturing areas that remain economically viable so these firms and jobs remain close to workers, transit, ports, highways, and rail connections. This will help maintain mobility for people and freight and reduce the increases in water pollutants and greenhouse gas emissions that would otherwise occur.
- We need to stop urban growth area expansions and protect our existing working farms and working forests. This will reduce the need to expand general purpose transportation capacity, increase the efficiency of our transit and other transportation investments, reduce greenhouse gas emissions from transportation, and reduce adverse water quality impacts on our streams, rivers, and Puget Sound.

The transportation system should be reconfigured to serve this changed land use plan. This transportation system needs to focus on transit and freight investments along with other investments that make the existing system and the new transit investments work more efficiently and effectively.

**O-009-005**

Based on comments from Futurewise and others, the Preferred Alternative includes more transit investment than the other alternatives studied.

**O-009-006**

The Preferred Alternative includes an aggressive transit and nonmotorized investment which exceeds the other alternatives. It includes expanded investment in both regional transit and local bus service, as well as pedestrian and bike access improvements.

**O-009-007**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

Mr. Sean Ardussi
July 29, 2009
Page 3

O-009-008

2. The environmental impacts of the alternatives.

We strongly the urge the Puget Sound Regional Council to include an alternative that meets the state greenhouse gas emission reduction requirements attributable to transportation and the statewide per capita vehicle miles of travel (VMT) reduction benchmarks. RCW 70.235.020 requires the following reductions in greenhouse gas emissions:

- Reduce overall emissions to the 1990 level by 2020;
- Reduce overall emissions by 25 percent below 1990 levels by 2035; and
- Reduce overall emissions by 50 percent below 1990 levels by 2050.

The current scientific evidence shows that these required reductions are not enough to stabilize atmospheric greenhouse gases at levels that will not dramatically change the climate. However, none of the alternatives in Transportation 2040 would achieve the part of even these inadequate reduction requirements attributable to transportation. We recommend the Puget Sound Regional Council include in the Final EIS and adopt an alternative that would at least meet the state's adopted reduction requirements. In evaluating this reduction, we believe that it a good practice to take into account the greenhouse gas emission reductions likely to occur as a result of cleaner fuels, the likely future fleet efficiency and fleet emissions generation characteristics, transportation mode switches, and land use changes.

O-009-009

RCW 47.01.440(1) adopted the following statewide benchmarks for reducing vehicle miles of travel (VMT):

- Reducing statewide annual per capita VMT by 18 percent below the projected 2020 VMT by 2020;
- Reducing statewide annual per capita VMT by 30 percent below the projected 2020 VMT by 2035; and
- Reducing statewide annual per capita VMT by 50 percent below the projected 2020 VMT by 2050.

We very much appreciate that the draft EIS analyzed whether the alternatives would meet these standards. However, we disagree with the conclusion that this analysis shows that the Alternatives 3, 4, and 5 will meet the 2035 benchmark. The

O-009-010

benchmarks are a statewide standard. Different parts of the state have varying levels of per capita VMT depending on their characteristics, including land use patterns and alternative modes of travel. Because of our available transportation alternatives and other characteristics, the Central Puget Sound Region probably has the greatest ability to reduce VMT. This is consistent with the Puget Sound Regional Council VMT estimates which show that the projected 2020 daily per capita VMT for Washington State is 27.03 miles compared to a baseline regional daily per capita VMT baseline of 20.08 miles. If the state is going to meet the 2035 benchmarks, the Central Puget

**O-009-008**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-009-009**

HB 2815 sets benchmarks for reducing statewide annual per capita

O-009-010

Sound Region must reduce its per capita VMT by 30 percent below the regions 2020 benchmark. This would be a daily per capita VMT of 14.06 miles in 2035. None of the alternatives meet this standard in 2040. We recommend that the Final EIS include an alternative that does meet this standard and that the Puget Sound Regional Council adopt that alternative.

O-009-011

We are also concerned that the alternatives will not maintain the forest cover and pervious surfaces needed to maintain the water quality of rivers, lakes, streams, and Puget Sound. Again, we recommend that the PSRC include such an alternative in the Final EIS and adopt it. We believe the modifications we suggest in Question 1 would go along way to meet all three of these standards.

O-009-012

3. **Funding strategies, for raising revenue and paying for transportation needs.**

We agree that given the other available funding sources, tolling will be a necessary source of finding. To meet the region's needs, tolling revenues must be available to help fund transit capital and operations, bicycle and pedestrian facilities, trip reduction programs and similar measures.

O-009-013

4. **The information contained in the analysis.**

Generally, we believe the information included in the Draft EIS is of high quality. We have not conducted a detailed analysis of the modeling work. We understand that the Cascade Bicycle Alliance has and we recommend that the Puget Sound Regional Council consider incorporating their conclusions and recommendations into the Final EIS.

O-009-014

5. **The alternative you think best accomplishes our regional needs out to 2040.**

Alternative 5 with the changes we outlined in Questions 1 and 2.

O-009-015

6. **Other comments.**

We very much appreciate that the Puget Sound Regional Council is using models and methods that advance the state of the art transportation planning in Washington State and the country. We believe the council should be proud of its work. We also appreciate that the DEIS took into account greenhouse gas generation, VMT, impervious surfaces, and other important factors. We thank the Puget Sound Regional Council, its staff, its consultants, and its policy and governing boards for their hard work.

VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**O-009-010**

PSRC has not been directed in RCW 47.01.440(1) to reduce the per capita VMT in the region by 30 percent below the region's 2020 benchmark. Therefore, PSRC has not included or adopted an alternative that meets this suggested VMT reduction benchmark.

**O-009-011**

Many modifications suggested in Question 1, including prioritizing transit and freight mobility and investing in efficiency improvements, are included in the Preferred Alternative. As noted in the response to comment O-009-007, the Preferred Alternative was designed to support the Regional Growth Strategy in VISION 2040, which has been adopted by PSRC.

**O-009-012**

Comment noted.

**O-009-013**

Comment noted.

O-009-016 Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 and email tim@futurewise.org

Sincerely,



Tim Trohimovich, AICP
Planning Director

**O-009-014**

Thank you for stating your preference among the alternatives.

**O-009-015**

Thank you.

**O-009-016**

Thank you.




July 30, 2009

King County Councilmember Julia Patterson
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104

Councilmember Patterson and PSRC Board members:

O-010-001 The Bellevue Chamber of Commerce appreciates the opportunity to extend comments regarding the Puget Sound Regional Council's Draft Environmental Impact Statement for Transportation 2040.

O-010-002 As the region's population and employment continue to grow, so does congestion and traffic. Transportation is the critical link between business competitiveness and the ability to attract and retain employees, as well as move freight conveniently and safely on major corridors. Washington State and the Puget Sound Region are dependent on the ability to make ongoing investments in transportation infrastructure that will result in reduced congestion and improved mobility for all users.

O-010-003 The Bellevue Chamber of Commerce would like to emphasize that any alternative, or combination thereof, that is selected for further study in Transportation 2040 should provide:

- Recognition of the nexus between long term economic development and transportation infrastructure planning.
- O-010-004 Increased investment in roadway capacity to sufficiently address growing population and congestion.
- O-010-005 Improved efficiency of existing infrastructure through chokepoint elimination.
- O-010-006 Connectivity between different modes of transportation.
- O-010-007 Enhanced mobility for freight.
- O-010-008 The maximum safety benefit.
- O-010-009 A realistic and sustainable financing strategy, including a strict adherence to reinvesting revenues back into the infrastructure where they are generated.

**O-010-001**
Comment noted.

**O-010-002**
Transportation 2040 recognizes the importance of freight mobility and provides more detail in the plan itself under Regional Freight Strategy.

**O-010-003**
Comment noted. Appendix D evaluates the support of Transportation 2040 alternatives for the adopted Regional Economic Strategy, manufacturing industrial centers, and for freight and goods movement. See Appendix D pp. 38-46.

**O-010-004**
The preferred alternative provides for an increase in investment in roadway capacity based on criteria established in VISION 2040.

**O-010-005**
Comment noted.

**O-010-006**
Concur. One of the goals of the preferred alternative is to expand efficiency of the transportation system by completing transit supportive and efficiency investments and improving access to and within centers.

**O-010-007**
Transportation 2040 recognizes the importance of freight mobility and provides more detail in the plan itself under Regional Freight Strategy.

**O-010-008**
Improving safety for all modes is critical to improving quality of life and

O-010-010

We encourage the staff and Board of the Puget Sound Regional Council to consider a hybrid option of the available alternatives that will achieve the aforementioned goals.

As the region prepares to add an additional 1.1 million jobs and 1.4 million residents in the next 30 years, we look forward to continued opportunities to work with the Puget Sound Regional Council in developing long term transportation policies.

Thank you,



Craig Foreman
Chairman 2008 – 2009



Betty Nokes
President & CEO

improving access for all the citizens of the region. Transportation safety is a critical component of the regional long range transportation plan, and it informs multiple elements of the plan as crash reduction is integral to the congestion management process, bicycle and pedestrian planning, transit planning, and freight planning. The Transportation 2040 safety component is guided primarily by that of Target Zero, the Washington State Strategic Highway Safety plan developed by the Washington Traffic Safety Commission.

**O-010-009**

Comment noted. Sustainable funding is a critical issue. Regarding the use of toll revenues, there is significant debate about where and how toll revenues should be used.

**O-010-010**

Comment noted.

BELLEVUE DOWNTOWN ASSOCIATION

July 31, 2009

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

**RE: Transportation 2040 Draft Environmental Impact Statement**

Dear Mr. Ardussi:

**O-011-001** The Bellevue Downtown Association (BDA) Board of Directors appreciates the opportunity to comment on the Puget Sound Regional Council's Transportation 2040 Draft Environmental Impact Statement (DEIS).

The BDA is a non-profit membership organization charged with leading the continuing evolution of Downtown Bellevue as the economic and cultural heart of the Eastside. Planned growth in Downtown Bellevue continues to be an essential element of the region's growth strategy, most recently expressed in PSRC's VISION 2040 plan to accommodate an additional 1.5 million people and 1.2 million new jobs in the region by the year 2040.

**O-011-002** Nearly 75 percent of Bellevue's housing and employment growth through 2020 will occur downtown, which comprises just two percent of the city's total land area. Bellevue has been identified by VISION 2040 as one of five Metropolitan Cities in the Central Puget Sound region, while Downtown Bellevue is among the most established and fastest growing regional growth centers in King County. As a result, Downtown Bellevue will remain the highest priority transportation hub for the Eastside. A well-coordinated plan for mobility investments is essential to improve access for all modes and to achieve our region's growth goals.

**O-011-003** Our review of the DEIS alternatives concludes that none of the options cover the full range of investments already identified in adopted plans to improve mobility to and from Downtown Bellevue. Therefore, we strongly urge PSRC to tailor a Transportation 2040 preferred alternative that recognizes the unique travel patterns and adopted plans for each Metropolitan City and regional growth center.

The successful Transportation 2040 alternative for Downtown Bellevue must include the following project investments identified by the City of Bellevue, WSDOT, King County Metro Transit and Sound Transit.

*Making A Great Place Together*

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Steve Sarkozy
CITY OF BELLEVUE

*Executive Committee


**O-011-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. PSRC recognizes Bellevue's importance to the region as a Metropolitan City and Regional Growth Center. The Preferred Alternative was constructed to serve Regional Growth Centers like Bellevue.

**O-011-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-011-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as

PSRC Transportation 2040 DEIS
BDA Comment Letter
Page 2

O-011-003

- Completion of all Interstate 405 Congestion Relief and Bus Rapid Transit Projects adopted in the I-405 Master Plan, including the half-diamond interchange at NE 2nd Street, and the full-build of the NE 8th Street/SR-520 northbound and southbound braids project with ramp access at NE 10th Street.
- Completion of all transportation improvements in the City of Bellevue's adopted Downtown Implementation Plan (excluding the 106th/108th Ave Couplet, which failed to demonstrate a benefit in a recent City study).
- Completion of all SR 520 projects identified for the Eastside, including a full interchange at SR 520 and 124th Ave NE.
- Completion of transportation projects defined in the City of Bellevue's approved Mobility and Infrastructure Initiative.
- Completion of the projects listed in the City of Bellevue's 12-year Transportation Facilities Plan.
- Completion of the Sound Transit 2 Regional Bus and East Link Light Rail Program, including the C3T deep bore tunnel alternative for Downtown Bellevue, plus necessary mitigation to improve general purpose and HOV vehicle access related to the modified side-running B3 alternative and Park & Ride expansion in South Bellevue. The BDA supports the light rail extension to downtown Redmond as a high priority as soon as funding is identified.
- Completion of King County Metro Transit Now investments identified for the Eastside. Transportation 2040 should call for strong coordination among Metro, the City of Bellevue and TransManage that will result in more effective planning and prioritization of existing transit service and future expansions of service.
- Downtown Bellevue's continued status and funding as a highly successful Growth and Transportation Efficiency Center.

O-011-004

The Transportation 2040 draft alternatives present several approaches to financing improvements to the regional system. Specifically, the alternatives ask us to contemplate varying degrees of tolling as a revenue source and demand management tool. The BDA recognizes that needed investments may call for a combination of new sources and reallocation or increases in existing sources.

While heavy tolling on the regional system, including primary arterials (in Alternative 5), may show the greatest improvements in travel time, the DEIS does not offer a complete set of findings that cover the economic impact of regional

roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**O-011-004**

The EIS does evaluate the benefits and cost to geographic areas within the region against the Baseline Alternative (see Appendix D). The geographic areas analyzed include the primary business centers in the region. The cost of tolling and benefits from reduced travel time and improved reliability are included.

O-011-004

O-011-005 tolling on specific growth centers or provide a measure of competitiveness with other regions. In addition, the alternatives relying most on tolling would create the greatest negative cost-benefit impact on low-income individuals and families.

O-011-006 The most surprising finding when comparing Transportation 2040 alternatives comes in the very slight marginal change in mode share. The most aggressive transit investment strategy (Alternative 5) results in only 1% more (5.2% total) transit trips over the base alternative (4.2% total). Work trips for the same measure show a 3% difference. At the same time, the total number of regional trips is expected to increase to about the same level for each alternative. We would expect the differences to be greater in specific regional growth centers, but those findings were not made clear.

O-011-007 In 2002, the BDA developed a Definition of Transportation Success to help guide our work on transportation policy. It is a useful filter for evaluating the Transportation 2040 alternative.

*Success is an integrated regional transportation system that is consistently improved in ways that fulfill our vision for growth and ensure that all modes of travel operate more efficiently (with less congestion) and effectively (with choices) than they do today.*

The dimensions of this success are:

- A system with a mix of roadway, transit, pedestrian, bicycle and ferry components, each tailored effectively to the markets they serve, with Downtown Bellevue a priority transportation hub for the Eastside;
- Regional freeways with adequate capacity to meet an appropriate level of demand, recognizing that the majority of demand now and in the future will be for private vehicles; and also recognizing that travel times in the region need to be shorter and more predictable than they are now;
- A public transit system offering clean, safe, reliable service tailored to development patterns, travel patterns and densities utilizing both conventional and high-capacity transit options where indicated;
- Reduction in undue pass-through traffic affecting local arterials and local streets (currently caused by excess demand not being served on regional freeways);
- Transportation infrastructure that supports and facilitates growth management plans, particularly for urban areas; and
- Improved freight mobility so that the movement of commerce can be a key attractor for the region.

**O-011-005**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**O-011-006**

The 1% change in total daily transit mode share between Alternative 5 and the Baseline in year 2040 appears small because the portion of total daily trips made by transit is small. Achieving this mode shift, however, entails an 18.9% increase in work trips by transit and a 32.9% increase in non-work trips by transit between the 2040 Baseline and 2040 Alternative 5. This is a significant growth in transit trip-making.

**O-011-007**

These match closely with the objectives, goals, and policies outlined in VISION 2040 from which Transportation 2040 is being developed.

O-011-008 We commend PSRC and the Regional Transportation Policy Board for its leadership in advancing answers to many of the toughest challenges we face as a region. For Downtown Bellevue specifically, no single draft alternative appears to fulfill our definition of transportation success.

O-011-009 The preferred Transportation 2040 alternative should reflect the attributes of the respective regional growth centers, including economic and land use composition, all local and regional transportation improvement plans and policies, and current

O-011-010 and projected travel patterns. In addition, the alternative should offer a clear signal for improved regional coordination across all levels of elected leadership, agencies and jurisdictions. Transportation 2040 is the prime opportunity to achieve far better integration, greater efficiencies, and a safer and more sustainable regional transportation system for our future.

Sincerely,

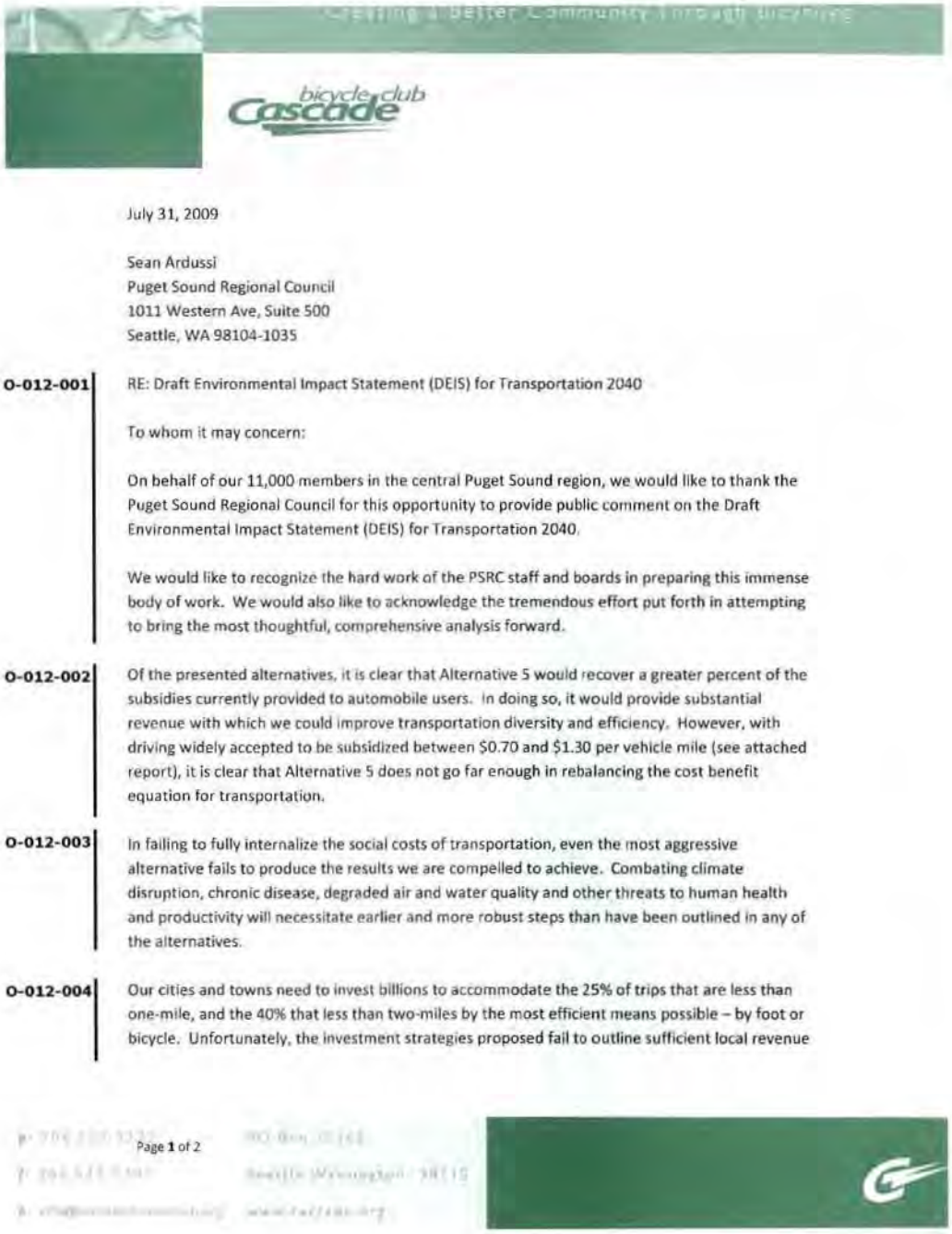
Jill Ostrem
BDA Chair

Leslie Lloyd
BDA President

**O-011-008**
Thank you.

**O-011-009**
Linking and serving Regional Growth Centers was a critical component of the design of the Preferred Alternative. Investments in roadway infrastructure, transit infrastructure, walk/bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes varied depending on location and were tailored to local conditions.

**O-011-010**
Comment noted.



bicycle club Cascade

July 31, 2009

Sean Ardussi
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

**O-012-001** RE: Draft Environmental Impact Statement (DEIS) for Transportation 2040

To whom it may concern:

On behalf of our 11,000 members in the central Puget Sound region, we would like to thank the Puget Sound Regional Council for this opportunity to provide public comment on the Draft Environmental Impact Statement (DEIS) for Transportation 2040.

We would like to recognize the hard work of 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 thoughtful, comprehensive analysis forward.

**O-012-002** Of the presented alternatives, it is clear that Alternative 5 would recover a greater percent of the subsidies currently provided to automobile users. In doing so, it would provide substantial revenue with which we could improve transportation diversity and efficiency. However, with driving widely accepted to be subsidized between $0.70 and $1.30 per vehicle mile (see attached report), it is clear that Alternative 5 does not go far enough in rebalancing the cost benefit equation for transportation.

**O-012-003** In failing to fully internalize the social costs of transportation, even the most aggressive alternative fails to produce the results we are compelled to achieve. Combating climate disruption, chronic disease, degraded air and water quality and other threats to human health and productivity will necessitate earlier and more robust steps than have been outlined in any of the alternatives.

**O-012-004** Our cities and towns need to invest billions to accommodate the 25% of trips that are less than one-mile, and the 40% that less than two-miles by the most efficient means possible – by foot or bicycle. Unfortunately, the investment strategies proposed fail to outline sufficient local revenue

Page 1 of 2

**O-012-001**

Thank you for your comment. Based on comments and input from Cascade Bicycle Club and others, the Preferred Alternative includes an aggressive commitment to tolling, with policy language encouraging adoption as early as possible; more non-motorized investments than any of the other alternatives; and a strong commitment to implementing the regional growth strategy. In addition, the Preferred Alternative has more transit investment and service than any of the other alternatives.

**O-012-002**

Comment noted.

**O-012-003**

Comment noted. While taxes to internalize social costs are advocated by economists, there is considerable disagreement regarding the nature and extent of the cost externalities associated with personal mobility. The Transportation 2040 alternatives test a range of social-type taxes for vehicle use that covers a reasonable range of estimates of these kind of cost externalities.

**O-012-004**

Comment noted.

**O-012-004** for our core urban areas to complete their sidewalk and on-street bicycle networks. Our pricing scheme by being designed to maximize benefits to drivers, tails to reinforce appropriate mode choices. Finally, our policy framework fails to prioritize the management of our rights of way for the safest and most efficient access for our most vulnerable and least impactful users.

**O-012-005** To earn our support an alternative must implement comprehensive tolling at the earliest possible date, direct more robust investments in the region's nonmotorized network, and deliver strict agreement on full compliance with the Regional Growth Strategy. All of these are essential components of any alternative that will support us meeting the region's sustainability, equity and mobility needs. Sadly, none of the alternatives meet these goals.

**O-012-006** So, while it would have been easiest for us to simply recommend that you consider Alternative 5 to be the most viable and the one that comes closest to meeting the region's needs – we feel it falls short in many areas. However, an effort as ambitious as the one PSRC put forward deserves an equally thorough response. Please find attached our DEIS analysis that highlights numerous technical and methodological shortcomings in the analysis.

Thank you again for this opportunity to provide public comment on the Draft Environmental Impact Statement (DEIS) for Transportation 2040. Please feel free to contact us should you need any clarification or additional information.

Sincerely,

David Hiller
Advocacy Director

Enclosure:
*PSRC Transportation 2040 DEIS Comments & Analysis*

Page 2 of 2

**O-012-005**

The Preferred Alternative was designed with comments from your organization, and others, in mind:

- New projects are recommended to be tolled as they are implemented, and recommendations for systematic tolling have been forwarded to the legislature.
- The Preferred Alternative includes more miles of nonmotorized facilities than any other alternative.
- The Regional Growth Strategy is the adopted land use plan for the region. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. Please see the response to comment 0-12-034.

**O-012-006**

Comment noted.

# PSRC Transportation 2040 DEIS

**Comment & Analysis**

**31 July 2009**

By
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Cascade Bicycle Club Recommendations© 2009

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TABLE OF CONTENTS


Page

List of Figures ..... ii

List of Tables ..... ii

Executive Summary ..... 1

**Recommendations** **Page**

Evaluate bicycle, pedestrian & transit investments alongside other modes ..... 5

Monetize benefits that received only qualitative assessments ..... 8

Add evaluative measures directly related to the evidence on health ..... 11

Better measure the interface between land use and transportation ..... 13

Improve methods of modeling & monitoring non-motorized travel ..... 15

Enumerate the external and internal costs beyond those analyzed ..... 18

Project prioritization and equity ..... 23

Vehicle miles traveled and climate ..... 28

## LIST OF FIGURES


| Figures | Title | Page |
|---|---|---|
| 1 | Illustration of local nonmotorized networks excluded from PSRC Model | 17 |


## LIST OF TABLES


| Table | Title | Page |
|---|---|---|
| 1 | Distribution of walking time and travel distance | 10 |
| 2 | Cost of collisions by severity | 19 |
| 3 | Total pedestrian and bicycle crashes for the Puget Sound region in 2007 | 20 |
| 4 | External costs needing additional analysis | 21 |
| 5 | Expected results from alternatives relative to WA VMT and climate goals | 29 |

## EXECUTIVE SUMMARY

O-012-007 The purpose of Transportation 2040, as identified by the Puget Sound Regional Council (PSRC) is to address the following question: *How can the region best provide the mobility required to support a growing population to the year 2040, sustain the region's environment and economic vitality, improve system safety and efficiency, and enhance the region's overall quality of life?* As PSRC sought varying transportation alternatives to address this question, the primary objectives that emerged to provide the evaluative framework for analyzing the alternatives were: congestion and mobility, the environment, and transportation finance.

This report demonstrates why a more inclusive and holistic set of objectives and metrics should be included in PSRC's evaluative framework in order to produce a more complete picture of the impacts of transportation on the future of the Puget Sound region. It defines a specific set of recommendations, supported through well-established research, which we contend to be essential considerations as PSRC moves toward adoption of a preferred alternative. All too often, planning decisions and transportation investments are made without a complete picture of the external impacts, resulting in unintended outcomes. Specific to PSRC's Transportation 2040 DEIS, our primary recommendation to the PSRC is to pursue a more comprehensive analysis of the impacts that each transportation alternative will have on public health, equity and social justice.

O-012-008 **Public Health**

Public health issues have become increasingly prevalent. Documentation surrounding the role of transportation in public health supports our recommendation that external health costs and benefits should be key considerations in PSRC's analysis. This report will illustrate how the following health objectives can be realized through prioritization of transit, pedestrian, and bicycling improvements, and suggest methodologies for monetizing the health benefits of such investments:

- Provide a way to build moderate physical activity into our daily lives.[1]
- Increase safety for pedestrians by calming traffic.[2]
- Provide an opportunity to lower regional air pollution and greenhouse gas emissions through less-polluting modes of transportation.
- Reduce overall costs that would otherwise be directly related with road building.
- Reduce indirect costs that arise as a function of health and the environmental impacts of highway investment.
- Support compact, mixed land use patterns that have been shown to be linked to physical activity and lower per capita air pollution.[3]

O-012-009 Conversely, research has concluded that roadway investments can have adverse impacts on public health. Also included in this report is a detailed discussion of the following external health costs, which would likely have affected the results of PSRC's benefit cost analysis:

[1] Besser LM and Dannenberg AL (2005). Walking to public transit: Steps to help meet physical activity recommendations. American Journal of Preventive Medicine, 29(4), 273-280

[2] Campbell BJ, Zegeer CV, Huang HH, Cynecki MJ. A Review of Pedestrian Safety Research in the United States and Abroad. Washington DC: U.S. Department of Transportation, Federal Highway Administration. January 2004.

[3] Frank L, Sallis JF, Conway T, Chapman J, Saelens B, Bachman W (2006). Multiple Pathways from Land Use to Health: Walkability Associations With Active Transportation, Body Mass Index, and Air Quality. *Journal of the American Planning Association* Vol. 72 No. 1. 2006.

**O-012-007**

As a Metropolitan Planning Organization, PSRC is required to prepare a Metropolitan Transportation Plan that meets the following requirements:

- Plans must be developed through an open and inclusive process that ensures public input and seeks out and considers the needs of those traditionally under-served by existing transportation systems.
- Plans must extend for a period not less than 20 years into the future.
- Plans must reflect the most recent assumptions for population, travel, land use, congestion, employment, and economic activity.
- Plans must be financially constrained, and revenue assumptions must be reasonable in that funds can be expected to be available during the time frame of the plan.
- Plans must conform to the Clean Air Act and its amendments, and to applicable state implementation plans for regional air quality.

**O-012-008**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given currently available literature, such quantitative estimates of costs have been included as appropriate. The active living human health impacts of transportation is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs. Human health impacts of transportation associated with air pollutants and accidents have been quantified in Appendix D.

**O-012-009**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three

**O-012-009**

- Driving is a sedentary (and often stressful) activity, and long periods in a car takes away time that might otherwise be used for health-promoting activities such as exercise or time with friends and family. In fact, time spent driving has been directly linked to obesity,[4] - in one study, over 60 minutes daily in a car was found to increase the odds of being obese by 6 percent.
- A transportation system that is weighed heavily towards auto investment and provides little opportunity for other options can trap people into driving and lengthy commutes. Further road investments may ease congestion temporarily, but end up exacerbating the problem – as congestion is reduced, people make more and longer trips, use different routes, and travel at congested times of day - ultimately leading back to congestion, and long periods of time in the car.[5]
- The more miles people drive, the more likely they are to be in a crash.[6]
- Increases in the level of service on roadways increases the attractiveness of outlying areas for development and residential location choice. Resulting VMT is therefore higher, which increases per capita criteria air pollutants and GHG emissions.
- Wide,[7] high volume,[8] high speed[9] roads increase the likelihood of a crash for cyclists and pedestrians.

**O-012-010**

**Equity and Social Justice**

Potential benefits achieved through investments in transit, pedestrian, and bicycle improvements:

- Generate economic benefits, particularly to low-income households - especially if transit and non-motorized investments are made where low-income populations are located.
- Provide mobility for those that are unable to drive (youth, elderly, and disabled populations).

**O-012-011**

Potential adverse costs of roadway investments:

- Mobility benefits of road investments are often inequitably dispersed – low-income, non-driving and ethnic minority populations are less likely to realize benefits of road investments, and often suffer more of the impacts.[10]

---

[4] Frank L, Andresen M and Schmid T (2004). Obesity Relationships With Community Design, Physical Activity, and Time Spent in Cars. American Journal of Preventive Medicine Vol 27. No 2. June, 2004, pp. 87-97.
Wen LM; Orr N; Millett C; Rissel C (2006). Driving to work and overweight and obesity: findings from the 2003 New South Wales Health Survey, Australia.. Int J Obes 30(5):782-6.

[5] Downs, Anthony. Stuck in Traffic: Coping with Peak Hour Traffic Congestion. Washington, DC: Brookings Institution, 1992.

[6] Jovanis P, Chang HL (1986) MODELING THE RELATIONSHIP OF ACCIDENTS TO MILES TRAVELED. Washington, DC: Transportation Research Board. Transportation Research Record 1068, 42-51.
Khan, S ; Shanmugam, R ; Hoeschen, B (1999). INJURY, FATAL, AND PROPERTY DAMAGE ACCIDENT MODELS FOR HIGHWAY CORRIDORS. Washington, DC: Transportation Research Board. Transportation Research Record 1665, 84-92.

[7] Swift P, Residential Street Typology and Injury Accident Frequency, Swift and Associates (Longmont), 31 March 1998.

[8] LaScala EA, Gerber D, Gruenewald PJ. 2000. Demographic and environmental correlates of pedestrian injury collisions: a spatial analysis. Accident Analysis and Prevention 32:651-658.
Roberts I, Norton R, Jackson R, Dunn R, Hassall I. Effect of environmental factors on risk of injury of child pedestrians by motor vehicles: a case-control study. BMJ 1995;310(6972):91-4.

[9] U.K. Department of Transport, Killing Speed and Saving Lives, London, 1997.
National Highway Traffic Safety Administration. Literature Review on Vehicle Travel Speeds and Pedestrian Injuries. Washington DC: USDOT, 1999

[10] Robert D. Bullard and Glenn S. Johnson. Just Transportation: Dismantling Race and Class Barriers to Mobility. New Society Publishers, 1997
K. H. Schaeffer, Elliott Sclar. Access for all: transportation and urban growth. New York: Columbia University Press, 1980

concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**O-012-010**

Comment noted.

**O-012-011**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

O-012-012 **Key Recommendations**

While this report focuses primarily on the impacts of transportation on public health, we also identify elements of PSRC's DEIS in which specific costs and benefits are excluded, and further, how specific outcomes from PSRC's modeling efforts contradict the findings supported through extensive research. The following recommendations provide the framework for the remainder of the document, which we strongly encourage consideration of prior to adopting a preferred alternative:

1. **Evaluate bicycle, pedestrian & transit investments alongside other modes**

Several of the evaluative measures employed in the DEIS only enumerate costs and benefits for vehicle modes (HOV, SOV, freight or commercial travel), and do not evaluate costs and benefits of nonmotorized or transit improvements. Failing to do so undercounts the health benefits of those alternatives that assume large investments in bicycling, walking and transit, and dismisses the health costs of those alternatives that invest heavily in roadway expansion.

O-012-013

2. **Monetize benefits that received only qualitative assessments**

PSRC acknowledges the use of qualitative measures where quantitative measures are not developed, particularly for the public health costs and benefits. We contend that there are, in fact, quantitative strategies based on well-established research available for measuring the public health benefits and costs of the various alternatives. Use of these strategies would provide a more complete analysis for selecting among the various alternatives.

O-012-014

3. **Add evaluative measures directly related to the evidence on health**

To help give a more complete picture of the impacts of the alternatives on health, a few additional evaluative measures could be included in the analysis. The report will discuss how measures such as bike and walk travel times, time spent driving, transit service, and proximity to roadways and rail yards, have been shown in the research to be associated with health outcomes.

O-012-015

4. **Better measure the interface between land use and transportation**

PSRC concludes that the distributional land use differences among the alternatives are expected to be marginal over the time period analyzed. While it is reasonable to expect that the *total* population and employment growth among the different alternatives will be fairly consistent and minimal, that does not automatically translate into consistent growth distribution among the alternatives. Research supports that transportation is inherently linked to land use; given this, we believe the diverse transportation investments among the alternatives should be producing vastly different outcomes on land use.

O-012-016

5. **Improve methods of modeling & monitoring nonmotorized travel**

The relationship between urban form and bicycle and pedestrian trip generation has already been partially reflected in PSRC's current modeling efforts, however this did not capture existing and planned local-level bicycle and pedestrian infrastructure. While separated bike and pedestrian trails are clearly important to promoting non-motorized travel modes (and to related physical activity benefits), local on-street networks in urban areas are also a major contributing factor. Given the importance of non-motorized travel to reducing energy use, climate change, and air pollution; and for increasing physical activity, we strongly encourage PSRC to consider exploring methodologies that can more completely capture all or most bicycle and pedestrian infrastructure.

**O-012-012**

Appendix D and the main document include measures of benefits to users that include the benefits to transit patrons. These transit benefits are called out explicitly in many places in Appendix D. Due to constraints on how bike and walk trips are represented in the current modeling framework, measuring the benefits to makers of these trips proves a challenge. As bike and walk trips do not include explicit network detail the main metrics that compose the user benefits are not available in a consistent manner; trip lengths and times do not deterministically result from assignment on a network. This means that measures of user benefit from increasing walk and bike trips would be counter-rational and have even proved to be negative. This is a structural constraint of the existing model platforms that can only be overcome through the development of new modeling practices and new data elements that sufficiently represent the choice possibilities for walk and bike trips at a much higher grain of detail. The issue of health benefits is addressed in the response to comment O-012-013.

**O-012-013**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given the PSRC current understanding of the available literature such quantitative estimates of costs have been included as appropriate. The active living human health impacts of transportation is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs. Human health impacts of transportation associated with air pollutants and accidents have been quantified in Appendix D.

**O-012-014**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given the PSRC current understanding

O-012-017

**6. Enumerate the external and internal costs beyond those analyzed**

While it is notable that PSRC has committed significant resources toward assessing costs and benefits of the MTP alternatives, many categories of costs and benefits and inputs into the equation are still overlooked. We suggest a more complete evaluation of vehicle and stationary emissions, accident costs, and the social costs of transportation – that are not currently monetized in the alternatives analysis.

O-012-018

**7. Project prioritization and equity**

We strongly encourage PSRC to do a more complete accounting of potential costs and benefits to different populations, such as children and elderly, while fully accounting for investments in transit, bicycling and pedestrian infrastructure. It is unrealistic to use factors that by and large measure only vehicle benefits when discussing populations that are going to be more reliant on non-vehicle modes and less likely to realize the benefits of driving

O-012-019

**8. Vehicle miles traveled and climate**

In establishing baselines and modeling Vehicle Miles Traveled (VMT), PSRC has recognized that there are significant external costs of increasing trips and trip distances. The State of Washington, as per RCW 47.01.440, has committed to reducing VMT per capita by 50% by 2050. In addition to this, WSDOT is charged with working with PSRC to cooperatively develop regional transportation plans that will provide people with additional transportation choices, and reduce greenhouse gases and achieve the statutory benchmarks to reduce annual per capita vehicle miles traveled. Under this framework, the Transportation 2040 alternatives do not appear to reduce emissions to a level that will comply with the state's VMT reduction mandates, and thus we suggest a more aggressive approach to developing an alternative that supports Washington's climate goals.

O-012-020

This report will further distill the above recommendations and illustrate why the outcomes we are currently presented with in the DEIS might look differently given inclusion of such factors. We assert that, in order to accurately evaluate and consider the impacts of transportation on our region – these recommendations should be included within PSRC's quantitative analysis. We are presented with an opportunity to define a transportation system for the next 30 years in the Puget Sound region, however in order to identify a set of transportation investments that best fits the context and vision of the region, we need the right information to do so.

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of the available literature such quantitative estimates of costs have been included as appropriate. The active living human health impacts of transportation is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs. Human health impacts of transportation associated with air pollutants and accidents have been quantified in Appendix D.

**O-012-015**

PSRC has performed an analysis of the development pattern changes that could result from the transportation alternatives and has concluded that none of the action alternatives would lead to future land use and development pattern changes that are substantively different than the Baseline Alternative.

**O-012-016**

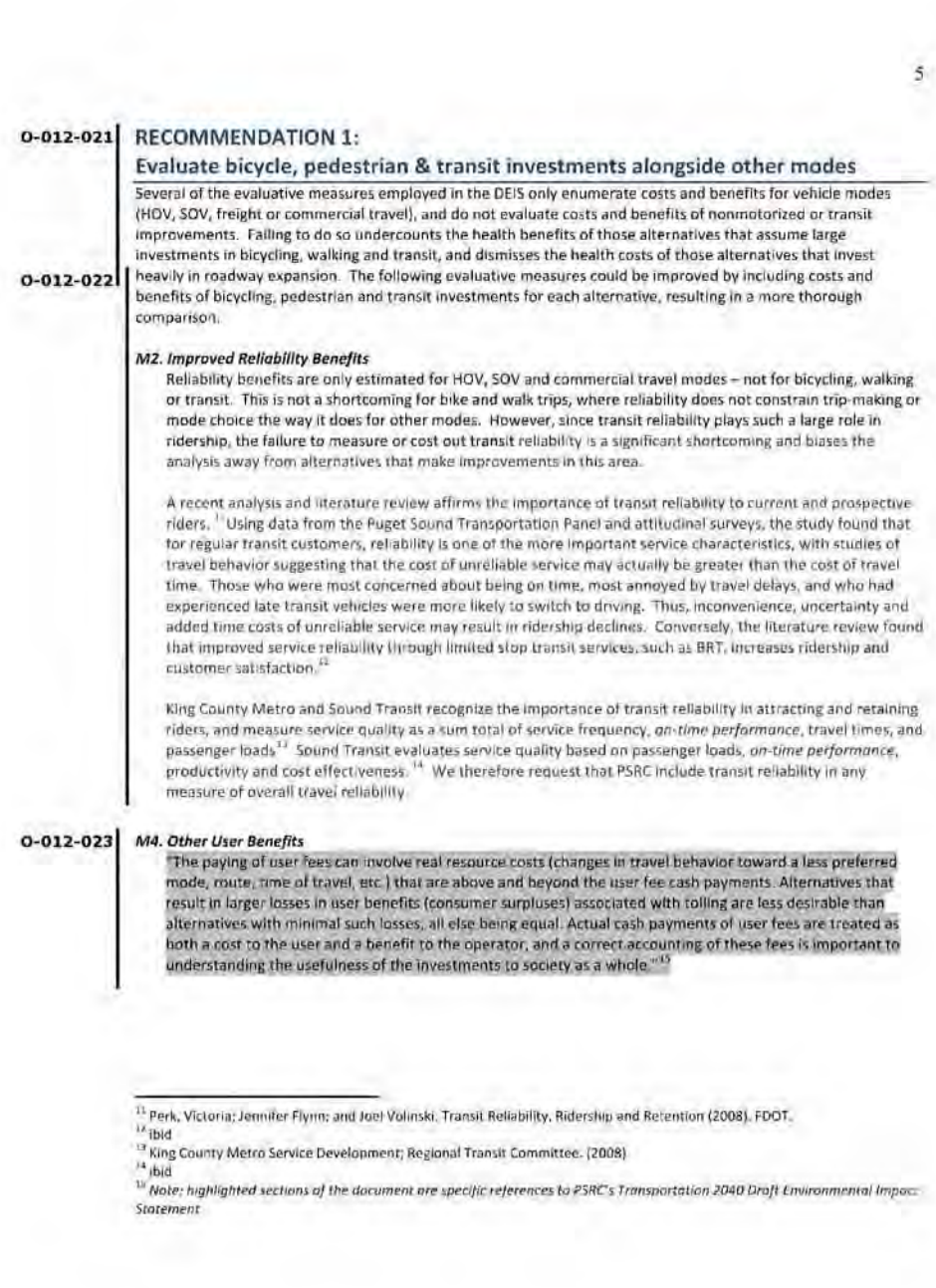
Thank you for the comment. PSRC will be investing considerable effort in a new generation of models over the next 3 years in order to improve the forecasting of various aspects of travel, including non-motorized trip-making.

**O-012-017**

Existing benefit-cost analysis methods and techniques will be an ongoing area of investigation and improvement. These methods have been implemented in what appears to be a first-ever systematic application during a regional transportation planning analysis.

**O-012-018**

Appendix D and the main document include measures of benefits to user that include the benefits to transit patrons. These transit benefits are called out explicitly in many places in Appendix D. Due to constraints on how bike and walk trips are represented in the current modeling framework measuring the benefits to makers of these trips proves a



5

O-012-021 **RECOMMENDATION 1:**

**Evaluate bicycle, pedestrian & transit investments alongside other modes**

Several of the evaluative measures employed in the DEIS only enumerate costs and benefits for vehicle modes (HOV, SOV, freight or commercial travel), and do not evaluate costs and benefits of nonmotorized or transit improvements. Failing to do so undercounts the health benefits of those alternatives that assume large investments in bicycling, walking and transit, and dismisses the health costs of those alternatives that invest

O-012-022 heavily in roadway expansion. The following evaluative measures could be improved by including costs and benefits of bicycling, pedestrian and transit investments for each alternative, resulting in a more thorough comparison.

***M2. Improved Reliability Benefits***

Reliability benefits are only estimated for HOV, SOV and commercial travel modes – not for bicycling, walking or transit. This is not a shortcoming for bike and walk trips, where reliability does not constrain trip-making or mode choice the way it does for other modes. However, since transit reliability plays such a large role in ridership, the failure to measure or cost out transit reliability is a significant shortcoming and biases the analysis away from alternatives that make improvements in this area.

A recent analysis and literature review affirms the importance of transit reliability to current and prospective riders.[11] Using data from the Puget Sound Transportation Panel and attitudinal surveys, the study found that for regular transit customers, reliability is one of the more important service characteristics, with studies of travel behavior suggesting that the cost of unreliable service may actually be greater than the cost of travel time. Those who were most concerned about being on time, most annoyed by travel delays, and who had experienced late transit vehicles were more likely to switch to driving. Thus, inconvenience, uncertainty and added time costs of unreliable service may result in ridership declines. Conversely, the literature review found that improved service reliability (through limited stop transit services, such as BRT, increases ridership and customer satisfaction.[12]

King County Metro and Sound Transit recognize the importance of transit reliability in attracting and retaining riders, and measure service quality as a sum total of service frequency, *on-time performance*, travel times, and passenger loads.[13] Sound Transit evaluates service quality based on passenger loads, *on-time performance*, productivity and cost effectiveness.[14] We therefore request that PSRC include transit reliability in any measure of overall travel reliability.

O-012-023 ***M4. Other User Benefits***

"The paying of user fees can involve real resource costs (changes in travel behavior toward a less preferred mode, route, time of travel, etc.) that are above and beyond the user fee cash payments. Alternatives that result in larger losses in user benefits (consumer surpluses) associated with tolling are less desirable than alternatives with minimal such losses, all else being equal. Actual cash payments of user fees are treated as both a cost to the user and a benefit to the operator, and a correct accounting of these fees is important to understanding the usefulness of the investments to society as a whole."[15]

[11] Perk, Victoria; Jennifer Flynn; and Joel Volinski. Transit Reliability, Ridership and Retention (2008). FDOT.
[12] ibid
[13] King County Metro Service Development; Regional Transit Committee. (2008)
[14] ibid
[15] *Note: highlighted sections of the document are specific references to PSRC's Transportation 2040 Draft Environmental Impact Statement*

challenge. As bike and walk trips do not include explicit network detail the main metrics that compose the user benefits are not available in a consistent manner; trip lengths and times do not deterministically result from assignment on a network. This means that measures of user benefit from increasing walk and bike trips would be counter-rational and have even proved to be negative. This is a structural constraint of the existing model platforms that can only be overcome through the development of new modeling practices and new data elements that sufficiently represent the choice possibilities for walk and bike trips at a much high grain of detail.

**O-012-019**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**O-012-020**

Comment noted.

**O-012-021**

See response to comment O-012-012.

O-012-023

"Alternative 5 has the highest costs to users (least benefits) associated with paying tolls; -$470 million in 2040. These costs are losses in well-being that result from living with less preferred choices when faced with toll payments. Other Alternatives have costs that range between -$15 million and $77 million."[16]

This is an interesting but incomplete measure to recognize the tradeoffs inherent in roadway pricing with regards to cost benefit analysis. Accommodating ever-growing motor vehicle travel requires significant costs and resources to continually expand roadway and parking capacity, and provide traffic services, in addition to crash risks, pollution emissions and other undesirable impacts. [17] As many of the costs of transportation are borne by society as a whole, the external costs less the users investment is more accurately viewed as a subsidy. For example, estimates of highway costs not recovered from users exceeded $0.15/mile in 1995. [18] Other analyses put the total social costs of driving between $0.79 and $1.20 per vehicle mile. [19] The T2040 DEIS alternatives would benefit from a more detailed assessment of these widely acknowledged social costs. Moreover, monetizing the differential between fees collected and social costs for each alternative would paint a more accurate cost benefit picture than the simplistic user fees vs. user benefits comparison.

O-012-024

Additionally, there are two considerations worth addressing in greater detail. First, as presented the $470 million lost consumer benefit in Alternative 5 is a rather high estimate; while the dollar figure may be an accurate representation of the tolls paid by users, it does not appear to reduce the final cost by the value of time saved to the individual. Second, the cost estimate does not factor in the potential health and mobility benefits of switching to a physically active mode of travel as a potential tradeoff for the direct (toll) costs. Theoretically, if the total monetized value of time saved and health benefits are more than the total tolls collected (i.e., the $470 million), then individuals come out ahead in the benefit/cost calculation.

O-012-025

Third, pricing strategies such as tolling can have regressive impacts on low-income households; the tolls represent an additional cost to driving, which must be paid out of the household's after tax income. However, the effects of income vary depending on auto ownership. For example, many low income travelers do not own vehicles, and thus won't pay user charges. Moreover, they may benefit from revenue recycling if the money is invested in nonmotorized transportation and transit.[20] Though not suggested in the DEIS, these investments in alternatives to driving may have benefits, described above, that may be greater in low income communities than for other cohorts as these communities suffer greater rates of chronic and cardiovascular disease, are at greater risk for disability and loss of life from vehicle crashes and suffer greater opportunity costs from automobile ownership and operation. (See Recommendation 7: project prioritization and equitable funding.)

Among other solutions to this regressive impact, include using of toll revenues to prioritize the expansion of transit service and pedestrian and bicycle networks where lower income households and

[16] *Note: highlighted sections of the document are specific references to PSRC's Transportation 2040 Draft Environmental Impact Statement*
[17] Peter Miller and John Moffet (1993), The Price of Mobility, Natural Resources Defense Council (www.nrdc.org).
[18] Douglas Lee (1995), Full Cost Pricing of Highways, USDOT Volpe National Transportation Systems Center (www.volpe.dot.gov).
[19] Mark Delucchi (1996), Annualized Social Cost of Motor Vehicle Use in the United States, Based on 1990-1991 Data, University of California at Davis (www.its.ucdavis.edu), 1996-97; summarized in "Total Cost of Motor-Vehicle Use," Access (www.uctc.net), No. 8, Spring 1996, pp. 7-13.
[20] Metz, D. (2008), "National road pricing: a critique and an alternative", Transport , Vol. 161(3), Thomas Telford, pp. 167–174.

**O-012-022**

Existing benefit-cost analysis methods and techniques will be an ongoing area of investigation and improvement. These methods have been implemented in what appears to be a first-ever systematic application during a regional transportation planning analysis. Like most areas of analysis there is room for the introduction of improved methods and more detail. While continuing to explore method improvements the PSRC will continue to apply the best tools that are available in order to provide decision makers with the best possible information.

**O-012-023**

In accordance with the conventions of benefit-cost analysis the various measures of user benefits are consumer surplus calculations. These measures include an accounting of travel time savings benefits, improved reliability, changes in vehicle ownership and operating costs, and other costs/cost savings. In this last category are included the change in toll costs net of toll revenues. Toll revenues have been netted out because these revenues are a transfer from the toll payer to the toll authority. An alternative approach would include the revenues in the toll costs for users and would include an offsetting revenue gain as a non-user benefit. Some other social costs are estimated elsewhere in Appendix D, including accident cost savings and vehicle emission cost savings.

**O-012-024**

The $470 million cost to users is not actually an accounting of the tolls paid by the users, but rather the difference between the change in non-time-savings consumer surplus and the actual toll revenues. These are losses to the users that are beyond the cash transfer of the toll itself. In this instance there are users of the system that are not as well off with tolls are they were before tolls (possibly after having chosen a less desirable time or mode of travel), but were unwilling or unable to pay the toll associated with not modifying their before-toll travel behavior.

**O-012-025** lower paying jobs are located.[21] Unlike differential pricing, which is difficult to administer (requiring highly personal information to be accurately and frequently collected and applied), a policy that prioritizes expansion of transit service and pedestrian/bicycle networks in tolled corridors (particularly in low-income areas) could be incorporated into one or more of the proposed Alternatives. There is no explanation of how the funds collected from parking charges and/or tolls in Alternatives 3, 4 and 5 will be dispersed or prioritized among the various transportation options (Appendix A, Sec. 2f, Sec. 2g and Sec. 2h).

[21] Elizabeth Deakin and Greig Harvey, *Transportation Pricing Strategies for California: An Assessment of Congestion, Energy and Equity Impacts*, California Air Resources Board, Sacramento, 1995.

Benefit-cost analysis must be satisfied with analysis at the margin, or the accounting of benefits and costs associated with a change in the state of the world. Full cost and benefit accounting is beyond the scope of this planning analysis and is unproductive when making choices between alternate states of the world.

As the health benefits associated with active modes of travel acrue to the user directly (in technical terms this means the health costs of inactive travel modes are not a cost externality), we would expect users to choose these active modes when the benefits of doing so exceed the costs associated with those choices.

**O-012-025**

The effects of tolling on low-income households are discussed in the Environmental Justice chapter of the FEIS.

O-012-026

## RECOMMENDATION 2:
## Monetize benefits that received only qualitative assessments

PSRC acknowledges the use of qualitative measures where quantitative measures are not developed, particularly for the public health costs and benefits. Recognizing the costs and benefits to physical activity, even only qualitatively, represents a step forward and we appreciate PSRC's willingness to examine the relationship between public health and planning decisions. However, we contend that there are, in fact, quantitative strategies based on well-established research available for measuring the public health benefits and costs of the various alternatives. Use of these strategies would provide a more complete analysis for selecting among the various alternatives.

O-012-027

***E54. Energy Usage from Vehicle and Building Use***

These results should be monetized using current (2008) costs of gas, electricity and natural gas. Energy costs are well-documented; calculating total costs based on estimated usage should be a straightforward procedure and will allow a more complete comparison of the relative costs and benefits of each alternative.

O-012-028

***QL2. Non-Motorized Travel***

The impacts and benefits to physical activity are only discussed qualitatively. By taking PSRC's analysis further and combining model results with the evidence of impacts, thresholds and costs, it is possible to generate a reasonable estimate of physical activity costs and benefits for each MTP DEIS alternative.

The PSRC Transportation 2040 DEIS provides summary values of the number of bike and pedestrian trips throughout the region anticipated under the various alternative scenarios; however, it does not quantitatively evaluate or monetize the marginal changes in physical activity between the Baseline and the DEIS Alternatives. Without a monetized metric of benefit, it is more difficult to examine how the benefits on this particular criteria compare against the benefits and costs of other evaluation criteria; especially those that are quantitatively measured and monetized. In addition, the DEIS does not apportion the amount of walking and biking activity under the various Alternatives down to the Transportation Analysis Zone (TAZ) level. A more disaggregate portrayal of results (either tabular or in the form of a map) would facilitate examining the forecasts of the various alternatives with respect to the Equity evaluation criteria.

We believe the analysis of the marginal benefits of physical activity under each of the Alternatives, and the apportioning of those benefits, are feasible with data already available to PSRC. In addition, two key pieces of evidence are used to estimate the benefits and costs:

- **The Surgeon General's 1996 report on physical activity**[72] had a large impact on physical activity promotion, because it found engaging in even moderate physical activity in short bouts could offset the likelihood of chronic disease onset and thus improve health substantially. The report recognizes that building physical activity into our everyday lives through activities housework, gardening, and bicycling and walking will have a positive health impact. Based on an extensive review of the evidence, the report recommends **getting 30 minutes of moderate physical activity on most days.** Meeting this threshold of physical activity was found to result in significant benefits to health, including reduced risks of coronary heart disease, hypertension, colon cancer, and diabetes.

- **NCHRP Report #552 – Guidelines for Analysis of Investments in Bicycle Facilities**, based on a literature assessment, found that people who meet the threshold of at least 30 minutes of physical activity per day generate an annual per capita cost savings from between $19 and $1,175 (median value = $128).[73]

[72] Physical Activity and Health: Report of the Surgeon General on Physical Activity. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Centers for Disease Control and Prevention; National Center for Chronic Disease Prevention and Health Promotion, and the President's Council on Physical Fitness and Sports. Washington D.C: 1996. Access online at: http://www.cdc.gov/nccdphp/sgr/contents.htm

[73] Krizek K et al (2006). NCHRP report 552: Guidelines for Analysis of Investments in Bicycle Facilities. Washington, D.C.: Transportation Research Board, p. 3 / appendix E

**O-012-026**

Thank you. The literature on active living and the corresponding health and transportation relationships is an emerging area, and arguably in its developmental stages. PSRC has reviewed the literature that is known to be available by the staff and has not found applicable methods or unambiguous causal evidence that would allow a more quantitative analysis at this time. Human health impacts from pollution and accidents, where the causality and quantification approaches are unambiguous, have been included. We look forward to being able to elaborate upon the basic benefit-cost analysis framework in the future.

**O-012-027**

Thank you. The energy consumption costs of the transportation sector are already captured in the vehicle operating cost changes, which include fuel costs. The analysis strives to account for all major cost elements without double counting any costs.

**O-012-028**

NCHRP #552 states the following regarding estimating the health benefits of non-motorized investments:

"To establish a health-care, cost-based reason for bicycle facilities, several types of specific empirical evidence must be gathered and communicated to interested parties. Using reasoning from Goetzel et al., researchers must first demonstrate relationships between a given feature of the built environment (e.g., a bicycle facility) and levels of cycling. This activity is similar to methodologies previously described to measure the demand induced from various facilities.
International research on this question is likely to have reliable results that can enhance this line of inquiry in relatively short order time (i.e., a couple of years).

Second, any amount of induced cycling that could be 'teased' out from a

O-012-028

Using these sources as a starting point (and converting the annual values to daily measurements), the additional public health benefit or cost from the Baseline scenario can be estimated as follows: According to the DEIS, PSRC anticipates between 2,801,300 and 3,303,600 walk, bike and walk to transit trips per day, across the various alternatives (Exhibit 4-33, pg. 4-74). In order to measure the marginal physical activity benefits of each alternative from the baseline, the difference between the alternatives and the Baseline case should be used.

Using the NCHRP cost figures as a starting point the additional public health benefit (or loss) from the Baseline scenario can be estimated by converting the NCHRP costs to daily measurements, then calculating as follows:

*Change from baseline for total trips*
x
*Daily per capita cost savings*
x
*Proportion of walk & bike trips likely to result in significantly increased physical activity*

The application of the final adjustment factor *Proportion of Walk & Bike Trips likely to result in Significantly Increased Physical Activity* acknowledges that not all of the additional trips will result in increased physical activity. To estimate this adjustment factor, the 2006 PSRC household travel survey can be used to find the average travel time of all walk and bike trips recorded (13.96 minutes, with a median value of 10 minutes).

Based on the travel time distribution, we expect 40 percent of the marginal increment of additional bike/walk trips to assist in achieving the recommended physical activity levels. This is because trips at around the 60$^{th}$ percentile for travel time - 14 minutes and above – come closest to meeting the daily recommended amount of physical activity. *(See Table 1)* Two assumptions underpin this conclusion: 1) that a trip begun by walking or biking is complemented with a subsequent return trip of equal duration, resulting in 28 minutes / day of physical activity from the marginal trips in the MTP analysis; and 2) that other physical activities throughout the day (including the bicycling and walking trips that exist in the baseline alternative, and other physical activity not related to travel) will fill the gap (2 minutes) for achieving the 30 minutes of recommended physical activity. This second assumption is conservative, as it assumes that the people making bike and walk trips will get all but two of their daily minutes of physical activity due to additional bike and walking trips. In all actuality, many of these people may be getting additional daily moderate physical activity beyond simply walking and bicycling trips; the higher the amount of pre-existing minutes of moderate physical activity from other sources, the lower the amount required from additional bike and walk trips. Reducing the number of minutes required would increase the *Proportion of Walk & Bike Trips likely to result in Significantly Increased Physical Activity* which would, in turn, increase the estimated benefit under the baseline and each alternative.

Using this assumption and NCHRP benefit estimates, it is possible to select the level of cost that is the most consistent and appropriate to the analysis, and use that as a base cost to monetize a range of presumed public health benefits under the various alternatives. The estimates can be scaled up to the annual level by multiplying by 365. The net present value of that annual value could then be calculated using the time period and with a discount rate deemed appropriate.

facility would then need to be translated into an average percentage of one's weekly physical activity. For example, the daily recommended level of physical activity is defined as 30 min of moderate physical activity on 5 or more days per week. Cycling 5 mi in 30 min or 4 mi in 15 min would meet these current public health guidelines for physical activity.

Third, researchers must then demonstrate that lack of physical activity—because it is indicative of certain risk factors—imposes a financial burden to the individual or to society. A fourth step would be to show that improving certain risk factors (i.e., increasing physical activity) does result in reduced cost. The final step is for researchers to demonstrate that health habits can be changed and that the resultant lower risk can be maintained over time. As can be seen, the challenges associated with documenting a health financial payback from a bicycle facility are significant. Looking at the problem optimistically and from the perspective of needing analytical justification, such exercise is not completely out of the realm of possibility. For this reason, these later steps (three through five) constitute the focus of the following review."

This analysis is beyond what is reasonable for a regional plan, where many of the analytical and causal conditions cannot be verified. This report reinforces the notion that such analysis could be conducted in a more detailed and localized analysis of individual projects. The suggestion of a specific method for calculating the health benefits, included in the comment, is appreciated. And while this method is not directly comparable to other measures included in Appendix D, which are consumer surplus measures, it is possibly instructive to apply such methods. Applying the assumptions outlined in the comment result in between a $7 million annual (2040) loss (Alternative 2) and a $22 million gain (Alternative 5). These values could be compared with other estimates of benefit/loss included in Appendix D.

O-012-028

**Table 1: Distribution of walking time & travel distance**

| | | Travel time (min) | Distance used in Analysis (miles) |
|---|---|---|---|
| Percentiles | 10 | 3.00 | .0900 |
| | 20 | 5.00 | .1500 |
| | 30 | 5.00 | .2200 |
| | 40 | 9.00 | .2800 |
| | 50 | 10.00 | .3800 |
| | 60 | 14.00 | .4900 |
| | 70 | 15.00 | .6300 |
| | 80 | 20.00 | .8700 |
| | 90 | 30.00 | 1.5600 |

O-012-029

**Spatial Distribution of Benefits and Costs**

These additional benefits can also be apportioned throughout the region in order to enhance the analysis of Equity criteria E1: Geographic Distribution of Benefits, and E4: Benefits to Environmental Justice Populations. The modeling process employed by PSRC already lends itself to incorporating the proposed advances in benefit cost analysis at the more localized level. The trip estimations created as part of the various alternative settings were created at the TAZ level and then aggregated to the final summary figures shown in the MTP DEIS. Therefore, it should then be possible to apply the above methods at the TAZ level for a disaggregate estimate. The benefits or costs can then be mapped by TAZ in order to identify and enumerate spatial concentrations of costs and benefits that overlay vulnerable populations. (see Recommendation 7: project prioritization and equity.).

**O-012-029**

Regrettably, the 2006 household survey does not contain a sample size sufficient to isolate non-motorized travel times and distances at a disaggregated scale of spatial analysis. It is a desire of PSRC to incorporate advances in survey design and analysis and more advanced modeling practices as possible in the future. More advanced modeling approaches include a greater spatial resolution (parcel as compared with zone) for analysis, the representation of individual households instead of categorical analysis and representation of tours of activity instead of trips or segments of trips. All of these future anticipated improvements will more accurately represent non-motorized activities and facilitate a new generation of more advanced analytical and planning methods.

O-012-030 **RECOMMENDATION 3:**

**Add evaluative measures directly related to the evidence on health**

To help give a more complete picture of the impacts of the alternatives on health, a few additional evaluative measures could be included in the analysis. The following measures have been shown in the research to be associated with health outcomes.

**Bike and walk travel times:** The MTP DEIS measures pedestrian and bike trips by number of bike / pedestrian trips generated. Although this measure is reasonable to use, we strongly recommend adding daily minutes of bike / walk travel as a measure, due to the well-established threshold of 30 minutes of moderate physical activity per day.[24] Time is the required unit to measure the actual dose of physical activity that is obtained from walking and biking.

O-012-031 **Time spent driving:** Time spent driving has been directly linked to obesity.[25] At this time the evidence is not developed enough to quantify the changes in physical activity due to changes in time spent driving or riding in a car. However, we recommend that PSRC consider a qualitative evaluation of how long term changes in vehicle travel times in each DEIS alternative may be impacting physical activity, after accounting for secondary land use impacts and induced demand.

O-012-032 **Transit service:** Because most public transit trips also involve a walking link, transit can also encourage physical activity. Recent evidence shows that after adjusting for demographic factors, transit riders are 3.49 times more likely to get the amount of physical activity recommended by the U.S. Surgeon General.[26] Another analysis of US travel survey data found that 16 percent of all recorded walking trips were part of transit trips, and that transit-based walk trips tended to be longer than average,[27] and a different study found that transit users spend a median of 19 minutes per day walking to transit, and 29 percent walked more than 30 minutes daily on their transit trip alone. The same study found that not only are low-income populations more likely to be transit users, low-income and non-white people are also more likely to walk to public transit, and more likely to spend more than 30 minutes on their trip to transit.[28] Therefore, facilitating pedestrian access to public transit may have the greatest health benefits for low-income individuals.

Because the walk and bike trip totals generated by PSRC include trips to transit, the benefits of these trips can be accounted for through a thorough estimate and costing of these measures. In the future, the PSRC may want to break out trips to transit from other bicycle and walking trips to examine the comparative health benefits of transit investments.

O-012-033 **Proximity to roadways and rail yards:** The MTP does not perform any sort of geographic analysis of air pollution to determine proximity to elevated air pollution exposure levels due to investments in each of the MTP Alternatives. Although this approach may be legitimate for a plan-level analysis, we strongly encourage the PSRC to provide some information that may help differentiate these impacts. The California Air Resources

[24] Physical Activity and Health: Report of the Surgeon General on Physical Activity. U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, and the President's Council on Physical Fitness and Sports. Washington D.C: 1996. Access online at: http://www.cdc.gov/nccdphp/sgr/contents.htm

[25] Frank L, Andresen M and Schmid T (2004). Obesity Relationships With Community Design, Physical Activity, and Time Spent in Cars. American Journal of Preventive Medicine Vol 27. No 2. June, 2004, pp. 87-97.
Wen LM; Orr N; Millett C; Rissel C (2006). Driving to work and overweight and obesity: findings from the 2003 New South Wales Health Survey, Australia,. Int J Obes 30(5):782-6.

[26] LaChapelle U, Frank, LD (2009). "Mode of Transport, Employer Sponsored Transit Program and Physical Activity." *Journal of Public Health Policy* **30,** S73–S94.

[27] Weinstein, Asha and Schimek P (2005). How Much Do Americans Walk? An Analysis of the 2001 NHTS, Transportation Research Board Annual Meeting.

[28] Besser LM and Dannenberg AL (2005). Walking to public transit: Steps to help meet physical activity recommendations. American Journal of Preventive Medicine, 29(4), 273-280

**O-012-030**

Thank you. The literature on active living and the corresponding health and transportation relationships is an emerging area, and arguably in its developmental stages. PSRC has reviewed the literature that is known to be available by the staff and has not found applicable methods or unambiguous causal evidence that would allow a more quantitative analysis at this time. We look forward to being able to elaborate upon the basic benefit-cost analysis framework into the future.

**O-012-031**

Thank you. The literature on active living and the corresponding health and transportation relationships is an emerging area, and arguably in its developmental stages. PSRC has reviewed the literature that is known to be available by the staff and has not found applicable methods or unambiguous causal evidence that would allow a more quantitative analysis at this time. We look forward to being able to elaborate upon the basic benefit-cost analysis framework into the future.

**O-012-032**

Comment noted.

**O-012-033**

Thank you for your comment. PSRC is aware of the relationship between health impacts to sensitive populations and proximity to transportation facilities. This is an emerging area of research, and one that was discussed in the VISION 2040 FEIS as it related to future land use sitings. PSRC will review our modeling capabilities to see if this type of analysis is currently feasible. Further, as part of the ongoing research into improving our ability to incorporate health impacts into long-range transportation planning, this is an area that will continue to be pursued.

**O-012-033**

Board (CARB) recently developed health-based standards to avoid exposing vulnerable populations to elevated air pollution exposure levels.[29] CARB defines "sensitive uses" as residences (houses, apartments, and senior living complexes), schools, day care centers, playgrounds, and medical facilities (hospitals, convalescent homes, and health clinics). CARB recommends avoiding siting sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, rural roads with 50,000 vehicles/day, or within 1,000 feet of a major service and maintenance rail yard. We recommend that the PSRC map and/or further evaluate the extent of these potential conflicts for each alternative in the MTP DEIS.

[29] California Environmental Protection Agency / California Air Resources Board (2005). Air Quality and Land Use Handbook: A Community Health Perspective.

O-012-034

## RECOMMENDATION 4:

### Better measure the interface between land use and transportation

An assumption stated by PSRC in modeling the alternatives is that growth over the next several decades will build upon well-established urban areas, and thus the distributional land use differences among the alternatives are expected to be marginal over the time period analyzed. In Measures GM1 (Population), GM2 (Employment), and ES3 (Agricultural and Resource Lands) PSRC states that all alternatives produced population distribution patterns that were consistent with the Vision 2040 Regional Growth Strategy (RGS). This finding raises several concerns:

1) The degree to which this is an accurate conclusion, given that the development trends since 2000 have already diverged from Vision 2040. The assumption that all alternatives will support the RGS is in direct contradiction of current land use trends, which have diverged from the RGS. For instance, in Kitsap County, since 2000 between 40 and 60% of new housing units have occurred outside of the Urban Growth Boundary. PSRC needs to elaborate on its process for correcting growth patterns that are in conflict with Vision 2040. Alternately, PSRC needs to remodel land use outcomes that use more accurate baseline and trend data for observed regional land use.

O-012-035

2) Why the land use outcomes are not more consistent with the diverse investments in transportation across the alternatives. The additional lane miles proposed in the alternatives range from 468 (Alternative 5) to 1,158 (Alternative 2). The difference in the infrastructure investments should be producing vastly different land use scenarios, beyond that which is being reported on in the DEIS.

   Part of the reason for the lack of divergence among the results is to be found in the land use and transportation assumptions applied in the MTP 2040 DEIS. Some of these are necessary to facilitate comparison between the alternatives - the population and employment totals used in the analysis are fixed, and likewise, PSRC did not assume any changes in land use or zoning as a result of the changes in the transportation network. PSRC acknowledges that "Adopted plans, policies, and regulations might need to change to accommodate any of the future alternatives as particular transportation facilities are developed. Local jurisdictions would determine the actual permitted densities and types of land uses appropriate for different levels of transportation service." One logical conclusion of this statement is that, whatever alternative is eventually adopted, PSRC will need to re-evaluate (or at least facilitate local jurisdictions in their evaluation) of the localized growth inducing impacts of the finally adopted regional MTP.

   One aspect that would go a long way towards addressing that conclusion is a clearer understanding of how PSRC ran its integrated land use/transportation modeling process. Exhibit 1 in Appendix E (pg. E-2), and the Land Use Forecasts discussion in Appendix K (Appendix K, pg. 5) provides a conceptually straightforward approach, but there are points about the execution of the approach which are not clearly communicated. According to the discussion in Section 2 of Appendix E, alternatives were developed and then run separately through the integrated modeling system, using the 2006 base year as initial calibrations of regional travel demand, the existing regional travel network, and existing land use patterns. As part of modeling land use/transportation interaction under the various alternatives, updated land use forecasts were calculated using definitions of future network conditions in 2020 and 2040.

   While PSRC has stated that it has used local land use plans (both current and anticipated) as part of the land use modeling process, it has not been clearly described how much ***net additional*** square footage of various land use categories (as described in Exhibit 5-5, and in Appendix K, pg. 9) will be required under the various transportation plan alternatives. It is reasonable to expect that potential for infill and redevelopment would necessarily feed back into the travel model networks and travel model runs, reducing demand for motorized vehicle modes; this could, in turn, alter the size of, or redistribute, the regional network as proposed under the various alternatives.

**O-012-034**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.

PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

**O-012-035**

The assumptions for regional geographies from VISION 2040 are standardized across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

O-012-036

3) In measures GM 1 and GM2, while the total population and employment change relative to the baseline for the alternatives is negligible, the distribution of additional population across geographies can be quite substantial.

GM1. Population
Number of persons within each of six regional geographies.
"No significant change across any of the alternatives. All of the action alternatives appear to be consistent with and support the Regional Growth Strategy."[30]

GM2. Employment
Number of jobs within each of six regional geographies.
"No significant change across any of the alternatives. All of the action alternatives appear to be consistent with and support the Regional Growth Strategy."[31]

While it is reasonable to expect that the *total* population and employment growth among the different alternatives are fairly consistent and minimal (given the requirement that population, housing and employment growth be held fixed across the Baseline, and all Alternative, scenarios), that does not automatically translate into minimal impact or little difference between the distribution of growth between alternatives, or even within a specific alternative over time. The different design philosophies embodied in each alternative have differential impacts in terms of the *urban form* of population and employment growth, which in turn can be anticipated to have substantial fiscal, infrastructure and environmental impacts. Put a different way, small differences in population and employment may be associated with larger changes in land forms, especially in exurban / rural areas. Outside the UGB, a 'rural' designation may simply translate into large-lot residential development, and large amounts of employment in rural areas can readily fuel even more growth and traffic into those areas. A visual representation of where the anticipated growth would occur under the different alternatives, or summarizing the growth impacts using acreage/ square footage of development (as is done in Measure ES3, Agricultural and Resource Lands), could provide useful insights to monitoring localized impacts.

O-012-037

4) Alternative 2, which is cited as resulting in a "measurable increase in non-residential square footage" generates just 2,000 more square feet of non-residential development across the entire region over a 30 year period than Alternative 3. The description of the results mischaracterizes the performance of the alternatives in the conclusion and should instead read "Alternatives 2 and 3." (see PSRC's Transportation 2040 DEIS, Appendix D).

Again, there appears to be some substantial relative differences between alternatives, particularly for non-residential development. Although these differences may be within the margin of error, negligible differences in total marginal outcome might still result in substantial differences in urban form and at the scale of Regional Geographies, both within and between the Baseline and various alternatives. PSRC has already anticipated that local land use planning efforts will likely result in modification/re-evaluation of the impacts once the final alternative is selected. As part of that process, it would be useful to estimate the amount of residential and non-residential square footage PSRC anticipates *per municipality or Regional Geography*, and then compare that to existing capacities in those locations. This would aid in anticipating significant environmental impacts from anticipated growth, and help PSRC and/or counties and municipalities minimize or avoid those impacts.

[30] *Note: highlighted sections of the document are specific references to PSRC's Transportation 2040 Draft Environmental Impact Statement*
[31] ibid

**O-012-036**

The assumptions for regional geographies from VISION 2040 are standardized across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

**O-012-037**

The assumptions for unincorporated areas from VISION 2040 are standardized based on regional geography across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

O-012-038

## RECOMMENDATION 5:
## Improve methods of modeling & monitoring nonmotorized travel

The relationship between urban form and bicycle and pedestrian trip generation has already been partially reflected in PSRC's current modeling efforts (Section 9, Appendix E).[32] Additionally, the catchment area of pedestrian and bike facilities used (1/4 mile) is consistent with most of the literature relating urban form and travel behavior.[33]

However, it appears that PSRC's modeling efforts have not considered existing and planned local-level bicycle and pedestrian infrastructure:

> *"[PSRC's effort] captures a significant portion of actions mentioned in Section 2 regarding completing bicycle trail networks and a portion—but not all-of any actions alluding to completing the pedestrian network. On-road pedestrian/bicycle facility actions (sidewalks, bike lanes) will be treated qualitatively in the alternatives evaluation reports."*[34] *(See Figure 1)*

O-012-039

Further, the non-motorized projects included as inputs in the model represent a relatively dispersed and disconnected network across the region, with many of the modeled investments in exurban, rural or sparsely populated areas that would not be anticipated to generate large numbers of non-motorized trips. By only modeling these facilities, the potential to capture the high percentage of trips that could be made by walking or biking, particularly in urban areas, is largely unmet and the impedance for non-motorized trips has been overestimated. This also has the result of underestimating potential mode shift and physical activity benefits, and overestimating greenhouse gas emissions and traffic crashes. Accurately estimating non-motorized travel is an inherently difficult task. That said, it is also vitally important if the benefits and costs of bicycle and pedestrian investments are to be properly reflected in the analysis of Alternatives.

O-012-040

While separated bike and pedestrian trails are clearly important to promoting non-motorized travel modes (and to related physical activity benefits), local on-street networks in urban areas are also a major contributing factor. Local urban networks, in places like Seattle, where a higher density of services and people exist, can capture a substantial portion of local trips. In Seattle, over 450 miles of varying types of bicycle facilities are planned for 2017. Cities with higher levels of bicycle infrastructure have been found to support higher levels of bicycle commuting,[35] indicating that as cities across the region continue to implement local non-motorized plans, the region's share of non-motorized trips will increase beyond what is projected in PSRC's estimates.[36] Local pedestrian networks likewise support physical activity and walking - a recent 11-country study of physical activity and the built environment found that sidewalks were the biggest single factor in influencing physical activity. People located in urban neighborhoods with sidewalks were between 15-50 percent more likely to get at least 30 minutes of moderate-to- vigorous activity at least five days a week.[37]

O-012-041

Given the importance of non-motorized travel to reducing energy use, climate change, and air pollution; and for increasing physical activity, we strongly encourage PSRC to consider exploring methodologies that can more

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[32] Greenwald (2003), Frank et al. (2007) and Krizek (2003) provide additional evidence that clearly relates urban form to mode choice outcomes for individual trips (particularly pedestrian and bike trips), personal VMT generation and trip tour length.

[33] Appendix E, Section 9

[34] Appendix A, Addendum G: Bicycle and Pedestrian Strategies

[35] Dill, J. & Carr, T. Bicycle Commuting and Facilities in Major U.S. Cities: If you build them, Commuters will use them – Another Look. 2003. TRB Annual Meeting.

[36] According to the highest non-motorized mode split projections in Alternative 5, 216,000 work trips per day on average would involve walking or biking. While these estimates are not delineated into walk and bike trips, the average ratio of bike to walk trips in Washington is 1 to 4, suggesting approximately 52,000 trips would involve biking and the remainder would involve walking. By 2017, Seattle alone plans to triple the amount of bicycling in the City. By 2040, it can be expected that Seattle's bike mode split will surpass what would be its calculated share of projected trips based on PSRC's estimates.

[37] Sallis JF, Bowles HR, Bauman A et al. (2009). Neighborhood Environments and Physical Activity Among Adults in 11 Countries. Am Jour Prev Med 36 (6); 484-490.

**O-012-038**

Yes, correct. There is a limited representation of the actual network and its characteristics that are relevant to walk and bike trips. To be more precise it is the nature of improvements on these local networks that lack the detail that would support an actual trip assignment process. In addition, it is the step of actually assigning these trips that also remains unperfected in most travel models. Often a qualitative characterization of quantifications of network attributes at a zonal scale are used in mode choice to help the models reflect the investments in non-motorized assets. This is the current approach employed by PSRC.

**O-012-039**

As stated elsewhere this is the long-term goal of model improvements that are funded but will take a number of years to complete and validate.

**O-012-040**

Comment noted.

**O-012-041**

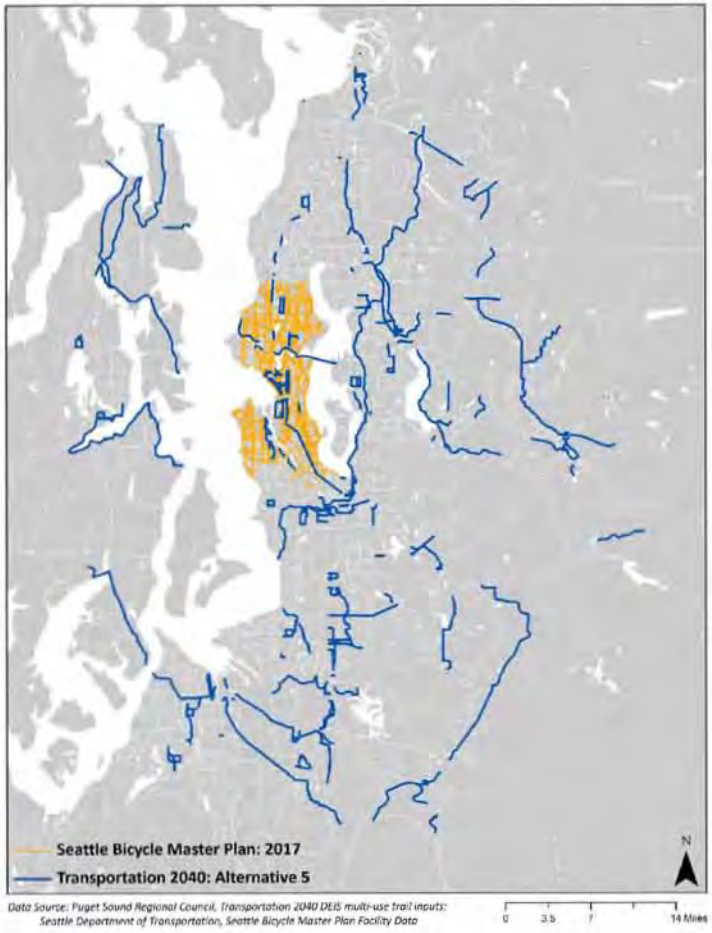
The methods suggested are already consistent with the methods employed. Workplace location choice is a multinomial choice where destination zones can be the same as origin zones. The household survey is the estimation dataset. Unfortunately, this approach still does not afford the opportunity to assign bike and walk trips. This requires a complete network with all the appropriate network features and attributes (e.g. capacity constraints, speed, geometry, grade), and an assignment algorithm that solves the network loading given the network attributes that are available.

**O-012-041** completely capture all or most bicycle and pedestrian infrastructure. One method is to apply the findings from recent literature indicating that trips which are internal to TAZs are more likely to use non-motorized modes. Using a series of multinomial and binary logit models, Greenwald (2006) demonstrated that urban form can play a significant role in that decision by the individual traveler to keep a trip within the TAZ where it originated, and that decision jointly affected the choice of non-motorized travel mode options. It may be possible to replicate a similar type of analysis at the TAZ level for the PSRC region, using the 2006 Household Travel Diary Survey as a calibration dataset; the output would estimate the probability of trips generated from the TAZ being retained internally, and by what mode they would be completed, based on localized urban form within the TAZ (including an updated sidewalk and bike network, as described in the paragraph above). Those probabilities could be then used as part of the iterative process for balancing (and creating more refined) trip making and land use projections across the various alternatives, at the TAZ level.

Currently, a number of PSRC cities and counties have local pedestrian and bicycle network data available. For places that do not have this data available, automated methods now exist to generate networks based on Google satellite photography.

O-012-042

Figure 1: Illustration of local nonmotorized networks excluded from PSRC model (Seattle Bicycle Master Plan overlayed with PSRC's proposed trail network included in the modeling of Alternative 5)




**O-012-042**

Comment noted.

O-012-043 **RECOMMENDATION 6:**

**Enumerate the external and internal costs beyond those analyzed**

***ES1. Vehicle and Stationary Emission Benefits***

This estimate includes the cost of health impacts of mobile source air pollution, but contains no information on how the costs to health were estimated. Language suggests that PSRC did, in fact, have these benefits estimated separately at one point, and consolidated the measures in the final report (Note: tables in Appendix D, pg. 86 may help in terms of estimating enhanced public health benefit from changes in emissions).

O-012-044 ***QL1. Accident Cost Savings***

In measuring the impacts of traffic crashes, bicycle, pedestrian and transit crashes are not included in the MTP DEIS analysis. This is a major shortcoming of this analysis, given the high percentage of traffic crashes that involve non-motorized roadway users.

Certain elements of the built environment which influence traffic safety should be factored into a non-motorized crash estimate. Given that the frequency and severity of traffic crashes are, in large part, a function of traffic volume and speed,[38] the infrastructure investments that have the potential to influence traffic volume and speed should be captured in such an analysis.

Traffic-calming measures, such as on-street bicycle facilities, roundabouts and sidewalks, which effectively reduce vehicle volumes and speeds, have been found to reduce collision frequencies and severities. Pedestrian and bicycle countermeasures, such as sidewalks and pedestrian signal phasing, have been found to improve the safety of roadways.[39] One study concluded that traffic calming could reduce the number of traffic injuries by 15%.[40] In Seattle, intersections where traffic circles were installed reduced collisions by up to 90%. This would suggest that the alternatives would perform differently given varying levels of investment in facilities such as sidewalks, crosswalk improvements and bicycle infrastructure, ultimately producing different crash cost estimates.

O-012-045 • Traffic safety should also be evaluated as an important dimension of equity (see Recommendation 7: project prioritization and equity). Populations who are more often dependent on non-motorized modes of transportation, such as the elderly, low-income and children, also have a greater risk of being involved or being severely injured in a traffic crash. In 2003, the National Highway Traffic Safety Administration reported that the age group with the highest rate of pedestrian fatalities was those age 70 and over. In 2007, almost one-fifth of all traffic fatalities involving youth aged 14 and younger were pedestrians. In NHTSA's most recent analysis of pedestrian fatalities, the findings indicated that young children are especially likely to be the victims of fatal crashes.[41]

**A Method for Calculating the Accident (Crash) Cost of MTP DEIS Alternatives**

In order to estimate the number of pedestrian and bicycle crashes, we recommend an approach similar to the one employed by the San Francisco Department of Public Health (SFDPH). The SFDPH used census-tract level

[38] Ewing R., Dumbaugh. The Built Environment and Traffic Safety: A Review of Empirical Evidence. *Journal of Planning Literature*. 2009; 23: 347-367

[39] Knoblauch, R. L., B. H. Tustin, S. A. Smith, and M. T. Pietrucha. 1988. Investigation of exposure-based pedestrian accident areas: Crosswalks, sidewalks, local streets, and major arterials. Washington , DC: Federal Highway Administration.

[40] Elvik, R. (2001). Area-wide urban traffic calming schemes: A meta-analysis of safety effects. Accident Analysis and Prevention, 33, 327-336.

[41] U.S. Department of Transportation. NHTSA. www.dot.gov/affairs/briefing.htm (2003)

**O-012-043**

Emission costs were pulled from available literature and in particular the "Manual of User Benefits for Highways, 2003," published by the American Association of State Highways and Transportation Officials (AASHTO), 2nd Addition, 2002, and referred to as the “Red Book." More information about the benefit-cost tool and methods can be found at http://www.psrc.org/assets/2127/_09-45_BenefitCostAnalysisMethods.pdf.

**O-012-044**

Comment noted. Improving safety for all modes is critical to improving quality of life and improving access for all the citizens of the region. Transportation safety is a critical component of the regional long range transportation plan, and it informs multiple elements of the plan as crash reduction is integral to the congestion management process, bicycle and pedestrian planning, transit planning and freight planning. The Transportation 2040 safety component is guided primarily by that of Target Zero, the Washington State Strategic Highway Safety plan developed by the Washington Traffic Safety Commission.

**O-012-045**

Comment noted. Improving safety for all modes is critical to improving quality of life and improving access for all the citizens of the region. The Transportation 2040 safety component is guided primarily by that of Target Zero, the Washington State Strategic Highway Safety (SHSP) plan developed by the Washington Traffic Safety Commission. At the core of Washington State’s SHSP are traffic safety emphasis areas and proven strategies/countermeasures that target problems on Washington roadways. These emphasis areas and proven strategies are organized under the following five basic categories:

- Driver and Occupant Behaviors: impaired, unlicensed, drowsy, and speeding drivers
- Other Special Users: young drivers, motorcycles, pedestrians,

O-012-045

data on pedestrian – vehicle injury crashes in San Francisco was used to develop a statistical model of the significant built environment factors.[42] These factors included:

- Traffic volume (non-highway; limited access facilities were not included in the analysis)
- Proportion of arterial streets without transit
- Proportion of land area zoned for neighborhood commercial
- Proportion of land area zoned for mixed residential/neighborhood commercial use
- Total employees
- Total residents
- Proportion of people living in poverty

The model explained over 70% of the variation in pedestrian-vehicle collisions in San Francisco census tracts. The model results could be applied to the Puget Sound Region, or a similar method could be used with local data to produce a local-specific set of factors. Projected changes in population, employment, traffic volumes and other modifiable factors in each of the DEIS alternatives can be used to adjust the model factors, resulting in an estimate of change in pedestrian injury crashes for each alternative.

Cost estimates can then be applied to the results, using regional crash data to determine the distribution of pedestrian/vehicle crash severity *(see Table 2.)* The cost factors presented below are the US DOT's estimates of costs for traffic crashes (both vehicle/vehicle and vehicle/pedestrian). The costs are comprehensive and include property damage, lost earnings, medical and legal costs, and costs of pain and lost quality of life, and are adjusted in the table below to year 2007 dollars.[43]

**Table 2: Cost of collisions by severity**

| | Value per accident *($2007) |
|---|---|
| Fatalities | $2,709,000 |
| Severe Injuries | $180,000 |
| Visible Injuries | $38,000 |
| Pain Complaints | $20,000 |
| Total | -- |

[42] Wier M, Weintraub J, Humphreys E, Seto E, Bhatia R. 2009. An area-level model of vehicle-pedestrian injury collisions with implications for land use and transportation planning. Accident Analysis & Prevention 41:137-145.

[43] U.S. Department of Transportation, Federal Highway Administration. Motor Vehicle Accident Costs. Technical Advisory T 7570.2. October 31, 1994. Online at: http://www.fhwa.dot.gov/legsregs/directives/techadvs/t75702.htm

and commercial vehicles

- Roadways: run off road, intersection, and head-on crashes
- Emergency Medical Services: enhance capabilities
- Traffic Information Systems: improve data collection

O-012-045

Table 3 presents total pedestrian and bicycle crashes, by severity for the region in the year 2007. In the case of San Francisco, a five-year crash total was used to increase the sample size and smooth the data over a longer time period.

**Table 3: Total pedestrian and bicycle crashes, by severity, for the Puget Sound region in 2007[44]**

| COUNTY | TOTAL PEDESTRIANS INVOLVED IN COLLISIONS | FATALITIES | | SERIOUS INJURIES | | MINOR INJURIES | | NO INJURY | |
|---|---|---|---|---|---|---|---|---|---|
| | | NO. | PCT | NO. | PCT | NO. | PCT | NO. | PCT |
| King | 908 | 19 | 2.09% | 112 | 12.33% | 749 | 82.49% | 28 | 3.08% |
| Kitsap | 49 | 2 | 4.08% | 10 | 20.41% | 34 | 69.39% | 3 | 6.12% |
| Pierce | 207 | 5 | 2.42% | 36 | 17.39% | 165 | 79.71% | 1 | 0.48% |
| Snohomish | 178 | 3 | 1.69% | 24 | 13.48% | 143 | 80.34% | 8 | 4.49% |
| **TOTAL** | 1342 | 29 | 2.16% | 182 | 13.56% | 1091 | 81.30% | 40 | 2.98% |

| COUNTY | TOTAL CYCLISTS INVOLVED IN COLLISIONS | FATALITIES | | SERIOUS INJURIES | | MINOR INJURIES | | NO INJURY | |
|---|---|---|---|---|---|---|---|---|---|
| | | NO. | PCT | NO. | PCT | NO. | PCT | NO. | PCT |
| King | 582 | 3 | 0.52% | 67 | 11.51% | 470 | 80.76% | 42 | 7.22% |
| Kitsap | 30 | 1 | 3.33% | 3 | 10.00% | 25 | 83.33% | 1 | 3.33% |
| Pierce | 97 | 2 | 2.06% | 6 | 6.19% | 84 | 86.60% | 5 | 5.15% |
| Snohomish | 102 | 0 | 0.00% | 7 | 6.86% | 83 | 81.37% | 12 | 11.76% |
| **TOTAL** | 811 | 6 | 0.74% | 83 | 10.23% | 662 | 81.63% | 60 | 7.40% |

O-012-046

**Other External Costs Not Evaluated**

While it is notable that PSRC has committed significant resources toward assessing costs and benefits of the MTP alternatives, many categories of costs and benefits are still overlooked. In addition to those that we have

[44] Washington State Department of Transportation. 2007 Washington State Collision Data Summary. Online at: http://www.wsdot.wa.gov/mapsdata/tdo/PDF_and_ZIP_Files/2007_Annual_Summary.pdf

**O-012-046**

It is not immediately clear that parking requirements (as with many land development regulations) or the allocation of parking facilities (as with many public or private investment strategies) are suboptimal or result in cost externalities that are not elsewhere accounted for.

Land resources required for transportation investments are typically included in the costs of projects and not estimated as a non-project cost. Transportation services are included in the programmatic estimate of individual program areas (cities, counties, transit, etc.).

Transportation diversity can mean many things, and it is unclear what cost or benefit is being addressed in this comment. There is some literature on the option value of various kinds of services or programs. The option value is what people might be willing to pay to have an option available even though they do not expect to use that option on a routine basis. This is a fairly complex area of analysis that requires parameter values (such as risk preferences and estimated frequency of low frequency events) that are not currently available to PSRC.

O-012-046

highlighted above there are additional social costs of transportation that are supported by the overwhelming preponderance of the available research. These can and have been monetized and we suggest that the alternatives analysis is less than complete absent a discussion of the following:

**Table 4: External costs needing additional analysis**

| | |
|---|---|
| Parking | Parking, whether supplied by governments or required as a part of private development is a direct subsidy for drivers – as the cost of providing parking is not fully paid by the user. Further, there is usually an opportunity cost to devoting land to parking, since it could be used for buildings and landscaping or leased or sold. Similarly, parking lanes can be converted to traffic lanes, busways, bike lanes, landscaping or additional sidewalk space. Therefore, more than simply the costs of providing parking facilities, the T2040 analysis, should include the distribution of parking costs and opportunity costs and assess the user subsidies provided by non users as a discrete disbenefit or transfer.[45] |
| Roadway Land Value | More than 26,300 square miles of the United States is tied up in roadway land. This is an area larger than New Hampshire, New Jersey, and Connecticut combined. Although roadway land is often treated as a sunk cost, there is considerable agreement among economists that such assets should be valued as they would be in a competitive market, that is, at their current replacement cost.[46] Economic neutrality requires that land be priced and taxed at the same rate for competing uses,[47] particularly in urban areas where land costs are high and multiple modes compete.[48]<br><br>Failing to charge road users the equivalent of rent and taxes on roadway land underprices roads compared with other land uses, and underprices space-intensive travel modes. This tends to increase the amount of land devoted to roads and encourage lower-density urban development. T2040 should investigate the amount of land devoted to roads, the value of this land, and how this cost can be allocated to road users. |
| Traffic Services | A variety of public services are provided to support transportation activities, including law enforcement, emergency response, planning, and street lighting. With the exception of the Washington State Patrol, which is included in state transportation budget, these services are largely funded through sales and property taxes. Studies indicate that a significant portion of municipal government budgets are devoted to traffic services.[49]<br><br>Although they serve a wide range of users including pedestrians and cyclists, the need for these services, and therefore their costs, tend to increase with motor vehicle traffic, since motorized travel is more dangerous and so requires more management and emergency response. T2040 should investigate the cost of Traffic Services and how this cost can be allocated to road users. |
| Transportation | Inadequate diversity reduces transportation system efficiency, forcing people to use |

[45] Donald Shoup (2005), *The High Cost of Free Parking*, Planners Press (www.planning.org). Table 7-3 p 211. Values not adjusted for inflation.

[46] Ronald Hirshhorn (2003), *Concepts And Practical Values Of Land Costs And Capital Charges For A "Full-Cost Accounting" Of Transport Infrastructure In Canada*, Transport Canada Policy Group (www.tc.gc.ca); at www.tc.gc.ca/pol/en/aca/fci/transmodal/menu.htm

[47] Alex Anas, Richard Arnott and Kenneth Small (1997), *Urban Spatial Structure*, University of California Transportation Center (www.uctc.net), No. 357.

[48] William Vickrey (1997), *Public Economics; Selected Papers by William Vickrey*, Cambridge University Press (http://uk.cambridge.org), p. 211 and 309.

[49] Apogee Research (1994), *The Costs of Transportation: Final Report*, Conservation Law Foundation (www.clf.org), p. 138-144.

O-012-046

| | |
|---|---|
| Diversity | modes that are not optimal for a particular trip. For example, in automobile dependent communities people must drive even when they would prefer to use alternatives. This increases economic, social and environmental costs and is particularly harmful to people who are physically, economically and socially disadvantaged, and so are unable to drive.<br><br>Transportation diversity affects various costs for individuals and society, and described more positively, improving transportation diversity can provide significant benefits, [50] such as being able to defer or avoid automobile ownership and its related opportunity costs, that should be evaluated in the T2040 DEIS. To the degree that planning decisions involve mutually-exclusive trade-offs between modes (such as whether road space should be devoted to general traffic lanes, HOV lanes, automobile parking, bike lanes or sidewalks) it is important to consider the resulting transportation diversity impacts. |
| Barrier Effect | Roads and vehicle traffic tend to create a barrier to pedestrian and cyclist travel.[51] The barrier effect is equivalent to traffic congestion costs (the T2040 traffic congestion cost estimates exclude impacts on nonmotorized travel). In addition to travel delays, vehicle traffic imposes crash risk and pollution on nonmotorized travelers. The barrier effect reflects a degradation of the nonmotorized travel environment. This is not to imply that drivers intentionally cause harm, but rather that such impacts are unavoidable when, heavy and hard vehicles traveling at high speed share space with vulnerable road users.<br><br>The barrier effect reduces the viability of nonmotorized travel. This, in turn, reduces mobility for non-drivers, and reduces public fitness and health. It causes shifts from nonmotorized to motorized travel, and increasing external costs such as traffic congestion, increased parking demand, and pollution emissions. It tends to be inequitable as disadvantaged populations tend to bear a disproportionate share of this cost since they are more dependent on nonmotorized transportation. Finally, studies indicate that people would like to walk and bicycle more but are constrained, in part, by heavy roadway traffic.[52] As there is substantial research supporting the monetization of barriers to walking and bicycling,[53][54] the T2040 analysis should investigate the barrier or severance costs of the alternatives. |

[50] Todd Litman (2007), "You Can Get There From Here: Evaluating Transportation Choice," *Transportation Research Record 1756*, TRB (www.trb.org), pp. 32-41; at www.vtpi.org/choice.pdf.

[51] J.M. Clark and B.J. Hutton (1991), *The Appraisal of Community Severance*, Transport Research Laboratory (www.trl.co.uk), Report #135; Julian Hine and John Russel (1993), "Traffic Barriers and Pedestrian Crossing Behavior," *Journal of Transport Geography*, Vol. 1 No. 4, (www.elsevier.com/locate/jtrangeo), pp. 230-239.

[52] Robert Davis (1992), *Death in the Streets*, Leading Edge (North Yorkshire), 1992, p. 156.

[53] Swedish National Road Administration (1986), *Investment in Roads and Streets*, publication 1986:15E, (www.vv.se).

[54] Danish Road Directorate (1992), *Evaluation of Highway Investment Projects* (undersogelse af store hovedlandeveejsarbejder. Metode for effektberegninger og okonomisk vurdering), Danish Road Directorate (www.vejdirektoratet.dk)

O-012-047

## RECOMMENDATION 7:
## Project prioritization and equity

We recommend that in addition to the health benefits and costs already discussed, PSRC include some discussion of the costs and benefits to children and elderly populations beyond those required in the Environmental Justice evaluation. Both groups are more likely to suffer disproportionate impacts of air pollution and crashes. And because children and the elderly are less likely to drive, they will also benefit more from investments in safe, reliable transit systems and well-designed, continuous nonmotorized networks – through both increased mobility and additional physical activity. Because the region's senior population is projected to increase rapidly over the next 20 years, and because of the rapid increase in obesity in children and youth, we believe that, at minimum, a qualitative discussion of the potential health and mobility impacts to children and the elderly is well justified.

***Elderly***

- Because it has been shown to reduce many of the ongoing health problems associated with aging (including weight-related problems, flexibility and arthritis) and increase overall well-being, sense of independence and self-esteem, physical activity – particularly walking - is important for the elderly[55]
- The elderly are generally frailer, and more likely to have chronic respiratory and other illnesses. For this reason, they are also more vulnerable to the impacts of air pollution and traffic injuries. Injuries to elderly pedestrians, however minor, are more likely to result in serious injuries or fatalities. In terms of air quality, senior residential / long term care facilities, medical facilities and hospitals that are near high-traffic locations may have disproportionate impacts on elderly populations.
- In the Puget Sound region, the population age 65 and older, which represented 10% of the region's population in 2000, is expected to grow by nearly 150% over the next 40 years to constitute 17% of total population by 2040. The expansion of the senior population will place unique demands on the region's transportation services and infrastructure.[56] Without public transit options, elderly populations often remain immobile. Focusing on mobility and accessibility interventions that will benefit the aging demographic should include transportation alternatives that provide a sense of independence, security and mobility.[57]

***Children and Youth***

- Recent trends in physical activity and obesity are even more dramatic for children and youth. Currently, about 17 percent of U.S. children and adolescents (ages 6-19) are obese – a rate nearly triple what it was 30 years ago.[58] Overweight kids are more likely to grow up into overweight adults[59] and may end up with chronic

[55] Shin Y. 1999. "The Effects of a Walking Exercise Program on Physical Function and Emotional State of Elderly Korean Women." *Public Health Nursing*, 16, pp. 146–154.
Pollock M.L., Carroll J.F., & Graves J.E., (1991). "Injuries and Adherence to Walk/Jog and Resistance Training Programs in the Elderly." Medicine and Science in Sports and Exercise, 23, pp. 1194-1200.
Taylor, L., Whittington, F., Hollingsworth, C., Ball, M., King, S., Patterson, V., Diwan, S., Rosenbloom, C., and Neel, A. (2003). "Assessing the Effectiveness of a Walking Program on Physical Function of Residents Living in an Assisted Living Facility." *Journal of Community Health Nursing*, 20:1, pp. 15-26.
Tanaka H, Reiling M, Seals, DR. (1998). Regular walking increases peak limb vasodilatory capacity of older hypertensive humans: implications for arterial structure. Journal of Hypertension. 16(4):423-428
Kovar, P., Allegrante, J., Mackenzie, C., Peterson, M., Gutin, B., & Carlson, M. (1992). "Supervised Fitness Walking in Patients with Arthritis of the Knee: A Randomized, Controlled Trial." *Annals of Internal Medicine*, 116:7, pp. 529-534.
[56] Appendix B. Regional Trends and Forecasts. PSRC. Transportation 2040 DEIS.
[57] Alsnih, R., Hensher, D. (2003) The mobility and accessibility expectations of seniors in an aging population. *Institute of Transport Studies*.
[58] Centers for Disease Control & Prevention. Trends in Childhood Obesity. http://www.cdc.gov/obesity/childhood/prevalence.html

**O-012-047**

PSRC recognizes the importance of a transportation system that serves the needs of children and the elderly. As you have highlighted, issues of particular concern to these populations include accident reduction, access to transit, air quality and opportunities for physical activity. These issues are emphasized throughout the FEIS, particularly in Chapter 4: Transportation, Chapter 6: Air Quality, and Chapter 18: Human Health. These issues also were emphasized in the criteria evaluation process, as noted in Appendix D: Policy Analysis and Evaluation Criteria Report (refer to Policy focus: Air quality should be better than standards & greenhouse gas emissions should be minimized, Policy focus: There should be a high degree of connectivity in street network to accommodate walking, biking and transit, Policy focus: The region's built and natural environments should promote health, Criterion QL1: Accident Cost Savings, Criterion QL2: Non-motorized Travel).

O-012-047

diseases such as Type-2 Diabetes (previously known as adult-onset diabetes) before they reach adulthood.[60]

- The research shows that children and youth may derive additional physical activity benefits from the MTP alternatives that enhance non-motorized access to schools,[61] parks and recreation areas[62] within walking distance. Children, like the elderly, are also more vulnerable to harmful air pollutants, particularly PM and ozone.[63] Because of PM exposure (particularly that from diesel vehicles), alternatives that rely on roadway expansion – particularly those that increase freeway and/or freight volumes[64] – cause concern in terms of air pollution exposure for children. Schools, ballfields and playgrounds that are close to sources of elevated air pollution (such as rail yards, highways, and high-traffic roads or intersections) are likely to have greater impacts on the health of children and youth. PSRC may want to consider mapping and evaluating/enumerating these potential conflicts with each of the DEIS alternatives.

O-012-048

***Environmental Justice Populations***

The potential health impacts of transportation investments are likely to be greater for environmental justice populations. Even when accounting for income and level of urbanization, non-white and ethnic minority populations are exposed to more air pollution[65] and have higher rates of asthma,[66] especially for children.[67] Although these effects are partially due to income, ethnicity remains a significant predictor when income is

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[59] Whitaker RC, Wright JA, Pepe MS, Seidel KD, Dietz WH. Predicting obesity in young adulthood from childhood and parental obesity. *N Engl J Med* 1997; 37(13):869–873.

Serdula MK, Ivery D, Coates RJ, Freedman DS. Williamson DF. Byers T. Do obese children become obese adults? A review of the literature. *Prev Med* 1993;22:167–177.

[60] Preventing Childhood Obesity: Health in the Balance (2005). Institute of Medicine

Freedman DS, Mei Z, Srinivasan SR, Berenson GS, Dietz WH. Cardiovascular risk factors and excess adiposity among overweight children and adolescents: the Bogalusa Heart Study. J Pediatr. 2007 Jan;150(1):12–17.e2.

[61] Boarnet MG, Anderson CL, Day K, McMillan T, Alfonzo M (2005). Evaluation of the California Safe Routes to School Legislation: Urban Form Changes and Children's Active Transportation to School. Am J Prev Med 28(2S2): p. 134-140.

[62] Babey, Susan H., E. Richard Brown and Theresa A. Hastert. "Access to Safe Parks Helps Increase Physical Activity Among Teenagers." UCLA Health Policy Research Brief, December 2005.

Frank L, Kerr J, Chapman J, Sallis J (2007). Urban Form Relationships with Walk Trip Frequency and Distance among Youth. *American Journal of Health Promotion* Vol. 21 I4 Supplement, p. 305.

Kerr J, Frank L, Sallis J, Chapman J (2007). Urban form correlates of pedestrian travel in youth: Differences by gender, race-ethnicity and household attributes. Transportation Research Part D Vol. 12(3); 177-182.

[63] Etzel RA, Balk SJ, Eds. *Pediatric Environmental Health, 2nd Edition*. Elk Grove Village IL: American Academy of Pediatrics Committee on Environmental Health, 2003.

[64] Lin S, Munsie JP, Hwang S-A, Fitzgerald E, Cayo MR. Childhood asthma hospitalization and residential exposure to state route traffic. *Environ Res Section A* 2002;88:73-81.

van Vliet P, Knape M, de Hartog J, Janssen N, Harssema H, Brunekreef B. Motor vehicle exhaust and chronic respiratory symptoms in children living near freeways. *Environ Res* 1997;74(2):122-32.

[65] Perlin SA, Sexton K, Wong DW. An examination of race and poverty for populations living near industrial sources of air pollution. *J Exposure Analysis Environ Epidemiol* 1999;9(1):29-48.

Wernette DR, Nieves LA. Breathing polluted air: minorities are disproportionately exposed. *EPA Journal* 1992;18:16-17.

[66] National Heart, Lung, and Blood Institute Working Group. Respiratory diseases disproportionately affect minorities. *Chest* 1995;108:1380-92.

Mannino DM, Homa DM, Akinbami LJ, Moorman JE, Gwynn C, Redd SC. Surveillance for asthma—United State,1980-1999. Morbid Moral Weekly Rep 2002;51(SS-1):1-13.

[67] Rodriguez MA, Winkleby MA, Ahn D, Sundquist J, Kraemer HC. Identification of population subgroups of children and adolescents with high asthma prevalence: findings from the Third National Health and Nutrition Examination Survey. *Archives of Pediatrics & Adolescent Medicine 2002;156(3):269-75.*

Metzger R, Delgado JL, Herrell R. Environmental health and Hispanic children. *Environ Health Persp* 1995;103 Suppl 6:539-50.

Chabra A, Chavez GF, Adams EJ, Taylor D. Characteristics of children having multiple Medicaid-paid asthma hospitalizations. *Maternal Child Health J* 1998;2(4):223-9.

**O-012-048**

The FEIS contains an expanded discussion of environmental justice.

**O-012-048**

controlled for.[68] Pedestrian crashes are also more likely among low-income, non-white and ethnic minority populations.[69]

The associations around obesity, physical activity and active transportation are more complex for low-income and non-white and ethnic minority populations. Because they own fewer vehicles per household and are more likely to be transit dependent, low-income households already walk more on average.[70] According U.S Census estimates, the majority of people who walk to work earn less than $15,000 a year, and more than 2/3 of the people who walk to work earn less than $35,000. The lowest-income households (those with household income below $15,000 / year) make up over one quarter of all transit trips taken in the US.[71]

However, obesity and its associated health conditions (diabetes, heart disease, high blood pressure) are more prevalent among low-income, non-white and ethnic minority populations,[72] including children.[73] There is some evidence that this may be because of the low-nutrition, low-cost convenience / fast-food restaurants that often prevail in low-income neighborhoods and/or neighborhoods with large minority populations – and with less mobility it can be difficult for low-income populations to access healthy food.

Living in a neighborhood characterized by low education & income levels is a consistent predictor of poorer health status. It has been linked to mortality,[74] lower self-rated health[75] and increased prevalence of chronic conditions.[76] Elderly residents of low-SES areas may suffer more pronounced functional decline.[77] Finally,

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[68] Litonjua AA, Carey VJ, Weiss ST, Gold DR. Race, socioeconomic factors, and area of residence are associated with asthma prevalence. *Pediatric Pulmonology* 1999;28(6):394-401.

[69] Hanzlick R, McGowan D, Havlak J, Bishop M, Bennett H, Rawlins R, et al. Pedestrian fatalities—Cobb, DeKalb, Fulton, and Gwinnett Counties, Georgia, 1994–98. *Morbid Mortal Wkly Rep* 1999;48:601-5.

Marosi R. Pedestrian deaths reveal O.C.'s car culture clash; Safety: Latinos, 28% of Orange County's population, are victims In 40% of walking injuries, 43% of deaths. *Los Angeles Times*, November 28, 1999. p 1.

Moreno S, Sipress A. Fatalities higher for Latino pedestrians; Area's Hispanic immigrants apt to walk but unaccustomed to urban traffic. *Washington Post*, August 27, 1999. P A01.

[70] Murakami E, Young J (1997). Daily Travel by Persons with Low Income. Presentation for NPTS Symposium, Bethesda, MD, October 29-31, 1997.

[71] American Public Transit Association, Public Transportation Fact Book, 1999.

[72] American Obesity Fact Sheets (2005). Obesity in Minority Populations. http://obesity1.tempdomainname.com/subs/fastfacts/Obesity_Minority_Pop.shtml

[73] Centers for Disease Control and Prevention. Prevalence of Overweight and Obesity Among Children and Adolescents: United States, 1999-2002. Oct. 6, 2004.

[74] Haan M, Kaplan GA, Camacho T. Poverty and health. Prospective evidence from the Alameda County Study. *Am J Epidemiol.* 1987;125(6):989–998.

Yen IH, Kaplan GA. Neighborhood social environment and risk of death: multilevel evidence from the Alameda County Study. *Am J Epidemiol.* 1999;149: 898–907.

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[75] Brown AF, Ang A, Pebley AR (2007). The Relationship Between Neighborhood Characteristics and Self-Rated Health for Adults With Chronic Conditions. *Am J Public Health.* 97:926–932.

Patel KV, Eschbach K, Rudkin LL, Peek MK, Markides KS. Neighborhood context and self-rated health in older Mexican-Americans. *Ann Epidemiol.* 2003;13:620–628.

[76] Harburg E, Erfurt JC, Chape C, Hauenstein LS, Schull WJ, Schork MA. Socioecological stressor areas and black–white blood pressure: Detroit. *J Chronic Dis.* 1973;26(9):595–611.

Devesa SS, Diamond EL. Socioeconomic and racial differences in lung cancer incidence. *Am J Epidemiol.* 1983;118(6):818–831.

Jenkins CD. Social environment and cancer mortality in men. *N Engl J Med.* 1983;308(7):395–398.

Adler NE, Boyce WT, Chesney MA, Folkman S, Syme L. Socioeconomic inequalities in health: no easy solution. *JAMA.* 1993;269(4):3140–3145.

Diez-Roux AV, Nieto FJ, Muntaner C, et al. Neighborhood environments and coronary heart disease: a multilevel analysis. *Am J Epidemiol.* 1997;146:48–63.

Roberts EM. Socioeconomic position and health: the independent contribution of community socioeconomic context. *Ann Rev Sociol.* 1999;25:489–516.

O-012-048

and most importantly, the DEIS assigns the transportation capital investments proximate to these populations wholly within the benefit column. This is likely and inaccurate measure of the benefits and costs associated with the alternatives. As accommodating more vehicles is directly tied to disbenefits or costs detailed throughout our comments, a more complete analysis may demonstrate that numerous projects contained in the alternatives impose burdens on Environmental Justice populations. Thus, it is important that the PSRC fully document the potential for any of the MTP alternatives may have to impact health, safety, barrier effect, and transportation diversity in low-income areas.

O-012-049

***E1. Geographic Distribution of Benefits***

The only benefits included in this measure are travel time savings, reliability, and vehicle operating costs. By failing to include other benefits, such as those to health, the PSRC fails to give a complete accounting of who benefits from the different alternatives. The benefits that are included within this measure are ones that are, in themselves, focused on vehicular modes – as discussed in other, previous sections of this document, these measures should be changed to include benefits from all modes of transportation as appropriate.

Health benefits – air quality, traffic crashes, and physical activity – should also be included in this measure. Because these three primary impacts can be estimated at a relatively disaggregate level, it should be possible for PSRC to estimate geographic distribution of health cost benefits, in addition to other types of benefits.

- Air Quality: a dispersion model can be run from the travel model outputs in order to estimate benefits and costs to air quality that may accrue in the different geographic areas. Alternatively, an assessment of marginal increase in traffic volume by roadway segment can be used in tandem with population projections in order to estimate the relative increase in exposure by alternative and geography.
- Physical Activity: Since bicycle and pedestrian trips are estimated by TAZ, it is possible to add up the estimated health benefits by geographic sub-area (see proposed methodology discussed on p. 9).
- Traffic Crashes: Statistical models or model applications (see proposed methodology on p. 19) will be making use of travel and land use model data at a relatively disaggregate (TAZ / Census geography) level, results can be presented as regional totals, by subareas, or for areas with high concentrations of traditionally underserved populations.

O-012-050

***E2. Income Distribution of Benefits***

By focusing solely on drive alone commute trip benefits, comparisons between alternatives neglect health and mobility benefits from transit and non-motorized investments and will have the result of biasing the conclusions *against* the people in our region who cannot or do not drive, and low income residents that are less likely to own cars or who may realize substantial financial benefits from giving up a vehicle. On average, 37 percent of people in the US can't or don't drive, including the entire population under 16, and high proportions of elderly and low-income households. Census data indicates that about one-third of King and Kitsap County residents, and about a quarter of Pierce and Snohomish County residents, get to work using non-SOV modes of travel and so would be likely to benefit from the substantial bicycle, pedestrian and transit investments in some of the alternatives. On average, Americans spend 20 percent of their household income on transportation; this proportion is significantly greater for low-income populations[78] - for households earning less than $29,000 it is over 25 percent. On the other hand, low-income workers that are able to use public transit to commute to work spend, on average, 7 percent less of their income on transportation.[79]

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Yen IH, Syme SL. The social environment and health: a discussion of the epidemiological literature. *Annu Rev Public Health.* 1999;20:287–308.

Diez Roux AV, Merkin SS, Arnett D, et al. Neighborhood or residence and incidence of coronary heart disease. *N Engl J Med.* 2001;345:99–106.

[77] Balfour JL, Kaplan GA. Neighborhood environment and loss of physical function in older adults: evidence from the Alameda County Study. *Am J Epidemiol.* 2002;155(6):506–515.

[78] Transportation + Social Equity: Opportunity Follows Mobility. Transportation for America.

[79] Sanchez, Thomas. "MOVING TO EQUITY: Addressing Inequitable Effects of Transportation Policies on Minorities." The Civil Rights Project, Harvard University, 2003.

**O-012-049**

Geographic representation of benefits to users are presented because current PSRC modeling accounts for user activities at some appropriate geographic scale. Other costs and benefits (not associated directly with system users) are not available at this scale of analysis. This is not to say that individual projects would not need to assess potential local impacts in project level environmental review.

**O-012-050**

The income segmentation of travel in the PSRC models is limited to drive-alone work trips. This is a limitation of current models that can be overcome in the next generation of activity-based travel models. In addition to this measure the EIS includes estimates of benefits that accrue to geographic zones with high concentrations of minority and poverty households. Once again, this measure is incomplete in a number of ways. The analysis presents various measures that relate to questions of fairness precisely because each measure has limitations and because the objective function is not easily determined. These multiple measures are intended to provide decision-makers with a range of information with which to base their decisions.

O-012-050

This is a major shortcoming of the analysis, and we strongly encourage PSRC to make a more substantive effort to calculate health, mobility and financial benefits for transit, walking and bicycling trips to the different user groups.

O-012-051

***E3. Benefits to Personal and Commercial Users***

"Measures of user benefits categorized by different vehicle classes (personal and commercial vehicles)."

"Decision makers are interested in the way that benefits of transportation projects are distributed across classes of vehicles. Some transportation improvements have broad benefits to users of the transportation system while others may distribute benefits more narrowly to specific users, such as freight vehicles. This distributional issue relates to who pays and who benefits from improvements. The different vehicle classes are passenger cars, light commercial vehicles, medium trucks, and heavy trucks."[80]

Although little detail is provided as to how this measure was calculated, the failure to enumerate benefits to bike / pedestrian and transit users is a major shortcoming. Some measure of relative modal benefit would be most useful.

O-012-052

***E4. Benefits to Environmental Justice Populations***

"Measures of user benefits categorized by geographies that are correlated with observed concentrations of minority and low-income populations. Benefits are calculated for geographic zones where population in the target category as a percent of total population exceeds one standard deviation above the mean. In addition, changes in travel time per personal trip are also reported for these selected geographies."[81]

Appendix E, page 99 indicates that this measure includes travel time savings, reliability, and vehicle operating costs. Although there is details are not provided about these factors, we proceed with this discussion on the assumption that they are evaluative measures #M1, M2 and M3.

We strongly encourage PSRC to do a more complete accounting of potential costs and benefits to environmental justice populations by including potential health impacts in their analysis, and fully accounting for transit, bicycle and pedestrian trips within the factors they use to measure environmental justice. It is unrealistic to use factors that by and large measure only vehicle benefits when discussing populations that are going to be more reliant on non-vehicle modes and less likely to realize the benefits of driving.

Although Measure M1 (Travel Time Savings) does include transit travel time, transit reliability is not factored into Measure M2 (Improved Reliability Benefits), a significant limitation in the cost-benefit analysis. Although it is logical and appropriate to include Measure M3 (Vehicle Ownership and Operating Benefits), we strongly feel that any measure of Environmental Justice impacts needs to fully account for the potential costs and benefits of tolling (with the exception of travel time and reliability benefits that may result from tolls, which ARE included).

Physical activity, safety or air pollution costs and benefits are also not included in this measure – this is a major shortcoming, since environmental justice populations are by definition more likely to already be burdened by disparate health impacts. We strongly encourage PSRC to do a more complete accounting of potential costs and benefits to environmental justice populations by including potential health impacts in their analysis, and fully accounting for transit, bicycle and pedestrian trips within the existing user benefit measure (as discussed in previous sections).

[80] *Note: highlighted sections of the document are specific references to PSRC's Transportation 2040 Draft Environmental Impact Statement*

[81] ibid

**O-012-051**

Benefits to transit users are enumerated. Please see Appendix D for details. Given current limits in the representation of benefits to non-motorized trips the analysis presents the change in number of non-motorized trips, which in relative terms represents changes in the attractiveness of these modes.

**O-012-052**

Incorporating quantitative measures where the existing research clearly identifies causality and supports the unambiguous application of accepted methods is desirable. Given the PSRC current understanding of the available literature such quantitative estimates of costs have been included as appropriate. The active living human health impacts of transportation is an emerging area of research, but one that does not appear to have resulted in consensus on methods of analysis and magnitudes of costs. Human health impacts of transportation associated with air pollutants and accidents have been quantified in Appendix D.

O-012-053

## RECOMMENDATION 8:
## Vehicle miles traveled and climate

In establishing baselines and modeling Vehicle Miles Traveled (VMT), including VMT per capita, PSRC is moving toward recognizing that the deleterious effects of ever increasing trips and trip distances have external costs that are not insignificant. Potentially the greatest social cost of our present approach to transportation is the threat of catastrophic climate disruption. [42] Further, on April 17, 2009 the Environmental Protection Agency declared global warming a danger to public health and welfare. (SOURCE)

In Washington, transportation accounts for nearly half (47%) of the total greenhouse gas emissions, including emissions from cars, trucks, planes, and ships. As no plausible scenario for the implementation and introduction of private vehicle technologies appears to do anything other than slow the growth of greenhouse gas emissions, we are left with Reducing Vehicle Miles Traveled (VMT) as the most promising approach to reducing transportation-related climate pollution. In RCW 47.01.440, the state set the following VMT per capita reduction goals:

- 18% reduction by 2020
- 30% reduction by 2035
- 50% reduction by 2050

Further, Washington Governor Chris Gregoire signed Executive Order 09-05 on Climate Change on May 15, 2009. [43] Among other initiatives the Executive Order requires that by December 31, 2010, vehicle miles traveled (VMT) findings and recommendations be reported to the Governor. Most notable is that WSDOT is charged with working with the Puget Sound Regional Council and others to cooperatively develop and adopt regional transportation plans that will, when implemented:

- provide people with additional transportation alternatives and choices, and
- reduce greenhouse gases and achieve the statutory benchmarks to reduce annual per capita vehicle miles traveled

Alternative 5, while being the only alternative to post a significant reduction from the baseline, still projects an increase between 2006 and 2040 of more than 8.3 million tons of transportation related CO2 annually (Appendix E, Page 86). Short of a net decrease it is not likely that the PSRC MTP Transportation 2040 will be in compliance with Executive Orders 07-02 and/or 09-05, which does not call for slowing the growth of emissions, but a net reduction in emissions.

Assuming a 30% improvement in fleet efficiency by 2040, the following table (Table 5.) demonstrates the difference between RCW 47.01.440, the Governor's Executive Orders and Transportation 2040 for direct emissions from vehicles.

[42] United Nations, International Panel on Climate Change, Fourth Assessment Report, 2007 http://www.ipcc.ch/
[43] State of Washington: Office of the Governor. Executive Order 09-05: Washington's Leadership on Climate Change. Online at: http://www.governor.wa.gov/execorders/eo_09-05.pdf

**O-012-053**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

O-012-053

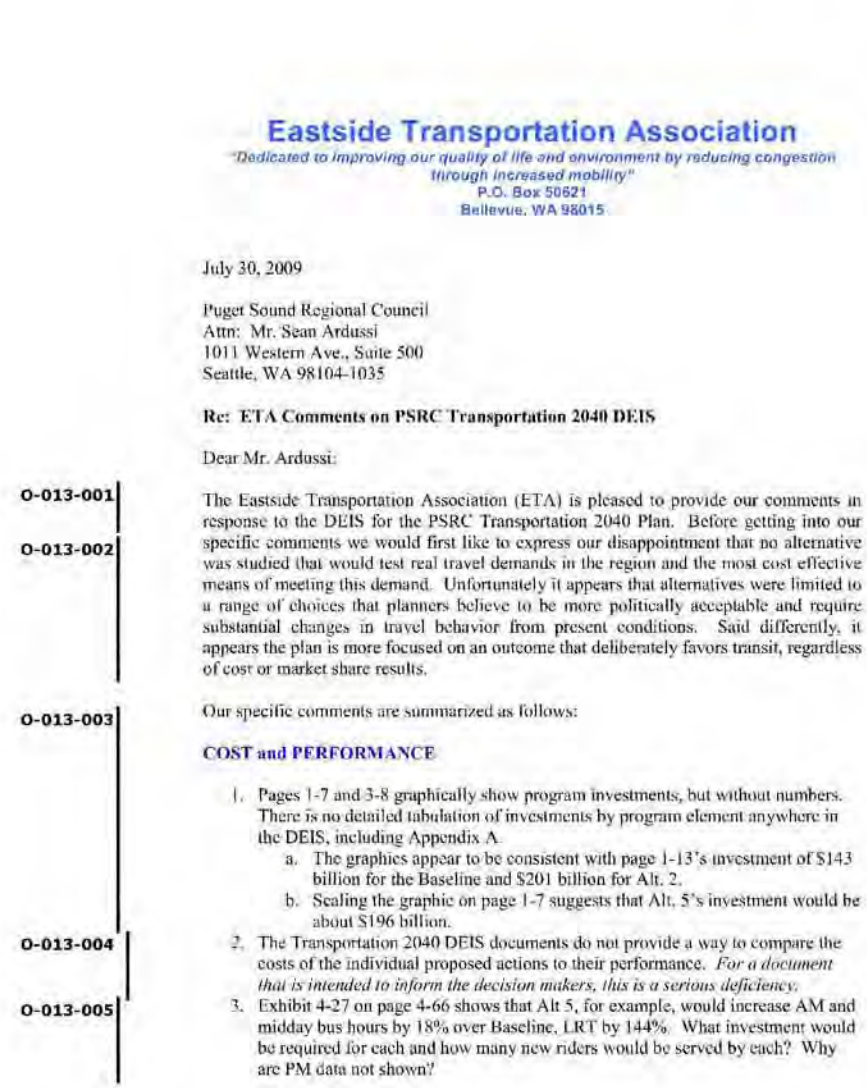
**Table 5: Expected results from alternatives relative to WA VMT and climate goals**

| Scenario & Year | 2006 | 2040<br>Alt 3 | 2040<br>Alt 5 | 2035<br>State VMT Law |
|---|---|---|---|---|
| Emissions, tons/year | 39000 | 38646 | 32922 | 23625 |
| Reduction from baseline | | 0% | 15% | 40% |

Governor's Executive Order 07-02 states, "By 2035, reduce greenhouse gas emissions in the state of Washington to 25% below 1990 levels, a reduction of 30 million metric tons below 2004." [84] It has been demonstrated that this goal cannot be achieved without significant changes in our state's transportation system.

Moreover, with the alternatives reducing VMT per Capita only between 2 and 16 percent, it does not appear that a number, if not all, of the DEIS alternatives are in compliance with RCW 47.01.440.

[84] State of Washington: Office of the Govenort. Executive Order 07-02: Washington Climate Change Challenge, Online at: http://www.governor.wa.gov/execorders/eo_07-02.pdf



Eastside Transportation Association

"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"

P.O. Box 50621
Bellevue, WA 98015

July 30, 2009

Puget Sound Regional Council
Attn: Mr. Sean Ardussi
1011 Western Ave., Suite 500
Seattle, WA 98104-1035

**Re: ETA Comments on PSRC Transportation 2040 DEIS**

Dear Mr. Ardussi:

O-013-001 O-013-002

The Eastside Transportation Association (ETA) is pleased to provide our comments in response to the DEIS for the PSRC Transportation 2040 Plan. Before getting into our specific comments we would first like to express our disappointment that no alternative was studied that would test real travel demands in the region and the most cost effective means of meeting this demand. Unfortunately it appears that alternatives were limited to a range of choices that planners believe to be more politically acceptable and require substantial changes in travel behavior from present conditions. Said differently, it appears the plan is more focused on an outcome that deliberately favors transit, regardless of cost or market share results.

O-013-003

Our specific comments are summarized as follows:

**COST and PERFORMANCE**

1. Pages 1-7 and 3-8 graphically show program investments, but without numbers. There is no detailed tabulation of investments by program element anywhere in the DEIS, including Appendix A.
   a. The graphics appear to be consistent with page 1-13's investment of $143 billion for the Baseline and $201 billion for Alt. 2.
   b. Scaling the graphic on page 1-7 suggests that Alt. 5's investment would be about $196 billion.

O-013-004

2. The Transportation 2040 DEIS documents do not provide a way to compare the costs of the individual proposed actions to their performance. *For a document that is intended to inform the decision makers, this is a serious deficiency.*

O-013-005

3. Exhibit 4-27 on page 4-66 shows that Alt 5, for example, would increase AM and midday bus hours by 18% over Baseline, LRT by 144%. What investment would be required for each and how many new riders would be served by each? Why are PM data not shown?

**O-013-001**

Thank you for your detailed response to the Transportation 2040 DEIS. PSRC would like to acknowledge your concerns related to cost, performance, transit market share, alternatives, travel and delay, tolling, emissions, energy, benefits and development/land use. These issues were given consideration during the construction of the Preferred Alternative.

**O-013-002**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

O-013-006

**TRANSIT MARKET SHARE**

1. The graphics on pages 1-7 and 3-8 indicate that from about 48% to 59% of the investments would be for transit. How can this be justified for the minor increases in transit's market share, as shown on page 4-61?
   a. For example, Alt 5 increases transit market share to 5.2% from the Baseline's 4.2% (Exhibit 4-25, page 4-61), and yet would spend about 59% of the $196 billion. This 1% shift to transit is equivalent to only one year for the projected growth in total travel from 2006 to 2040. The alternatives provided offer little for the other 29 years of travel growth, and little for existing congestion and delay problems.
   b. Because increasing trip lengths expand opportunities, both for jobs and other purposes, person-miles would be a better measure than person-trips. Converting to person miles would reduce transit's market share to about 2.1% for the Baseline and about 2.8% for Alt. 5.

O-013-007

2. Page 4-32, third line from the bottom, indicates 4.1% transit market share in 2006. However, the sum of work and non-work trips on Exhibit 4-26, page 4-64 indicates 2.9%. Why is there this difference?

O-013-008

3. Exhibit 4-26 on page 4-64 appears to mix transit boardings with person-trips for the other modes. That incorrectly exaggerates transit performance. See transit boardings on Exhibit 4-29, page 4-68. These boarding figures are close to, but not identical to the "transit" figures shown on Exhibit 4-26.
   a. The values on Exhibit 4-26 exceed the boardings on Exh. 4-29 by 3% to 6%. This discrepancy further exaggerates transit performance.
   b. With a transfer rate of 1.49 (see page C-6 Appx. C, ST2, July '08), transit trips would be about 33% fewer than boardings.

O-013-009

4. If the transit figures on Exhibit 4-26 are boardings, then the 5.2% transit mode share for Alt 5 on Exhibit 4-25 should be reduced to 3.5%.

O-013-010

**ALTERNATIVES OFFERED**

1. Why was there no alternative without a major rail and other transit investment particularly given the embarrassingly small contribution of transit?

O-013-011

2. Exhibit 1-8, page 1-17, and Exhibit 4-20, p. 4-51 both show Alt. 5 to have the lowest delay of all the Alternatives. How can this be with Alt 5's emphasis on transit? Alt. 5 has about 305,000 fewer vehicle trips or about 475,000 person-trips no longer in cars. Alt. 5 adds only about 130,000 more transit person-trips (about 190,000 boardings). Please provide specific numbers on what happened to the other 345,000 person-trips (475,000-130,000). Were some of these 8± mile automobile person-trips converted to 1-mile pedestrian/bike trips with a drastically reduced set of destination opportunities? What key assumptions were behind this result? Was the added time required for transit trips compared to auto trips, included in the delay estimate? Some skepticism about these results is justified. If PSRC can, with a straight face, propose devoting half of investments

2

**O-013-003**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. Appendix D contains cost information for each alternative in some detail.

**O-013-004**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. Appendix D compares the costs and financing of each Alternative and the various benefits and performance of each Alternative.

**O-013-005**

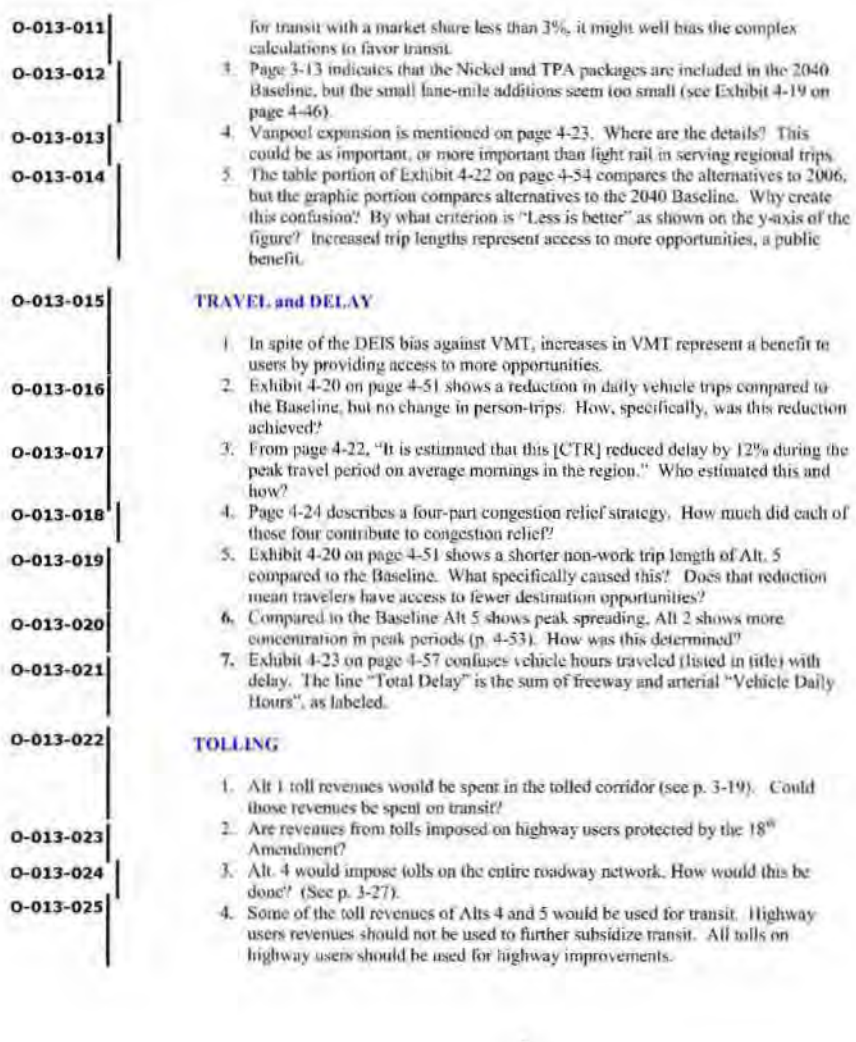
The costs of the alternatives are contained in Appendix D as well as performance information. PM transit performance is not explicitly modeled in the regional travel model; it is generally considered to be the inverse of the AM transit assignment.

**O-013-006**

Comments noted. Although transit's mode share increases slightly from the Baseline Alternative to Alternative 5 and the draft plan, the impact of the increased mode share is significant on land use and transportation patterns within the urban growth centers. Part of the draft plan's 90% increase in bus service hours would equate to significantly increased transit reliability and benefit to the transit user in decreased waiting time at stops and transfers.

**O-013-007**

The numbers differ slightly from results of the PSRC regional travel demand model used to evaluate the Transportation 2040 alternatives because the transit ridership data in the PSRC Household Surveys are a relatively small sample size. These data are merged with other transit survey data to estimate ridership for the regional travel demand model.



O-013-011 for transit with a market share less than 3%, it might well bias the complex calculations to favor transit.

O-013-012 3. Page 3-13 indicates that the Nickel and TPA packages are included in the 2040 Baseline, but the small lane-mile additions seem too small (see Exhibit 4-19 on page 4-46).

O-013-013 4. Vanpool expansion is mentioned on page 4-23. Where are the details? This could be as important, or more important than light rail in serving regional trips.

O-013-014 5. The table portion of Exhibit 4-22 on page 4-54 compares the alternatives to 2006, but the graphic portion compares alternatives to the 2040 Baseline. Why create this confusion? By what criterion is "Less is better" as shown on the y-axis of the figure? Increased trip lengths represent access to more opportunities, a public benefit.

O-013-015 **TRAVEL and DELAY**

1. In spite of the DEIS bias against VMT, increases in VMT represent a benefit to users by providing access to more opportunities.

O-013-016 2. Exhibit 4-20 on page 4-51 shows a reduction in daily vehicle trips compared to the Baseline, but no change in person-trips. How, specifically, was this reduction achieved?

O-013-017 3. From page 4-22, "It is estimated that this [CTR] reduced delay by 12% during the peak travel period on average mornings in the region." Who estimated this and how?

O-013-018 4. Page 4-24 describes a four-part congestion relief strategy. How much did each of these four contribute to congestion relief?

O-013-019 5. Exhibit 4-20 on page 4-51 shows a shorter non-work trip length of Alt. 5 compared to the Baseline. What specifically caused this? Does that reduction mean travelers have access to fewer destination opportunities?

O-013-020 6. Compared to the Baseline Alt 5 shows peak spreading, Alt 2 shows more concentration in peak periods (p. 4-53). How was this determined?

O-013-021 7. Exhibit 4-23 on page 4-57 confuses vehicle hours traveled (listed in title) with delay. The line "Total Delay" is the sum of freeway and arterial "Vehicle Daily Hours", as labeled.

O-013-022 **TOLLING**

1. Alt 1 toll revenues would be spent in the tolled corridor (see p. 3-19). Could those revenues be spent on transit?

O-013-023 2. Are revenues from tolls imposed on highway users protected by the 18th Amendment?

O-013-024 3. Alt. 4 would impose tolls on the entire roadway network. How would this be done? (See p. 3-27).

O-013-025 4. Some of the toll revenues of Alts 4 and 5 would be used for transit. Highway users revenues should not be used to further subsidize transit. All tolls on highway users should be used for highway improvements.

3

**O-013-008**

Exhibit 4-26 reports person-trips for choices of SOV, carpool, transit, and combined walk and bike modes as forecast by the mode choice component of the travel demand model. The transit category includes transit person-trips made by bus, rail, and walk-on ferry riders. The mode choice component forecasts trip choices for all five time periods (morning, midday, afternoon, evening, and night) of a typical weekday. Exhibit 4-29 shows transit boardings from the assignment component of the travel demand model. While this includes bus, rail, and walk-on ferry boardings the model does transit assignment only for the AM and MD periods to keep run-time manageable. Total daily boardings are reported by multiplying the AM and PM boardings by factors derived from observed data. The boardings forecasts are therefore not directly comparable to the person-trip forecast. Forecast transit boardings are only comparable to boardings and person-trips are only comparable to person-trips.

**O-013-009**

Exhibit 4-26 shows modal shares of daily person-trips for work trips, non-work trips, and all daily trips. The Alternative 5 travel demand model forecasted that all transit trips (bus, rail, and walk-on ferry) comrprised 5.2% of the daily total person-trips.

See the response to the previous comment for additional explanation of how the PSRC travel model treats person-trips and transit boardings.

**O-013-010**

As noted in the response to comment O-013-001, the six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels.

O-013-026

**EMISSIONS**

1. Comparison of Exhibit 1-17 (p. 1-24) and Exhibit 4-20 (p. 4-51) shows that $CO_2$ emissions roughly track VMT changes.
   a. This appears not to recognize improvements in fuel economy. By 2040, the U.S. automobile/light truck fleet will have been replaced with post-2016 vehicles, which, by President Obama's program, will be 25% to 30% more fuel-efficient. Increasing use of electric vehicles would further reduce $CO_2$ emissions.
   b. CO2 emissions per vehicle-mile traveled (VMT) for the 5 action alternatives are highest for Alt. 5 (the alternative with the most-extensive, and wasteful, rail program).

O-013-027

2. According to page 6-22, transit is not included in emissions estimates. How much would be added if transit were included? It should be clearer that the 26% reduction is from the State's 2020 forecast, not from the State's 2020 benchmark for which the reduction would only be 9%. Why are the VMT/capita values on Exhibit 6-11 different than the values on Exhibit 4-20?

O-013-028

**ENERGY**

1. P. 11-6. Exhibit 11-5 on page 11-6 does not include energy required by transit. How much would be added by including transit? What improvements in average fuel consumption were included in the estimates of Exhibit 11-5?

O-013-029

2. P. 11-8. In the section "How can the effect to energy be mitigated", what is the basis of the allegation that public transit saves energy? Bus transit uses more than automobiles per passenger mile. It is not clear that rail transit saves energy, particularly if the energy for manufacture and construction is included.

O-013-030

**BENEFITS**

1. Exhibit 4-34 on page 4-76 shows the highest commercial user benefits for Alts 3, 4, and 5. What assumptions led to this result?

O-013-031

2. Are the values shown in Exhibit 4-35 on page 4-85 in millions of dollars? The DEIS should explain how those time savings were derived. What were the key assumptions?

O-013-032

3. Exhibit 4-37 on page 4-88 shows annual accident reduction benefits. What was the basis for these estimates?

O-013-033

**DEVELOPMENT/LAND USE**

1. Exhibit 5-6 on page 5-12 shows that Alts 3, 4, 5 move away from small cities to large and Alt 2 reduces population in Metro Cities. How, specifically, were these results determined? Does this represent public desire or the bias of the transportation planners? The graphic on page 5-13 does not seem to match the table's results? By what criteria is "More is Better" concluded for the y-axis?

4

**O-013-011**

Much of the delay reduction in Alternative 5 is likely associated with the application of time-of-day tolls of the road network. This results in not only mode shifts but also time of day and route shifting to avoid the toll costs. In addition, the PSRC travel models incorporate an activity generator model that estimates trip generation response to changes in travel cost (time and money costs), among other factors. Some additional information on this topic can be found on the agency's web page at http://www.psrc.org/data/models/abmodel/, and specific activity generator details can be found at http://www.psrc.org/assets/1659/ActivityGenerator.pdf

**O-013-012**

The Nickel and TPA packages are included in the Baseline Alternative. Alternatives 2 and 3 were analyzed with the projects and programs outlined in Appendix A. We are unable to speculate about the performance of Alternatives that were not specifically analyzed.

**O-013-013**

Transportation 2040 includes approximately 55% more vanpools on the ground every day than what is included in the baseline. In addition to capital expansion, the Preferred Alternative includes the maintenance and operation of the existing and future fleet, life cycle replacement costs for rolling stock, a small amount of funding for marketing and incentives, and policy language related to rideshare vehicle parking. Transportation 2040 includes these strategies as well as acknowledgesthe fact that there are emerging markets for this important service and that the region should take steps to realize the full potential of vanpooling.

**O-013-014**

In the modeling of the Plan Alternatives all trip purposes are satisfied. So the economic or social activity has been achieved. If this activity can be

O-013-034

**GENERAL COMMENTS**

1. With information scattered over more than 1,100 pages, it is extremely difficult to see what travel improvements would be achieved and at what cost. The DEIS appears to have been designed to confuse and intimidate, rather than inform. How else can explain alternatives all of which spend half or more of the investments on transit for a transit market-share of 2% to 3%. Obviously, the DEIS strives to justify a pre-selected solution.
2. In general, this appears to be more of a sales document for coercing behavior change and extravagantly funding transit than a careful systems analysis supporting informed decisions.

Thank you for the opportunity to submit our comments and we look forward to your response.

Respectfully submitted,



Richard A. Paylor, Chair
Eastside Transportation Association

realized with a shorter trip length, on average, this is considered desirable. It is desirable not just because of the public benefit but also because of the private benefit realized through cost savings to the user.

**O-013-015**

The consumer surplus measures included in Appendix D reflect the value that users place on additional activity, not as a function of VMT but rather on a per trip basis across each origin-destination zone combination and vehicle class. These calculations reflect both the change in price and the change in quantity on each zone-to-zone demand curve.

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions. PSRC is working towards a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**O-013-016**

Reductions in vehicle trips can be achieved independently from changes in person trips as a function of mode choice. If more person trips are accommodated through shared ride, transit, bike, or walk modes then vehicle trips will be less.

**O-013-017**

Thank you for your comment. The CTR program analysis was performed by WSDOT and is contained on p. 7 of the CTR Taskforce 2005 Report to the Washington State Legislature.

**O-013-018**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**O-013-019**

While it is not possible to isolate specific causes of the Alternatives' performance since there are many different actions in each one, there are several factors that likely influence vehicle trip lengths in Alternative 5.

a) the tolling of all freeway and arterial roadways increases the monetary cost of personal vehicle travel although

b) better roadway performance (note that relative to other alternatives roadway speeds increase and travel time savings benefits are large in Alternative 5) decreases the time cost.

Travelers who value their time highly could be making longer trips; those to whom the monetary cost is more influential could be choosing to live closer to their typical destinations, choosing non-work trip destinations that are closer to their homes.  Also, if longer trips switch modes the remaining auto trips will be shorter.

**O-013-020**

The regional travel demand model contains a "Time of Day" model that spreads the peak vehicle loads to other time periods as a function of increases in time and/or money costs incurred during the peak period. This is a model that is empirically estimated. Alternative 5 includes roadway tolls that are considerably higher in the peak travel periods, thus inducing a time of day shift response for some portion of the auto trips as these trips attempt to reduce their exposure to the tolls.

**O-013-021**

Thank you for your comment. The Final EIS includes the appropriate edits.

**O-013-022**

The funds raised by tolling in Alt. 1 are significantly less than the capital costs needed for roadway construction within those corridors.

**O-013-023**
Comment noted.

**O-013-024**
Alternative 4 envisions tolling the region's entire freeway network. This tolling concept could be implemented electronically, using transponder equipment on all vehicles; it could be implemented with low technology, such as toll booths along all freeways; and it could use both methods, where users without electronic equipment would use toll booths, while EZ-pass lanes (toll booth bypass lanes) could be used by vehicles equipped with electronic transponder devices. Such systems are in use across the country.

**O-013-025**
Comment noted.

**O-013-026**
Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the

Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-013-027**

The state legislation regarding the VMT reduction benchmarks specifically exempts trucks over 10,000 gross vehicle weight. Therefore, the calculations performed to compare daily per capita VMT from the Transportation 2040 alternatives to the benchmarkes as defined in legislation are somewhat different than the full regional daily VMT per capita for each alternative.

**O-013-028**

The estimation of transit energy usage is an area within the current modeling framework that we were unable to compile to the same degree of accuracy as our other indicators. This is an area that PSRC will continue to strive to improve upon. The analysis as shown is representative of the current vehicle fleet; the improvements from technology is an area that PSRC is pursuing as part of the final plan.

**O-013-029**
Comment noted.

**O-013-030**
The measures of user benefit are the result of analysis that is supported by a wide variety of travel demand modeling elements. The benefits are simply an accounting of consumer surpluses (primarily travel time savings) for each class of user vehicles in the modeling. There are two primary reasons why freight benefits are large for Alternatives 3, 4 and 5. First, freight vehicles enjoy significant travel time savings in these alternatives, and second freight vehicles have higher values of time on average.

**O-013-031**
The details of this analysis are available in Appendix D: Policy Analysis and Criteria Evaluation Report.

**O-013-032**
Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**O-013-033**
Within the integrated land use and transportation modeling the population and employment distributions are a result of the analysis and not an input.  Please refer to Appendix E for a description of the analytical approach.

**O-013-034**
Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can

be found in Appendix E: Technical Description of the Modeling Framework.

07/30/2009 13:56 Admin (FAX)4258696035 P.001/003

O-014

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July 30, 2009

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

O-014-001

Dear Bob:

I appreciate this opportunity to provide public comment on the Draft Environmental Impact Statement (DEIS). The DEIS is critical to the successful implementation of the T2040 plan. Hopelink is eager to work with you to make the DEIS and the T2040 even better.

Since 1971, Hopelink has served homeless and low-income families, individuals, children, seniors and people with disabilities in North and East King County. Hopelink services include transportation, as well as food, shelter, transitional and permanent housing for homeless families, case management, employment services, and adult education. Hopelink's mission is to promote self-sufficiency for all members of our community; we help people make lasting change.

With five service centers and food banks in north and east King County and by providing more than 40 different programs, we help more than 50,000 people every year. Hopelink has *county-wide transportation operations* and is knowledgeable about regional travel issues. 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.

Given Hopelink's extensive history of working with the special needs population with the low income population with regard to transportation issues, as well as the general population (through our provision of countywide DART service) , I am focusing Hopelink's comments on two areas of concern:

(1) **The public involvement process**; and
(2) **The alternative designs.**

O-014-002

The Coordinated Transit-Human Services Transportation Plan states that "nearly one third of the 3.3 million people in central Puget Sound region have a greater need for transportation services due to income status, age or disability." By itself, this statistic suggests that the DEIS should focus more specific attention on how to better address the transportation needs of this substantial portion of our population. Given our longtime experience with special needs transportation, we would heartily second that.

(1) **Public Involvement Concerns:**

- The public involvement process had a good beginning with the five outreach meetings in June, 2009 but we believe that should be only a beginning step. We feel that it is insufficient to have approximately 100 individuals from frontline organizations providing direct services representing this entire population of people who are low-income, people of color, populations, with limited English proficiency, seniors and people with disabilities. It is difficult for the 100 people who gave input

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Adult Education

**O-014-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. PSRC would like to acknowledge your concerns about the public involvement process and the design of the alternatives.

PSRC is hosting five follow-up discussions with environmental justice population leaders to present the plan, share how PSRC incorporated their feedback into the plan, identify ways in which the plan may benefit or affect their communities, and discuss ways in which they could stay engaged in the implementation.

In addition to the roundtable discussions mentioned in your letter, PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007. While these meeting were not specifically targeted at environmental justice populations, they did include translated invitations, advertisements in ethnic publications, and locations in low-income or minority communities.

The FEIS Environmental Justice chapter contains an expanded discussion the effects of tolling, the provision of transit and how these actions affect low-income and minority populations. PSRC appreciates your involvement in these discussions.

**O-014-002**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investment in all forms of transit (local transit, Sound Transit, and ferries) accounts for over 50% of the total investments included in Transportation 2040. Transportation 2040, when adopted in spring 2010, will incorporate an updated Coordinated Transit-Human Services plan as required by federal statute.

The PSRC received more than 1200 comment letters, and more than

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O-014-002
- during the June 2009 round tables to represent the transportation needs of approximately 1,000,000 people.
- The 2000 Census data is insufficient to support the DEIS assumptions on the needs of the transportation disadvantaged communities.
- The DEIS statements on measures to be used for low-income, disadvantaged communities are too general to be helpful.

O-014-003 **Public Involvement Recommendations:**
- More direct outreach is necessary for the DEIS to be comprehensive.
- Expand participation in round table discussions to include more members of transportation disadvantaged communities.
- Include more agencies that work directly with these communities in the round table discussions as well.
- Include representatives from ADA Service providers, Medicaid Brokerages, and school districts as well as trip information from organizations that serve the transportation disadvantaged communities.
- Establish *concrete measures and benchmarks* so the effectiveness of the various transportation options can be determined.

O-014-004 (2) **Alternative Design Concerns**
- The evaluation of the impact of *tolling* on low-income, Medicaid clients and social service organizations is incomplete. Tolling will have a proportionally greater impact on the 1,000,000 transportation disadvantaged individuals than on other populations in the PSRC service area.

O-014-005
- For the special needs population, tolling restricts access in acquiring and maintaining jobs, medical assistance, education and other community resources.

O-014-006
- Tolling will drive up costs for social service organizations that focus on these populations and may require restricting or eliminating programs.

O-014-007
- Families will have to make difficult choices on how to spend their limited resources which will result in access issues. For example, for families already struggling to meet basic needs, purchasing critical medication may be delayed because of needing to pay tolls to get to work.

O-014-008
- The economic liabilities and benefits of public transportation for low-income, disadvantaged people needs more research. On page 4-92 the DEIS states that "Alternative 4 would produce significantly lower benefits to low-income users than all other alternatives. . ." Directly below this statement is a chart that reveals that the "benefit" is -$92. A -$92 amount is not a benefit.

O-014-009
- The benefits of public transportation to the transportation disadvantaged population are overstated. The capital investment when building light rail and the surrounding capital infusion in the neighborhoods has made those areas more desirable. As a result, housing prices have increased, driving low-income individuals to move to less expensive housing areas that are further from employment opportunities.

O-014-010 **Alternative Design Recommendations:**
- The DEIS needs further, detailed analysis and development of the impacts each of the alternatives will have on the one-third of our population that needs greater assistance in securing transportation services.



3700 individual comments, during the DEIS comment period, all of which have been considered and have been responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the preferred alternative was developed.

An expanded discussion of environmental justice is included in the FEIS.

**O-014-003**

PSRC engaged the consulting firm PRR to facilitate five roundtable discussions with community leaders in the four counties that are members of the Puget Sound Regional Council – King, Kitsap, Pierce and Snohomish counties. Although the public was welcome to attend any of the roundtable discussions, we extended specific invitations to community leaders representing low-income and minority populations. Consistent with PSRC policy, we also extended invitations to community leaders representing the elderly, special needs populations, limited-English proficient (LEP) residents or business owners, people who are completely reliant on public transit, and social service providers. We held the roundtables at ADA-accessible facilities. PSRC announced the discussions on the PSRC website and through a regionwide mailing to leaders identified in PSRC's contact database that represent minority and low-income communities. This database has been created over the years by PSRC as it has conducted outreach activities. PRR also made follow-up telephone calls and emails to community leaders to encourage attendance and participation.

Nearly 60 people representing more than 40 organizations and local governmental units participated in five facilitated roundtable discussions on the Transportation 2040 DEIS. Nearly a dozen key themes emerged from the discussions as critical concerns for low-income, minority, elderly, special-needs, and populations with limited English proficiency.

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O-014-010

- The successful alternative should include well-funded, reduced tolling programs that incorporate universal access as the standard.
- Greater emphasis should be placed on meeting the needs of the bus dependent low-income commuter.

O-014-011

Thank you for the opportunity to submit our input on the DEIS. Thanks also for working toward a comprehensive transportation plan that addresses the long term transportation needs of all in our community. We believe, however, that 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 should be refined and the plans improved/adjusted accordingly.

We at Hopelink look forward to our continued work together to create a plan that expands the transportation options for all people living in the central Puget Sound region.

Sincerely,

Marilyn Mason-Plunkett

Marilyn Mason-Plunkett
President/CEO

cc: Lynn Moody
Director of Transportation Services,
Hopelink



**O-014-004**

A discussion of tolling's effect on environmental justice populations is included in the FEIS.

**O-014-005**

An expanded discussion of tolling and equity is included in FEIS Chapter 17: Environmental Justice.

**O-014-006**

Comment noted.

**O-014-007**

Comment noted.

**O-014-008**

The convention of benefit-cost analysis is to report the results of making an investment as benefits (whether negative or positive) and report the costs of implementation as the costs. In this case the -$92 million is a negative benefit.

**O-014-009**

The EIS does not estimate the specific benefits or costs of individual elements of the alternatives, or how those elements effect different populations. The benefits and costs of each alternative taken as a whole are estimated instead. It is certainly possible that the circumstances described in the comment could transpire, but it is not a result that is specifically examined in the analysis.

**O-014-010**

Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all

forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

**O-014-011**
Thank you.




Puget Sound Regional Council
Attention: Sean Ardussi
1011 Western Avenue, Suite 500
Seattle, Washington 98104-1035

July 31, 2008

Dear Puget Sound Regional Council Members,

O-015-001 On behalf of the Quality Growth Alliance (QGA) we are writing to offer comments on the Puget Sound Regional Council's Transportation 2040 Plan Draft Environmental Impact Statement (DEIS). The QGA formed as a result of the April 30, 2008 unique, day-long event called "Reality Check." This event served as an extraordinary opportunity for key business, political, community, non-profit leaders and stakeholders from King, Pierce, Snohomish and Kitsap counties to think big about how the region will grow and thrive over the next 30 years by challenging participants to accommodate 1.7 million new residents and 1.2 million new jobs in the central Puget Sound region through a disciplined and documented visioning exercise.

In addition to the Puget Sound Regional Council, the sponsors of Reality Check included the Urban Land Institute Seattle District Council, University of Washington College of Built Environments, Enterprise Community Partners, Cascade Land Conservancy, Master Builders Association of King and Snohomish Counties, Futurewise, and NAIOP – Commercial Real Estate Development Association. These 8 organizations formed the QGA and set forth a 2-year commitment to provide staff, leadership, and funding to advance the principles and priorities of the shared vision defined during the event. These priorities include increasing transportation funding and capacity, galvanizing effective regional leadership, improving housing affordability, enhancing connections between housing and jobs, increasing neighborhood acceptance of density, reducing bias towards sprawl, and preserving open space. The QGA further committed to foster political support for mixed-use, mixed-income urban development, and to educate and advocate for state and local land use policies that encourage compact communities.

The QGA commends the leadership and courage of the Puget Sound Regional Council (PSRC) to advance serious and objective consideration of how we might address the complex and interdependent issues related to transportation over the next 30 years. This leadership is much needed and much appreciated. Some QGA partner organizations have already written individual letters in response to the Transportation 2040 Plan DEIS. This specific letter from the QGA represents common ground where the private, public and civic partner organizations have agreed about long-range land use and transportation planning strategies. The QGA compliments PSRC for the inclusive and transparent approach to developing Transportation 2040 and for the understandable presentation and quality of the data considered.

O-015-002 The QGA views the central Puget Sound region's substantial population and economic growth as an opportunity to improve the quality of life, and specifically compact development as a means of accommodating growth while reducing the impact to our natural resources, increasing energy independence, enabling easier, less costly access to jobs and services and supporting economically vital, healthy, complete communities. Securing sustainable financing for transportation and addressing congestion, while at the same time reducing the environmental impacts of growth and the transportation system may be the central element in achieving these objectives.

**O-015-001**
Thank you.

**O-015-002**
Comment noted.

**O-015-003** The QGA strongly supports using PSRC's Vision 2040 as the organizing framework for evaluating the alternatives presented in Transportation 2040. The impact the different transportation alternatives will have on regional mobility, growth, economic prosperity, financing, quality of life and the environment are exactly the criteria that should be considered in defining our approach to transportation in the future. We are particularly interested in criteria that:

1. Ensures land use patterns and transportation systems are considered together in creating strategies to meet goals related to mobility, economic vitality, climate change, environmental protection, housing affordability, and quality of life;
2. Facilitates the ability of jurisdictions expected to accommodate the greatest population growth over the next 30 years to plan for and absorb that growth in a manner that enhances the quality of life and prosperity of the region;
3. Fosters and enhances compact development oriented toward and integrated with the transportation system, particularly in areas surrounding high-capacity transit nodes; and
4. Ensures sufficient availability of multimodal transportation choices.

The QGA is confident that these outcomes will place the region in a positive position for the future.

**O-015-004** We are not in a position to suggest that one of the alternatives presented in the DEIS is preferred by QGA for several reasons. One, we are still absorbing the depth and complexity of all the data and considerations. Second, we recognize the fact that all of the alternatives in varying degrees present negative consequences and challenges for quality of life, prosperity, mobility, financial capacity and affordability, congestion, infrastructure, development patterns, and the built and natural environments in the region. And finally, there is no single alternative that maximizes the positive outcomes needed in the region; many actions from every level of government and the private sector will be required.

Consequently, we suggest the DEIS be used to foster a deeper and more involved conversation about preferences related to each of the proposed alternatives and as a means to fashion an integrated transportation strategy that is built on deep consensus, the reality of what our future would be like without bold action, and the commitment to secure the funds needed to ensure appropriate investment in our region's transportation system over the next 30 years.

Again, we applaud PSRC for bringing forward the considerations and framework needed to develop an integrated and visionary transportation plan for the region's future. We stand ready to play an active and collaborative role in forming that plan and fostering the commitment to achieving it.

Sincerely,

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

Daniel Friedman
*Partner, Quality Growth Alliance; Dean, University of Washington College of Built Environments*

**O-015-003**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-015-004**

Comment noted.

Monika Elgert
*Partner, Quality Growth Alliance; Vice President of the Pacific Northwest, Enterprise Community Partners*

Gene Duvernoy
*Partner, Quality Growth Alliance; President, Cascade Land Conservancy*

Sam Anderson
*Partner, Quality Growth Alliance; Executive Officer, Master Builders Association of King and Snohomish Counties*

Roberta Lewandowski
*Partner, Quality Growth Alliance; Board Officer, Futurewise*

Joe Blattner
*Partner, Quality Growth Alliance; Board President, NAIOP – Commercial Real Estate Development Association; Principal, Tarragon Development LLC*

Cc: Bob Drewel, PSRC; Charlie Howard; PSRC; Ben Bakkenta; PSRC
Hal Ferris, ULI Seattle; Tom Fitzsimmons, ULI Seattle; Suzanne Cartwright and Shawna Sherman, ULI Seattle
George Rolfe, University of Washington Runstad Center for Real Estate Studies
Valerie Pate, Enterprise Community Partners
Michelle Connor, Cascade Land Conservancy; Alison Van Gorp, Cascade Land Conservancy
Don Davis, Master Builders Association of King and Snohomish Counties
Sara Nikolic, Futurewise
Glenn Amster, NAIOP; Don Marcy, NAIOP; Tony Stewart, NAIOP

# SAVE OUR COMMUNITIES

P.O. Box 482 Mukilteo, WA 98275 www.saveow.org - info@saveow.org

*A citizens organization opposed to commercial airline service at Paine Field*

July 30, 2009

Mr. Sean Arduss:
Puget Sound Regional Council
1011 Western Ave.
Suite 500, Seattle, WA 98104-1035

Dear Mr. Arduss:

O-016-001 We want to comment on PSRC's Draft Environmental Impact Statement (DEIS) for the proposed Transportation 2040 plan. Our comments focus specifically on air transportation issues. Our group, Save Our Communities, is opposed to scheduled air service at Snohomish County (Paine Field) airport. The communities we represent (Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo and Woodway) have populations of over 120,000.

O-016-002 Currently Paine Field is a general aviation airport that also serves our nation's aerospace industry. We endorse such use. Converting Paine Field to a scheduled air service facility will negatively affect that use and the surrounding community that depends on Paine Field maintaining its current role.

O-016-003 We have three major comments outlined briefly here and in detail below.

1. **LATS.** We vigorously oppose the incorporation of the Long Term Air Transportation Study (LATS) into the PSRC's Transportation 2040 plan. The LATS study is highly unsuitable as a planning document for the reasons we set forth below. The LATS report would serve only to contaminate the DEIS with faulty models and flawed conclusions.

O-016-004 2. **MPP-DP-51.** ***Incompatible Land Uses:*** "MPP-DP-51 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land." We take issue with this language, as it is inconsistent with the Transportation 2040's goal to create coordinated, integrated transportation plans with the local community.

O-016-005 3. **Fly Away Bus.** We recommend that the PSRC consider the "Fly Away Bus" model developed by the city of Van Nuys, California.

O-016-006 **COMMENT 1: LATS.**

The Long Term Air Transportation Study (LATS) was implemented under ESSB 5121 by the State Legislature in 2005. It directed the Governor to form a committee to study air transportation on a statewide basis and to make recommendations to the Governor. The

1

**O-016-001**

Thank you for providing detailed comments on the Transportation 2040 DEIS. PSRC would like to acknowledge your opposition to scheduled air service at Paine Field. Transportation 2040 does not contemplate a change in the airport system role for Paine Field.

**O-016-002**

Comment noted. Transportation 2040 does not contemplate a change in the airport system role for Paine Field. The Washington State Long-Term Air Transportation Study (LATS), which informed the Transportation 2040 planning process, does not recommend a specific change in Paine Field's role in the regional or state airport system.

**O-016-003**

Comment noted. PSRC called for the state to undertake a study of airport capacity needs in 2004, which ultimately led to the LATS study, which began in 2005. Over the past four years PSRC has participated in the LATS process, from both a policy and a technical standpoint. We see no flaws in the approach used in the study or in its findings and conclusions. We believe the LATS study will provide the PSRC region with valuable information as we assess our long range air transportation needs and options for addressing those needs. While the LATS study does not answer every question facing our region, we believe it will help the PSRC region move ahead.

**O-016-004**

Comment noted. The policy you cite (MPP-DP-51) is consistent with the region's overall goals and objectives related to improving the relationships between airports and surrounding communities. For more information please visit PSRC's Web site at the following address: http://www.psrc.org/transportation/airtrans/compatible/
In addition, MPP-DP-51 is consistent with the intent and specific

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*A citizens organization opposed to commercial airline service at Paine Field*

**O-016-006**

Governor formed the LATS panel in 2005. Following the input from several consultants, the LATS panel issued their final report July 1, 2009.

Save Our Communities has followed the LATS process since its inception. We have attended many of their public hearings, offered public input and comment whenever possible, and have had several conference calls with LATS staff and the consultants hired by them so that we might better understand their analysis and conclusions.

**O-016-007**

We take issue with, and are disappointed in, the LATS final report for a variety of reasons. **Overall, we believe the Tranportation 2040 plan should not incorporate the LATS report:** the LATS report does not perform rigorous capacity analysis needed to make important and potentially highly expensive decisions affecting airport placement, design, and construction. Indeed, the LATS lead consultant made remarks similar to this in one of our conference calls.

1. According to LATS staff and their consultants, the LATS report was a "high level" analysis of ALL 600 airports throughout Washington State. As such, individual airport master plans take precedence over any analysis presented by LATS. To the extent that figures from LATS disagree with Sea-Tac International Airport, then Sea-Tac figures take precedence.

2. Sea-Tac currently reports far lower actual operations than LATS used for their assumptions. LATS uses a base of 346,744 operations at Sea-Tac for 2005, with a 2.5% growth rate. Just annualizing those figures means Sea-Tac should be at 382,740 operations per year right now– in 2009. However, the current annualized operations at Sea-Tac for 2009 are just 315,854, a difference of 66,886 operations, or 17.5% fewer operations than the LATS report would predict. Indeed, nothing in the LATS analysis or the report reflects the decline in air travel due to the recession, yet the FAA announced in March 2009 an 8% YOY decline. **This is significant** because these declines should reset all the analysis by LATS and significantly extend the projected time frame for Sea-Tac to reach capacity (see tables below).

3. Sea-Tac International analyzes their capacity in terms of millions of annual passengers (MAPS) through the airport. LATS' consultants stated that Sea-Tac's capacity is 45 MAP. However, Sea-Tac planners and the LATS consultants more commonly refer to 60 MAP as a capacity estimate. This represents 33% more capacity than LATS assumes. Again, this indicates a **significant difference and discrepancy** between the LATS report and a much better authority—Sea-Tac International.

4. These significant variations between the numbers used by LATS versus those actually recorded by Sea-Tac and/or used by Sea-Tac for planning reinforce LATS Panel's stated position that LATS was not intended as a document for large-scale transportation

2

guidance of the WSDOT Aviation Division's Airport Compatible Land Use program.For more information about the state's program see the WSDOT Web site at:

http://www.wsdot.wa.gov/aviation/Planning/default.htm#LandUse

**O-016-005**

Comment noted.

**O-016-006**

Comment noted.

**O-016-007**

Comment noted. The LATS process was not intended to provide the level of detail required to site, plan, or design a major airport facility. The process was intended to provide the next step in helping the state and the region determine where capacity issues exist, when new capacity might be needed, and how it might be provided. PSRC provided policy and technical input throughout the LATS process, and we support the overall technical approach used in the study, as well as the study's findings and conclusions. Transportation 2040 will draw upon the results of the LATS study to provide guidance as we continue to study the issue of airport capacity and seek logical solutions to our long terms needs. The LATS process takes us one step closer to understanding our future airport capacity options. This was one of the goals of the process.

According to the FAA's latest Aerospace Forecasts for 2009-2025 (Table 5, page 64), total U.S. scheduled commercial air passenger traffic is expected to increase at an average annual rate of 2.2%. This is a combined forecast which includes a projected annual forecast growth rate of 2.0% for major air carrier airlines and 3.2% for regional

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*A citizens organization opposed to commercial airline service at Paine Field*

O-016-007

infrastructure development and planning. Indeed, the enabling legislation for LATS (ESSB 5121) does not contemplate using the LATS report in PSRC's planning efforts.

5. Interestingly, the FAA has an Airport "Data and Statistics Home Page." The FAA uses an assumed growth rate of 1.55% per year for Sea-Tac, significantly lower than the 2.5% used by LATS. Our tables below compare the differences in these growth rates.

| **Assume 0% capacity increase from new technology (worst case) and compare FAA with LATS growth rates.** | | |
|---|---|---|
| | **FAA Growth Rate** | **LATS growth Rate** |
| **Growth Rate** | 1.55% | 2.50% |
| **Date of 60% capacity** | 2010 | 2010 |
| **Date of 100% capacity** | **2042** | **2030** |

6. The MITRE Corporate estimates that an airport can gain up to 17% more capacity through technology improvements such as NextGen, which is slated to be on-line by 2018. The table below provides the estimated impact of such improvements:

| **Assume 17% capacity increase from new technology (NextGen)** **(Source: MITRE CORP.)** | | |
|---|---|---|
| | **FAA Growth Rate** | **LATS growth Rate** |
| **Growth Rate** | 1.55% | 2.50% |
| **Date of 60% capacity** | **2020** | 2016 |
| **Date of 100% capacity** | **2053** | 2037 |

7. In this second scenario, Sea-Tac has another 11 years before it reaches its 60% capacity mark, and **another 44 years before it reaches 100% capacity. This is a significant difference. At a minimum, LATS should provide a reasonable "range" of possible capacity dates (as outlined above) based on variations in key assumptions.** Our graph below demonstrates the ranges from various inputs discussed in these tables.

3

(commuter) carriers. Although this growth forecast is slightly lower than the combined passenger forecasts used in the LATS study, it does not invalidate the overall findings of the LATS analysis. The extent to which Washington State and Sea-Tac Airport accommodate greater proportions of regional passenger traffic could produce higher total passenger forecasts than those predicted by the FAA, which are for the nation as a whole.

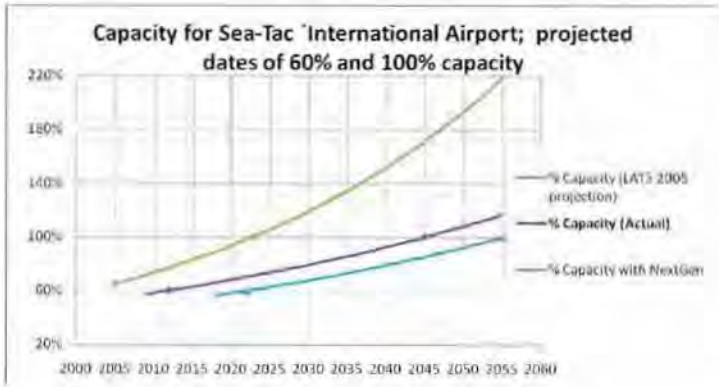
The introduction of new technologies, such as NextGen, have the potential to improve efficiencies in the air traffic control system, thereby increasing theoretical capacity at airports like Sea-Tac. While such technology may be predicted to come on line by the year 2018, this implementation time line is uncertain. Long range planning processes, such as LATS, should consider factors such as technological innovation, but they should also consider the realities we face today. Long range forecasting is uncertain, and perhaps should include ranges of potential future activity levels to account for these uncertainties. The LATS process should not be viewed as the sole source of information for making future airport capacity decisions, at the state, regional, or airport level. Additional, more detailed, analysis will undoubtedly be needed as we evaluate future demand and consider our options for addressing our future air travel needs.

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O-016-007




8. **Projected Capacity and Service Shortages** The LATS panel's conclusion derives from questionable inputs, as discussed. One must assume high growth rates (that do not exist) and no improvements from technology such as NextGen or from infrastructure developments.

9. **Comment on terminal capacity:** LATS determined terminal capacity at Sea-Tac based on FAA Advisory Circular AC 150/5360-13 first published in April 1988. It states, "A rule-of-thumb of about 150 square feet of gross terminal building area per design peak-hour passenger is sometimes used for rough estimating purposes."(p. 53). After 9-11, this figure increased to 175 sf/passenger to incorporate more space/passenger for security screening. Whether we use 150 or 175 sf/passenger is irrelevant: The current model for terminal capacity is static. It relies only on a certain amount of "real estate" in the terminal's footprint to calculate terminal size.

   A more sophisticated approach for determining terminal capacity should be used based on queuing theory. By doing so, even a small improvement in queuing should dramatically reduce bottlenecks. A queing theory model would dynamically look at passengers as throughputs in a system. Queing theory constantly looks for the bottlenecks in the system and then resolves those to improve throughput. Sea-Tac is already doing this with e-ticketing, faster screening at security checkpoints, improvements at the gates, baggage handling, parking and ground traffic.

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O-016-007

In addition, demand management techniques that shift resources to meet peak demand periods and/or use other techniques such as re-pricing landing fees, toll booths, coordinating load factors with the airlines, etc. to discourage travel during peak hours, might also be used. Incorporating Sea-Tac into a system-wide Transportation 2040 analysis using dynamic, cohesive models **can improve the overall capacity at Sea-Tac**.

Problematically, LATS fails to account for passenger flows (queuing theory) or for demand management. As stated earlier, the LATS report simply relies on terminal footprint size as a predictor of terminal capacity and it uses a simple 2.5% growth rate to predict air side capacity. This static model will never reflect any of Sea-Tac's improvements to throughput efficiency nor will it reflect any efforts under Transportation 2040 to make system-wide improvements. **The current model and underlying assumptions are woefully outdated, inaccurate and unsuitable**.

O-016-008

In conclusion:

- The LATS panel's report is a high-level summary of the status of all 600 airports in Washington State.
- The analysis was based on coarse, discredited, outdated assumptions.
- The modeling was similarly outdated, relying on static models. It should've used more accurate and flexible queuing theory (for terminal capacity) and demand management modeling to arrive at capacity figures that reflect changes due to our recession, improvements at Sea-Tac, and technology improvements from NextGen.
- The 2005 projections for Sea-Tac in no way reflect the actual 2009 numbers.
- The LATS report is completely unsuitable as part of a large-scale transportation planning effort. The LATS enabling legislation did not design LATS for, or contemplate its use in, the PSRC's transportation planning efforts.

O-016-009

Our region, State and federal government have invested billions of dollars in Sea-Tac for the 3rd runway, in our Sound Transit rail and bus transportation systems and in other ground and air transportation facilities. Poor analysis for the ground/air transportation connection at Sea-Tac will lead us to incorrect and costly conclusions—such as shifting demand from Sea-Tac to other reliever airports thus cannibalizing the investments made in Sea-Tac. We may even decide to build a new international airport with ever more finite dollars at astronomical expense. If we are going to pursue costly development or cannabilization of our current investments, we should go forward with the best available analysis rather than that provided by LATS.



**O-016-008**

PSRC called for the state to undertake a study of airport capacity needs in 2004, which ultimately led to the LATS study, which began in 2005. Over the past four years PSRC has participated in the LATS process, from both a policy and a technical standpoint. We see no flaws in the approach used in the study or in its findings and conclusions. We believe the LATS study will provide the PSRC region with valuable information as we assess our long range air transportation needs and options for addressing those needs. While the LATS study does not answer every question facing our region, we believe it will help the PSRC region move ahead.

The LATS findings and recommendations are only the next step in helping the PSRC region determine how to meet our long range air transportation needs. The current economic downturn has had an effect on demand for air transportation in the region, and this effect will need to be taken into account as we move toward future decisions. However, we believe the LATS forecasts and capacity analysis were prepared according to generally accepted best industry practices, and represent a solid technical basis for the LATS planning process.

**O-016-009**

Comment noted. We see no flaws in the approach used in the study or in its findings and conclusions. We believe the LATS study will provide the PSRC region with valuable information as we assess our long range air transportation needs and options for addressing those needs. While the LATS study does not answer every question facing our region, we believe it will help the PSRC region move ahead.

The LATS process does not commit the region to any specific action regarding new airport capacity in the PSRC region. The study merely confirms the fact that Sea-Tac Airport cannot meet the region's air transportation needs indefinitely. The LATS lays out a series of capacity strategies which could be considered as Sea-Tac Airport gets closer to

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O-016-009 For all of these reasons, the LATS report should not be included in the 2040 Transportation DEIS. The LATS report would serve only to contaminate the DEIS with faulty models and flawed conclusions.

O-016-010 **COMMENT 2:** MPP DP-51.

MPP DP-51 states: ***Incompatible Land Uses:*** "MPP-DP-51 Protect the continued operation of general aviation airports from encroachment by incompatible uses and development on adjacent land." We take issue with this language, as it is inconsistent with the Transporation 2040's goal to create coordinated, integrated transportation plans with the local community. The language here ("encroachment") suggests GA airports are under attack by the community. In fact, GA airports and the community must find methods to work together so that the community does not suffer "encroachment" by the GA airport. The South Snohomish County communities of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway are suffering from such encroachment now by Paine Field.

We suggest better language: "MPP-DP-51 Protect the continued operation of general aviation airports and protect the surrounding communities from encroachment on one another through long term growth planning, recognizing the incompatibility of airports and communities in close proximity to one another.

O-016-011 **COMMENT 3: The Fly-Away Bus**

We recommend that the PSRC consider the "Fly Away Bus" model developed by the city of Van Nuys, California. This model allows departing airline passengers to check baggage onto a coach at a local park-and-ride facility via coordination with TSA. The coach then departs for LAX, drops off passengers who go directly through airport screening and sends their luggage directly to airline baggage handling. This offers a highly efficient ground transportation modality for Sea-Tac. It could remove cars from our freeways while increasing throughput capacity for both ground transporation and terminal capacity at Sea-Tac. More about the FlyAway Bus is on our web site at www.socnw.org (just search for "FlyAway Bus").

Thank you for taking the time to consider our comments.

ON BEHALF OF THE BOARD OF DIRECTORS OF SAVE OUR COMMUNITIES:

*Don Doran*

Don Doran, President
Save Our Communities

6

reaching its ultimate capacity. The PSRC region, in our careful deliberations over the past 20 years, has shown a commitment to fiduciary responsibility regarding the existing investments in the region's airport infrastructure. Given the high cost, likely environmental impacts, and political difficulties which would attend a decision regarding major new airport capacity in our region, it's unlikely we would do so before absolutely necessary.

**O-016-010**

Multicounty Planning Policies are adopted by the Puget Sound Regional Council General Assembly. Adopted policy language can only be amended or changed through the action of that body.

**O-016-011**

Thank you. The "Fly Away Bus" model from Van Nuys is worthy of future consideration, although it presents complex logistics issues related to maintaining security for passengers and their luggage from their point of origin to their aircraft.

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31 July 2009

Puget Sound Regional Council
Attn: Sean Ardussi
1011 Western Ave., Suite 500
Seattle, WA 98104-1035
transportation2040@psrc.org

Dear Mr. Ardussi:

**O-017-001**

The Cascade Chapter of the Sierra Club is pleased to offer its comments on Draft Environmental Impact Statement (DEIS) for update for the region's Metropolitan Transportation Plan (aka Transportation 2040), released on May 29, 2009.

As in our responses to previous Vision 2040 and Destination 2030/Transportation 2040 documents, our comments are tempered by Cascade Chapter's strong conviction that the overriding long term global and regional environmental issue is the need for strong action to both mitigate the release of greenhouse gases into the atmosphere and develop adaptation strategies for the regional consequences of global climate change. We therefore share PSRC's recognition in the transmittal letter that the a key focus of this DEIS must be on "[h]ow do the alternatives reduce greenhouse gases linked to climate change and water quality impacts on Puget Sound?".

**O-017-002**

**Principal Conclusion of Our Assessment**

We understand that the study of 6 (baseline+5) alternatives in this DEIS is used to develop a preferred alternative for the Final Environmental Impact Statement for Transportation 2040. This is a very critical process.

We find that the conclusions of the DEIS to be very disheartening. It seems that this analysis (Exhibit 6-7) shows that even for this wide range of alternatives, only a modest reduction (0 to 6%) relative to the 2040 baseline in GHG emissions is likely from these transportation improvements alone. Even worse news is that the 2040 baseline for CO2 mobile component is itself a 38% increase over 2006 levels (see Exhibit 6-6).

How will the state meet its obligations under the state's GHG reduction goals? The Transportation Policy Board (pg. 6-22) directed staff to examine the potential for CO2 reductions from improved vehicle and fuel technologies. This is where we see substantial possible changes - ones that overtake the modest gains due to transportation system

**O-017-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. PSRC acknowledges the importance of greenhouse gas reductions and the linkage between land use and transportation planning. The Preferred Alternative was designed to reduce greenhouse gas emissions. Further details are provided in the FEIS Executive Summary, Chapter 6: Air Quality, and Appendix L: Greenhouse Gas 4-part Strategy.

**O-017-002**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether

O-017-002

improvements alone. How do we make these changes part of the preferred alternative for Transportation 2040?

Better integration of land use patterns and transportation investments has the potential to yield further reductions in mobile CO2 emissions through reduced number and length of trips. More attention to combinations of the land use vision and transportation alternatives can shed light on which innovative approaches will enable the region to meet the GHG reduction goals. Finally, if attainment of the state goals cannot happen in this region with its resources, other parts of the state will be severely challenged to reduce its GHG emissions.

O-017-003

**Linkage between Transportation and Land Use**

We know from examples all around us as well as from studies by experts in the field that the interaction between land use and transportation is crucial. Evidence from many cities supports the notion that fewer miles will be traveled by car with compact development rather than with the current ubiquitous sprawl found throughout much of the country ("Growing Cooler", Urban Land Institute). The development of Transportation 2040 assumes the regional land use strategy of Vision 2040 and its focus on regional geographies. These planning areas are expected to develop as the region's major hubs over time yet not all will evolve at the same pace or with a similar emphasis on compact residential development.

The use of consistent growth assumption identified in Ch. 1, page 7 clearly allows for a comparison across the different transportation plan alternatives. It does not however allow us to ask what combination of land use policies and transportation investments allow us to reduce the amounts of GHG gases. There is no iteration between the two plans at this time. PSRC must include such steps in the future. A key problem is that in picking a transportation plan at this time without the iteration with land use we will likely not get the best transportation to support land use practices that reduce GHG emissions and prepare for climate change adaptations. Indeed, it may be that the Vision 2040 growth strategy may encourage us to pick the less than optimal transportation plan with respect to the region's environmental and growth management goals.

Different land use policies and implementation may have important implications for the timing and alignment of transportation (road, path, sidewalk and transit) projects and for transit service levels that are part of the various alternatives. This is a fatal flaw in the overall process. In earlier times we might have been able to adopt this traditional measured iteration between transportation and land use but such an approach is not possible now with the state requirements and the absolutely critical nature of climate change. The sense of urgency is conveyed in comments in recent climate change impacts report from the US Global Change Research Program:
http://www.globalchange.gov/whats-new/286-new-assessment-climate-impacts-us

As often happens, problem lies in the underlying assumptions of the analysis. In this case it is the decision to keep the same land use policies as Vision 2040. This makes perfect sense in the broad context of the analysis of transportation alternatives relative to one another. But the problem is that those Vision 2040 land use policies were developed without examining the impact of various possible transportation strategies.

any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-017-003**

The Preferred Alternative was based upon adopted policy direction that recognizes the critical link between the region's transportation system and the ability to meet the region's land use, economic development, and environmental objectives. The Regional Growth Strategy puts a special emphasis on encouraging new employment and housing to locate in designated regional growth centers that are already connected by major transportation corridors, and that have or are planned for fast, convenient, and frequent high capacity transit. These centers serve as hubs for regional transportation, public services, and amenities, and are identified in regional policies as having a high priority for regional and local transportation investments. Building and maintaining the appropriate transportation infrastructure and services will be a critical part of implementing the Regional Growth Strategy and other goals articulated in VISION 2040.

O-017-003

A bigger study would have been to consider each of the Vision 2040 land use strategies with respect to each of the transportation alternatives considered here. Such an approach would provide valuable insight into the interplay between land use and transportation. We encourage the integration of Vision 2040 and Transportation 2040 process as soon as possible

O-017-004

**Land Use and Population Patterns**

In Chapter 5 "Land Use, Population, Employment, and Housing", a key finding of the effects from these different alternatives is stated as:
The modeled population distributions across regional geographies varied very little in response to the differing transportation networks in each action alternative.

We disagree with this premise, and consider the projected outcome to be unlikely due to the influence of transit-oriented development and the desire of all transportation system users to live in close proximity to those features of that system which they use frequently. Population is more likely to center in those locations that have a multitude of transportation modes available to them, each with ease of accessibility.

Growth needs to stay in the urban centers and supporting communities. While the addition of approximately 800,000 additional housing units will affect the character and intensity of urban areas (refer to Exhibit 5-5), it is assumed that the overall urban footprint will not expand dramatically. Urban growth over time gradually can be affected by where the transportation investments occur in the next three decades and likely be influenced sooner with appropriate transportation plans.

All of the alternative networks produced employment distribution patterns consistent with the VISION 2040 Regional Growth Strategy at the regional level. The weaker influence to keep the growth in major urban centers cited in Alternative 4 is peculiar. The specific locations of investments, rather than the overall approach of this alternative would appear to be a cause of shifted development patterns. It is critical to select projects to minimize this projected shift to outlying urban areas.

O-017-005

**Greenhouse Gas and Air Quality Impacts**

While the PSRC has taken an active stance to address the state's climate change goals in the VISION 2040 policies and in the development of Transportation 2040, the lack of integration between the land use and transportation components in the long-range plan lead to poor projected outcomes relative to these greenhouse gas (GHG) emission reduction goals. Even with a policy change that shifts transportation finance heavily to user fees such as alternative 5, the projected reduction in CO2 emissions is only about 6% (Exhibit 6-7), well short of the GHG emission reduction goals. The contribution of the transportation sector to GHG emissions in the Puget Sound region (50%) requires that its share of reductions be far greater than these projected levels.

We agree that technological improvements over time will assist in keeping criteria pollutant emissions from creating serious impacts. A scenario analysis that considers major change in behavior and technology choice such as nearly full conversion of fleets to electric propulsion,

**O-017-004**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**O-017-005**

As noted in the response to comment O-017-002, PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. Appendix L: Greenhouse Gas 4-Part Strategy discusses more aggressive options like conversion to a full electric fleet.

O-017-005 or severely rising fuel prices would be instructive to obtain a range of impacts on air quality and GHG emissions.

O-017-006 **Diversity of Transportation Alternatives**

We note total VMT goes up even while VMT/capita goes down -- i.e., population growth swamps transportation efficiency improvements. This finding puts the onus on the growth strategy for making any progress on GHG reduction. It also calls into question whether the range of alternatives is sufficiently diverse.

O-017-007 We appreciate the inclusion of tolling in so much of the plan alternatives. The function of tolling as a source of revenue for transportation construction, operation and maintenance but also as a trigger for driver / rider / biker / walker behavior is very important. This distinction is vital. The inclusion of HOT lanes is positive as long as they truly support the increased efficiency of all forms of mobility through the various transportation corridors.

O-017-008 We appreciate the inclusion of Alternative 5 to see how we can push transportation investments to achieve GHG emission reductions – even though the result is not encouraging. A dramatic shift in tolling/congestion pricing and accompanying investments simply does not have that much effect (Exhibit 6-7), though we expect this is due in part to projections of continued trends in vehicle ownership and use. Furthermore, these GHG emission reductions would be even lower if we included construction and embodied energy emissions.

O-017-009 Our focus will need to shift from simply changing what mode is used to take trips but to a real reduction in trips by vastly improved urban design, and smart employment patterns that collocate housing employment and commercial activities with an eye to reducing the number and length of trips. Once again, this strongly suggests changing Vision 2040 land use policies even more dramatically.

O-017-010 Finally, we have concerns over whether the region will even be able to maintain funding for the Baseline Alternative, given projected cuts in road maintenance and transit service. One hopes the present economic conditions will not endure but they have also illuminated some structural problems in long range funding. A good example of this is the funding shortfall projected for King County Metro Transit.

O-017-011 **Calculation of GHG emissions**

The analysis has focused on operations and not the emissions due to construction and embodied in vehicles and construction equipment and materials. While it is fair to argue that such calculations are best left to EISs at the program level, this approach should be more clearly illuminated by stating that the present calculations are the lower limit of the total emission.

We applaud PSRC for its pioneering use of MOVES. It is difficult to make the emissions estimates correspond to reality but this represents a sincere effort to get it right, in as defensible fashion as possible.

O-017-012 **Evaluation Criteria**

**O-017-006**

Thank you for the comment. It is not surprising that total vmt will increase with additional growth in population and employment over a thirty-year planning horizon. As noted, on a per capita basis vmt declines compared with the 2006 base year.

**O-017-007**

Comment noted.

**O-017-008**

Comment noted.

**O-017-009**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.

PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

**O-017-010**

Comment noted. Our region's transit service providers are facing financial challenges in the short term. In the longer term Transportation 2040 also needs to contain a financial strategy that will provide a

O-017-012

The criteria used to evaluate the alternatives are just as important as the alternatives themselves. For example, in Exhibit 1-4, the fact that the alternatives have "no significant change" for growth management reiterates the underlying flaw of the study. The transportation plan is not allowed to affect growth management. This interaction must be explicit is subsequent project level EIS efforts.

We thank you for the opportunity to comment and look forward to continued involvement in this important process.

Sincerely,

Tim Gould
Volunteer Chair, Transportation and Land Use Committee
Sierra Club Cascade Chapter

sustainable stream of revenue to support increased transit service, as well as the capital improvements needed.

**O-017-011**

Thank you for your comment.

**O-017-012**

Effects of transportation projects upon land use will be explicitly analyzed in future project-level EIS efforts.

Transportation Choices Coalition

July 30, 2009

Attention: PSRC Transportation 2040 Comments
Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Ardussi,

O-019-001 Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement.

Transportation Choices Coalition appreciates PSRC staff's work and the level of analysis that has gone into producing the five alternative proposals laid out in the Transportation 2040 DEIS. We believe this planning is critical to address the 19.1 million daily trips projected in the Puget Sound region by 2040. In a region where over 50 percent of greenhouse gas emissions originate from transportation, where reduced physical activity is causing our population's health to decline and where Puget Sound is losing its viability as a habitat in large part because of non-point toxic run-off and auto-induced sprawl, the ability of our community and economy to sustain itself is dependent on a profound shift in how we think about transportation in the coming decades.

O-019-002 For these reasons, Transportation Choices Coalition strongly supports adoption of a modified version of the DEIS's Alternative 5 as the preferred alternative for the 2040 Regional Transportation Plan update. Alternative 5 promotes transit and non-motorized infrastructure allowing a more robust and practical set of transportation choices for this growing region. This alternative also makes the best, most-efficient use of our existing highway system and better transitions our transportation funding from dependency on what we hope will be increasingly obsolete petroleum-based fuels. Additionally, Alternative 5 uses tolling revenue to fund transit and non-motorized programs, and includes the largest expansion of light rail, high capacity transit, bus service, and dedicated non motorized infrastructure. This alternative will do the most to reduce green house gasses and vehicle miles traveled (and, therefore, congestion related delay), thereby doing the most to help the state meet its climate change goals. The reduced

**O-019-001**

PSRC appreciates your organization's comments on the Transportation 2040 DEIS.

**O-019-002**

Thank you for stating your preference among the alternatives. Many of the features of Alternative 5 are incorporated in the Preferred Alternative, including as much high capacity transit and more nonmotorized and bus transit service hours than was modeled in Alternative 5. The economic competitiveness of the Preferred Alternative, as analyzed in the benefit-cost analysis, indicated greater net-benefits than Alternative 5. The full highway tolling in the financially constrained part of the Preferred Alternative and the array of funding and management strategies included in the full Preferred Alternative offer the opportunity to manage and fund transportation investments in a similar manner to Alternative 5.

O-019-002 amount of pollutants will limit what ends up in the Puget Sound, helping preserve an incredible natural resource. Finally, with some modification, this alternative promotes walking, biking, carpools, and dense development by managing demand at park and rides using parking fees. Alternative 5 is the best choice to move our region towards a more sustainable and economically competitive future.

O-019-003 It is in this context that Transportation Choices Coalition offers the following comments on the Transportation 2040 DEIS:

**State Emission Regulations**

We strongly believe that all alternatives should take state greenhouse gas emission requirements and vehicle miles traveled requirements into account as a baseline. House Bill 2815 requires a statewide 30% VMT per capita reduction and a 25% GHG reduction below 1990 levels by 2035. Most recently, Governor Gregoire reinforced the state's commitment to reducing transportation emissions through Executive Order 09-05. We believe these requirements should serve as a baseline for all alternatives presented in the DEIS and should be a major focus in Transportation 2040. Over 50% of Washington State's GHG emissions come from transportation making it paramount that a 30-year long range regional transportation plan start with these requirements as a baseline from which all other factors are weighed.

O-019-004 Reducing GHG in the transportation sector is a greater challenge in our region than most because of the proportion of emissions that come from transportation here in Washington, because this is the area of GHG reduction most likely to affect citizens with respect to personal habits and because we are so far behind many of our peer metropolitan areas in availability of transit alternatives and land use practices. However, as great as the challenges are in this area, we will fail our children and grandchildren who will suffer the most from average worldwide temperature increases of up to 10 degrees fahrenheit by 2100[1] if we fail to make a heroic effort to reduce emissions by leaps and bounds over the next 30 years. In spite of assertions from some, these efforts need not be coercive or painful. The Governor's Climate Action Team report[2] and other recent national level reports lay out a quite simple set of measures that Transportation 2040 can adopt to achieve adequate reductions over the next 30 years. These measures include ending subsidies for parking, variable, tolling intended to reduce VMT, increasing urban density, pay-as-you-drive insurance, shifting freight from truck to rail and reducing speed limits.[3]

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[1] Sokolov et. al., "Probabilistic Forecast for 21st Century Climate Based on Uncertainties in Emissions (without Policy) and Climate Parameters," *American Meteorological Society Journal of Climate*, 2009 http://ams.allenpress.com/perlserv/?request=get-abstract&doi=10.1175%2F2009JCLI2863.1&ct=1

[2] Governor's Climate Action Team, *Growing Washington's Economy in a Carbon-Constrained World: A Comprehensive Plan to Address the Challenges and Opportunities of Climate Change*, Dept. of Ecology/ Dept. of Community, Trade and Economic Development, 2008. http://www.ecy.wa.gov/pubs/0801025.pdf

[3] Cambridge Systematics, Inc., *Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions*, Urban Land Institute, 2009.

2

**O-019-003**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-019-004**

The most promising strategies identified in the State's Climate Action

O-019-004 Alternative 5 does the most to meet the VMT requirements by reducing per capita VMT by 16% by 2040, while the other four alternatives reduce VMT per capita by less than 10%. All alternatives are well below the state requirements of a 30% VMT per capita reduction by 2035 from the baseline of 2020. Also Alternative 5 projects a 10% reduction of GHGs, the most of the five alternatives, still well below the state required 25% reduction by 2035. With emissions from the transportation sector accounting for over 50% of our GHG emissions, it is crucial that the Puget Sound region works to meet these goals, and unfortunately none of the proposed Alternatives will reach them. Our region's long-range plans should comply with state regulations and should be a roadmap to reaching these goals.

O-019-005 These state requirements for VMT and GHG are statewide averages and many rural areas will not be able to meet the VMT regulations due to a lack of alternatives. This requires urban areas of the state, particularly the Puget Sound region, to reduce VMT by a greater percentage for the state to meet a 30% per capita state wide reduction by 2035. Even though residents in the Central Puget Sound are projected to drive a daily 20.08 miles per capita (PSRC Transportation Alternatives Analysis), the state predicts a statewide daily average of 27.03 vehicle miles traveled per capita. In order to offset the higher daily VMT by the rural areas of the state, our region must take on more than its share in reducing our VMT to meet a state wide average of 18.92 daily VMT by 2035. In order to reduce the hardship the VMT benchmarks will have on the auto dependent rural areas, we believe that PSRC must take the most aggressive stance to put the Puget Sound on a path to help the state meet these regulations.

It is the responsibility of our region to reduce our green house gas emissions as much as possible. As the major producer of CO2 emissions in the state, our region must be most aggressive in reducing our emissions. With over 50% of our emissions coming from transportation, it should be the Puget Sound region's goal to reduce our VMT as much as possible. Alternative 5 is the only alternative that reduces all GHG emissions by at least 5% below the 2040 baseline. Yet still, even alternative 5 will not reduce GHG emissions below 1990 levels, far from the state requirement of 25% below 1990 levels by 2035. We strongly believe that the region must work aggressively to reduce its green house gas emissions and Transportation 2040 should strongly lead the Puget Sound on a path to lower emissions. We recommend that PSRC develop an alternative that will meet these goals and adopt that alternative.

O-019-006 **Roadway Investments**
Transportation Choices very much believes that Alternative 5's approach on funding only very limited expansion of roadways is the best strategy for the next three decades. The years from 2010 to 2040 will likely see implementation of greenhouse reduction measures at the state and federal levels, a much older population, greater urban densities,

3

Team (CAT) report were compared to the strategies analyzed in the Transportation 2040 alternatives. It was found that each of the CAT strategies was captured within the Transportation 2040 analysis.

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions. PSRC is working towards a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**O-019-005**

HB 2815 sets benchmarks for reducing statewide annual per capita VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

O-019-006

a need to reduce the levels of obesity we see in our current population, reduced fuel tax revenues, a need to clean up Puget Sound in order to preserve it as a viable habitat for hundreds of bird, fish and marine mammal species, as well as a need to dramatically increase efficient spending of public dollars in an era of debt recovery. These trends all call for a need to absorb, at the very least, all new trips beyond today's baseline into transit and short distance trips that can be accomplished via walking or bicycling.

All these trends call for maintaining our current roadway system and making at most a small number of strategic chokepoint fixes in order to make the most of the current system. However, the era of expanding roadways to simply meet new SOV demand is no longer viable, economically or environmentally. With limited physical capacity, new High Capacity Transit is the only opportunity for significant new trip capacity anywhere in the region, at least if we are to remain true to our growth management goals. Making smarter use of our existing roadway system through pricing, aggressive maintenance and preservation efforts and more use of transit and transportation demand management (TDM) programs will make limited tax dollars go much farther than trying to keep up with transportation demand through roadway expansion. Alternative 5 best addresses these realities.

O-019-007

**Parking**

While we prefer most aspects of Alternative 5, we ask that the preferred alternative adopt Alternative 3's parking demand management strategies. We believe that Alternative 3 strategies for parking fees at Park & Rides will better manage demand in overcrowded lots and provide another user based funding source for the system. With region-wide Park & Ride utilization at 80%, and peaking above 90% in North King County, the system is in great demand.[4] Parking fees on these lots would manage this high demand by encouraging other means of getting to transit, such as walking, biking or just living closer to work or transit. We believe that a base fee should be applied to all major Park & Ride lots in the region with higher fees on higher demand lots. These parking fees should be applied to all of the alternatives being considered.

O-019-008

We also encourage PSRC to adopt a preferred alternative that encourages more shared parking and elimination of 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.

O-019-009

**Non Motorized Transportation**

We believe that our transportation system should be focused on moving goods and people, not automobiles. Investing in our region's non-motorized infrastructure is a key

[4] Puget Sound Trends. Major Park-In-Ride Utilization in Central Puget Sound Region. Issue 12. April 2009.

4

**O-019-006**

Comment noted.

**O-019-007**

Thank you for your comment. The preferred alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. The former investments are generally in the constrained plan. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park and ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study this issue, including the pricing of these facilities, in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**O-019-008**

Thank you for your comment. The Preferred Alternative includes an array of parking strategies ranging from regional parking surcharges to various policy decisions that should be examined by local jurisdictions. Shared parking is among those policies and should be further explored as a way to reduce the parking footprint within regional growth centers. A regional coordination and technical assistance element is also included.

**O-019-009**

Comment noted. The Preferred Alternative expands bike and walk infrastructure to fully connect the bicycle network to, within, and between regional centers (3 mile access) and provide full sidewalks and pedestrian networks in all cities (1 mile access). It includes more than 580 miles of additional off-road regional trails and focuses bike and walk improvements in regional growth centers, along facilities with one terminus in a center or within ¾ mile of transit passenger facilities,

O-019-009

aspect of our transportation system's future. Our bike lanes, sidewalks, and multi use paths are more than just for recreation, they are essential elements of a functional transportation system. With the number of bike and walking trips to work projected to double under all alternatives, we believe it is of utmost importance to invest in our non-motorized infrastructure and promote these emission free commutes. We support Alternative 5 as it does the most to support this system by doubling non-motorized capacity. We also believe that Complete Streets or Great Streets programs should be a guiding set of principles for all development and redevelopment of private and public streets within the UGA.

O-019-010

**Transit**

In any long range view of transportation in our region, expanding transit infrastructure is vitally important. High capacity transit such as light rail and bus rapid transit is crucial to moving our growing population while creating as few GHG emissions as possible. An expanded transit infrastructure is essential to meeting the states emission and VMT requirements and supporting dense, walkable communities that Vision 2040 promotes. We believe that tolling revenue should be used to help fund the entire transportation system, including transit, such as proposed in Alternative 5. Capital investments should be directed to expanding our fledgling HCT systems as quickly as possible. Transit investments with the highest capacity and highest frequencies should be prioritized for areas designated as growth centers and neighborhood centers in order to support development of more walkable, bikeable, mixed-use nodes.

O-019-011

**Land Use**

Land use policy that supports the plans outlined in Transportation 2040 is essential to making our system as efficient and sustainable as possible. Dense mixed-use development near transportation infrastructure will promote walking and biking to transit. This development provides jobs and residences that will provide ridership for transit and is a necessary to house the 1.5 million residents moving to our region with minimal impact on the environment. This development requires less land than sprawl, which retains more forest land to filter storm water, reducing pollutants -including emission of greenhouse gases- and helps protect Puget Sound.[5]

The land use plan for Transportation 2040 needs to be revised to support more of the population in transit oriented development. Also this development should be focused in urban areas to create densities to support transit service with minimum 30-minute intervals. Light-rail station areas PSRC needs to work to protect our forests and

[5] See, Ewing et. al., *Growing Cooler: The Evidence on Urban Development and Climate Change*, Urban Land Institute, 2008.

5

and on locations that overcome a barrier (such as crossing I-5) or provide a missing link. It would complete approximately 350 miles of the envisioned regional off-road trails. A key goal is to improve pedestrian and cyclist access to transit with improved terminal access, terminal facilities, and bike racks on transit vehicles. The plan would also add online regional nonmotor trip planning services, fund education/outreach programs, and make roadside investments to improve bicycle and pedestrian safety. The plan will promulgate both a "no net loss" policy to ensure that construction or modification of other transportation facilities does not diminish the supply or connectivity of the bicycle and pedestrian networks and a new way of thinking about the use of public right of way that gives full attention to the needs of all users. Finally, the plan proposes to explore the concept of a regional bike sharing program.

**O-019-010**

The Preferred Alternative recognizes the need for near term and long term transit funding. In the near term, this funding is likely to come from traditional sources such as motor vehicle taxes. The use of toll revenues should evolve over time toward increasingly broader uses, potentially including transit.

**O-019-011**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth.

These are high priority areas for the region's transportation investments.

O-019-011

farmlands by halting urban growth area expansions, which will make our transportation system more efficient and work to protect our vital watersheds.

Yet in order for this development to be viable, our region must plan to develop the transit, bike and pedestrian infrastructure to support it. Alternative 5 does the most to lay the foundation for Transit Oriented Development in our region and will begin to shift our region away from sprawled automobile focused development.

O-019-012

**Public Health**

Transportation has a massive impact on the public health of the region. Alternative 5 also does the most to support public health by reducing GHGs and promoting the more active lifestyles that come with transit-oriented development and bicycle and pedestrian facilities. Lower GHG emissions will work to slow down the effects of climate change, and reduces emissions which are linked to a variety of health issues, including asthma.[6]

O-019-013

The land use around our transportation system is of incredible importance to the health of the region. Dense mixed-use transit oriented development will encourage healthier lifestyles and produce fewer emissions of criteria pollutants as well as CO2 by promoting walking, biking and transit ahead of automobile use. Obesity is an epidemic in our country and communities that provide housing, retail, employment, parks and multiple transportation options in one area are proven to create an environment that can help residents reach their daily fitness needs.[7] Sprawl originating from freeways has created an automobile dependent lifestyle, discouraging walking and other physical activity and has been a major factor in the increase of our region's obesity rates. Obese and overweight people utilize a greater share of health care services than non obese populations of the same age group[8] increasing the cost of health care for the individuals, governments and other employers who pay for health insurance and hospital care, as well as taxpayers generally. Our built environment and transportation infrastructure is crucial in shaping the way we live. PSRC should help promote a healthier lifestyle by promoting transit, and non-motorized infrastructure that will allow Puget Sound residents to live a healthier, more active lifestyle.

O-019-014

**Tolling**

We believe that tolling is a necessary source of revenue for our region's transportation system. As revenues from the state gas tax diminish over time, our region needs a new funding source to maintain and improve our transportation network. Tolls effectively

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[6] GD Thurston. Summertime haze air pollution and children with Asthma. Am. J. Respir. Crit. Care Med., Volume 155, Issue 2, 2006, pages 654-660.

[7] Bresser, et All. "The contribution of active travel to children's physical activity levels: Cross-sectional results from the ALSPAC study" Preventive Medicine, *Volume 48, Issue 6, June 2009, Pages 519-524.*

[8] Wolf, Colditz. "Current Estimates of the Economic Costs of Obesity in the United States. Obes Res., Volume 6, Issue 2, Pages 97-106.

6

The Regional Growth Strategy also places a high priority the development of designated centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth. The Transportation 2040 plan discusses the significant opportunity to leverage public and private investments in transportation through transit oriented development.

**O-019-012**

Comment noted.

**O-019-013**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**O-019-014**

The Preferred Alternative recognizes the roadway management, environmental and funding potential of roadway tolling. The Preferred Alternative includes a variety of management and funding strategies up to and including full system tolling (similar to Alternative 5).

O-019-014 manage congestion, improve air quality and can reduce VMT to reduce GHG emissions and toxic run-off into Puget Sound. We support the full system tolling presented in Alternative 5, but we believe that variable tolls in our region's freeway system are a good intermediary step to this goal. Variable tolling allows us to manage congestion and support our system without relying on traditional funding sources. Also we strongly believe that tolling revenues should be used as a funding source for the region's transit system and non-motorized infrastructure needs though it is certainly reasonable to tie spending of tolling revenue on transit and infrastructure needs within the corridor generating the revenue.

O-019-015 We believe PSRC should take an aggressive stance on full system tolling with the region's freeways and highways tolled by 2020 and with the full system including arterials by 2030. With tolling on SR 520 to be implemented this year, an existing piece of infrastructure will be tolled for the first time in the country. Many believe that SR 520 will not be tolled for long before local officials demand tolling of the I-90 bridge. We believe that with tolls a planned revenue source on the Alaska Way Viaduct Tunnel, and tolling a proposed source for I-5 repairs and HOT lanes proposed for I-405 widening, full freeway system tolling is an inevitability within the next decade or so.

With gas tax revenue declining, an ever growing backlog of transit and local infrastructure projects not met with gas tax dollars, and both state and federal transportation leaders actively exploring mileage-based fees, full system tolling including arterials is no longer the far-fetched idea it was at the time of the previous update. We believe that the PSRC should be planning for full freeway tolling by 2020 and full system tolling by 2030. Such a robust and flexible revenue source will be crucial to maintaining and improving our transportation system and moving to a funding source non reliant on fossil fuels.

O-019-016 **Recommendations**

- **State Emission Regulations**
  - Meeting and exceeding statewide emission regulations should be a major factor in Transportation 2040. Due to the auto dependence of rural areas, PSRC should plan for greater reductions to compensate.

O-019-017
- **Roadway Investments**
  - Maximizing the efficiency of existing roadway infrastructure through "fix it first" policies, variable tolling and only very strategic chokepoint fixes should be the priority for roadway investments.

O-019-018
- **Parking**
  - All alternatives should plan for fees on all park and rides to manage demand and promote walking and biking to transit.

O-019-019
- **Non Motorized Transportation**

7

**O-019-015**

Comment noted.

**O-019-016**

Comment noted.

**O-019-017**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

O-019-019

- We believe non motorized transportation infrastructure should be a major part of any alternative to reduce VMT and GHG

O-019-020

- **Public Health**
  - Health concerns, particularly as they relate to respiratory disease, obesity (especially childhood obesity) and health complications of climate change should be a guiding principle for transportation investments in the next 30 years.

O-019-021

- **Tolling**
  - We support full system tolling and recommend tolling the regions freeways as an intermediary step.
  - We recommend that this funding be used for transit, bicycle and pedestrian improvements.
  - Full freeway tolling by 2020, full system tolling including arterials by 2030.

O-019-022

- **Revenue**
  - Funding for our transportation system should come from a source that does not rely on fossil fuels. PSRC should plan for tolls and user fees to be a major funding source for the transportation system.

O-019-023

**In Conclusion**

The Puget Sound region faces great challenges to meet the transportation needs of a growing metropolitan area. In order to preserve our cherished quality of life, natural beauty and robust economy, we must act now. The ideas presented in Alternative 5 can no longer be seen as the outer edge of the possible but instead must be embraced as the means necessary to redress so many of the problems that haunt our environment, our communities and our economy from a half-century of making all our transportation and land use decisions based on the needs of the automobile over the needs of people. Adoption of a variant of Alternative 5 cannot be seen as option but exactly the kind of transformation in transportation planning necessary to allow us to sustain and better what we all love about living and working in this region.

O-019-024

Transportation Choices is excited about many of the long range goals outlined and the quality of the analysis by PSRC staff in this Transportation 2040 DEIS. We thank the PSRC staff, board and its consultants for all of their efforts developing this plan. We look forward to working with PSRC and its member jurisdictions to implement a smarter

8

**O-019-018**

Thank you for your comment. The preferred alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. The former investments are generally in the constrained plan. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park and ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study this issue, including the pricing of these facilities, in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**O-019-019**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**O-019-020**

Please refer to Appendix D: Policy Analysis and Evaluation Criteria Report. The evaluation of the Transportation 2040 alternatives included a policy focus stating that the region's built and natural environments should promote health. The policy focus sought to answer the following questions as they related to guiding transportation investments in Transportation 2040:

Q. How do land use patterns, environmental factors, transportation

O-019-024 vision for the next 30 years and help create a more livable, sustainable future for this region.

Sincerely,



Bill LaBorde
Policy Director
Transportation Choices Coalition



systems and other infrastructure impact health?
Q. To what degree does the system promote environmental health (minimize emissions/pollutants and carcinogens); active living and wellness (increased opportunities for nonmotorized transportation); and safety?

**O-019-021**
Thank you for your recommendations.

**O-019-022**
Our federal mandates require PSRC to develop a financially feasible transportation plan. We have also received direction from the public and our boards expressing a desire for a sustainable funding strategy to support the plan. The constrained plan contains sufficient sustainable revenue sources for its implementation. The financial strategy relies on continued and increased revenues from traditional sources (such as gas and sales tax) in the short term; implementation of tolling on major state highway projects and HOT (high occupancy toll) lanes in the medium term; and tolling the entire freeway system in the long term. In addition, the financial strategy includes full system tolls (on all highways and arterials) as a way to fund all projects and programs contained in the unprogrammed plan.

**O-019-023**
Comment noted. Thank you for stating your preference among the alternatives.

**O-019-024**
Thank you.

**From:** Eugene Wasserman [eugene@ecwassociates.com]
**Posted At:** Friday, July 31, 2009 10:26 AM
**Conversation:** North Seattle Industrial Association comments on Transportation 2040
**Posted To:** Transportation 2040

O-020-001

**Subject:** North Seattle Industrial Association comments on Transportation 2040
The North Seattle Industrial Association comments are related to a poor process and faulting economic assumptions in developing Transportation 2040.

The process and assumptions in developing Transportation 2040 would lead decisionmakers to choose the false choose of option 5, even though option 5 could hurt the region's maritime/industrial sector.

Based on my 30 years experience in economic, land use and transportation planning and my Masters degree in Urban Planning I am appalled on how Transportation 2040 has been developed.

O-020-002

The planning mantra in this region is that land use and transportation planning should be done in conjunction. When the North Seattle Industrial Association stumbled upon Transportation 2040, we found that the land use portion of the Vision 2040 had already been completed. So Transportation 2040 was to implement Vision 2040 rather than be done in conjunction with Vision 2040. We can not identify the feedback loop from Transportation 2040 to Vision 2040. So Vision 2040 is developed in isolation from Transportation 2040 rather than together. It seems that he PSRC is not doing comprehensive regional planning: but just a bunch of plans that generally relate to each other. We feel that this type of planning is from another era, rather than a more current modern planning process.

O-020-003

The lack of public outreach and public participation in the development of Transportation is of great concern. The North Seattle Industrial Association has been involved in many of the major local and regional transportation decisions. Yet there has been very little outreach to our organization. Sending an e-mail about a planning effort that one can find on the PSRC website and that the comment period has been changed does not qualify as meaningful public participation. We have found the PSRC's outreach efforts to be minimal at best and we wonder it if meets federal guidelines. Clearly local governments to a much better job of outreach on their plans

We know that PSRC has done little outreach to business groups, we also wonder has it done any outreach to labor organizations?

It is the PSRC's responsibility to undertake outreach to business and labor organizations, the economic drivers in this region. It is not our responsibilty to determine what PSRC is up to.

O-020-004

The lack of a freight element is of great concern to the North Seattle Industrial Association. The North Seattle Industrial Association has previously commented on the lack of a freight elements in previous PSRC planning efforts. Apparently this lack of a meaningful freight element has been continued in Transportation 2040. With the concern about Boeing (a manufacturing and heavy freight user) leaving the state, we assumed that freight planning would be a major element of a regional transportation plan. Apparently the PSRC does no see the relationship between freight movement and transportation as important. Even more disturbing is that lack of concern about freight movement and economic development.

The lack of economic development planning Transportation 2040 is a major concern. Several years ago it is our understanding that PSRC became the regional economic planning agency. We feel



**O-020-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. The Preferred Alternative was developed with assistance from business and labor organizations, freight groups, and the rest of the regional community. Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative.

**O-020-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority the development of designated centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

An analysis of how the Transportation 2040 alternatives address VISION 2040 multicounty planning policies can be found in Appendix D.

**O-020-003**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings

O-020-004 that commitments were made that economic development would be integrated into PSRC's planning. Apparently that has not happened.

Many members of the North Seattle Industrial Association feel that the PSRC has not shown itself to be a pro-manufacturing-industrial organization. Transportation 2040 confirms this feeling.

The North Seattle Industrial Association is asking that Transportation does not go forward until:

There is a fully researched freight element, based on data that is interrelated with the rest of the Transportation 2040.

O-020-005 There is a major public outreach on the plan which includes business and labor organizations, freight groups as well as the rest of the regional community.

O-020-006 The economic assumptions behind Vision 2040 be adequately explained and show how it relates to Transportation 2040.

Thanks.

Eugene Wasserman
President, North Seattle Industrial Association
206 440-2660
eugene@ecwassociates.com



on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**O-020-004**

Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities. The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**O-020-005**

As noted in the response to comment O-020-002, PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007. These meetings included business and labor organizations, freight groups, and the rest of the regional community.

**O-020-006**

An explanation can be found in Appendix A: Alternatives Technical Report.




July 31, 2009

**To:** Puget Sound Regional Council
**From:** Bruce Agnew, Cascadia Center for Regional Development
**Subject:** Cascadia Center's Comments on Transportation 2040 Comments

O-021-001

The Cascadia Center for Regional Development is a think tank concerned with surface transportation policy and best practices in the Cascadia and West Coast corridors. We are proud of our reputation as an independent voice, and we appreciate the opportunity to comment on the Transportation 2040 DEIS and related issues.

Attached to this cover memorandum you will find our comprehensive comments on Transportation 2040. Our comments address several specific planning issues (such as our specific thoughts on the Eastside Burlington Northern Santa Fe rail corridor), but we also provide our views and suggestions in the context of the larger question facing the region: What should be done to ensure smooth surface transportation here in the future given major expected growth?

Thank you for your work and consideration of our comments.

CASCADIA CENTER FOR REGIONAL DEVELOPMENT
208 Columbia Street, Seattle Washington 98104
206 292 0401
www.cascadia project.org

**O-021-001**

PSRC appreciates your organization's comments on the Transportation 2040 DEIS.

TRANSPORTATION 2040 DRAFT ENVIRONMENTAL IMPACT STATEMENT COMMENTS
Cascadia Center for Regional Development
July 31, 2009

O-021-002

## INTRODUCTION AND BACKGROUND

**What the Modeling Predicts.** ACCORDING TO THE PUGET SOUND REGIONAL COUNCIL'S (PSRC) Transportation 2040 DEIS, population in the four-county region is projected to grow to 4.9 million by 2040, or 42 percent higher than the 2006 baseline figure of 3.5 million. Jobs in the region are projected to grow to 3.1 million by 2040, by 1.1 million or 60 percent from the 2006 figure of 1.94 million. Housing units would grow from 1.48 million in 2006 to 2.3 million in 2040, and 63 percent of those would be single-family.

Based on the PSRC's modeling, and depending which of the currently described alternatives is implemented, from 2006 to 2040 the number of average daily passenger vehicle trips will rise between 37 to 42 percent. Total vehicle miles traveled (VMT) will increase 18 to 39 percent, while per-capita VMT will decline from one to 16 percent. Based on the full range of currently described alternatives presented in the DEIS, for all passenger trips in our region, transit's mode share will rise from 2.9 percent in 2006 to between 4.2 and 5.2 percent in 2040. Walking and biking combined will rise from 10.4 percent of daily trips in 2006 to between 11.5 and 13.3 percent in 2040. Single- and multiple-occupant passenger vehicles, combined, will decline from 86.7 percent of daily trips in 2006 to between 81.5 and 84.3 percent in 2040.[1]

If reasonably accurate, these projections indicate our region will face a bracing challenge of how to accommodate that additional population, economic, housing and traffic growth while ensuring surface transportation mobility and maintaining environmental quality.

O-021-003

**Reducing Congestion and Facilitating Mobility – An Economic Imperative.** Reducing traffic congestion and facilitating surface transportation mobility as future growth occurs will help ensure that the region prospers economically and remains strong in the increasingly competitive national and global economies.

Data for Puget Sound in the Texas Transportation Institute's (TTI) 2009 Urban Mobility Report show that the annual cost of jammed roadways here in 2007 was $1.59 billion, the highest ever since TTI's first Urban Mobility Report was issued, using data for 1982. In that year, regional congestion costs for Puget Sound totaled a scant $96 million. According to the new TTI report, annual congestion costs per Puget Sound peak traveler reached a new high in 2007 of $938, versus $127 in 1982. Total traffic delay for the Seattle region totaled 73.6 million person hours in 2007, up by a factor of more than six since 1982. Daily vehicle miles traveled on highways and arterial streets combined have more than doubled in the region since 1982, according to the report.[2]

There are benefits not only to easing the first-order costs of congestion tabulated by TTI (lost time and wasted fuel), but also to smoothly facilitating forecasted future traffic loads. By one (2006) estimate, if Puget Sound is able to reduce congestion below current levels as future growth occurs, the region will gain up to an additional $13 billion in economic activity.[3] Another (2007) estimate is that for every $1 billion spent on federal highway construction projects, 30,000 person years of direct, induced and indirect employment in upgraded or new jobs are created, with accompanying annual wages of $1.15 billion.[4] Total economic activity generated from such wages is doubtless multiplied several times over.

O-021-004

**Congestion Reduction Requires More Than Just Growth Management Strategies.** PSRC's "Vision 2040" plan contains regional growth management targets and strategies, as required under the state's

[1] Executive Summary, Transportation 2040 DEIS, Puget Sound Regional Council, May 2009, http://www.psrc.org/projects/trans2040/deis/ch1.pdf
[2] 2009 Urban Mobility Report, Texas Transportation Institute, Seattle region data break-out, http://mobility.tamu.edu/ums/congestion_data/tables/seattle.pdf
[3] Samuel Staley, Reason Foundation, "We Face A Competitiveness Crisis Without Transport Spending," Puget Sound Business Journal, April 24, 2009, http://www.discovery.org/a/10391
[4] Economic Impacts of Highway Infrastructure Development, Federal Highway Administration, U.S. Department of Transportation, updated Feb. 23, 2009, http://www.fhwa.dot.gov/policy/otps/pubs/impacts/

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**O-021-002**

Comment noted. Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live.

**O-021-003**

Comment noted.

**O-021-004**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.

PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

**O-021-004**

Growth Management Act. It was adopted in April 2008, and is to be integrated with Transportation 2040, as the Transportation 2040 DEIS emphasizes. Vision 2040 prescribes that more than half of future population growth should, combined, be directed to the two inner-most rings: Thirty-two percent to "metropolitan cities" such as Seattle, Bellevue, Everett and Tacoma; and, 22 percent to "core cities" such as Auburn, Federal Way, Renton, Redmond and Tukwila. Additionally, 14 percent of the expected growth is prescribed for so-called large cities such as Arlington, Maple Valley, Gig Harbor, Shoreline and Woodinville; eight percent to small cities such as Newcastle, Black Diamond, Bonney Lake, Sumner, Milton, North Bend and Stanwood; eighteen percent to unincorporated urban areas and seven percent to rural areas.[5]

An intended outcome of the hoped-for conformance to these regional growth allocation targets is a reduction of traffic congestion. More settlement in the inner rings of the region will, it is thought, lead to more work and non-work trips occurring on transit or via walking or bicycling. However, there are several reasons why it is unwise to pin much hope on controlling traffic congestion through encouraging certain types of growth patterns. One is that housing prices are typically more affordable toward the region's edges. Another is that for a variety of reasons, distances between home and employment will remain considerable for many residents of the region (wherever they reside), as will the need to use cars rather than other modes of transport, in order to save time and execute multiple-destination trip chains. Additionally, the majority of daily trips are non-work, not work-related, and for these, the use of private vehicles rather than transit is and will remain even more pronounced than for work trips, as Transportation 2040 DEIS data show.

For reasons such as those just stated, the growth targets prescribed in Vision 2040 are not yet being realized. From 2000 to 2007, the percentage of the region's new population settling in designated metropolitan and core cities is slightly less than half that prescribed.[6] The trend toward outer-ring population growth, and smaller growth shares than envisioned in the inner rings continued through 2008.[7] Whether the trend is mitigated much or not, it remains important to develop more robust and strategic transit options while realizing resources are not infinite and hard choices must be made. It is also especially important to widely institute market-based pricing mechanisms for passenger vehicles on major highways in order to help reduce peak-hour traffic congestion as the region's population and employment grow in coming decades.

**O-021-005**

**Surface Transportation and Greenhouse Gas Emissions.** As the Transportation 2040 DEIS Executive Summary shows, if current proclivities hold, and if any one of the currently described alternatives were to be implemented, we will be looking 30 years from now at a region where more than four out of every five daily passenger trips is in a vehicle. This means that in order to achieve what are sure to be demanding greenhouse gas emission reduction targets, we will have to continue and intensify efforts to "green" the surface transportation sector.

Such and effort will involve a wide variety of strategies that both public and private sector actors will need to embrace. Generally speaking, some important priorities in "greening" the nation's vehicle fleet include: continued support for research and development of "net green" biofuels and smart grid technology; incentives for continued purchases of electric and plug-in hybrid electric vehicles by public sector and large private sector fleet owners; and, continued progress toward goals to expand electric vehicle charging infrastructure at residential, commercial, public sector, transit center, and travel corridor locations.

[5] Vision 2040, Executive Summary, PSRC, 2008, http://www.psrc.org/projects/vision/pubs/V2040execsumm.pdf
[6] "A Big New Growth Management Plan Is Already Outgrown," Douglas B. MacDonald, Crosscut, April 22, 2008, http://crosscut.com/2008/04/22/politics-government/13638/
[7] "Nice Plans To Save The Region, But....." Douglas B. MacDonald, Crosscut, April 16, 2009, http://crosscut.com/2009/04/16/real-estate/18957/



**O-021-005**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**O-021-005**

An important and as yet unsettled issue is what regulatory approach and policies will serve as the key drivers of change. There are ways that a carbon tax could be calibrated to the varied emission levels and/or fuels used by different types of vehicles, and this could serve as a powerful incentive for innovation. A national carbon tax could be made revenue-neutral with corresponding decreases in employee withholding taxes. Conceivably, vehicle emission levels could be factored into a vehicle mileage tax. The Washington State Transportation Commission offers a more immediate approach: "Consider imposing a state carbon tax structure based upon vehicle type. Ordinarily this concept would be a long-term notion in this country and in Washington State. However, such taxes are being implemented in other parts of the world and should be acted upon in the near future in this state and nation."[8]

As part of our annual Microsoft TransTech Conferences and elsewhere, Cascadia Center has been at the forefront of calling for pooling of government resources to purchase alternative fuel and plug-in hybrid electric vehicles. We think Transportation 2040 needs to affirm support for government purchases of these types of vehicles. Cascadia Center supports transit improvements to reduce VMT (Vehicles Miles Traveled), but we believe a quicker path to reducing greenhouse gases is a more aggressive commitment by governments to purchase alternative fuel and plug-in hybrid electric vehicles, something we refer to as "oil-free VMT."

**O-021-006**

**The Effectiveness of the Gas Tax Will Continue to Diminish.** The gas tax is destined for obsolescence within a decade or less due to political constraints preventing it from being raised substantially; due to ever-increasing fuel economy of vehicles; and, due to four decades of increased wear and tear on the nation's highways, arterial roads, and bridges. The gas tax simply cannot keep up with the system's need for maintenance and expansion.

Already the federal gas tax trust fund is on its last legs, and will require another emergency infusion later this year. States, of course, may incrementally raise their own gas taxes and some (including Washington in 2003 and 2005) have. A hike in the federal gas tax in the next six-year federal transportation bill may well be advisable as a "bridge" to a better, more fail-safe surface transportation funding strategy. However, as the National Surface Transportation Infrastructure Finance Commission noted, due to sharp price fluctuations at the pump, the failure to link usage of specific facilities to operations and maintenance costs, and because of subsidies from other revenue sources, the gas tax fails to signal to motorists the real costs of driving.

As a result, gas tax hikes are very likely to be perceived at the pump as simply another price increase due to prerogatives of oil-producing nations or oil companies rather than as a signal that roads are a limited resource requiring constant upkeep. In contrast, variable-rate tolling and/or a vehicle mileage charge clearly signal the linkage between using specific roads at specific times, and the related costs of upkeep.[9]

*Contributed by Matt Rosenberg, Senior Fellow, Cascadia Center for Regional Development*

[8] Washington State Transportation Commission, 2009 Policy Platform, http://www.wstc.wa.gov/2009PolicyPlatform.htm
[9] "Paying Our Way: A New Framework For Transportation Finance," Executive Summary, National Surface Transportation Infrastructure Finance Commission, February 2009, http://financecommission.dot.gov/Documents/NSTIF_Commission_Final_Report_Exec_Summary_Feb09.pdf



**O-021-006**

Concur. Our federal mandates require PSRC to develop a financially feasible transportation plan. We have also received direction from the public and our boards expressing a desire for a sustainable funding strategy to support the plan. The constrained plan contains sufficient sustainable revenue sources for its implementation. The financial strategy relies on continued and increased revenues from traditional sources (such as gas and sales tax) in the short term; implementation of tolling on major state highway projects and HOT (high occupancy toll) lanes in the medium term; and tolling the entire freeway system in the long term. In addition, the financial strategy includes full system tolls (on all highways and arterials) as a way to fund all projects and programs contained in the unprogrammed plan.

Your comments about the signals users receive when they pay for fuel and use the system demonstrate a continuing need to inform the public about the true costs of transportation. The Transportation 2040 planning process is one way for us to provide useful information to the traveling public so they can make informed decisions about how they travel and how they pay for travel.

O-021-007

**CASCADIA CENTER'S RECOMMENDATIONS**

THE PREFERRED ALTERNATIVE OUTLINED HERE IS A *hybrid*, combining various elements from among six draft EIS alternatives, and other elements that may not be included in any of them, such as funding/finance and governance. We do not seek here to make a detailed critique of any of the alternatives, but rather to recommend key elements which we believe should be included in the final preferred alternative for the Transportation 2040 plan.[10]

As described in the DEIS, Transportation 2040 is executed in accordance with guidelines in the State Environmental Policy Act (SEPA). It is important the letter of that law be followed. However, our guiding principles here may differ somewhat from that of PSRC. While we have much to offer on components of the alternatives discussed in Transportation 2040, we are also going beyond the SEPA requirements that guide Transportation 2040 in order to present a vision of what we believe any solid, useful year-2040 surface transportation plan for metro Puget Sound should include.

O-021-008

**RECOMMENDATIONS**

**I. INCLUDE EASTSIDE COMMUTER RAIL ON THE BNSF CORRIDOR IN THE FINAL ALTERNATIVE**

Only one of the current Transportation 2040 alternatives includes the proposed Eastside commuter rail line in the BNSF corridor from Snohomish to Renton (with a spur to Redmond). The preferred alternative should include this option. Commuter rail in this corridor would provide an important new, convenient transit option for residents of eastern Snohomish County and south-central King County, allowing them car-free access to the major regional jobs centers of Bellevue and Redmond, as well as to Kirkland. This commuter rail line would also offer close connections with Sound Transit's Phase 2 light rail line connecting Seattle with the Eastside. On the issue of the Eastside Corridor, we have very specific comments about the "components in the six alternatives" (baseline plus five alternatives). Upon review we found that the forty-six miles of additional commuter rail shown in alternative 5 is comprised of a Sounder extension from Lakewood to DuPont and the BNSF Eastside rail corridor.

We urge that whatever alternative is chosen, that the Eastside rail corridor be included. During Cascadia Rail Week in May 2009, representatives from Sonoma-Marin (Calif.) articulated how they were successful planning for the transforming of an abandoned California rail line into a 71-mile "rails and trails" corridor. Their experience is instructive to Seattle, for their cost figures for a 71-mile corridor come in at $540 million, whereas Sound Transit's numbers for our 42-mile corridor come in at $1.3 billion; Sonoma-Marin has 50-75 feet of ROW, whereas we have 100 feet. Sound Transit and PSRC analysis has shown that developing this corridor would serve "significant ridership and be a significant component in the overall system." The right-of-way (ROW) exists and could easily become capable of being implemented into a linking component up and down the eastside and with the East Link extension presently under environmental evaluation and design.

Most importantly it would be the least cost-fixed guideway alternative suggested in any transit addition to the region. Additional bus service would either utilize valuable freeway/alternative lane miles adding to congestion, or require the acquisition and construction of lane mile ROW. Light rail acquisition and construction would also require the acquisition and construction of ROW and line that by Sound Transit estimates would cost $225M to $350M per mile. The additional service hours of commuter rail service shown in alternative 5 would be the least expensive rail addition that could be added to any alternative.

[10] We do provide, however, a more direct critique under our recommendation for the Eastside BNSF corridor.



**O-021-007**

Thank you for stating your preference among the alternatives.

**O-021-008**

This project has been included in the Preferred Alternative.

O-021-008 Environmentally, adding the development of Eastside BNSF commuter rail to any alternative will prove to be the least environmentally intrusive of any service type, except possibly for the addition of regular bus hours. Even other service hours for regular "Sounder" commuter rail service might entail re-negotiation of the BNSF contract and additional construction. (As this corridor already exists, limited environmental review and mitigation would be necessary.) Any rail and structural rehabilitation (e.g. Culvert replacement) may only enhance existing environmental conditions.

Importantly, federal RIFF and Infrastructure Bank (economic stimulus) funding is now available for the development of the Eastside BNSF corridor project. That funding may not be available in the future, and if the project is not included in the region's long-term plan, it might not be available for federal funding at all. Major investment analysis for the corridor would prove that its relative cost-effectiveness in comparison to other corridors around the country is very high.

O-021-009 ***In our review of the information contained in the analysis for the alternatives, we uncovered an important omission.*** In the Appendices to the DEIS, "Exhibit 4, Final Bus Service Configuration, AM and Mid-day Transit Service Hours," the last column showing the percentage change in all service hours from the 2006 levels was inadvertently left out of the final document. We have included a full copy of that exhibit with these comments.[11] In reviewing that column, one statistic becomes spotlighted. Light rail service hours would increase by 5,800 percent (five thousand, eight hundred) from the 2006 levels. While we understand that figure represents the implementation of existing recently opened service, North Link and East Link assumptions, and other anticipated additional service, it is also the largest light rail increase of all alternatives. This may make alternative 5 less attractive and other alternatives "more

O-021-010 balanced." We feel that the Eastside BNSF corridor should also be included with any of these other more "balanced" alternatives. With the addition of the Eastside BNSF rail corridor, we believe that either alternatives 2 or 4 *with the inclusion of the BNSF Eastside corridor* would best accomplish the regional needs to 2040.

O-021-011 With a systems approach, new park and rides (described in a later section) could be blended with the commuter line. At stops in Bellevue and South Kirkland, for example, a remote airport clearance station could be added for future transit connections to Sea-Tac Airport that are actually convenient for Eastsiders.

O-021-012 **II. Variable-Rate Tolling on Major Highways to Reduce Peak-Hour Congestion**

Tolling all major arterials in the region is inevitable, *but it will have to be done incrementally*. Importantly, tolling should be approached from a corridor perspective, for which we believe there are three distinct corridors in our region: 1) The Interstate 5-State Route 99-State Route 509 corridor from the Snohomish-King County line to I-5 at Federal Way; 2) The Interstate 405-State Route 167 corridor Lynwood to the Port of Tacoma; and, 3) The Interstate 90-State Route 520 corridor connecting Seattle to the Eastside. Each of these should be managed as corridors. (Senator Ed Murray proposed a corridor development bill in the last legislative session.)

For the first example (I-5, SR99, SR509), the deep-bored tunnel to replace the Alaskan Way Viaduct should be tolled, the I-5 express lanes between downtown and Northgate (reversible express lanes only) will help provide revenue and reduce congestion. There would be three revenue streams: I-5 and the reversible express lanes only, the deep-bored tunnel tolling, and tolling to construct the missing link between Burien and Federal Way for SR509. For the second example (I-405, SR 167), if it were managed as a corridor, there could be a melding of revenue from I-405 HOT lanes and SR167 HOT lanes. For the

[11] Found in the appendices of our comments.



**O-021-009**

Comment noted.

**O-021-010**

The alternatives were developed in collaboration with multiple agencies, including the Washington State Department of Transportation, Sound Transit, Washington State Ferries and many other local and regional agencies and with public input. The alternatives were presented and discussed with decision makers and were endorsed by both the Transportation Policy Board and Executive Board. Information on the alternatives has been provided to decision makers through public testimony and distribution of the DEIS comments and no request has been made by either Board to reconsider the configuration of the DEIS alternatives.

**O-021-011**

The Preferred Alternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park-and-ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**O-021-012**

Thank you for your recommendation.

O-021-012 third example (I-90, SR520), revenue could be shared by the tolls on SR520 and (temporary) tolls of the express lanes on I-90 until light rail there was built. Tolling I-90 until then can help cross-subsidize the corridor.

We recommend (within the corridor context) that tolling should be expanded to the express lanes on I-5 and I-90, treating these as HOT (high occupancy-toll) "premium lanes." I-5 is an especially high priority. Due to poor engineering and congestion, it needs to be rebuilt from downtown to Northgate and there is no federal funding available and a few million in state funds. Tolling of the express lanes only can pay for reconfiguration within the existing I-5 footprint to three bi-directional express HOT lanes that would allow two-way flows and eliminate major bottleneck when directions are reversed. Also, expand tolling to add capacity on I-405, and extend SR 167 to the Port of Tacoma. The general model is to give commuters a choice between general purpose and HOT lanes in each direction, while having existing HOV lanes converted into HOT lanes. This will allow the public to get used to tolling by giving them a choice for a transitional period of time.

O-021-013 **Corridor Tolling is Better than Facility-only Tolling.** "Corridor tolling" is distinct from the nascent approach of bite-sized "facility tolling" in Puget Sound, such as current tolling on the Tacoma Narrows Bridge, planned tolling on the 520 bridge, plus possible tolling ion the I-90 bridge, and the SR 99 downtown bypass tunnel. Such tolling of discrete sections of major highway corridors, rather than far longer stretches of these corridors, is a necessary first step.

O-021-014 **Using Tolling Revenues.** In no way should the revenues from the tolling approach we describe here be used only for construction projects, with tolling then to be ended. Once initial improvements have been paid for, tolling of bridges, tunnels and corridors should, without fail, be continued as an ongoing source of funds for operations and maintenance, including transit components, and for next-phase infrastructure improvements as those needs arise. Tolling revenues should be spent in the same corridors in which they are raised.[12]

Among major unfunded projects in Central Puget Sound are $2 billion worth of pavement repair and interchange reconfiguration work on I-5 in Seattle; the $2 billion extension of SR 167 to I-5 and the Port of Tacoma; more than $1 billion in important safety and roadway improvements on US 2 in Snohomish County; more than $1 billion for extension of SR 509; and, for hundreds of millions more, construction of SR 704, the Cross-base Highway, in Pierce County. Numerous other roadway and transit projects add to that total. If a vehicle mileage charge is eventually implemented for all highways and arterials, existing highway corridor tolling will need to be integrated with that system.

O-021-015 **III. Increase Bus Service & Incorporate a Robust Passenger Ferry System**

The corridor tolling strategy proposed above should include increased and frequent peak-hour express bus service using the tolled express lanes (at no charge) in the specified corridors. The plan should also detail optimal providers and modes for "first mile" and "last mile" transit and para-transit connections from the express bus corridors to major park-and-ride facilities.

With regard to passenger ferries, Puget Sound is blessed with an extensive namesake water highway that early last century was used extensively by a network of passenger-only ferries known as "The Mosquito

[12] Defining Highway Corridors: SR 520 and I-90 together constitute a single, major east-west highway and transit corridor. Likewise, I-5 and SR 99/SR 509 constitute a single north-south corridor. I-405 and SR 167 constitute a single north-south corridor. SR 16/SR 3 is a corridor, as are SR 18, and US 2. This list is intended for illustrative purposes; it is not intended to be exhaustive.



**O-021-013**

Thank you for your recommendation.

**O-021-014**

Thank you for your recommendation.

**O-021-015**

Comment noted. The Preferred Alternative emphasizes core transit service (frequent all-day service on key regional travel corridor using rights of way, traffic management techniques, and transit facility investments that provide travel time savings to users).
The Transportation 2040 alternatives incorporate the work of Washington State Ferries (WSF) in planning for the long range ferry system. In addition, the Transportation 2040 plan incorporates the findings and recommendations resulting from the Regional Passenger Only Ferry Study, completed in 2008. Both the WSF Long Range Plan (June 30, 2009) and PSRC's 2008 Regional Passenger Only Ferry Study encourage a shift toward increased walk-on passengers on state and regional ferries, as well as improved transit access serving ferry terminals. This direction was reflected in the final Transportation 2040 plan.

As of the writing of the Transportation 2040 DEIS (May 2009) the WSF Long Range Plan was still in draft form. The final WSF Long Range Plan was published on June 30, 2009, after the release of the Transportation 2040 DEIS. Planning by WSF and PSRC related to the Washington State Ferries and possible future passenger ferries was well coordinated. With the completion of the Final Long Range Plan by WSF there is more certainty about the future of the state ferry system. This information allowed PSRC to fully incorporate plans for the state ferry system into Transportation 2040. In addition, planning for passenger ferries continues by King County Ferry District, Kitsap Transit, and the Port of Kingston. These efforts were also coordinated with PSRC's work on

O-021-015

Fleet." The age of the auto led to the Mosquito Fleet's demise, but in recent years the utility of water transit has again become apparent. The legislature should enable a Sound-wide Passenger Ferry agreement among ports, transit districts, local governments, private operators, and the state ferries to pool resources for passenger-only ferries and coordinate regional routes. As they did in San Francisco during the earthquake, new technology passenger ferries could provide an emergency transportation back up in case of earthquake damage to bridges and highways. Passenger ferries should be considered as part of the solution in a systems approach.

We acknowledge and support the formation of the King County Ferry District and believe its routes should be expanded across Lake Washington in addition to Vashon and West Seattle routes. The King County Ferry District should partner with the Ports of Kingston and Port Townsend on a shared route linking Seattle to those communities, and the legislature should look to create a Sound-wide ferry district.

O-021-016

**IV. Increase Efficiency in Bus Operations & Encourage Broader Adoption of Bus Transit Innovations**

The preferred alternative should strongly recommend to bus route operators that the vast majority of bus routes in the region be operated on major arterials and highways only, with the number of bus stops being limited, and schedule frequency expanded in peak hours. Additionally, route offerings should be significantly winnowed down to include only those with highest riderships, and with average load factors at or above some significant threshold to be determined. As part of this recommended approach, the preferred alternative should make clear, and decision-makers will need to understand, that in many instances it is indispensable for transit users to be able to drive to major transit hubs and park there. Successful regional transit facilities will need to provide ample parking, considerably more than is typically available at such facilities presently. This is a matter of significant concern because in our region there is a trend in the opposite direction, to skimp on parking at new transit facilities.

Bus transit providers should be encouraged to more broadly adopt, and more funding should be directed to, the following service innovations, some of which are considered integral to bus rapid transit. These include: buses with multiple entries and exits to allow quicker boarding and disembarking by passengers and thus faster trip times; automated ticket machines, and real-time expected arrival data at bus stops; green-light extenders for drivers; on-board Wi-fi; roomier coaches; and, where needed, a greater presence of transit police. Corridor tolling revenues can help pay for broader adoption of these bus service features, which in turn hold potential to boost ridership.

O-021-017

The Puget Sound Regional Council is working to help better coordinate signalized intersections; there are 2,300-plus in our four counties. Greater synchronization, where signals actually talk to each other, could significantly cut congestion. Related strategies use real-time traffic information to alter electronic roadway signs, signals and even lane configurations, maximizing capacity.

O-021-018

**V. Transforming Park and Rides into Transportation Hubs**

On the Eastside, crucial suburb-to-suburb transit remains a challenge even after the 2006 Metro measure added new express bus routes. (Microsoft's private Connector buses with their reservation system, Wi-Fi and that magical morning-commute invention, the cupholder, are the gold standard. Other Eastside companies could copy this approach, utilizing grants from the state's Trip Reduction Performance Program and, eventually, carbon-tax credits.)

The Eastside is also prime territory to jazz up the dead zones we call park-and-ride lots. They are transformable into high-tech hubs with joint housing, retail services, plug-in electric vehicle stations, technology-office clusters and many transportation choices.



Transportation 2040.

**O-021-016**

The Preferred Alternative includes multiple bus rapid transit routes in each county beyond that currently proposed in the Baseline Alternative. These BRT lines on major arterials are predominately for short local on-off trips that are successful in capturing a higher percentage of non-work related trips (shopping, medical, recreational, etc.). In addition, the Preferred Alternative includes additional service hours for core bus service on major arterials that provides buses every 15 minutes to encourage transit users to access these local core routes via walking or biking to transit.

For regional transit routes, the Preferred Aternative includes park-and-ride lot expansions and additions where operating agencies articulated an identified or potential need. However, the Transportation 2040 planning process revealed that transit operators and many other stakeholders believe that the general regional park and ride strategy needs to be reexamined. For this reason Transportation 2040 includes language suggesting that the region study the issue in more depth. The plan includes mechanisms for amendments on an as-needed basis so the results of any future study can be incorporated.

**O-021-017**

Thank you. The efficiency and safety of our existing transportation system is identified as one of the highest priorities in Transportation 2040 as a low cost means to optimize the efficiency and effectiveness of our multimodal transportation system by managing congestion, increasing reliability and providing convenient connections for people and goods. The ITS component of the plan contains various regional arterial, freeway, transit and traveler information ITS projects.

O-021-018 Cascadia Center's depiction (in appendices) of what the park and rides of the future can and should look like is a model for which to strive. Instead of "dead zones," park and rides should become multi-modal hubs connecting buses, commuter rail (such as that which could run on the Eastside corridor), and commuters. Our South Kirkland Transportation Hub depiction represents what is possible, and what should be applied, for example, at the Everett Multi-Modal Station and Tacoma's Freighthouse Square.

O-021-019 **VI. Make the Most of Current Vehicle Infrastructure & Intelligent Transportation Systems**

In part with the assistance of the PSRC, the region is continuing efforts to better maximize the efficiency of the current vehicle infrastructure. The preferred alternative should accentuate the importance of continuing to fund and implement important measures such as: synchronizing more traffic signals (especially on regional arterials); providing continually updated corridor travel times online and via roadway signage; and introducing variable speed limits based on current congestion levels and incidents. Flexible lane-divider markings would be very helpful, allowing highway configurations to shift, even onto an unused shoulder, as conditions warrant.

Smart strategies can complement and enhance our state and regional investments in road and transit infrastructure. Known collectively as "intelligent transportation systems," or ITS, these technologies are used on roads and vehicles to help prevent congestion and accidents and improve responses when they occur. ITS systems yield massive increases in information that system managers and travelers can use in achieving a more efficient transportation network with seamless connections between modes. Companies such as Microsoft are in the forefront of designing ways to collect, interpret and distribute this information. Ramping up ITS technologies in Puget Sound means that the very roads and transit systems in which taxpayers invest billions of dollars can run smoother and perform better. Because time is our most valuable nonrenewable resource, that's an investment we can't afford to minimize.

O-021-020 **VII. Gradual Implementation of a Vehicle Mileage Tax**

Cascadia Center supports further consideration of and careful planning for gradual implementation of a vehicle mileage tax, utilizing on-board location-reporting devices such as GPS units, and corresponding GIS reporting systems which can track, at least within broadly differentiated zones of a metro region, where drivers go. Charges would apply to all miles traveled by private and commercial vehicles, with discounts for off-peak travel, use of less congested zones, and perhaps also some discounts for high occupancy vehicles, and certifiably low-emission vehicles. By virtue of their greater weight and impact upon roads and bridges, it seems fair that higher rates for trucks be given due analysis. The final alternative for Transportation 2040 should recommend the gradual adoption of a VMT approach for the region, and to the extent possible at this time, detail who does what, and how.

Oregon and Washington have both completed landmark VMT (a.k.a. mileage-based user fee) pilot projects, and a major national pilot project funded by the federal government is now moving into its second phase of field-testing.[13] One view heard in capitals is that states should ultimately implement any VMT but the feds should help set the stage with further funding for advanced research and testing, and development of technical and procedural best practices.

It would also fall to Congress to set a schedule for eventually requiring on-board GPS units on all new vehicles, and for the retrofitting of older vehicles with GPS. Tracking of drivers in pilot projects has been limited to several different zones in a metro region, with higher prices in those which are more central,

[13] Road User Study, University of Iowa, http://utcm.tamu.edu/mbuf/presentations/pdfs/Kuhl-UIowa-Eval.pdf



**O-021-018**

The updated Transportation 2040 plan increases local transit service by approximately 50%, while achieving opera-tional efficiencies to reduce long-run costs; emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

Additionally, Transportation 2040 increases the active daily vanpool fleet by 151% over 2006 levels. The plan also promotes dense transit-oriented development at major transportation hubs such as large park-and-rides and transit station areas.

**O-021-019**

The region has long been involved in the deployment of intelligent transportation and has developed a regional transportation technology plan. IntelliDrive$^{SM}$ is the next step. PSCR has the regional forum in place to assist with the success of IntelliDrive$^{SM.}$ This forum, the Regional Traffic Operators Committee, collaboratively works together to make the arterials smarter through regional coordination. The region has resources such as INRIX to help foster the communication of traffic data between the transportation engineers and the traveling public.

**O-021-020**

Comment noted. Current work toward developing the financial plan for Transportation 2040 recognizes the need to identify and implement new sustainable alternatives to the fuel tax. A phased approach to implementing a VMT charge is included in our current plans, with perhaps a 1 cent per mile charge being implemented by the year 2020, increasing to 2 cents per mile by 2030. This charge could possibly be seen as part of a phased replacement for the current gas tax.

O-021-020

and congested. As the technology evolves it may become possible—and despite inevitable controversy at the outset of public dialog, desirable—to track the exact streets, roads and highways taken by drivers, and to calibrate charges in part by real-time congestion levels on specific arteries and by vehicle fuel efficiency, in addition to distance traveled. VMT administrators will need to ensure the public is confident that driver route data, whatever its specificity, is secure. Both the Oregon and Puget Sound pilot projects showed, among other things, that most users trust their privacy rights were being respected.

Other proof points will be important. System users who have paid gas taxes and seen congestion still worsen will also want "return on investment" guarantees that VMT revenues collected will yield real improvements in mobility. Where projections show that the vast bulk of a region's daily passenger trips will continue to be in vehicles rather than on transit or via biking or walking (as in Puget Sound in 2040 under any of the currently described Transportation 2040 alternatives), planners and decision-makers must be careful to focus on using VMT revenues for projects which make the most sense for the most system users. These would likely include operations and maintenance of roadway and bridge infrastructure; strategic infrastructure improvements as needed, including new left-turn lanes and interchange ramp lanes; express bus systems; expanded park-and-ride facilities; continued traffic signal synchronization, and active traffic management projects; ongoing development of electric vehicle charging infrastructure; and enhanced, free and widespread real-time information to aid in ridesharing, and selection of optimal trip departure "windows" and travel routes.

In the near to mid-term (from now going forward 10 to 20 years) there must be a greater reliance on varied taxes and fees to benefit surface transportation; expanded opportunities for carefully calibrated public-private partnerships; and especially, more comprehensive implementation of electronic, time-variable, distance-based highway corridor tolling. This last strategy will help acclimate the public to automated pay-per-mile tolling regimens and ease the way for acceptance of the VMT as long as privacy and ROI issues are well addressed, too.

O-021-021

**VIII. Address Optimal Mid-term Finance Plan for Suggested Improvements**

Highway corridor tolling as we have described it here should be combined with other funding tools to make necessary improvements in the region's surface transportation system. While we understand the PSRC is primarily a planning agency and that decisions about what projects to fund and how to fund them are the responsibility of other actors such as the state legislature, regional transit agencies, and county and local governments, we would nonetheless respectfully suggest that the Transportation 2040 final preferred alternative document should discuss which funding tools especially warrant further consideration to pay for needed improvements.

A serious transportation plan should prominently feature substantive discussion of a funding strategy even if that is not required under the legislation guiding the drafting of the plan. What elements should that discussion feature? In our view, the likelihood of paying for unfunded mega-projects or portions thereof with increased gas or sales taxes is infinitesimal. And while tolling revenue is very important, it cannot do the job alone. Additional funding tools that decision-makers should champion include a local option motor vehicle excise tax of .08 percent which could raise funds within a transportation benefit district or, if allowed by the legislature, within a corridor authority; and expanded public-private partnerships.

O-021-022

**IX. Support P3s as a Tool for Regional Transportation Improvements**

The Washington State Transportation Commission's legislatively mandated duties include advising decision makers on best practices in transportation finance. The Commission has made insightful and specific recommendations to lawmakers on how to help create a more welcoming climate for surface transportation P3s in Washington State. The Commission has noted that a series of key state assessments



**O-021-021**

Comment noted. We agree that Transportation 2040 should include a balanced financial plan that identifies a range of sustainable funding sources to finance the plan.

The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we will continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy would include VMT charges as well as a carbon charge, and possibly a charge similar to the MVET to help fund transit. Our long range financial strategy must address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

**O-021-022**

Comment noted.

**O-021-022**

have urged the P3 approach be more closely considered for major transportation projects. The Expert Review Panel on SR 99 Alaskan Way Viaduct Replacement and SR 520 bridge replacement stressed the value of regional tolling and P3s as finance tools, especially for the looming life-safety rebuild of the 520 bridge. The Regional Transportation Commission chaired by former Seattle Mayor Norm Rice and ex-Western Wireless CEO John Stanton recommended serious attention to possible long-term concessions and build-operate agreements with private partners. A report prepared for the legislature's Joint Transportation Committee stressed that P3s can attract new capital otherwise unavailable, accelerate project delivery, and offload government's construction cost overrun risk.[14]

The Commission added that P3s could prove especially helpful in getting built the new bridge across the Columbia River between Clark County, Wash. and Portland, Ore., extending SR 167 from South King County to the Port of Tacoma, constructing the SR 704 "Cross Base Highway" in Pierce County, in making improvements on Interstate 90 at Snoqualmie Pass, upgrading the state ferry system's big Colman Dock terminal in Seattle, and in financing additional ferry terminal, freight rail capacity, and "transloading" projects.[15]

In the report, the Commissions had several more recommendations on P3s. State-issued bonds are required for all projects; that should be changed to allow comparison of alternative financing structures. State bonding timelines should be extended from 30 to 40 years to help finance mega-projects. No fewer than six entities can effectively stop a P3 project; clearer authority should be given to the transportation commission to make final decisions.[16]

As well, in a special presentation to the Pacific Northwest Economic Region, the Washington State Department of Transportation has highlighted some important distinctions in different types of P3s, namely the more basic design-build approach versus design-build-operate, and design-build-operate-maintain. WSDOT officials made several important observations: 1) U.S. public sector motivations for P3s include contractual allocation of risk and price certainty; outsourcing of unpleasant tasks and costs of facility operations and maintenance; creation of new revenue sources, use of innovative financing and the monetizing of existing assets; 2) In the continuum of P3s, WSDOT sees the state as firmly in the middle, comfortable with approaches going as far as "design-build" contracts which unite those two phases for increased efficiency and savings (such as for the newer southbound span of the Tacoma Narrows Bridge,) but shying away, so far, from more full-on P3s such as design-build-finance-operate-maintain lease arrangements with private partners; 3) In the U.S., P3s are seen in a more limited function, as an alternative finance mechanism, while "Canada views P3s more holistically" in terms of full life cycle project costs.[17]

Full life cycle project costs are important. Private debt adds costs to a project more than state-issued debt, but other savings during a project's full life cycle, such as from privately-managed operations and maintenance of a toll road or transit line for several decades, can compensate. Add to that the value of an asset returned to public management in turnkey condition after an operating lease expires, replete with the recipe for smooth going from industry-leading experts. Another consideration: the hefty economic and social benefits of getting something built years sooner—including the associated savings in congestion avoided, business opportunities not lost, and idling vehicle emissions reduced.

[14] "Report On The Transportation Innovative Partnerships Program," Washington State Transportation Commission, January, 2007, http://www.wstc.wa.gov/TIP/TranspInnovPartnership.pdf
[15] Ibid
[16] Ibid
[17] "Public-Private Partnerships In Washington: Presentation To PNWER, Paula Hammond & Jeff Doyle, WSDOT, July 23, 2008, http://www.wsdot.wa.gov/NR/rdonlyres/8320CDC6-1887-4486-B7C1-3604CF19BD05/0/PresentationtoPNWERJuly232008.pdf

O-021-022 For further detailed analysis about P3's please see the appendices of these comments.

O-021-023

**X. UNIFY MANAGEMENT OF PLANNING, FUNDING AND IMPLEMENTATION**

Cascadia Center concurs with the recommendation in the final report of the legislatively created Stanton-Rice advisory commission on surface transportation governance that a single entity should be created to plan, prioritize and fund major regional roadway and transit improvements for the Central Puget Sound region.[18] The region is not well served by the current piecemeal and balkanized approach to planning, project prioritization, funding and completion. Failing creation of such an entity, we would support the next best alternative; formation of corridor authorities to plan, fund and manage needed improvements. The Transportation 2040 final alternative should address the need for unifying planning and decision-making in regional surface transportation in metro Puget Sound.

O-021-024

**XI. CONSIDER FLEXIBLE CARPOOLING**

One way to "incentivize" as opposed to mandate carpooling is to introduce the virtual HOV lane concept. Flexible carpooling was pioneered by a New Zealand entrepreneur named Paul Minett. Prescreened drivers and commuters pair up in designated park-and-ride areas for trips to different employment clusters, under a market-based credit and debit system. As described by Mr. Minett's company, it is "a solution that enables highway authorities to reward people for sharing rides without the expense of building an HOV lane." An RF reader is placed at a "bottleneck point" and participating carpoolers are equipped with technology that records when they carpool. The end result is that a payment is put into the carpoolers account for participation. Rather than mandating carpooling, it is becomes "incentivized."

*Cascadia Center Contributors: Bruce Agnew, Director; Tom Jones, Consultant; Steve Marshall, Senior Fellow; Matt Rosenberg, Senior Fellow; Mike Wussow, Director of Public Affairs*

[18] Regional Transportation Commission, Final Report To Governor, Dec. 31, 2006, http://globaltelematics.com/pitf/psrtc-report.pdf



**O-021-023**

Comment noted.

**O-021-024**

Thank you for your comment. Transportation 2040 is comprised of three elements: the constrained plan (programs and projects that can be paid for through identified funding sources), the unprogrameed element (programs and projects for which no funding source or project sponsor has been identified), and a concepts list. The concepts portion of the plan is a holding space for those proposals that need further study before being admitted into the unprogrammed portion of the plan. Flexible carpooling has not yet demonstrated its ability to cost-effectively achieve the goals that Mr. Minett has touted and as such is currently listed in the concepts holding space. After a demonstration, or further study, of this service, flexible carpooling may be admitted to the unprogrammed element of the plan first, and then if sufficient funding and a project sponsor are identified, the project may move into the constrained portion of the Transportation 2040.

O-021-025

## Appendices

- Full copy of "Exhibit 4, Final Bus Service Configuration, AM and Mid-day Transit Service Hours"
- P3 Supplemental information
- Cascadia Center's depiction of South Kirkland Transportation Hub



**O-021-025**

Thank you.

O-021-025

**Exhibit 4. Final Bus Service Configuration, AM and Mid-day Transit Service Hours**

| Service type | 2006 Service Hours*** | Transportation System (2040) | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Baseline Service Hours** | Baseline % Change from 2006 | Alt. 1 Service Hours** | Alt. 1 % Change from 2006 | Alt. 2 Service Hours** | Alt. 2 % Change from 2006 | Alt. 3 Service Hours** | Alt. 3 % Change from 2006 | Alt. 4 Service Hours** | Alt. 4 % Change from 2006 | Alt. 5 Service Hours** | Alt. 5 % Change from 2006 |
| AM core bus service* | 46,000 (56%) | 53,000 (48%) | 17% | 55,000 (45%) | 21% | 54,000 (49%) | 18% | 55,000 (46%) | 22% | 57,000 (46%) | 25% | 55,000 (42%) | 21% |
| AM connector bus service* | 15,000 (18%) | 19,000 (17%) | 24% | 21,000 (17%) | 39% | 19,000 (17%) | 25% | 19,000 (16%) | 26% | 20,000 (16%) | 33% | 21,000 (16%) | 39% |
| AM specialized bus service* | 21,000 (26%) | 35,000 (31%) | 2% | 40,000 (32%) | 91% | 33,000 (30%) | 59% | 39,000 (32%) | 85% | 37,000 (29%) | 73% | 41,000 (31%) | 96% |
| AM bus rapid transit (BRT) service* | 0 | 4,000 (4%) | - | 7,000 (6%) | - | 5,000 (4%) | - | 8,000 (7%) | - | 12,000 (9%) | - | 16,000 (12%) | - |
| **AM Bus Total** | **82,000** | **111,000** | **36%** | **124,000** | **51%** | **111,000** | **36%** | **122,000** | **49%** | **125,000** | **53%** | **133,200** | **62%** |
| Mid-day core bus service* | 39,000 (74%) | 46,000 (71%) | 15% | 46,000 (68%) | 14% | 44,000 (70%) | 13% | 46,000 (67%) | 67% | 46,000 (63%) | 15% | 44,000 (60%) | 12% |
| Mid-day connector bus service* | 13,000 (24%) | 15,000 (23%) | 13% | 15,000 (22%) | 13% | 14,000 (22%) | 10% | 14,000 (21%) | 21% | 15,000 (21%) | 17% | 15,000 (20%) | 15% |
| Mid-day specialized bus service* | 1,300 (2%) | 1,300 (2%) | 0% | 1,300 (1%) | 0% | 1,300 (2%) | 0% | 1,300 (2%) | 0% | 1,300 (1%) | 0% | 1,300 (1%) | 0% |
| Mid-day BRT service* | 0 | 3,000 (4%) | - | 6,000 (9%) | - | 4,000 (6%) | - | 7,000 (10%) | - | 10,000 (14%) | - | 13,000 | - |
| **Mid-day Bus Total** | **53,000** | **64,000** | **20%** | **66,000** | **24%** | **63,000** | **19%** | **67,000** | **25%** | **72,000** | **34%** | **73,000** | **38%** |
| AM light rail service* | 112 | 2,900 | 2,500% | 3,700 | 3,200% | 4,800 | 4,200% | 3,700 | 3,200% | 4,800 | 4,200% | 5,600 | 5,000% |
| AM commuter rail service* | 100 | 400 | 235% | 400 | 235% | 400 | 235% | 400 | 235% | 400 | 235% | 800 | 620% |
| Mid-day light rail service* | 100 | 2,200 | 2,000% | 3,000 | 2,700% | 3,600 | 3,500% | 3,000 | 2,700% | 3,600 | 3,500% | 5,600 | 5,200% |
| Mid-day commuter rail service* | 0 | 0 | - | 0 | - | 0 | - | 0 | - | 0 | - | 400 | - |
| Total rail service* | 327 | 5,500 | 1,580% | 7,100 | 2,100% | 9,000 | 2,600% | 7,100 | 2,100 | 9,000 | 2,600% | 13,400 | 4,000% |

* Hours of service during the morning peak and mid-day periods, not entire day. Numbers rounded to the nearest hundred or thousand, except for rail service in 2006, and may not sum precisely.
** Numbers in parentheses indicate the proportion of that service type out of the total bus service hours in that time of day (AM or Mid-day)

O-021-025

**P3 Supplement**

**Protecting the Public Interest in P3s.** As is well known, P3s may include a private finance element. While the market for private capital has been extremely tight in the last year-plus due to the economic downturn, both the economy and the availability of private capital will improve. And as the PSRC's own Transportation 2040 modeling indicates, under any combination of policies, there will be marked growth in population, jobs and daily vehicle trips in the region, which bodes well for projects financed with toll revenues. The public interest in any transportation P3s can be protected by the contract language and provisions which leave the public sector partner in ownership of the asset, in control of toll rates if the facility is a toll road, and through terms which limit the length of any lease arrangement to, say, 40 years. Careful vetting of potential deals will allow decision-makers to see if a net public benefit is achieved. Performance safeguards written into P3 contracts can ensure quality service from private consortiums that may be granted responsibilities for maintenance and operations of a surface transportation facility. If quantifiable annual, quarterly or monthly performance targets are not met, the private operator gets less than full pay. These sorts of protections, combined with retention of public ownership and rate controls, would help ease knee-jerk resistance to P3s, which in turn could help deliver better mobility to the region as it struggles to balance growth, mobility and the environment. Surface transportation P3s are not a "silver bullet," but they are an important tool to have in our toolbox in the Puget Sound region.

**Infrastructure Funds, Building Trades Unions and Public Employee Pension Funds as "Private" Partners.** International infrastructure funds are among the "private" investors in some P3 projects. In some instances, much is made of the "foreign" nature of these firms. For instance, one prominent fund is managed by a division of an Australian-based international banking concern, others are headquartered in Spain. However, a substantial portion of investment in these "foreign-owned" infrastructure funds comes from public employee union pension funds in the U.S. and Canada, and North American building trades union pension funds.

Provided a change in state law, "alliance contracting" and project cost-sharing between WSDOT and public employee and building trade union pension funds could be considered for many projects. British Columbia offers a remarkable example of how private equity capital was leveraged with public resources to finish major infrastructure projects like expansion of the Sea to Sky Highway before the 2010 Olympic Games.

Hard-working union members see their pension funds gain long-term security through diversification of investment portfolios into the growing infrastructure sector. The false populist arguments against infrastructure funds should be rejected. In addition, some public employee pension funds are able to make direct investments in infrastructure. One example is the Dallas Police and Fire Pension Fund, which has directly invested in two toll road projects.[1] In Washington State, the umbrella pension fund for state employees is the Washington State Investment Board. The WSIB has announced its intention to invest as much as 5 percent of its holdings in "tangible asset" classes including real estate, timber lands and infrastructure. However any infrastructure investments would have to be through infrastructure funds, according to the WSIB. The region could benefit from the availability of a more direct approach. The Transportation 2040 final preferred alternative should, as we have already noted, include mention of potential key elements in the region's as-yet unarticulated transportation finance plan. Given the pressing need for innovation in funding surface transportation improvements in metro Puget Sound and elsewhere in the state's major metro regions (Clark and Spokane Counties, most notably), a recommendation is warranted for a state study to asses the pathways to, and potential benefits of, allowing the WSIB the option of making direct investments in infrastructure; where that is found prudent based on full due diligence analyses.

*Contributed by Matt Rosenberg, Senior Fellow, Cascadia Center for Regional Development*

[1] http://www.reuters.com/article/reutersEdge/idUSTRE5295DX20090310?sp=true

O-021-025


CONCEPTUAL VIEW
SOUTH KIRKLAND
TRANSPORTATION HUB
CASCADIA

**From:** Bob Myrick [bobmyrick@msn.com]
**Posted At:** Monday, June 01, 2009 3:18 PM
**Conversation:** Transportation 2040 Draft Environmental Impact Statement
**Posted To:** Transportation 2040

**Subject:** Transportation 2040 Draft Environmental Impact Statement

**I-001-001** I have reviewed the Draft EIS for Transportation 2040 and the five alternatives plus the baseline case. I am suggesting a sixth alternative that might be called the Sustainable alternative or the Doomsday alternative. The trouble with growth management laws and transportation planning is the long term effects on our health and the health and capacity of the environment is not really adequately considered. We should be looking out at least 100 years into the future. We know the present growth in population can not be accomodated by our natural resources such as fuel and food. We also know that China, India and the Third World will be putting unsustainable demands on our natural resources.

**I-001-002** 1. Why not encourage "Living Close to Work" and "Getting off the System"?

**I-001-003** 2. What do we do if we suddenly run out of fuel?

3. What do we do if gasoline suddenly goes to $10 per gallon?

4. Shouldn't we manage where people live?

5. If we allow congestion to get worse, will people move closer to work?

6. Shouldn't we have zoning or "no zoning", so work moves closer to where people live?

7. Should we subsidize housing that is close to work? We could pay up to $60,000 or more. Consider that a "free" park and ride spot costs over $30,000 per spot and a new freeway like the Cross Base Highway costs just over $30,000 per user.

**I-001-004** In summary, I am suggesting that we all should watch "Mad Max-Beyond Thunderdome" and consider taking measures that allow a true sustainable future where human and environmental health are properly provided for. With our present internet systems, we should be able to move toward a village oriented system that was in effect before the age of the car.



**I-001-001**

As a Metropolitan Planning Organization, PSRC is required to prepare a Metropolitan Transportation Plan that meets the following requirements:

- Plans must be developed through an open and inclusive process that ensures public input and seeks out and considers the needs of those traditionally under-served by existing transportation systems.
- Plans must extend for a period not less than 20 years into the future.
- Plans must reflect the most recent assumptions for population, travel, land use, congestion, employment, and economic activity.
- Plans must be financially constrained, and revenue assumptions must be reasonable in that funds can be expected to be available during the time frame of the plan.
- Plans must conform to the Clean Air Act and its amendments, and to applicable state implementation plans for regional air quality.

**I-001-002**

Transportation 2040 includes many TDM programs. TDM is not focused on facilities but instead on policies, programs, and strategies to improve transportation system efficiency by: (1) promoting alternatives to driving alone, (2) shifting trips out of peak travel periods, or (3) eliminating the need for trips altogether. These efforts are implemented at the employer, local, regional, and state levels and can have a significant impact on congestion. A wide array of programs are being implemented throughout the region, including numerous commuter financial incentives offered through employers or jurisdictions, calendaring software to track commutes, education and promotion, employer outreach, parking management, and other land-use decisions.

**I-001-003**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**I-001-004**

Comment noted.

005

## Send Us Your Comments

You are encouraged to submit your thoughts, ideas, and comments about Transportation 2040 and the Draft EIS. Please submit comments in writing, or by e-mail to transportation2040@psrc.org, by fax at 206-587-4825, or by mail to Sean Ardussi, 1011 Western Avenue, Suite 500, Seattle, WA 98104-1035.

Your comments on the DEIS must be received in writing by July 13, 2009. A Final EIS is scheduled to be available in fall 2009 for comment through early 2010. Your comments will become part of the public record and will help decision-makers select a preferred alternative and prepare the final plan. Responses to written comments will be published in the Final Environmental Impact Statement.

### The Plan Must Address Critical Issues

Our region faces challenging issues associated with continued population and economic growth, preserving and improving our transportation system, protecting our environment, and funding improvements. People and goods must be kept moving as the population and employment numbers increase. We must respond to the effects transportation infrastructure and vehicle gas emissions have on our natural and built environments — in particular air quality and the condition of Puget Sound. We must find new sources of revenue to pay for system improvements, services, and facilities.

### What Do You Think? Please Offer Your Comments On:

I-002-001

*1. The various components in the six alternatives.*

Re, ONLY standout element for me is the Alternative 5 "... expansion of light rail / other high capacity transit." Hello, see San Francisco, Portland, Seattle, Vancouver etc. Let's get on with alternative 6 / 1 person / 1 driver mode of transportation

*2. The environmental impacts of the alternatives.*

Environmental impacts, esp. volumes for high efficiency public transit options ... BUS, LIGHT RAIL TO/FROM HARBOR AREA, CENTERS, INCL. KITSAP COUNTY. Just back from trips to CA, NYC, BOSTON and we, as a "green state" are way behind the curve.

I-002-002

*3. Funding strategies, for raising revenue and paying for transportation needs.*

Public transportation is a public infrastructure investment. Get the money from the available/influential sources at the levels required and keep the fares a common sense level to promote usability.

Last page: Tolls, Income Tax, Gas Tax, etc. > for a 21st Century Transportation System.

**I-002-001**

Thank you for stating your preference among the alternatives.

**I-002-002**

Comment noted. The financial strategy for the Transportation 2040 plan includes assumptions about investment levels and fares for public transportation. However, Transportation 2040 will not bind transit providers to specific fare structures. Future transit fares will be set by transit agencies and state ferry fares will be set by the Transportation Commission.

I-002-003

4. The information contained in the analysis.

Roads like Committee Inadequate. Its
Seattle stop studying, make a
regional decision, look at the future.
We are a perfect region to establish a
network model.

I-002-004

5. The alternative you think best accomplishes our regional needs out to 2040.

Alt. 5

**Contact Information**

*At a minimum, you would like to be added to the Transportation 2040 mailing list, provide your information and check the box below.*

Lou Foritano
34555 Hood Canal Dr Ne
Kingston, WA 98346-9743

*Name*

*Organization* Kitsap County Reng. Comm.; Cliffside Beach Hoa

*Address*

*City, State, ZIP*

*E-mail*

*Check here if you would like to be added to the Transportation 2040 mailing list* ☑

**Other Ways to Comment and Participate**

- *Subscribe to the Regional VIEW Newsletter — subscribe me* ☐
- *Visit the Transportation 2040 webpage at psrc.org*
- *Attend any PSRC board or committee meeting (a public comment period is offered at the beginning of each meeting)*
- *Send an e-mail to transportation2040@psrc.org*
- *Contact the PSRC Information Center at 206-464-7532 or info@psrc.org*
- *Schedule a presentation on Transportation 2040 by contacting Marina King at 206-389-2878 or mking@psrc.org*
- *Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices*

**I-002-003**

Comment noted.

**I-002-004**

Thank you for stating your preference among the alternatives.

South King County
6/4

004

# Transportation 2040

## Send Us Your Comments

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**What Do You Think? Please Offer Your Comments On:**

*1. The various components in the six alternatives.*

I-003-001 I agree with tolling all areas & spreading the funding as needed.

I-003-002 Are we taking this seminar to colleges? — I won't be working in 5 years — but they will !!

*2. The environmental impacts of the alternatives.*

I-003-003 Tolling will help to eliminate unnecessary trips.

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-003-004 ~~Tolling~~ => and increase fees for apartments, condos & housing out of urban central areas which continues to contribute to sprawl & congestion leave the outer areas for truck farms, etc. Keep the new building — mixed use preferred — in the urban downtown corridor.

**I-003-001**

Comment noted.

**I-003-002**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**I-003-003**

Comment noted.

**I-003-004**

Comment noted.

I-003-005

4. The information contained in the analysis.

Good info – haven't read it to all

I-003-006

How do we successfully get from the East Hill down to the train station at peak hours? Have we looked at a tram or shuttle stops with designated lanes?

I-003-007

5. The alternative you think best accomplishes our regional needs out to 2040.

** I would really like our cities to set the example of employment near homes by requiring new city employees to live within the city. Not only would it free up commute space but also if you live & work in a community you have a better overall picture of the needs & areas of the community – a big vested interest —

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

Name Sally McDonough

Organization

Address 26441 137th Ave SE

City, State, ZIP Kent WA 98042

E-mail salbrimcd@comcast.net

Check here if you would like to be added to the Transportation 2040 mailing list ☒

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- Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices

**I-003-005**

Thank you.

**I-003-006**

Thank you for your comment. The Regional Transportation Plan focuses on regional transit projects. Local transit operations such as a shuttle from East Hill to the Sounder Station in Kent or Auburn would be addressed by the local transit agency, in this case, King County Metro. Your comment will be forwarded to them.

**I-003-007**

Comment noted.

**From:** Kay Wall [kay@przlaw.com]
**Posted At:** Friday, June 05, 2009 4:09 PM
**Conversation:** Comments
**Posted To:** Transportation 2040

**Subject:** Comments
The various components in the six alternatives:

I-005-001

The toll ideas are a good idea – rather than heavily tax everyone, allow those who insist on fast, well-maintained roads to pay for them – across the state. If you consider that when you put a toll on one road, people will use every other road in the area to avoid the toll, all major arterials should be

I-005-002

tolled. We definitely need to do something to expand the transit/transportation system we have now. My preference would be for longer rail lines along a central corridor east and west and north and south with the buses running to them, eliminating the need for long major bus routes.

I-005-003

I think smaller buses would probably be a more productive idea since they are more readily moved from one location to another.

Changing and rearranging routes are easier and more doable with smaller buses. Most bedroom communities do not want the giant articulated buses coming down their street because of noise, etc. concerns, not to mention the damage they do to roads.

I-005-004

I think the transportation systems needs to look at temporary signage to alert people that you're going to try something – a big pink sign, saying, TEMPORARY BUS STOP FOR ROUTE 150 – LET US KNOW IF YOU LIKE IT. A lot of people, me included, rarely attend meetings. I got to the meeting last evening after an hour plus commute and no supper until after I left the meeting. If you hit people 'between the eyes with a 2 x 4,' they generally realize something is changing.
I also think you need to try some new routes and reroutes with the pink sign idea. There are people out there who claim transit is not available to them in part because it does not come close enough to them to allow for easy transport of whatever they buy – or some other reason. As we grow older, and our society as a whole is, we move less rapidly, no matter how fit we are. If, as in my case, we are not totally mobile, it is difficult to walk 4-5 blocks to catch a bus. I think some of the bus stops have been there for so long, no one has every contemplated moving them to see if the ridership picks up.

I-005-005

Perhaps one way to get a little more funding is to use the transit system, as opposed to yellow school buses for all middle school and older students, allowing some of the school bus funding to go to transit funding and, at the same time, adding a route to the transit system that would otherwise not exist – after all, where there are students, there are parents who have to go to work; hence new ridership. More ridership means a bigger community to request changes in the way transit is funded by the legislature and the support to make the legislature listen.

I-005-006

I think, overall, you have done a good job. I would just like to see a little more "out of the box" thinking. Things like utilizing the park 'n ride areas as shopping hubs. I think Kent has done a great job on this with the Kent Station; but, whoever designed the parking lot for the Kent Station needs to taken to task. It is horrible with little or no direction for cars who are not willing to "just jump in there" to move freely. I am really surprised at the minimum of accidents that happen there. I have some thoughts for better parking lot planning but that is for another day.

I-005-007

I think the transportation system also needs to look at multi-use facilities for some of its areas. Would it work to build a grocery store over a bus/train station? I think of the King Street Station downtown and think it would make a excellent Safeway in the suburbs where bus riders and other commuters would be encouraged to shop, then pick up their car and go home.

Hope this helps a little.

And please put me on the Transportation 2040 mailing list. Thanks.



**I-005-001**
The analysis that has been conducted in support of developing the Preferred Alternative indicates that the toll rate strongly influences traffic diversion. If this rate is set to improve travel on all roadways, then diversion from a tolled highway to a nearby arterial can be reduced or potentially eliminated. Tolling the arterials as well can further avoid the potential for traffic diversion.

**I-005-002**
Thank you for stating your preference for the type of transit among the alternatives.

**I-005-003**
Comment noted.

**I-005-004**
Thank you for your comments. Providing timely and accurate information to transit users is important as is engaging transit users in changes in the system.

**I-005-005**
Thank you for your comment. Several school districts are doing what you suggested already in having students use the existing bus routes to school. However, adding new bus routes that specifically serve schools only is no longer allowed under a new interpretation of the Bus Charter regulations by the Federal Transit Administration.

**I-005-006**
Thank you for your comments. The transit agencies are trying to develop stations and park-and-rides that serve more functions than just transit.

Kay E. Wall
kewall1@msn.com
10501 S.E. 250th Place, #C107
Kent, Washington 98030
253-852-2598

**I-005-007**

The final Transportation 2040 plan encourages transit-oriented development - or mixing multiple uses in transit and other transportation facilities - as an important implementation strategy for providing increased access to goods and services.

**From:** Donald F Padelford [dfp07@dfpnet.net]
**Posted At:** Monday, June 15, 2009 1:29 PM
**Conversation:** 2040 comment
**Posted To:** Transportation 2040

**Subject:** 2040 comment

I-006-001 1) If mobility (aka congestion) pricing is implemented on the region's freeways, either in the form of HOT lanes or in the form of all-lanes pricing (all lanes become, in effect, HOT), then transit mobility on these lanes will be achieved, assuming they are priced correctly. Therefore an expansion of the light rail system where it parallels the freeways would be superfluous and unwarranted (and, of course, very very expensive).

I-006-002 2) Bus-only lanes on major arterials is necessary to complement the above pricing / mobility strategy.

I-006-003 3) Pricing all roads, while optimal, is far too technologically and politically ambitious to attempt at this point in time.

I-006-004 4) Therefore, of the listed alternatives, Alt 4 (with the exception of light rail expansion) looks like the best bet at this time.

I-006-005 5) Because no region has priced a freeway system (as opposed to a freeway) yet, it is unknown what problems may arise. It may be difficult to balance various segments of intersecting freeways correctly where they have different levels of demand and capacity. If freeway X has a great deal of demand, it may be necessary to price intersecting freeway Y to the point where it appears under-utilized – which may not be politically acceptable. Thus a phased approach, starting with HOT lanes and then moving to full freeway pricing, may be the way to go. In this case the HOT lanes could be retained as transit+ lanes, with pricing set so that they never become congested (achieving transit mobility 24/7). Whereas the other lanes could be priced so that they seldom (but not never) become congested.

The above suggests an Alternative 6: phased pricing on freeways, bus-only lanes on major arterials, and no (or very little) additional light rail.

Donald F Padelford
POB 2846
Seattle WA 98111



**I-006-001**
Comment noted.

**I-006-002**
Comment noted. As part of the transit strategy, many of the core transit routes will have right of way enhancements such as bus only lanes, intersection queue jumps, and signal priority to maintain and improve transit travel times on busy arterials.

**I-006-003**
The tolling concepts discussed in all the alternatives, including the Preferred Alternative, are intended and modeled to be phased in over the next 30 years.

**I-006-004**
Thank you for stating your preference among the alternatives.

**I-006-005**
Comment noted.

# Transportation 2040

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Your comments on the DEIS must be received in writing by July 13, 2009. A Final EIS is scheduled to be available in fall 2009 for comment through early 2010. Your comments will become part of the public record and will help decision-makers select a preferred alternative and prepare the final plan. Responses to written comments will be published in the Final Environmental Impact Statement.

**The Plan Must Address Critical Issues**

Our region faces challenging issues associated with continued population and economic growth, preserving and improving our transportation system, protecting our environment, and funding improvements. People and goods must be kept moving as the population and employment numbers increase. We must respond to the effects transportation infrastructure and vehicle gas emissions have on our natural and built environments — in particular air quality and the condition of Puget Sound. We must find new sources of revenue to pay for system improvements, services, and facilities.

**What Do You Think? Please Offer Your Comments On:**

*1. The various components in the six alternatives.*

I-007-001 Should not ↑ road capacity – should work to enhance efficiency of existing infrastructure - Should emphasize transit and non-motorized modes User should pay → Alt 5 accomplishes these goals the best.

I-007-002 Alts 2 & 3 are not what we should be doing.

*2. The environmental impacts of the alternatives.*

I-007-003 Alt 5 performs best. Env. impacts should receive more weight than they have in the past. Global warming and transportations contribution in this region are critical issues we need to address.

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-007-004 Direct user of infrastructure should pay directly – all major highways should be tolled & revenue should be used to improve ~~them~~ the efficiency of those corridors (w/o major expansions) as well as alternative modes like transit and trails. Alt 5 seems to best accomplish this.

**I-007-001**

Comment noted.

**I-007-002**

Comment noted.

**I-007-003**

Thank you for stating your preference among the alternatives.

**I-007-004**

Thank you for stating your preference among the alternatives.

4. The information contained in the analysis.

5. The alternative you think best accomplishes our regional needs out to 2040.

I-007-005

Alt 5 addresses our regional transportation needs while also addressing our dire need to reduce GHG emissions. It also appears to be fiscally responsible.

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

Name Michael Hintze

Organization

Address

City, State, ZIP 98122

E-mail

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**I-007-005**

Thank you for stating your preference among the alternatives.

003 MarkBardwellR.txt

From: FormProcessing@cevian.com
Posted At: Friday, June 05, 2009 5:20 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Mark Bardwell
Address: 5042 17th Ave NE
City: Seattle WA 98105
Email: mark.bardwell@gmail.com

I-008-001 Environmental-impacts: Alternative 5 (reduce emissions) will protect the environment best.
It will allow people to travel through most of the region without using a car, which will
pay dividends for the natural environment (reducing emissions, oil imports, and impermeable
surfaces) and for the human environment (less driving and more walking means decreased auto
collisions and increased personal fitness and healthy living.)

I-008-002 Info-in-analysis: Thorough, and the charts and graphs are valuable and easy to understand.

I-008-003 Best alternative: Alternative 5 is the best option. Every graph and chart related to transit
capacity and congestion shows that Alternative 5 is the most effective by far. It is best
use of funds, even taking into account its comparatively high costs.

I-008-004 Other comments: In the DEIS, Alternative 5 does not show a mass transit route between Kent
and Auburn. A mass transit route there did exist in previous drafts (BRT in the January 2009
draft.) Now, only Sounder is showing. Those cities are two large population centers that are
currently auto-dependent; they should have mass transit in the future.

Page 1

**I-008-001**

Comment noted.

**I-008-002**

Thank you.

**I-008-003**

Thank you for stating your preference among the alternatives.

**I-008-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

007 Alex CallendarR.txt

Subject: Comment on T2040 DEIS

Name: Alex Callender

E-Mail: alexcallender@hotmail.com

I-009-001 Info-in-analysis: No change in employment due to the efficiencies offered by each scenario?

Page 1

**I-009-001**

All of the alternatives were based on the same assumptions for regional employment growth through the year 2040.

008 Dennis ClarkR.txt

Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Dennis Clark
Address: 4310 Dayton Ave., N. Apt. 203
City = Seattle, WA 98103
Email = dennisbclark@hotmail.com

**I-010-001**

Funding strategies: Strongly endorse the use of tolls to maximize system efficiency and/or generate funding. Fuel-based revenues will be ever ess popular as costs of petroleum resumes its ever-increasing growth and thus are less likely to be politically sustainable.

**I-010-002**

Info-in-analysis: The DEIS fails to discuss addressing one of the drivers of increasing transportation needs in the four-county region: population growth. This growth is driven by both natural increase and high rates of immigration to the U.S. (some directly to the region, other causing in-migration from other states). The four-county region could address the former issue by promoting policies known to reduce population growth by reducing unintended or mistimed pregnancies (e.g., education, availability of contraceptives, reduced child abuse). While the four-county region cannot address the latter problem on its own, it could make a policy statement urging the federal government to reduce immigration to a more sustainable level. The long-term well-being of people in the four-county area depends on stabilizing our population and PSRC -- as an organization devoted largely to addressing the problems of growth -- can contribute by addressing population growth directly in each of its constituent work products.

**I-010-003**

Best-alternative: Prefer Alternative 5 due to its benefits in terms of slower CO2 emissions growth and promotion of more energy-efficient forms of transportation (transit, non-motorized).

Page 1

**I-010-001**

Comment noted.

**I-010-002**

Each alternative was analyzed using the same assumptions for future land use policies and strategies for growth management as established in VISION 2040. VISION 2040 was built upon the region's long range economic and demographic forecasts, which expect an additional 1.5 million people and 1.2 million new jobs in the region by the year 2040. Transportation 2040 is a long-range regional transportation plan designed to accommodate that growth.

**I-010-003**

Thank you for stating your preference among the alternatives.

011 James EwingR.txt

Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: James M. Ewing
Address: 25030 110th Place SE
Apt. C
City: Kent, WA 98030-8286
Email: jamesmewing5@hotmail.com

I-011-001 Components: I prefer Alternative 5, to reduce dependence on fossil fuels and reduce greenhouse gas emissions.

I-011-002 Environmental-impacts: I prefer Alternative 5.

I-011-003 Funding-strategies: I prefer the toll strategy of Alternative 5.

Info-in-analysis: Good.

I-011-004 Best-alternative: Alternative 5.

I-011-005 Other-comments: I have often wondered why no one ever seems to discuss subways. I have read that China is currently building over 60 subway systems and the United States is currently building none. It is my impression that in a city or metropolitan area with subways, one can walk from almost anywhere in the city to a subway station and go to almost anywhere else on the subway. It is not my impression that this type of transportation is foreseen with light rail. Is there a specific reason why subways are not even mentioned. Is it earthquakes?

Page 1

**I-011-001**

Comment noted.

**I-011-002**

Thank you for stating your preference among the alternatives.

**I-011-003**

Thank you for stating your preference among the alternatives.

**I-011-004**

Thank you for stating your preference among the alternatives.

**I-011-005**

In the Puget Sound region, several analyses have been done to evaluate the most appropriate high-capacity-transit mode for a particular corridor. For Transportation 2040, the basis of the high-capacity-transit network was Sound Transit's Long Range Vision, adopted in 2005. That vision builds a backbone of light rail transit lines based on the forecasted ridership and desired improved reliability over the existing bus network.

014

# Transportation 2040

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**What Do You Think? Please Offer Your Comments On:**

*1. The various components in the six alternatives.*

~~How bus investments in Alternative 5 compared to the investments in Alternative 1.~~

I-012-001 The effectiveness of the transit ~~Alternatives~~ investments in alternative 1 and 5.

*2. The environmental impacts of the alternatives.*

I-012-002 I would like to see ~~the~~ how environmental impacts are driven by tolls vs transportation investments

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-012-003 Tolls are effective means of allocating scarce resources.

**I-012-001**

Thank you for stating your preference among the alternatives.

**I-012-002**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**I-012-003**

Comment noted.

4. The information contained in the analysis.

5. The alternative you think best accomplishes our regional needs out to 2040.

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City, State, ZIP

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LR FinleyR.txt

From: info@fixieconsulting.com
Posted At: Sunday, June 21, 2009 11:24 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: LR Finlay

Address: 2282 Whidbey Shores Road

City: Langley, WA 98260

Email: lfinlay@halcyon.com

Add to mailing list?: yes

I-013-001 The various components in the six alternatives: I do not believe you are doing enough for single car or truck working drivers. Without personal mobility to get to and from appointments, costs to consumers rise.

The environmental impacts of the alternatives:

I-013-002 Funding strategies, for raising revenue and paying for transportation needs: Funding for ferries is not nearly adequate.

The information contained in the analysis:

I-013-003 The alternative you think best accomplishes our regional needs out to 2040: Think more about personal vehicle mobility, ferries and roads. Instead of 'HOV lanes' allow 'work mobility lanes' where all HOV lane throughout the State of Washington are opened for a reasonable toll to anyone with a verified job need to be a single occupant driver. A higher toll could also be charged for those who have personal reasons to use the HOV, including out-of-state vehicles.

Other comments:

Page 1

**I-013-001**

Benefits to all user classes have been evaluated across all theÂ six alternatives. The Preferred Alternative for Transportation 2040 will produce significant mobility benefits for single occupant vehicle users as well as freight users. About $5 billion per year in user benefits will accrue from the transportation investments in the constrained portion of the plan. Of this total, just under half these benefits would be enjoyed by SOV users, about half would be realized by medium and heavy trucks (freight users), and the remainder would accrue to transit, carpool, and light trucks.

**I-013-002**

The short term and long term ferry funding issues were identified in the development of the Preferred Alternative. While the Legislature is responsible for developing a funding program for the Washington State Ferries (WSF), the financial strategy for the Preferred Alternative does propose possible strategies for funding the preservation, operation, and maintenance of the current system WSF and retention and expansion of the passenger-only ferry service on Puget Sound.

**I-013-003**

Comment noted.

Karen GuzakR.txt

From: info@fixieconsulting.com
Posted At: Thursday, June 18, 2009 5:39 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Karen Guzak

Address: 230 Avenue B

City: Snohomish, WA 98290

Email: Karen@KarenGuzak.com

Add to mailing list?: yes

I-014-001 The various components in the six alternatives: After hearing two PSRC presentations of the Transportation Alternatives, and having studied the options, I am firmly in favor of Alternative 5.

I-014-002 Of special interest to the City of Snohomish and many eastside cities, is the use of the Burlington

I-014-003 Northern rail right of way for future commuter use. I also believe that user fees (tolling) is the best way to pay for the transportation upgrades that we will need - and to offset CO2 emissions. The other Alternatives simply do not fully meet future needs.

I-014-004 The environmental impacts of the alternatives: Alternative 5 is the one that takes more cars

I-014-005 off the road and lowers greenhouse gases. Investing in more transit choices, encouraging growth around urban centers so more of us can live and work in close proximity is a vital and necessary to our quality of life.

I-014-006 Funding strategies, for raising revenue and paying for transportation needs: User fees are the way to go on all major roadways. Electronic tolling is an easy way to collect these fees.

I-014-007 The information contained in the analysis: PSRC staff did a great job in providing a clear analysis in all of the Alternatives.

I-014-008 The alternative you think best accomplishes our regional needs out to 2040: Alternative 5... is the clear winner. PSRC needs to take a clear and courageous lead in promoting this Alternative. More cars on the road, and choosing the lesser of evils in the other Alternatives, simply continues the degradation of our quality of life.

I-014-009 Other comments: I am a memeber of the City of Snohomish City Council, a member of our Rails and Trails Committee, and sit on the Snohomish County Tomorrow Steering Committee. I've been studying these alternatives carefully, and am convinced that PSRC needs to be BOLD in laying out our future. Global climate change is a critical issue...worsening year by year and very likely to become irreversible in the next decades. All of us must take strong and courageous action, and clearly communicate the downside of the alternatives that lead to the same old problems of traffic congestion and environmental degradation. I'm counting on PSRC to take the lead...for the good of the region...for the good of our state...for the good of the globe.

Page 1

**I-014-001**

Thank you for stating your preference among the alternatives.

**I-014-002**

Comment noted.

**I-014-003**

Thank you for stating your preference among the alternatives.

**I-014-004**

Comment noted.

**I-014-005**

Concur.

**I-014-006**

Comment noted.

**I-014-007**

Thank you.

**I-014-008**

Comment noted.

**I-014-009**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

Karen GuzakR.txt

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

Page 2

**From:** Benjamin Brackett
**Sent:** Thursday, June 25, 2009 9:38 AM
**To:** Marina King
**Subject:** FW: Bike/Ped 2040

**Follow Up Flag:** Follow up
**Flag Status:** Red
Thanks Marina!

---

**From:** Wiatr, Diane [mailto:DWIATR@ci.tacoma.wa.us]
**Sent:** Thursday, June 25, 2009 9:21 AM
**To:** Benjamin Brackett
**Subject:** Bike/Ped 2040

Hey Ben.
I-015-001 Here's Bob Myrick's comment on the five alternatives for transportation in 2040.

After I read the EIS document listing the alternatives, I decided we needed a Sustainability or Doomsday alternative where gasoline disappears to India and China or gets to be $6 per gallon. I suggested we all watch Mad Max, Beyond Thunderdome, so we could do some good planning.

I concur.

Hope things are good over there at PSRC.

Diane

*Diane Wiatr*
*Mobility Coordinator/Urban Planner*
City of Tacoma
747 Market St., Room 1036
Tacoma, WA 98402
(253) 591-5380

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**I-015-001**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

I-016 Chad Newton.txt

From: info@fixieconsulting.com
Posted At: Tuesday, June 30, 2009 1:18 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Chad Newton

Address:

City:

Email: chadnewt@gmail.com

The various components in the six alternatives:

I-016-001 The environmental impacts of the alternatives: The report admits that none of the alternatives would reduce CO2 emissions below 1990 levels (the baseline of the Kyoto Protocol). Well, go back to work and

I-016-002 develop some alternatives that do! And the alternatives should also meet Washington's goal of 35% VMT reduction by 2035. Hint: develop an electrified transit network that provide fast, integrated travel throughout the region.

Funding strategies, for raising revenue and paying for transportation needs:

I-016-003 The information contained in the analysis: The DEIS is successful as a study of various highway tolling alternatives. It is NOT a comprehensive transportation plan for the next 30 years. The report focuses on highway management and highway expansion. Sound Transit has a long-range plan, and only 1 out of 5 alternatives even includes this plan. PSRC should include one or more alternatives that expand transit beyond Sound Transit's long-range plan.

I-016-004 The alternative you think best accomplishes our regional needs out to 2040: Alternative 5, without arterial tolling.

I-016-005 Other comments: Either rename the report a "Study of Tolling Alternatives", or revise its contents significantly.

Page 1

**I-016-001**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**I-016-002**

HB 2815 sets benchmarks for reducing statewide annual per capita

VMT. Governor Gregoire's Executive Order 09-05 calls for WSDOT to work with a variety of stakeholders to evaluate these benchmarks for potential changes and develop additional strategies to reduce emissions from the transportation sector by December 31, 2010. PSRC is actively engaged in this process and has taken a proactive stance to address both the VMT benchmarks set forth in HB 2815 and the state's greenhouse gas reduction goals. The analysis conducted for the DEIS suggests that many of the alternatives are moving in the right direction to meet the benchmarks as defined in the current legislation. The FEIS contains an analysis related to both VMT and greenhouse gas emissions.

**I-016-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the

Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-016-004**
Comment noted.

**I-016-005**
Comment noted.

I-017Colleen King.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 01, 2009 10:36 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Colleen King

Address: 7410 Second Ave NE

City: Seattle, WA 98115

Email: Cking@samaritanps.org

I-017-001 | The various components in the six alternatives: Only Alternative Five makes significant changes to reduce car congestion and pollution. And only Alternative Five promotes increases bicycling as part of the solution.

I-017-002 | The environmental impacts of the alternatives: Only Alternative Five makes significant changes to reduce car congestion and pollution. And only Alternative Five promotes increases bicycling as part of the solution.

I-017-003 | Funding strategies, for raising revenue and paying for transportation needs: Only Alternative Five makes significant changes to reduce car congestion and pollution. And only Alternative Five promotes increases bicycling as part of the solution.

I-017-004 |

I-017-005 | The information contained in the analysis: Only Alternative Five makes significant changes to reduce car congestion and pollution. And only Alternative Five promotes increases bicycling as part of the solution.

I-017-006 |

I-017-007 | The alternative you think best accomplishes our regional needs out to 2040: Alternative 5 is supported by Cascade Bicycle club

I-017-008 | Other comments: I vote pro bicycle first.

Page 1

**I-017-001**

Thank you for stating your preference among the alternatives.

**I-017-002**

Comment noted.

**I-017-003**

Thank you for stating your preference among the alternatives.

**I-017-004**

Comment noted.

**I-017-005**

Thank you for stating your preference among the alternatives.

**I-017-006**

Comment noted.

**I-017-007**

Thank you for stating your preference among the alternatives.

**I-017-008**

Comment noted.

From: info@fixieconsulting.com
Posted At: Saturday, June 27, 2009 10:54 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Tim Hesterberg

Address: 2628 31st Ave W

City: Seattle, WA 98199

Email: TimHeterberg@comcast.net

Add to mailing list?: yes

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

The alternative you think best accomplishes our regional needs out to 2040:

Other comments: Dear PSRC:

Thank you for the chance to comment on the draft EIS.

My comments are based on three principles:

I-018-001 * Reduce CO2 emissions. The future of our planet depends on it.
I am a scientist and a parent, and the combination scares me - what
I read in the scientific literature about where our planet is heading
makes me upset about what we're leaving for my children.

I-018-002 * Stop subsidizing cars. For too long our society has subsidized
cars in various ways, by amounts ranging from $2.86 to $7.55/gallon,
see http://www.sierraclub.org/sprawl/articles/subsidies.asp
By subsidizing driving we get more of it, more traffic, noise,
pollution, CO2, and area residents have gotten fatter.
Even people who can't afford cars pay higher taxes to keep driving cheap.

I-018-003 * Provide healthy alternatives to driving. Biking and walking save
I-018-004 people money and are good for their health. Even transit often
involves more walking than driving, so offers some health benefits.

I-018-005 Based on these principles, Alternative 5 is the clear choice.
I-018-006 It offers the greatest reductions in CO2, and other pollutants.
I-018-007 It shifts toward paying more of the costs by tolling, rather than by sales and other general taxes. And it offers
the greatest support for walking and biking.

I-018-008 I would also encourage working toward changing land use patterns to reduce th need for driving, both by shortening
the distances that people must travel in their daily lives, and by making it easier for them to use transit when
they do need to make longer trips.

Sincerely yours,

Tim Hesterberg



**I-018-001**
Thank you for your comment.

**I-018-002**
Comment noted.

**I-018-003**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-018-004**
Concur.

**I-018-005**
Thank you for stating your preference among the alternatives.

**I-018-006**
Comment noted.

**I-018-007**
Comment noted.

**I-018-008**
Land use assumptions for all alternatives, including the Preferred

Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

From: Matt Knox [mknox@net-venture.com]
Posted At: Friday, June 26, 2009 7:53 AM
Conversation: Support for Transit, Dedicated Trails and Lower Emissions -- Alternative 5
Posted To: Transportation 2040

Subject: Support for Transit, Dedicated Trails and Lower Emissions -- Alternative 5

Dear PSRC board members and other stakeholders,

I-019-001
I-019-002

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. This one comes closest to the goals that I believe our community needs to embrace -- moving away from reliance on single-occupant vehicle transportation and aggressively reducing greenhouse gas emissions. Please join me in supporting a more sustainable future and enhancing the liveability of our region in the long term.

Sincerely,

Matt Knox
Tacoma

Matt Knox
4602 29th Ave. NE
Tacoma, WA 98422



**I-019-001**

Thank you for stating your preference among the alternatives.

**I-019-002**

Comment noted.

I-020P & N Rimbos.txt

From: info@fixieconsulting.com
Posted At: Wednesday, June 24, 2009 8:54 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Peter and Naomi Rimbos

Address: 19711 241st Ave SE

City: Maple Valley, 98038

Email: primbos@comcast.net

I-020-001 The various components in the six alternatives: PSRC has done a good comprehensive assessment of the various transportation alternatives available to the region.

I-020-002 The environmental impacts of the alternatives: PSRC has identified and evaluated the environmental impacts to a degree that satifies us.

I-020-003 Funding strategies, for raising revenue and paying for transportation needs: We would rather see more revenue produced from "user fees": miles driven taxes, gas taxes, tolling, etc.

I-020-004 The information contained in the analysis: Very comprehensive, thought provoking, and informative.

I-020-005 The alternative you think best accomplishes our regional needs out to 2040: We favor Alternative #5. We cannot "grow" our way out of traffic congestion.

Other comments:

Page 1

**I-020-001**
Thank you.

**I-020-002**
Thank you.

**I-020-003**
Comment noted. The financial strategy for Transportation 2040 relies on all the funding sources you note in your comment, with more heavy emphasis on tolling/pricing, VMT charges, and other potential user fees. In the short to medium term the plan will continue to derive revenues from gas and sales taxes, until such time as tolling/pricing and other user fees become a more significant source of revenue.

**I-020-004**
Thank you.

**I-020-005**
Thank you for stating your preference among the alternatives.

I-021Ptasnik.txt

From: info@fixieconsulting.com
Posted At: Friday, June 26, 2009 8:09 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: David Ptasnik

Address:

City:

Email: daveporphans@gmail.com

I-021-001 | I-021-002 | I-021-003 | The various components in the six alternatives: All of them are woefully inadequate. Far too much attention is being paid to the unrealistic expansion of walking and bicycle trips. Far too little investment is being made into roads. Even the transit plans are headed in the wrong direction with greater concentration of passengers on fewer trunk routes. There should be more neighborhood transit options with smaller vehicles stopping at more locations with greater frequency. Giant buses and trains on limited feeder routes adds to inconvenience.

I-021-004 | The environmental impacts of the alternatives: All horrible, the decrease the quality of life for everyone in Puget Sound, the most important aspect of our environment.

I-021-005 | Funding strategies, for raising revenue and paying for transportation needs: Per mile driven taxes are a disgusting and unnecessary invasion of personal privacy. Taxing gasoline has the same impact, with the added benefit of penalizing wealthier drivers in larger vehicles, making the tax less regressive. Additionally per mile driven taxes require much more administrative overhead, with technology added to every car and a vast increase in records. Great for bureaucrats, terrible for citizens. How about making our city more attractive to business and investment, creating more wealth in the region, and then collecting more taxes from the existing tax structure.

I-021-006 | The information contained in the analysis: Biased, limited, unrealistic, and presented in a way to obfuscate intent, and hide alternative plans.

I-021-007 | I-021-008 | The alternative you think best accomplishes our regional needs out to 2040: Build more roads, add more and smaller buses, encourage regional business centers that encourage more family friendly single family houses to be clustered around the new business centers.

I-021-009 | Other comments: This plan is dreadful. It is going in entirely the wrong direction and will only make life more bleak and unpleasant in the Sound.

Page 1

**I-021-001**

Comment noted.

**I-021-002**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-021-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees

formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-021-004**
Comment noted.

**I-021-005**
Comment noted.

**I-021-006**
Comment noted.

**I-021-007**
Comment noted. The constrained part of the Transportation 2040 plan includes 746 miles of new roadways by the the year 2040.

**I-021-008**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-021-009**

Comment noted.

I-022Rose.txt

From: info@fixieconsulting.com
Posted At: Sunday, June 28, 2009 3:16 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Anita Rose

Address: 1020 Morton St.

City: Port Orchard, WA 98366

Email: ineedarose2@gmail.com

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

**I-022-001**

The alternative you think best accomplishes our regional needs out to 2040: I am an active bicyclist living in Port Orchard, but I am appalled at the lack of adequate areas to bike-commute or to pleasure-bike in this area. If I want to bike home from my work in Silverdale, I must cross 7 lanes of two highways at once - a horrible traffic situation in Gorst. Further, the shoulder along Hwy 166 is often dangerously overgrown or strewn with glass, causing one to veer suddenly into traffic.

Last year, when I decided to pleasure-bike along the Kitsap County-designated bike road of Lake Flora Rd, I found the road treacherous. There are no shoulders whatsoever on the road - often not even a right side line. Further, because of all the undulating hillsides along the way, cars and trucks roar past me at 60 to 80 M.P.H., and pass me closely and continuously on blind hills and curves. THIS is a bike route????? Appalling.

**I-022-002**

Finally I've long noticed a potentially fatal situation for children along Jackson Road in the Parkwood area of Port Orchard. Two schools are within blocks of this busy street - Marcus Whitman J.H. and Orchard Heights Elementary. There are only thin cow trails along Jackson and I've frequently seen children walking in the rain on this fast-paced roadway because the alternative is walking in the mud. A child will be seriously hurt or killed if we don't act in a way to protect them with adequate sidewalks or walking/biking lanes.

**I-022-003**

In just about every top-rated community in the U.S. these days, bike paths and sidewalks are seen as a must. These are the kinds of things people take into consideration when they decide to move into a community: Will their children grow up healthy there? Can they leave their car at home to go to work? Can they walk or bike in safety in their neighborhoods and count?

I am an adventuresome individual and I love to exercise, but I have so many close calls by careless or reckless drivers who pass me dangerously on streets without shoulders, I, like many of my friends, hesitate to go out on a bike any more. This is a tragedy for people who heretofore have always loved to travel on their own two wheels.

Please make our community stronger and more viable by helping to ensure safe roads for all - walkers, bicyclists and motor vehicles. Please vote for all legislation that will encourage safe alternatives to driving Sincerely, Anita Rose

Other comments:

**I-022-001**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-022-002**

Improving safety for all modes is critical to improving quality of life and improving access for all the citizens of the region. Transportation safety is a critical component of the regional long range transportation plan, and it informs multiple elements of the plan as crash reduction is integral to the cngestion mnagement pocess, bicycle and pedestrian planning, transit planning,and freight planning. The Transportation 2040 safety component is guided primarily by that of Target Zero, the Washington State Strategic Highway Safety plan developed by the Washington Traffic Safety Commission.

**I-022-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

I-023Sarah Larsen.txt

From: info@fixieconsulting.com
Posted At: Tuesday, June 23, 2009 1:17 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Sarah Larsen

Address: 18024 94th Ave. NE

City: Bothell, WA 98011

Email: sarahandhans@yahoo.com

**I-023-001** The various components in the six alternatives: The BNSF rail Corridor is existing infrastructure, why isn't it included in alternative 1 which is supposed to emphasize the efficiency of the existing system? The BNSF rail corridor is a relatively in-expensive expansion of transit capacity why isn't it included in alternative 2 or 3 or 4 as well?

**I-023-002** The environmental impacts of the alternatives: Tolling main arterials without some of the smaller highways and by ways will encourage cut through traffic on the non tolled roads. For example if 520 is tolled and 522 is not, then there will be a shift in traffic from 520 onto 522 which doesn't solve a congestion problem, it is just moved. This is a problem for alternatives 1-4

**I-023-003** Funding strategies, for raising revenue and paying for transportation needs: Paying for use is key to encouraging more efficient transportation choices.

The information contained in the analysis:

**I-023-004** The alternative you think best accomplishes our regional needs out to 2040: Alternative 5 at least gives the east side something more than just a few more busses, there is some light rail and the BNSF cooridor. Those who use the roads share in the cost of their up keep without encouraging cut through

**I-023-005** Other comments: I find it interesting that four of the five alternatives apear to be heavily road oriented and that mass transit is all stuffed in just a single option, there seems to be a definate bias.

**I-023-001**

The BNSF eastside commuter rail corridor was included only in Alternative 5, the high transit capital alternative. It is currently owned by BNSF and not part of the overall public transportation network. The focus in Alternative 1 was to maximize the efficiency of existing transit systems with additions of low-capital cost BRT routes. Alternative 2 reflected Sound Transit's Long Range Plan, in which the BNSF Corridor was not included. Alternative 2 also includes BRT along I-405 per the I-405 Master Plan. Alternatives 3 and 4 only included additional low-capital cost transit services in corridors adjacent to major tolled freeways, with the exception of BRT and light rail where they paralleled the tolled facilities.

**I-023-002**

Just as heavy congestion results in people using alternative travel routes, tolls can have the same impact. The toll rates included in Alternative 4 did result in increased congestion on the arterial system compared to the Baseline. The toll rates where lowered in the Preferred Alternative, which is estimated to not only reduce congestion on the highways but the arterial system as well compared to the Baseline Alternative.

**I-023-003**

Comment noted.

**I-023-004**

Thank you for stating your preference among the alternatives.

**I-023-005**

In consultation with program area stakeholders, levels of transit (bus and rail) investments for each of the alternatives were intentionally varied to assess performance.

I-024siroky.txt

From: info@fixieconsulting.com
Posted At: Friday, June 26, 2009 12:01 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Evan Siroky

Address: 756 S Monroe St

City: Tacoma

Email: djstroky@yahoo.com

Add to mailing list?: yes

I-024-001 The various components in the six alternatives: -Des Moines ferries:
+ A little skeptical about these. I think it'd be better to have a Bainbridge to Ballard run instead.

I-024-002 -Alt 5 redundant transit on I-405:
+ Seems like the commuter rail and HCT would be redundant since service will be fast for either line since it will go along 405. Consider dropping HCT or Commuter rail. 1 should be enough for this corridor.

I-024-003 -Alt 5 Tacoma Streetcar:
+ Where is it? I'd much rather see the streetcar extend from downtown to TCC than BRT.
-SR 16 and ditch bike paths in Alt 5 in Tacoma are already done:
+ Both of these projects are already complete. You should take these out and spend the money elsewhere. Instead please consider building a bike path from Downtown Tacoma to Old Town then we would have a bike path all along the Tacoma waterfront to Point Defiance. That thing would get probably as much bike traffic as some parts of the Burke-Gilman.

I-024-004 -consider also Bothell to Kirkland ferry:
+ Perhaps have the Bothell ferry stop at Kirkland on the way to Seattle and then again on the way back?

I-024-005 -trails outside of UGA for recreation only:
+ kinda want to bring up this point that all these bike facilities way out in the middle of nowhere will be purely for recreational use. Please consider making more bike paths and trails within urban cores. Why not make Lake Washington Blvd or at least most of its lanes for non-motorized only? Howabout have a general funding account for spot improvements for bike lanes or other stuff within cities. I'd rather see a lot of this non-motorized stuff happen in urban cores rather than in farmland.

I-024-006 -Railroads
+ Can we get a High Speed Rail or railroad freight effort in here? I think more attention could be given to these modes as rail is so much more efficient for medium range passenger journeys and long-haul freight transportation. I got a feeling that if Amtrak Cascades was improved significantly we wouldn't see as much traffic on I-5.

I-024-007 -Also as commenter Alex Callender pointed out, land use will likely change due to accessibility to transportation. Alt 2 will probably have way more sprawl than alt 5 and this should be taken into account.

I-024-008 The environmental impacts of the alternatives: Alt 2 is inherently environmentally dreadful since it builds so many
I-024-009 roads. Alt 5 is pretty green, but could be greener if all those bike improvements were put in urban centers and cores instead of out in the middle of nowhere.

I-024-010 Funding strategies, for raising revenue and paying for transportation needs: I think you guys are shooting for the moon with Alt 5 funding. Yeah it would be awesome, but I think it is a really hard sell. It would be a challenge for sure that would cause a lot of growing pain, but in the end would be really awesome. Besides, our federal government has a history of bailing out entities that have made bad decisions, so what's there to lose?

I-024-011 However, at the same time Alt 5 has a lot of good projects which would certainly be a shame that if they were tied solely to this funding mechanism. I think there should be a backup funding plan or maybe a phasing in plan for all of these scenarios in case we may want the funding from one alternative to fund the projects of another.

I-024-012 Also if you toll the freeways only I think you will see way more traffic than might be expected on side streets and arterials. I did a study (that still hasn't been released yet) on ferry fare avoidance for grad school and found that people had high toll avoidance tendencies even for seemingly small amounts of money. People aren't used to tolls in this part of the country so I think they take extra effort to avoid them.

I-024-015 The information contained in the analysis: Would be nice to have open source access to the full transportation model and all the data used to make it run.

I-024-013 The alternative you think best accomplishes our regional needs out to 2040: I think none of the alternatives meets
I-024-014 the 2040 needs in terms of public transportation. Alt 5 gets maybe 20% there which makes it my favorite since it is the least worst alternative. We have dug ourselves into such a deep hole by allowing our region to sprawl like it did. We need daily 10-minute headway bus service to every neighborhood in the region connecting to a regional HCT system. The Sounder should be upgraded to 1) run at a top speed of 100mph or more 2) travel b/w Seattle and Tacoma or Everett in less than 40 minutes and 3) needs to run at least every half hour most of the day every single
I-024-016 day. The biggest problem in the future will likely continue to be sprawl unless we really start to hold the UGA boundary like it's the border to North Korea and force development to happen in downtowns and centers.

I-024-017 Other comments: Hopefully we can pass some laws that make our state more apt to not focus on roads and for whichever entity needed to better direct development to urban centers. Without these two changes any transportation alternative selected will succumb to the effects of continued sprawl.

**I-024-001**

The proposed Bainbridge Island to Des Moines passenger ferry route was identified during PSRC's Regional Passenger Only Ferry Study, completed in 2008. This route, which was supported by the city of Des Moines, would provide a new passenger ferry connection from Kitsap County to Sea-Tac Airport. Your idea of a route between Bainbridge Island and Ballard would not meet this objective.

**I-024-002**

The eastside BNSF commuter rail corridor is slightly different from the I-405 BRT or HCT corridor. From the BNSF Eastside Commuter Rail Feasibilty Study, the ridership draw for the commuter rail was slightly different from that of the I-405 HCT corridor.

Once the proposed commuter rail route passes north of SR 520, it shifts west to run closer to Lake Washington and through the middle of two of the highest ridership areas on the Eastside in Kirkland. After running through Totem Lake, another high ridership location, the commuter route heads east to Woodinville and north to the City of Snohomish, serving areas that are more removed from the direct I-405 corridor.

**I-024-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were

taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the draft plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

In the 2008 voter-approved ST2 ballot measure, which funds projects through 2023, Sound Transit identified a financial contribution or ST2 match of Pierce County local funds to extend Tacoma Link to Tacoma General Hospital or 1/8 of the way to Tacoma Community College (TCC). Over the longer term, Sound Transit does include an extension the Tacoma Link Light Rail system to TCC in their 2007 Long Range Plan, however at this time, they have limited their LRT expansion efforts towards completing the LRT core route from Seattle to Tacoma by 2040.

**I-024-004**

A new passenger ferry route between Kenmore and the University of Washington was identified and evaluated by King County in an earlier study, and was included in the PSRC Regional Passenger Only Ferry Study completed in 2008. We did not study an option to serve Bothell, and we also did not study an option to connect Kenmore and Kirkland on route to Seattle (UW). Such a route could be considered by the King County Ferry District (KCFD), which is now operating the Vashon Island and Elliott Bay ferries. KCFD is also looking at possible routes across Lake Washington from Kenmore to UW, from Kirkland to UW, and from Renton to Leschi.

**I-024-005**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-024-006**

The Destination 2030 plan did include enhanced Amtrak service through incremental improvements in the Amtrak Cascades Service in the federally designated high speed rail corridor between Portland, Seattle, and Vancouver, Canada. Since these types of long distance intercity trips end outside of the PSRC region, they were not modeled in the DEIS or the FEIS. WSDOT's Rail Divison is currently applying for high-speed rail funds for the Pacific Northwest corridor through Tacoma, Seattle, and Everett based on the premise that additional capacity on these intercity trains would shift air and automobile trips from I-5 to the Amtrak Cascades passenger rail train service.

**I-024-007**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to

areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-024-008**
Comment noted.

**I-024-009**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-024-010**
Comment noted. Tolling/pricing and other user fees (such as VMT charges) are suggested as a major source of revenues to finance Transportation 2040. We understand these financial strategies will likely require actions by the state Legislature as well as efforts to build public support over time. In spite of these possible hurdles, the region is moving in this direction because these types of financial strategies appear to be the most feasible way to fund the plan.

**I-024-011**

Concur. The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we may continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately lead to tolling the entire highway system or the highway and arterial system.

**I-024-012**

Comment noted.

**I-024-013**

Comment noted.

**I-024-014**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

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recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-024-015**
Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**I-024-016**
Comment noted.

**I-024-017**
Comment noted.

# MATT RYAN, CLU, MBA

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June 26, 2009

Sean Ardussi
Transportation2040
Puget Sound Regional Council
1011 Western Avenue Suite 500
Seattle WA 98104-1035

Dear Sir:

I am writing this letter for the record following a meeting held at the Kitsap County Fairgrounds on your Transportation 2040 alternatives. Here are my observations:

I-025-001 **PUBLIC INPUT** What I felt I attended was the Kitsap Transit follies starring Dick Hayes. Charts focused on transit routes and foot ferries. I would gather that highways will be ignored other than adding HOV and toll booths. Your public input portion is a sham in that you invite a roomful of people to come to hear and make comments but it was one way. You presented your vision without even taking notes of what the public comments were.

I-025-002 **CROSS SOUND TRANSPORTATION** It would appear that the planners at PRSC do not learn from the mistakes of others or themselves. In the 1990's, when I was on the Transportation Planning Board, WSFS planners came and told you that foot ferries were a loser. You went ahead and stuffed them down their throat and sure enough they were losers. They sold them. So what are you doing now, you are planning another fleet of them. Please, stop wasting money on these. They don't work and they are financial black holes. Emphasis on foot ferries shows PSRC is only interested in Kitsap County as a bedroom for downtown Seattle.

I suspect that passenger only ferries' attraction is that the sticker price comes with grant range on an individual basis. Cumulatively they suck away the state's capital that should be spent on the auto fleet. Foot ferries aren't all weather craft. They are personnel intensive uses. They have no auto fares to subsidize fares.

I-025-003 Kitsap has foolishly over more decades than they should, had a contempt for productive non-consumer commercial land uses. The ratio of land zoned for non-government wealth producing family wage jobs to residential is way out from most counties

**I-025-001**

The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

**I-025-002**

The PSRC Regional Passenger Only Ferry Study, completed in 2008, shows strong demand for cross-sound service, particularly between Bremerton, Southworth, and Kingston and downtown Seattle. On these routes our analysis shows capital and operating costs, combined with a 40% fare recovery ratio, would produce reasonable fares for users (one way fares were estimated at $3.60 for Bremerton, $3.30 for Southworth, and $7.60 for Kinston).

**I-025-003**

Comment noted.

I-025-003 nationwide. This was aggravated in the 1990s by foolishly myopic decisions on land use forced on us by GMA and the local opponents of development. There are even more residential rooftops bearing the social and tax burdens of one of the most densely populated counties in the state. Contributing to this problem has been limited access across Sound.

I-025-004 With regard to Kitsap county and ferries; I find missing a third auto ferry for the Bremerton run. The addition of that third ferry on the Bremerton run gives a greater access for freight and goods as well as a significant boost for passengers. The Bremerton terminal was built at great expense to accommodate transit access. It ought to be fully utilized.

I-025-005 There will come a time when another North South arterial will be necessary to get around I-5 gridlock. Make one alternatives one that uses bridges and tunnels say from Whidbey to North Kitsap; toll road to Shelton – Or a fleet of ferries designed to carry
I-025-006 trucks. They could board in southern Snohomish and off load in Kitsap. This would de facto put West Sound on the I-5 corridor, opening the Peninsula to far more commercial development.

I-025-007 I was disappointed not to see at least as an alternative, a toll bridge from Kitsap county to Vashon Island as well as a submerged suspended tunnel across to Federal Way. This would eliminate the necessity of having ferries on that run since the state doesn't
I-025-008 seem to have the capital to replace the ones that are rusting to death. I would visualize such a project as a public-private partnership.

I-025-009 **HIGHWAYS** In the charts that were displayed in the meeting, I did not see any effort to improve the road between Poulsbo and Kingston. Given the lower rainfall and access to two ferry runs, it would appear to me that this is an area that over the next thirty
I-025-010 years, will grow in population sufficiently to warrant more than two lane roads. I did not see any attempt to significantly improve the death-trap highway between Gorst and
I-025-011 Shelton. The planners stated that they are seeing greater increases in population in Mason county and other counties to the west. Others pointed out in the meeting that there have been a significant growth in the Olympia area. This should be taken into account in your planning.

I-025-012 **TOLLING** As I looked at your charts showing all those tolls, I recalled a 1990s PSRC TPB meeting during which a staff planner presented a plan to toll just about every major road, including I-5. Afterward, I asked the electeds on the Board to raise their hands if they were in favor of these tolls. Nobody raised their hand. I recognize that you are in a viscous circle when it comes to gas tax revenue. Cars are getting better mileage and
I-025-013 there are more of them. Rather than hang your hat on tolls, seek other avenues. I'm uncomfortable with a GPS tracking system, but wouldn't be adverse to one that tallied miles driven at fuel up or recharge.

I-025-014 The presenter stated Kitsap had only two good tolling locations; Bainbridge at Agate Pass and the Navy Yard Highway between Bremerton and Gorst. If you're in need of subsidizing extraction of igneous rock and creating more bottlenecks, the second will do the trick. Instead construct a bridge across Sinclair Inlet joining where Highway 3 turns North and 16 where it comes down the hill. The toll booth could be placed just back from where the bridge is so that the traffic going to both Gorst and across the bridge

**I-025-004**

The gap in mid-day service on the Seattle-Bremerton route is well documented. However, the WSF Long Range Plan does not include a third auto ferry on this route. Limited state funding makes this financially infeasible. Instead, passenger-only ferries are seen as a feasible way to meet cross-sound travel demand in the mid-day, and perhaps to augment the auto ferries on heavily travelled commuter routes.

**I-025-005**

Comment noted.

**I-025-006**

Comment noted.

**I-025-007**

The bridge and tunnel referred to in the comment are not in the transportation plan.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental

I-025-014 would be tolled. Besides shortening the trip to Tacoma, it would also connect the Urban Growth Areas on the North and South sides of Sindair Inlet.

I-025-015 If you wish to toll Bainbridge Island, that is your business. However, I don't think that the electeds that choose to do it will survive the next election.

I-025-016 **POPULATION PROJECTIONS** I didn't write the numbers down, but I recall numbers between 100,000 and 195,000 with some reliance on using lower numbers. I suggest that you explore how much longer they can mine water east of the Cascades to the continental divide before it all goes dry. When those wells go dry, people will move to where there is water, such as Western Washington. I noting while serving in office between 1993 and 1996 that the state population projections were low. I suspect this long term low balling has aggravated congestion problems in the past. Again, I came away with the feeling you don't learn from past mistakes.

Sincerely,



Matt Ryan

processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-025-008**

Comment noted.

**I-025-009**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

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recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-025-010**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

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**I-025-011**

Comment noted.

**I-025-012**

While tolls are a significant component of the Preferred Alternative it is

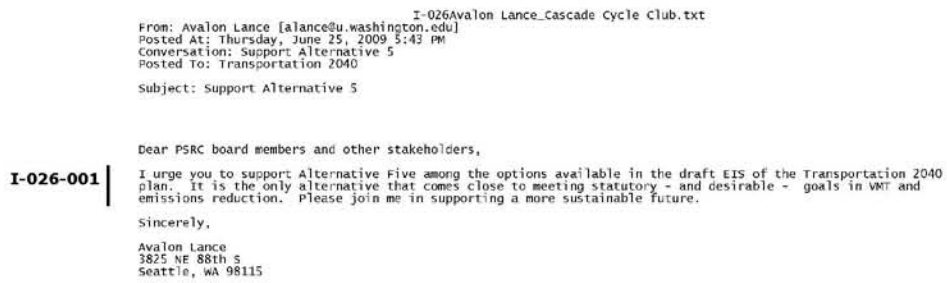
recognized that in the short term transportation funding will be highly dependent on traditional sources of revenue such as the gas tax. Even in the long term other non-toll sources of revenue will be needed to fund planned transportation projects and programs.

**I-025-013**
Comment noted.

**I-025-014**
Comment noted.

**I-025-015**
Comment noted.

**I-025-016**
Comment noted.



I-026Avalon Lance_Cascade Cycle Club.txt
From: Avalon Lance [alance@u.washington.edu]
Posted At: Thursday, June 25, 2009 5:43 PM
Conversation: Support Alternative 5
Posted To: Transportation 2040

Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-026-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Avalon Lance
3825 NE 88th S
Seattle, WA 98115

**I-026-001**

Thank you for stating your preference among the alternatives.

Please note: This identical letter was submitted by the following 668 commenters:

Peter Abrahamsen, Breck Adams, Rolf Agather, Katherine Alesandrini, Judith Alexander, Scott Alexander, Eric Althoff, Jennifer Anderson, Heidi Angel, Tristan Ansell, Laura Appleby, Christina Arcidy, Mary Armstrong, Ralph Armstrong, Perry Atterberry, Keith Bachman, Dave Bachman, Becky Backstrom, Lauren Bael, Mark Bailey, Robert Bailey, Marlin Baker, Carson Baker, David Balas, Amy Ball, Andy Ball, Dana-Lynn Ballou, Chuff Barden, John Barker, Wesley Barkley, John Barnes, Martin Barr, David Baty, Lynn Baugher, John Bay, Arman Bedrosvan, Douglas Beeman, Karen Behm, Andrew Behnke, Steven Behrend, Thomas Beirne, Christian Bennignus, Connie Benson, Bronson Berg, Gregg Bergstrom, Dave Billings, Richard Binder, Joanna Bisset, Bruce Blaser, Steve Bleifuhs, Miranda Bodfish, John Boone, Laura Bourmatnov, Bruce Bowman, Maureen Boyd, Ed Breen, Drew Britten, Erik Brooks, Jason Brouwer, Matthew Brown, Tom Broznowski, Don Brubeck, Betsy Bruemmer, Alan Bunin, Jack Burg, Andrew Burkhalter, Nancy Burns, Nora Burton, Roger Burton, Louis Burwell, Gina Buscarello, Margaret Bustion, Anthony Byrd, Allegra Calder, Glenn Cannon, Anthony Carbary, David Carpenter, Douglas Carpenter, Shane Carr, Philippa Carson, Andrew Carter, Bill Carver, Italo Castellanos, David Castor, Alden Chace, Matt Chadsey, Robert Chaffeur, Srijan Chakraborty, Kelly Champoux, Justin Chan, Damien Chapman, Yong Chen, Yu-Chin Chen, James Chesko, Ian Ching, Clifford Chirls, Dave Chitty, May Lee Chung, Ivan Cintron, Ken Claflin, Luke St. Clair, Kristen Clark, Barbra Clary, Nathan Clement, Hunter Close, Tami Cobb, Richard Cochrane, Barbara Cole, Nate Cole-Daum, Melvin Coleman, Lee Colleton, Bryce Colvill, Thyce Colyn, Andrew Concordia, Angela Conway, Carl Cook, James Cooke, Mel Cooke, Brad Cowles, Bob Coyne, Zelda Crain, Eric Cramer, Bruce Crawford, Rick Creekmore, Kari Crial, Rob Crichton, Amanda

Cronin, Wendy Crozier, Aaron Cruz, Beth Cuffel, Arden Cuise, Scott Culberson, Kate Cunningham, Richard Daifuku, Wendy Darcy, Sherry Dariotes, Mary Davies, Mike Davis, Rex Davis, Patricia Dawson, Lanham Deal, Steven Degroot, Eric Dejulio, Chris Deleon, Bill Dempsey, Mary Dettrich, Brian Dew, Lisa Digiorgio, Jeremy Dinsel, Kevin Dix, Steven Doman, John Doody, Tim Dorman, Mary Dorn, Dru Druzianich, John Duggan, Jeffrey Dunn, Daniel Dunne, Andre Durudas, Andre Dusablon, Deina Duval, John Earhart, Douglas Edwards, Paul Edwardsen, Joe Ehle, Jeff Ellerbrook, Jennifer Ellestad, Jp Emery, Erika Enright, Radka Enriquez, Mohammed Esseddiqi, Olivier Fabris, Sherry Fadely, Lawrence Falk, Christopher Fast, Brian Felber, Zach Felsenstein, Jeff Fernandes, Sean Fernandez, Charles Field, Rebecca Finkel, Alicia Finn, Olivia Finney, David Fisher, Kathrina Fisher, Patrick Fitzgerald, Aaron Fjelstad, Bill Flanagan, Erik Flink, Mark Flora, Francine Florance, Michael Flory, Andrea Foegler, Brian Foley, Dellanie Fragnoli, Max Frieda, Debi Friese, Jamie Froebe, Tom Gaines, Joseph Gannon, Simon Garrod, Steven Gaub, Vince Gayman, Judy Gayne, John Gebhart, Jennifer Gentry, Christine George, Maria Luisa Germani, Philip Giammarino, Stephanie Gilbert, Mike Gladfelter, Shelly Glenn, Mark Glidden, Vanja Glisic, William Gobie, Eli Goldberg, Joseph Goldberg, Roman Golouin, Greg Gottlieb, Paul Gotz, Elizabeth Gould, Fabio Governato, Doug Graham, Gabriel Grant, Andrew Gravano, Steven Gray, Margaret Graybill, Heather Green, Alan Greenbaum, Sarah Greene, Annika Greenig, Jennifer Greenough, Tom Greenwood, Paul Grekin, Paul Griffin, Susan Griffith, Gabe Grijalva, Brian Groth, Dorothy Jean Guth, Pablo Guzman, Brie Gyncild, Casey Hagen, Walker Hagius, Stefanie Hale, John Hall, Nathan Hamilton, Deborah Hammond, Daniel Hanlon, Blake Hansen, Marilyn Harnden, Tammy Hathaway, Mark Haught, Ken Havekost, Peggy Hawkins, Nataly Hawthorn, Colleen Hedeen, Julie K Heine, Patricia Heller, Thayrn Henderson, Tim Hennings, Timothy Hensley, Linda Hester, Ross Hill, Russell Hill, Stephen Hitch, Carrie Hite, Matthew Hixson, Kuno Hollnegel, Sonia Honeydew, Aubree Hoover, Brian Horman, Kris Horrocks, Megan Horst,

Ryan Howell, Vicki Hsueh, Mark Hubbard, Andrew Hughes, Drew Hunt, Stephen Hurley, Andreea Hutu, Connie Ireland, Dayle Iverson, Connie Ivey-Pasche, Peter Jack, Dwight Jacobson, David Jang, Sara-Beth Jeffrey, Stephen Jensen, Rosalyn Jinkens, Juanpablo Jofre, David Johansen, Karl Johnson, Martin Johnson, Wesley Johnson, Carl Jones, Denise Jones, Philip Jones, Heather Jordan, Angela Judkins, Joe Julian, Mark Kadlec, Brian Kaku, Evan Kalstad, Vemcatesh Kandallu, Ron Kaplan, David Karnes, Troy Kasper, Kathleen Keegan, Caitlin Kehoe, Mark Keithly, Jonathan Kellenberg, Joseph Kelley, Tyler Kellogg, Seamus Kelly, M.J. Kelly, John Kerher, John Kerr, Diane Kerstein, Daniel King, Sean King, Daniel Kinney, Terri Kinney, Maxwell Knauss, Artsiom Kokhan, Marybeth Koreman, Germaine Kornegay, Pravomil Kral, Cynthia Krass, Michael Krause, Kekoa Kuhia, Branko Kukolja, Sandra Lafontaine, Edward Lammi, Avalon Lance, Eric Langlais, Maria Langlais, Dorothy Lautman, Hilary Law, Wytold Lebing, Adam Leblanc, Judith Lee, Kris Lee, Serena Lehman, Stephen Leidel, Claudia Levi, Cynthia Levine, David Levinger, Bill Leyrer, Martha Lindley, Andrea Little, Jim Lloyd, John Loney, Margaret Longeway, David Longmuir, Nubia Lopez, Ray Lou, Marcia Lupton, Robert Lusby, Andrea Lynch, Dong Ma, Kenneth Mackenzie, Ian Mackie, Bob Macmillan, Simon Macpherson, Mildred Magner, Mike Mahanay, Kelly Main, Ruel Malig, Steve Malone, Ilana Mantell, Vance Maples, Tomislav Maric, Richard Marshall, Georgene Marshman, Chuck Martin, John Martin, Cecilia Martin, Denis Martynowych, Cody Mast, Ignacio Fernandez Mata, Scott Mccall, Paul Mccollum, Michelle Mccully, Patrice Mcdermott, Mark Mcdermott, Sean Mcdonough, Ray Mcfall, Pam Mcgaffin, Dan Mcgrady, Gram Mcgregor, Sara Mcmahon, Kathleen Mcmonigal, Heather Mcmullen, Karin Mellskog, Catherine Mesich, Doug Metzler, David Meyer, Val Meyer, Gary Meyers, Mark Michaelis, John Mickett, Hugh Milburn, Paul Millage, Gordon Miller, Aimee Mills, David Minsk, Laurel Minter, Jeffrey Mirsepasy, Margaret Misenti, Alex Moll, Jane Moore, Brad Moore, Jo Moore, Margaret Moore, Nickie Moran, Michael Moreland, Karol Dana Morphew, Judi Morris, Michal Morrison, Dennis Morrissette,

Ann Morrow, Margo Morse, Kari Mosden-Schlosshauer, Joe Moyer, Mark Mumm, Katarina Murphy, George Murray, Amy Murry, Aya Nakazato, Florizel Negrillo, William Neville, Marie Nishida, Peter Nobes, John Nolan, Dominick Novelo, Mariano De Ocampo, David Oliver, Nadine Oliver, Frances Olson, Jennifer O'Neill, John Otakie, Samuel Otis, Michael Pace, Radu Palanca, Bernd Pankow, Oleksiy Pantyeyev, Clare Parfitt, Lauren Parke, Mark Parker, Anita Parks, John Pauletti, Don Pease, Joie Pedersen, Chris Peele, Tonja Pekic, Steve Pellegrin, Adrian Perera, Eric Perlin, Aeron Perlman, Terri Perlman, Ellen Peterson, Eric Peterson, Bruce Petrie, Carole Pettenski, Steve Philips, John Phillips, Gregg Pinkerton, Ted Piotrowski, Jenna Pisel, Marina Pita, Eugene Pitcher, Kristin Poinar, David Pope, Alan Presley, Sandy Privett, Sheridan Probst, Ronald Proctor, John Quattrocchi, Iain Quigley, Alan Quincy, Paul Quinn, Francisco Ragland, Guillermo Ramos Ramirez, Allan Rand, Charlene Rankin, Peggy Ratermann, Kit Rawson, Pete Ray, David Reeder, Eileen Reichert, Bob Reid, Cheryl Dos Remedios, Wroy Renaghan, Scott Renz, Alicia Reuter, Rick Reuter, Sharon Reuter, Bobby Reyes, Laurie Rhein, James Rice, Kim Rich, Paul Richter, Amber Ricketts, Scott Riggs, Tim Riley, Russ Ringer, Paul Ringsrud, Ricardo Rios-Zalapa, Nate Ripperton, Richard Roberts, Allen Roberts, Brett Roberts, Leslie Rogers, Hakim Ronaque, Patricia Rose, Rex Rosekrans, Alan Ross, Philip Rudolph, Scott Ruff, Dan Russell, William Ruth, Rodney Rutherford, Aden Ryan, Gary Ryno, Sangeeta Saigal, Peter Sajal, Julie Salathe, Ali San, Steven Saner, Hilla Sang, B L Saunders, Michael Scavezze, Trevor Schaaf, Eric Scharnhorst, Phillip Schlachter, Christopher Schneider, Sharon Schneider, Jennifer Schofield, Norman Schroeder, Brian Schuessler, Ryan Schuetze, Audra Schumacher, Kent Scott, Shelby Scovel, J Sea, Allan Seeger, Alexander Seguin, Lucinda Selk, Bryan Selner, Ronald Shackelford, Susanne Sherburne, Rajashekhar Shirantaoka, Susan Shultz, Karen Singer, Phillip Singer, Sudipta Sinha, Robert Slack, Kim Slater, Doug Sluis, Stephen Smith, Barbara Smith, Jerry Smith, Preston Smith, Renee Smith, Richard Smith, Alice Smith, Eve Smith, Mark Smith, Kris Solem, Evelyn Spieker,

Jennefer Sporleder, Radhakrishnan Kadathur Srinnasan, Sarah Steiger, Steven Steiner, Matthew Sterner, Peter Stevens, Zach Stevenson, Anne Stewart, Tristan Stone, Jeff Stucky, Nathan Sugg, Pamela Suiaunoa, Ryan Surface, Sean Sweeney, William Sweigert, Christina Swift, Kris Symer, Anne Symonds, Robert Sympson, Scott Tallman, Bee Tan, Linda Tarte, Dan Tasse, Peter Tassoni, Mark Taylor, Robert Taywr, Cosimo Terranella, Thuy Thiem, Scott Thomas, Heather Tillman, Elena Tolkova, Bret Torbelk, Jason Torrie, Tyson Trautmann, Jenifer Trusty, Richard Tupper, Eren Turgay, Mark Turner, Debbie Uhler, Mark Ullberg, Benjamin Upsall, Richard Vanderwouden, Anwar Vanegas, Erick Vargas, Nicole Vela, Eric Vernon, Zach Vincent, Robert Vogt, Richard Vonlehman, Darrel Vorderstrasse, Kat Wamba, Steve Wangen, Daniel Ward, Liberty Waters, Tracy Wayman, James Weber, Thomas Weber, Stuart Weiler, Kristi Weir, Jeff Weissman, Michael Weldon, Susan Wetstone, Robert Wharton, Nancy Wheelwright, Gregg Whitcomb, Gary White, Bryan Whitlock, Lane Wilkinson, Dawn Williams, Brian Williams, Greg Williams, Mark Williams, Nathan Williams, Jay Williamson, Michael Wilsey, Dean Wilson, Kelvin Wing, Dave Withrow, James Witte, Thomas Wojtkowiak, Jeff Wolf, Melanie Wood, Raenette Wood, Todd Woodcock, Dave Woods, Karalee Woody, Steve Wright, Daniel Wright, Lynn Yarnall, Robert Yarnell, Michael Yoder, Greg York, Rob Younger, Dale Zach, Barbara Zaroff, Mohammad Zuberi, Maryanne Zukowski, and Thomas Zylstra.

I-027Annalee Luhman.txt

From: info@fixieconsulting.com
Posted At: Saturday, July 04, 2009 2:01 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Tom and Annalee Luhman

Address:

City:

Email: annaleeluhman@comcast.net

I-027-001 The various components in the six alternatives: We prefer alternative #5.

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

The alternative you think best accomplishes our regional needs out to 2040:

Other comments:

**I-027-001**

Thank you for stating your preference among the alternatives.

**From:** ANN REED [abreed1@prodigy.net]
**Posted At:** Monday, July 06, 2009 11:31 AM
**Conversation:** Transportation 2040 comments
**Posted To:** Transportation 2040

**Subject:** Transportation 2040 comments

I-028-001 This might be a bit late for any input to the next 2040 Transportation meeting, but I would like to express my opinions concerning Kitsap County 2040 transportation issues anyway. My suggestions primarily concern Kitsap County transportation since I'm a resident there. I say opinions, because like the consultants designing the 2040 Transportation Plan, I don't have exact or even reasonable data on which to base my suggestions. What I do see is the tremendous costs associated with some of the WSDOT, WSF, Kitsap Transit and the authors of 2040 Transportation Plan. With that kind of money, if it ever comes into being, my suggestions would have no funding issues, if proven functional.

I-028-002 With that said, the first suggestion that I have is to spend a year or two assembling a data base that shows people and freight movement into, out of and around Kitsap County. Money spent on this suggestion is not a consulting project, but one that honest decisions can be made from and not SWAGs. The first place I'd start mining data is public transportation rider data. The ORCA pass should turn out to be an excellent source since it can provide a users home location, age and where they use the pass. Names or personal information need not be attached to the data and the data has to be available because the system has to correctly bill the user for the service. The second place that I'd start collecting data is WSF vehicle use. Currently WSF can't produce any useful data due to the ticketing system they use. My suggestion is to replace the WSF Wave2Go ticketing system with the WSDOT Good To Go tolling system. I know from talking to some of the ticket takers that they oppose doing this because "someone has to measure vehicle length" and "someone has to determine number and type of vehicle passenger fares". Both arguments are not reasonable and easily solved. The third place that needs to be examined is vehicle traffic destinations from Kitsap County 's major employers – the Navy bases. As an interested party, the Navy could probably supply this data. Finally, data needs to be obtained from our neighbors. Mason, Clallum and Jefferson Counties need to supply as best they can their current and estimated future commuter, casual use and freight traffic that would use Kitsap County either as a terminal destination for employment or as an exit off the peninsula (ferry) or roads, to transit through the County to other destinations.

I-028-003 The next suggestion that I have is for the 2040 consultants coordinate WSDOT and WSF long range plans with their 2040 Transportation Plan. After reading the latest WSF long range plan, that doesn't seem to have occurred or is at best limited.

I-028-004 Now for my suggested Kitsap County 2040 Transportation improvements. These suggestions are to move people and freight to and from their destinations within the county or to destinations out of the county while keeping freight off the roadways and out of major population centers as much as possible. Freight in highly populated areas is never a good thing and povs, unless the populated area is their destination should be reduced to that area as much as possible also.'

I-028-005 1. Correct the Highway 3/Highway 16 toll bridge over Sinclair Inlet 2040 Transportation Plan omission. This was in the initial studies at least 30 years ago and still needs to be done.

I-028-006 2. Construct a toll bridge and extend Highway 160 between Southworth and Vashon Island to terminate at Vashon Island ferry terminal. This also appears on old maps of proposed transportation improvements to Kitsap County and Vashon Island . Construct a limited access road between the Vashon Island bridge head and Vashon ferry terminal parking.

**I-028-001**
Comment noted.

**I-028-002**
Comment noted.

**I-028-003**
When the Transportation 2040 DEIS was released (May 2009) the WSF Long Range Plan was still in draft form. The final WSF Long Range Plan was published on June 30, 2009, after the release of the Transportation 2040 DEIS. Planning by WSF and PSRC related to the Washington State Ferries and possible future passenger ferries was well coordinated. With the completion of the Final Long Range Plan by WSF there is more certainty about the future of the state ferry system. This information allowed PSRC to fully incorporate plans for the state ferry system into Transportation 2040. In addition, planning for passenger ferries continues by the King County Ferry District, Kitsap Transit, and the Port of Kingston. These efforts were also coordinated with PSRC's work on Transportation 2040.

**I-028-004**
Comment noted.

**I-028-005**
The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Reroute Vashon/Fauntleroy ferry route to Vashon/Seattle. The benefits of doing this are:

- Removes Vashon residents from complete ferry dependency without exposing them directly to colonization by Seattle .
- Would allow removal of the Southworth and Fauntleroy ferry terminals from WSF financial responsibility.
- Provide better and faster ferry schedules for South Kitsap County residents to/from Seattle .
- Return Fauntleroy ferry terminal to the residents and remove a huge amount of West Seattle transit traffic.

I-028-006

I-028-007

3. Construct park and ride lots at Illahee State Park and perhaps the Westwood area of Bainbridge Island , connected with a passenger only ferry and a zero or limited access road to the Winslow ferry terminal. The benefits of doing this are:

   - Provides Central Kitsap and West Bremerton area residents quick, easy access to the Bainbridge Island/Seattle ferry route.
   - Greatly reduce the vehicle traffic from Central Kitsap area to the Bainbridge/Seattle ferry somewhat solve the vehicle bottleneck at Agate Pass Bridge . One seldom recognized fact is that a good percentage of Bainbridge/Seattle ferry route passenger and vehicle traffic is from the Central Kitsap area. This suggestion would save money in road/bridge improvements now and in the future while providing traffic relief to Bainbridge residents.

4. Establish a truck/barge terminal either North of Kingston, just off Highway 104 or, if the additional water route distance was not considered too long, North of the Hood Canal Bridge in Jefferson County . Truck freight traffic could be barged to Everett or the Harbor Island area in Seattle , usually the primary freight destinations to/from Kitsap and surrounding counties. The benefits of doing this are:

   - Keeps a large part of Kitsap and surrounding area freight traffic off roadways between Kitsap County and Seattle area destinations and out of major population areas.
   - Greatly reduces the pollution and fuel usage that the freight movers would produce.
   - Trucks do not require the support systems that passengers do. A barge, coffee machine and a couple porta-potties would probably suffice. The fuel and pollution produced by a tug or two needed to move a barge would probably not exceed that of a semi-truck.

5. Work with those designing the new Seattle Highway 99 tunnel to integrate the Seattle ferry vehicle area with surrounding roadway systems to allow increased ferry traffic to easily disperse and enter ferry vehicle holding areas. As currently designed, the Coleman Dock area is a bottle neck and an additional ferry from the Southworth/Vashon area would overwhelm it. The redesign should be made with use of the Good To Go tolling system in mind.

I-028-008

All I have time for right now and I'm sure more than you have the patience to read. However, the comments that I'm submitting to you are probably more environmentally sound, people friendly and could be funded by tolls or elimination of some costly state supported capital assets. Construction of a freight/barge service from Kitsap County to the Seattle area could use federal funds for ferry system capital improvements that Senator Murray is working to procure. Since no

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-028-006**

Comment noted.

**I-028-007**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes

I-028-008

new ferries are involved, possibly only existing barge/tug service ( Washington State law requiring any new ferry to be built in Washington State also prohibits any federal money from being used on new ferry construction), the money could be used for capital terminal construction or improvements.

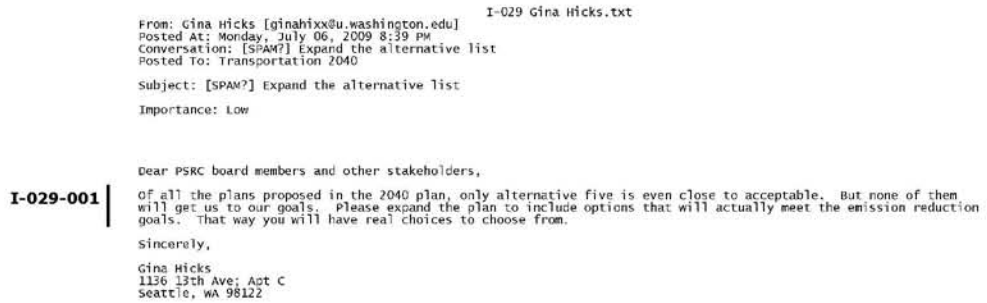
Thank you for your time,

Frank Reed

and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-028-008**

Thank you for your comments.



I-029 Gina Hicks.txt

From: Gina Hicks [ginahixx@u.washington.edu]
Posted At: Monday, July 06, 2009 8:39 PM
Conversation: [SPAM?] Expand the alternative list
Posted To: Transportation 2040

Subject: [SPAM?] Expand the alternative list

Importance: Low

Dear PSRC board members and other stakeholders,

I-029-001

Of all the plans proposed in the 2040 plan, only alternative five is even close to acceptable. But none of them will get us to our goals. Please expand the plan to include options that will actually meet the emission reduction goals. That way you will have real choices to choose from.

Sincerely,

Gina Hicks
1136 13th Ave; Apt C
Seattle, WA 98122

**I-029-001**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**Marina King**

**From:** Stoney Bird [sjbird@verizon.net]
**Posted At:** Tuesday, July 07, 2009 8:05 AM
**Conversation:** Transportation 2040
**Posted To:** Transportation 2040
**Subject:** Transportation 2040

Two comments:

I-030-001 1. Alternative 5 (maximum reduction in greenhouse gases) should be adopted.
I-030-002 2. The financial effects omitted in the reports that I have seen are the effects on the private (financial) cost of the various alternatives. Presumably maximum tolling, maximum improvements in transit service and in bicycle and walking facilities will mean that people spend less money on cars: now the lion's share of transportation cost. Family budgets will be greatly lightened. The public should know this.

-
Stoney Bird

**********
Stonewall Jackson Bird
2222 E. Fulton St.
Mount Vernon, WA 98273
(360) 428-7929
**********



**I-030-001**

Thank you for stating your preference among the alternatives.

**I-030-001**

Thank you for stating your preference among the alternatives.

**I-030-002**

Comment noted. The method of finance can involve additional costs. Where these are known to us we've included them in our financial analysis. Your point about revealing the true cost of our transportation choices is well taken. This type of information is not always made available to the traveling public. Such information could lead travelers to make different travel choices, if they're available.

I-031 Janet Winans.txt

From: Janet Winans [janetwinans@earthlink.net]
Posted At: Wednesday, July 08, 2009 10:10 AM
Conversation: Comments on draft EIS
Posted To: Transportation 2040

Subject: Comments on draft EIS

Thank you for the opportunity to comment on the Executive Summary of the DEIS.

I-031-001

1. Because each of the alternatives begins from the assumption that there will and should be the growth in population and jobs that the study estimates, many important aspects of living in the Puget Sound region are excluded from consideration.
Each assumes that employment, housing and cultural activity will stay fixed in their current locations and that the role of the transportation system is to provide access for VEHICLES to connect them.
Only Alternative 5 offers any emphasis on mass transit or decreased emphasis on roads.
None of the alternatives mention the possibility that environmental, economic, and/or political events may demand innovative responses.
None of the alternatives assert any priority to change the region's dependence on SOVs and the internal combustion engine.

I-031-002

2. It is very hard to see how any alternative is designed to mitigate the impact of the construction processes or to mitigate the impact of increasing vehicular traffic in the region.

I-031-003

3. Alternatives 3, 4, &5 include regional tolling and, therefore, address costs of individual vehicle use for the region more directly than current funding sources. It is important, however, than any revenue source provide funding for the across the region needs of transportation, not just the local needs of a particular roadway or the transportation needs of a particular population.

I-031-004

4. The information provided by the Executive Summary does not include analysis of past growth dynamicvs or predict any changes in what are seen as current dynamics.
There is no information about innovations arising from important players like regional employers or innovative entrepreneurs.
The focus is entirely on moving vehicles through already established corridors.
The information does not include and consideration of "peak oil," rising cost of fuel, the decline of the auto industry or for any change in traditional work environments (such as telecommuting). The summary does mention "Global Warming" but does not address any changes in practice to address it.

I-031-005

5. #5 provides for the "largest expansion" of mass transit and support for "non motorized infrastructure" while using imaginative tolling to fund vehicle use.

I-031-006

However, none of the alternatives claims to make regional travel faster and more convenient in 2040 or any time in between.

Janet Winans
I am a member of the League of Women Voters Transportation Committee and very interested in this issue. At this time the League is taking no position on the draft but we will be following the process with concern.
My address is:
3837 E. Crockett
Seattle, Wa 98112

Please add me to your mailing list

**I-031-001**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-031-002**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**I-031-003**

Comment noted. Transportation 2040 recognizes and addresses the travel needs of all the region's populations and freight users. The financial strategy includes a balance of funding sources that produce adequate, predictable, and sustainable revenues to finance all the investments contained in the plan. The strategy includes tolls, VMT charges, and other possible user fees, some of which will be used for improvements in the corridors where the tolls are collected. In addition, some tolling revenues and VMT charges may be used more broadly

around the region to meet a variety of goals, such as improving transit and building more biking and walking trails.

**I-031-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-031-005**

Thank you for your comment.

**I-031-006**

Comment noted.

I-032 Joan McBride.txt

From: info@fixieconsulting.com
Posted At: Thursday, July 09, 2009 8:03 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Joan McBride

Address: 842 Kirkland Avenue

City: Kirkland, WA 98033

Email: jmcbr38519@aol.com

Add to mailing list?: yes

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

I-032-001

The alternative you think best accomplishes our regional needs out to 2040: I think the only alternative that looks to a positive future is Alternative #5. I realize it would take time to impliment but it is the only real choice. The others are either the old tired attempts to build our way out of congestion or much to modest and tentative. We don't need to be afraid to be bold anymore. If anything #5 is too modest in its attempts to reduce CO2. Tolling if fine with me, treating our roads, etc as a utility is fine by me! Good luck in your deliberations.

Other comments:

**I-032-001**

Thank you for stating your preference among the alternatives.

I-033 David Plummer.txt

From: David F.Plummer [pdf3@comcast.net]
Posted At: Thursday, July 09, 2009 10:41 AM
Conversation: Comments on DEIS for PSRC's "Transportation 2040" Plan
Posted To: Transportation 2040

Subject: Comments on DEIS for PSRC's "Transportation 2040" Plan

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

Dear Mr. Ardussi:

Following are my comments on the DEIS for PSRC's "Transportation 2040":

I-033-001 | 1. There is no reference to the source of the cost information given in Exhibit 1-4 of the DEIS Executive Summary. The source for this information should be provided so that reviewers can understand what elements of each alternative are included in the acquisition (capital) and ownership (operating) costs for each
I-033-002 | alternative. Also, the cost for the "Baseline" is not defined, so it is not possible to understand what the total costs are for the "Baseline" and each alternative; nor is there any explanation of how the acquisition and ownership costs were calculated, what the base-year is for the estimates (2006, 2007, etc.), what escalation and inflation rates were assumed, and what other cost-estimating variables were considered in developing the incremental cost estimates.

I-033-003 | 2. The "Facility Operating Cost" information given in Exhibit 1-4 of the Executive Summary is not defined as to whether it is an incremental cost per year, a total cost, etc. There is no source given for the "Facility Operating Cost" values in Exhibit 1-4 These deficiencies should be corrected.

I-033-004 | 3. There is no explanation of what "Influence of Finance on the Economy" (in Exhibit 1-4) means, or how this incremental cost was determined. This should be clarified.

I-033-005 | 4. The DEIS evaluation methodology is heavily based on "benefit/cost analysis" (BEA) methodology. This technique requires that dollar values be assigned to non-monetizable elements, e.g., "travel time savings." The DEIS/EIS should be revised to include a cost effectiveness analysis of the Baseline and the 5 Alternatives in contrast to the BEA methodology. Without such a comparative analysis, it is not possible to correctly compare the various alternatives to the "Baseline."

I-033-006 | 5. The DEIS should be clarified, or an appendix added or a reference given to explain how "travel time savings" are calculated, since, if this illusory cost element were deleted (or revised to reflect only actual monetary cost reductions by, for example, commercial freight truckers), the BEA evaluation would change dramatically. There is no certainty that reduced travel times are to be judged unambiguously as a 'good.' Further, the valuation of a unit of travel time reduction (usually the so-called 'prevailing wage rate'), is not necessarily the correct value, nor is it certain that such reduction can, indeed, be monetized. For example, in some situations, a reduction in travel time between origin and destination can have a dis-utility. Further, the value that each individual affected by the reduced travel times would assign to each unit of travel-time reduction cannot be determined, as there is, generally, no market for the units of reduced
travel time, and the per-unit value will vary for each individual.
Because of the difficulty in establishing any credible economic/ monetary treatment for reduced travel times, they should only be included in the BEA when actual future costs change, e.g., when commercial truck drivers' costs vary according to the actual travel time.

I-033-007 | 6. In Exhibit 6-7 of DEIS Chapter 6, the values given are in English tons of each 'pollutant', and appear to be the total value per year.
However, since these statistics would vary over the time period of interest (2006-2040), the values for each year for the baseline and 5 alternatives should be tabulated. If the values given in Exhibit 6-7
are 'average' values, they should be identified as expected values.

Page 1

**I-033-001**

Detailed information about cost by alternative can be found in Appendix D.

**I-033-002**

Detailed information about cost by alternative can be found in Appendix D.

**I-033-003**

Please refer to the detailed analysis results, which can be found in Appendix D: Policy Analysis and Evaluation Criteria Report.

**I-033-004**

Detailed information about cost by alternative can be found in Appendix D.

**I-033-005**

Benefit-cost analysis has been applied to transportation program and project analysis for over a hundred years and is generally regarded to be superior to cost-effectiveness analysis, which is constrained to having only a single objective against which costs are compared. Benefit-cost analysis permits multiple objectives and relies upon long accepted methods for the monetization of benefits.

**I-033-006**

Monetizing travel time savings has a long history of practice in the application of benefit-cost analysis.

Information about benefit-cost analysis can be found on the agency's web page at the following location:

http://www.psrc.org/data/models/benefit-cost-analysis

I-033-007 If there are bands of uncertainty for each of the 'pollutant' values, these uncertainty band values should be identified. The same problems exist with Exhibit 11-6 of Chapter 11: are the energy use statistics (Btu and mWh) given in average annual values; if so, what are the yearly use values over the 2006-2040 time period? Also, Exhibit 11-6 shows that there is no substantive difference in energy use between the Baseline and the Alternatives, as, surely the tabulated differences are well within the error limits of the models used to predict the tabulated values.

I-033-008 7. The entire DEIS is based on incomplete, and, in many cases, unknown project design/construction details, unknown transit performance, and unknown changes in citizen behavior to the massive changes in the Regional transportation system contemplated for the 5 Alternatives. This DEIS is based on a variety of PSRC (and other agencies') models, many of which have not been completely calibrated to actual behavior patterns of the Region's citizens. For example, it is not known how travelers will behave if Sound Transit's East Link light rail line is ever deployed and operated.

I-033-009 In addition, the distribution of jobs and population in the Region may change dramatically from PSRC's forecasts; employers, such as Boeing and Microsoft, may choose to locate their future facilities outside the Region; and the impacts of an aging Regional population, and a changing ethic mix, mean that PSRC's models will not accurately predict future transportation requirements. Further,

I-033-010 PSRC's (and other municipal and county planning agencies in the Region) have failed to account for the impact on their planning schemes of the increasing numbers of older persons: these persons cannot (safely) ride bicycles, cannot easily use pedestrian facilities, are more likely to need discretionary use of automobiles for transportation (for medical and other shopping needs), and do not want to reside in congested, crime-infested neighborhoods envisioned by Regional planners.

I-033-011 8. The DEIS simply reinforces the extant oligarchical, power-broker, development-driven plans for the Region; these plans are being implemented in Transportation 2040 Alternatives. Thus, all planning is directed toward concentrating more population into the immutable, congested confines of the Region's Urban Growth Areas in order to preserve the hinterlands for the oligarchy. All analyses produced by PSRC and other Regional, municipal, and county planning agencies have adopted this growth concept in order to confine population and employment growth to narrow, restricted, congested areas. None of the planning by these agencies has dealt with the inevitable decline in social conditions that will accompany the planned development: the rising crime, higher environmental degradation in the population centers, more intense energy and natural resource demands that will accompany this development. The Puget Sound Region will become identical to the mega-cities in other parts of the USA and the world (New York, Paris, etc.). The characteristics of such a development vector has never been divulged to the Region's citizens, and are most emphatically hidden in the DEIS for this proposed transportation scheme.

I-033-012 Please include my comments in your records, and provide responses in the EIS for this proposal.

Sincerely yours,

David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007



Travel demand model documentation can be found on the agency's web page at the following location:

http://www.psrc.org/assets/1511/model_doc_final_.pdf

Information about values of time can be found on the agency's web page at the following location:

http://www.psrc.org/assets/1820/ValueofTimeMemo-updated.pdf

**I-033-007**

All values are for the analytical year 2040, as is true for other measures reported in the EIS. It is true that emissions and energy consumption would vary across the planning time period (2010-2040), but the analysis year is the plan horizon year of 2040. While timing of growth and investments will influence the trend, a first approximation of the emission and energy consumption trend might be linear between the base year and each alternative's 2040 profile.

**I-033-008**

Models are by their nature a reduced form mathematical representation of some aspect of the real world. It is true that no model can predict with certainty some future outcome. It is not clear what means could be employed that would predict future outcomes with certainty. Models are built with the best available information and science in order to aid decision-makers in making judgments in the face of uncertainty.

**I-033-009**

Land use models provide a best estimate of the future location of employment and households. No model will reliably predict low probability and high impact events like the individual decisions made by

specific large firms to relocate out of the region. This is not a reasonable expectation for any model.

**I-033-010**

The regional economic models do predict a larger share and number of older residents in the region  in the future. Age is a variable in many aspects of the travel models that use the regional economic and demographic variables as inputs.

**I-033-011**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The impacts and benefits of various land use alternatives were evaluated in the VISION 2040 Environmental Impact Statement, published by the Regional Council in April 2008.

**I-033-012**

Comment noted.

I-034 Joshua Franklin.txt

From: info@fixieconsulting.com
Posted At: Friday, July 10, 2009 10:50 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Joshua Franklin

Address: 5622 20th Ave NE

City: Seattle, WA 98105

Email: joshuadfranklin@yahoo.com

Add to mailing list?: yes

The various components in the six alternatives:

The environmental impacts of the alternatives:

I-034-001 Funding strategies, for raising revenue and paying for transportation needs: I believe the arterial tolling is an excellent idea, but to work it should be made as invisible as possible to us users. Today's technology already allows this.

The information contained in the analysis:

I-034-002 The alternative you think best accomplishes our regional needs out to 2040: Alternative 5

Other comments: Thanks for all your work.

**I-034-001**

Thank you for your comment. As you stated technology does exist today to begin tolling the arterial system, but we anticipate that continuing improvements in this are will provide increased reliablity, lower cost, and improved privacy protection.

**I-034-002**

Thank you for stating your preference among the alternatives.

TRANSPORTATION 2040

I-035-001

1) The various components in the six alternatives.

After reading and reviewing the 6 alternatives it is obvious which alternatives need to be implemented in order to prepare for the increase in population that will occur by 2040. As of today our transportation infrastructure is obsolete in many areas. An example is I-405 from Renton to Bellevue, which has been neglected from funding for the last 30 years. This section should have been widened by 2 lanes each way 20 years ago, instead this roadway is the worst stretch of freeway in the state. There are many others that do not have enough capacity and others that need to be built.

I-035-002

I-035-003

The two best alternatives to address these transportation needs are a combination of Alternative #2 and Alternative #3. In alternative number #2 which resembles the current plan, adds capacity through lane additions to existing highways, the creation of several new highways. With the added lanes I support regular single occupant lanes verses hot lanes. I only support hot lanes if there is at least 4 general-purpose lanes in each direction. Hwy 167 is an example of where the hot lanes should NOT have been built until there is adequate capacity in the other lanes. I am also concerned about funding for the current #2 alternative since not enough projects are getting built in a timely manner. This is why alternative #3 has some good ideas as well. If all else fails in regard to funding new roadways, then I would support tolls in the areas where the project would be built. Some examples would be the HWY 167 extension, SR 509 extension, The Cross Base Hwy, Other highways that I support with tolls would be a 3rd lake Washington bridge and I-605 fry for the eastside. I do not support using tolls for demand management on roadways with no improvements. As for the other alternatives they do not go far enough to address or dire need of infrastructures improvements. We are years behind where we could have been, we have already done the (No action alternative) in the 1980's and that is why we are in the mess that we are in today. Alternative 5 will bring us backwards into an even worse future of severe congestion. Alternative 4 will not work as well because our transportation network as already obsolete and tolling the whole network will not get citizen support. .

I-035-004

I-035-005

I-035-006

2) The environmental impacts of the alternatives.

I-035-007

I feel the environmental impacts of not doing Alternatives #2 and #3 will create a metropolitan area that will be so congested that businesses will want to move out to other metro areas with better infrastructures. We have already seen Boeing move its headquarters and other assembly lines to other areas with better infrastructures. One has to wonder how many more will move when they cant move good and services in a manner that is profitable. As for pollution I feel that cars are already getting better in regards to emissions standards and will continue to do so. Think about all the pollution along roadways such as I-405 from Renton to Bellevue from cars going 8mph. That could be the future on other neglected roadways.

I-035-008

**I-035-001**

Comment noted. The constrained part of the Transportation 2040 plan includes 746 miles of new roadways, including significant improvements along the I-405 corridor.

**I-035-002**

Thank you for stating your preference among the alternatives.

**I-035-003**

Comment noted.

**I-035-004**

Comment noted.

**I-035-005**

Comment noted.

**I-035-006**

Comment noted.

**I-035-007**

Thank you for stating your preference among the alternatives. Compared to the 2040 Baseline Alternative, all of the alternatives proposed in Transportation 2040 reduce traffic congestion in the region. The Preferred Alternative for Transportation 2040 would produce significant mobility benefits for the region, including freight users and the region's key industry clusters, which include Aerospace. The Preferred Alternative would also reduce congestion on freeways and arterials when compared with the Baseline Alternative.

I-035-009

3) Funding strategies, for raising revenue and paying for transportation needs.

As I stated earlier I am concerned about the current funding for future projects in the Puget Sound area. As of today there is NO funding for I-405 expansion from Renton to Bellevue and to the north of HWY 522 to I-5, Hwy 167 expansion also has NO funding. A major interchange with I-405 and HWY 167 is also not funded. These projects should

I-035-010

have been done 20 years ago and they continue to deteriorate with more congestion. I was really hopeful about these strategies last year when Dino Rossi was running for governor. He campaigned changing the way we raise revenue to fund these mega projects. I think the state needs to raise the gas tax again, perhaps 10 cents a gallon.

I-035-011

Some tolls need to be implemented on the HWY 167 extension, 509 extension, and a toll on the cross base highway. Other tolls where funding is needed, but not for traffic demand management. I would have supported a toll on the Highway 520 bridge if it were built correctly, as of now they only plan on building a 6 lane with HOV lanes. HWY 520 needs to be an 8 lane bridge. When it is completed it will resemble another I-405 in Renton. Something needs to be done to address these funding shortages.

I-035-012

4) The information contained in the analysis.

After reading the information in the analysis, I came to the same conclusion that I have already known. Our transportation network is obsolete and needs immediate attention. Major highways need to be widened and others need to be built. The population of our region is going to grow, and we need to keep up with it by investing in our infrastructure. The growth management act of 1990 funnels growth in incorporated areas of the metropolitan area. With a denser population in the cities requires roadways with higher capacity to support it. I don't see any other way to sustain without these investments.

I-035-013

5) The alternative you think best accomplishes our regional needs out to 2040.

As I stated earlier, Alternative 2 with better revenue for projects and parts of Alternative 3 for building highway projects with tolls when all other revenue sources have dried up. Both of these alternative with the right funding can expand I-405 from Renton to Bellevue (add 2 lanes each way) expand Hwy 167 (add 2 lanes) Expand Hwy 520 to an 8 lane bridge (not a 6 lane bridge) Build a freeway to freeway interchange at HWY 167 and I-405, Missing links freeways of Hwy 167, 509, Hwy 522 extension thru Bothell, possible 3rd bridge across lake Washington, or I-605 for

I-035-014

the eastside. One needs to go to other similar size cities to see how bad our current transportation system is. Denver, San Diego, Phoenix, are all similar size cities and they are good cities to look for ideas. All of these cities have expanded major roadways and are in the process of building more. We should be embarrassed to even be where we are today. Ex. I-405 from Renton to Bellevue is not something to be proud off. Hopefully with this study the future of transportation is going to go in the right direction, and to try as best as we can to correct bad decisions we made in the

**I-035-008**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**I-035-009**

Comment noted. Your comment points out one of our most pressing issues: how to fund critical projects. The Preferred Alternative for Transportation 2040 is accompanied by a financial strategy to implement

I-035-014

past. (No Build), (Not in my back yard) and (no funding this year!) helped make this one of the worst traffic congested metro areas in the country. Good Luck!

Sincerely

Jeff A Lykken
1116 N 31st
Renton WA 98056
Jalykken@hotmail.com

the transportation improvements needed for the next 30 years. The major projects you mention would likely be funded (in part) through tolls on those facilities.

**I-035-010**

Comment noted. Our financial strategy for Transportation 2040 may include an increase in the gas tax in the short term to finance some projects, as we tool up to begin tolling of others.

**I-035-011**

Comment noted. Tolling is planned on all the projects you note in your comments. The option of an eight-lane SR 520 bridge is no longer on the table.

**I-035-012**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-035-013**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-035-014**

Comment noted.

I-036 John Worthington.txt

From: info@fixieconsulting.com
Posted At: Friday, July 10, 2009 11:59 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: John Worthington

Address: 4500 se 2nd pl

City: Renton WA 98059

Email: worthington jw2u@hotmail.com

I-036-001 The various components in the six alternatives: None have enough cheap afforadble parking to link with regional transit

I-036-002 The environmental impacts of the alternatives: The environmental impacts of all alternatives are worse than would be if more Levx were used,and more affordable parking to link with Levx

I-036-003 Funding strategies, for raising revenue and paying for transportation needs: Legalize the sale of medical marijuana which is already legal in washington state.Pot clubs are making a tax free fortune.That money needs to go to into civic infrastructure.

The information contained in the analysis:

I-036-004 The alternative you think best accomplishes our regional needs out to 2040: Builing lots of Levx and affordable parking

I-036-005 Other comments: 2040 is a tool for the GMA,whch wants to acquire a fill in of the city centers.2040 will not enable the consumer to generate the type of commerce,that will sustain our society.Instead of ordinancing the public into city centers and mass transit milk runs,The city centers need to be built to draw the public in on their own accord,without social engineering.
2040 needs to target the commuter where they live now rather than hoping to coerce or inconvenience the commuter.Too many green house gases will be created with social engineering techniques designed to frustrate long distance commuters into transit or relocation to someplace they may not be able to afford to live.Too much revenue will be lost by impeding the flow of goods and services with social engineering schemes.Enough levx,and affordable parking could be built to serve the long distance commuter with a service that outcompetes the automobile.With the playing field cleared of the epic battle to coerce relocation or transit ridership out of long distnace commuters,the recreational travel and commercial traffic willhave the room to conduct commerce unmolested.If the city centers contained significant civic spectacle investments that were capable of making citiy centers irresistable,the public would not need to be socially engineered into filling in the city centers.

2040 spends billions to force a relocation to the city centers at the expense of a free market society.2040 is a cop out on building the transportation infrastructure that we will need to maintain American dominance of the free market world.2040 needs to account for the growing demands of a modern society ,rather than cop out on those demands.
2040 needs to invest in Levx transportation systems and affordable 3-d parking to entice the public into a superior service that outcompetes the automobile,and gets the commuters of the freeways opening them up for the future commerce to thrive.

**I-036-001**
Comment noted.

**I-036-002**
PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects (and individual technologies like Levx) is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

**I-036-003**
Comment noted.

**I-036-004**
Comment noted.

**I-036-005**
Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to

areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

I-037 Lary Coppola.txt

From: info@fixieconsulting.com
Posted At: Sunday, July 12, 2009 11:56 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Lary Coppola

Address:

City: 98366

Email: biznews@wetapple.com

I-037-001 The various components in the six alternatives: I find ALL of them unacceptable. It appears that social engineering is running rampant, and that no one who lives in the "real world" - outside of downtown Seattle - must have worked on this. In my view, all the tax money spent to produce this document has been poured down a rathole and was apparently used simply to make work for people with a very narrow outlook, and whose main agenda appears to be the Europeanization of America. There is absolutely NO common sense or real world perspective that I could see applied anywhere in this entire document.

I-037-002 The environmental impacts of the alternatives: Alternatives 1 through 5 will all make traffic congestion worse, not better, and the results will be seriously increased levels of air pollution because of it. In my view, while stating it doesn't, when you actually read it through and apply all of the suggestions to the real world, this document contradicts the state's goals on climate change more often than supporting them. The planners apparently haven't ventured anywhere in the state east of I-405, north of 520, or south of Tacoma.

I-037-003 Funding strategies, for raising revenue and paying for transportation needs: Tolling for NEW projects such as a new 520 Bridge is acceptable and makes sense. However, things like a VMT tax are not - unless it is used exclusively for non-motorized and/or electric vehicles that don't pay any gas tax. To impose this on vehicles that already pay a gas tax is not only unfair, but is double taxation that blatantly penalizes people who have purchased high mileage vehicles such as hybrids, for doing the right thing for the environment. This is not only punitive and downright stupid, it eliminates all the incentive to do what's right for the environment.

I-037-004 The idea of tolling - especially on major arterials such as I-5, and all other state highways - is COMPLETELY UNACCEPTABLE. These roads have been bought and paid for for half a century. To toll them either outright, or create HOV and HOT lanes without adding lane capacity to the roads that are to be tolled is not only unfair, it is flat out wrong - and will most likely generate lawsuits that will tie up any form of progress for years - and substantially increase the cost of any eventual solution no matter how the legal challenges are resolved.

I-037-005 Tolling and a VMT tax will also have a negative effect on the economy of our state. These will only add one more reason for businesses like Boeing and Microsoft to leave Washington, not to mention make it more difficult to recruit new companies (read grow jobs) to locate here. Location for business is a CHOICE.It is not a requirement to either locate here or stay here. Post Falls, Idaho is a prime example. How many businesses along that I-90 corridor used to be located in our state?

I-037-006 In my view, long term, any of these plans if implemented as outlined will cost those of us who remain here, significantly more in higher taxes, higher user fees, and will ultimately chase business and jobs out of our state at a fairly rapid rate. I know my small business will be gone - along with the 11 family wage jobs it supports, and the ones those jobs support in our small community. And I won't be the only one. When that exodus begins to happen, we will most likely find our current capacity is adequate because there won't be enough people left to have to build any new capacity for.

I-037-007 The information contained in the analysis: The main assumption - that you are going to financially penalize people out of their cars and get them onto mass transit is fatally flawed. In most other parts of the state outside of King County, the geography and topography - not to mention the economic conditions most residents must endure to survive financially, are not going to allow this to happen. Even if people wanted it to - which is far from a certainty - working class economics and the built environment must be considered, nether of which it appears have been realistically analyzed. Planning should revolve around what is actually existing on the ground - not the Utopian outlook of what the planners would like it to force it to be.

I-037-008 The alternative you think best accomplishes our regional needs out to 2040: None of them.

I-037-009 Other comments: Scrap the entire thing and start over. This time, hire some planners who live in places other than King County and have a realistic view of the world as it actually exists - not as they would like it to.

**I-037-001**

Comment noted.

**I-037-002**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**I-037-003**
Comment noted. There are valid concerns associated with a potential VMT tax, as you have noted. The details of how traditional revenue instruments are used over time and how the region transitions to new funding strategies are important issues. Some of these issues are not fully resolved in the plan, but will be the subject of continuing debate.

**I-037-004**
Comment noted.

**I-037-005**
Comment noted.

**I-037-006**
Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**I-037-007**
Comment noted.

**I-037-008**
Comment noted.

**I-037-009**

Comment noted.

From: Burk Ketcham [burk80@juno.com]
Posted At: Monday, July 13, 2009 8:07 AM
Conversation: DEIS
Posted To: Transportation 2040

Subject: DEIS

Dear PSRC:

**I-038-001**

In the years ahead the engines of economic expansion worldwide will be its major metropolitan areas. One of the factors in the dollars and cents efficiency of such areas will be the ease/cost of commuting too or from work and distributing goods Any metropolitan area that does not invest in an efficient transit and rail systems is doomed to lag behind its competitors. Most American metro areas, including Seattle and environs, are choking with cars because of an obsession with the automobile. Even if alternative means of energy are evolved to deal with the threat of peak oil and ever more expensive gasoline, just adding roads is no solution even though the public may want it that way. This is not a popularity contest and the PSRC must think long term about how we will match up against the progressive metropolitan areas thinking of how they will flourish in a dog eat dog economic environment.

**I-038-002**

The only DEIS alternative that makes any sense to me is Number 5 which promised the "largest expansion of high capacity transit ....." I am not sure how the highway toll system will work but think it is the best way to go.

Sincerely,

Burk Ketcham
Tacoma, WA

Click to reduce wrinkles & lines. Anti-aging that works, try now.
http://thirdpartyoffers.juno.com/TGL2141/fc/BLSrjpTJYtBakWhtVa8K5Wzx1Mhhon9R3jZyLcsblBgHFk8xG1SALpkmFiA/



**I-038-001**

Comment noted.

**I-038-002**

Thank you for stating your preference among the alternatives.

**Marina King**

**From:** phil [pwhitener1@msn.com]
**Posted At:** Monday, July 13, 2009 5:53 PM
**Conversation:** TRANSPORTATION 2040
**Posted To:** Transportation 2040
**Subject:** TRANSPORTATION 2040

I-039-001 What should the Puget Sound transportation system look like in the 21st century and how should it be financed
**From:** PHILIP WHITENER pwhitener1@msn.com

I gave testimony at the WSF hearing on Bainbridge Island:
The ferry system assumes that technology will not change in the next 22 years. If ferry technology *did* change it would not be used if it caused any change to the docks. The only system in view is ever larger ferries that look just like the ones they have.
Existing technology could produce wake free Bremerton to Seattle crossings in less than 20 minutes. A fleet of small 50 car ferries operating on a 10 minute turnaround could carry 300 cars per hour. The ferries would operate on a demand schedule and would consume about the same fuel as the cars would use for the same trip. The fleet could be designed to burn hydrogen to eliminate all pollution. The system would function as a floating conveyor belt equivalent to a bridge. All elements would be highly automated to reduce labor cost. The system would easily expand to offer many direct connections around Puget Sound. Kitsap county would blossom. We should not accept small thinkers.

I-039-002 While projecting a $3,500,000,000 deficit, the loss of growth must be added to that deficit.
What funds are committed to defining a system that may not produce a deficit?

I-039-003 These are some additional thoughts I sent in.

It should be possible for less than $200,000 to define the state of the art for at least the next 10 years with estimates for ticket prices. Elasticity in the market can have a profound effect on ridership. The economy of scale cannot be realized without including all positive factors.

I-039-004 I didn't detect any coordination with regional transportation plans in the WSF plan. Any study should take advantage of regional interests that intersect.

I-039-005 If interest rates are less than inflation then capital facilities should be financed and included in the ticket price just like a toll bridge. Taxpayers should not be forced to borrow money at credit card rates to finance government capital facilities.

I-039-006 The real question to be answered is: What should the Puget Sound transportation system look like in the 21st century (WILL IT USE 19th CENTURY TECHNOLOGY?) and how should it be financed?

Philip C. Whitener, PE
Advanced Marine Concepts, LLC
5955 NE Battle Point dr.
Bainbridge Island WA 98110



**I-039-001**

Thank you for your thoughtful and innovative comment about a new type of ferry and a new brand of ferry service. While PSRC is looking to new technology and new ideas that could transform our future transportation system, we rely on Washington State Ferries to provide us with clear direction for the state ferry system.

**I-039-002**

Comment noted. At the regional level, our work on passenger ferries shows potential in providing a regional system of passenger ferries that could have comparatively low capital cost, low operating cost, low environmental impact, reasonable fares, and Seattle-Bremerton crossing times of 30 minutes.

**I-039-003**

Comment noted.

**I-039-004**

When the Transportation 2040 DEIS was released (May 2009), the WSF Long Range Plan was still in draft form. The final WSF Long Range Plan was published on June 30, 2009, after the release of the Transportation 2040 DEIS. Planning by WSF and PSRC related to the Washington State Ferries and possible future passenger ferries was well coordinated. With the completion of the Final Long Range Plan by WSF there is more certainty about the future of the state ferry system. This information allowed PSRC to fully incorporate plans for the state ferry system into Transportation 2040. In addition, planning for passenger ferries continues by the King County Ferry District, Kitsap Transit, and the Port of Kingston. These efforts were also coordinated with PSRC's work on Transportation 2040.

**I-039-005**

Comment noted. The financial strategy for Transportation 2040 will reflect the type of sensitivities you mention, to assure the region is investing wisely.

**I-039-006**

Comment noted.

Andy Goodwin.txt

From: info@fixieconsulting.com
Posted At: Monday, July 20, 2009 9:17 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Andy Goodwin

Address: 6719 earl ave nw

City: seattle, wa, 98117

Email: goodwin60@msn.com

**I-040-001**

The various components in the six alternatives: None of these alternatives is even close to being acceptable. They all represent surrender. We have enough mass transit. I don't want you to waste any more money on this expensive non-solution. I could choose Alternative 2 as the least bad, but that would not express how displeased I am with all of your plans, which are all guaranteed to fail.

**I-040-002**

The environmental impacts of the alternatives: The estimates of energy usage are fantasy. We all know electric cars are coming, even the least scientific and most uninformed among us. Obama's fuel efficiency standards are real. The Prius is already more fuel efficient per passenger than a bus, and that difference will only get more pronounced as plug-in hybrids come around in the next couple of years.

Any energy estimates that rely on electricity from dams are outright dishonesty. We all know the dams are at 100% capacity all the time, so electric trains don't count. All new energy usage comes from coal. Until real alternatives come on-line and eliminate coal completely, electricity for trains generates new capacity demands. The question is what is the usage with and without the train, and subtract the difference. Any other accounting doesn't save Polar bears at all.

**I-040-003**

Funding strategies, for raising revenue and paying for transportation needs: Any costs for new roads can be fairly considered the responsibility of people who drive. Everyone who drives on the roads should have to pay for them at the same rate, not just those who drive on specific roads. fair's, fair. The proposal to toll is thinly disguised. The idea of course is to justify making some of the people pay for transit, especially those who don't use it. Divide and conquer, is that the idea? The utter unfairness of this system obscene.

**I-040-004**

The information contained in the analysis: We keep hearing "if you build more freeways and they will just fill up". Baloney! I saw how I-5 filled up as did everyone else who lived here for the past 50 years. For 20 years there were no backups, then you would occasionally have backups southbound starting at the ship canal in the 70s, sometimes all the way back to the university of Washington. Then it slowly got worse. The same thing happened to I-405. There is no evidence that this was any sort of "induced demand". The freeways filled up at exactly the rate you would expect as population grew and a certain percentage of people chose the suburbs.

**I-040-005**

We spend less than a penny per vehicle mile to maintain roads. We will spend about 40 cents per passenger mile operating cost for trains and about 75 cents for buses. The operating costs of transit will eventually grind this region to a halt. The idea that we could reduce vehicle miles traveled by half with transit is laughable. We will all be paying $5,000 to $10,000 a year in taxes just to support transit!

At 40 cents per vehicle mile a freeway will eventually pay for itself, in a couple of decades. Trains will continue to cost 40 cents per passenger mile forever, and buses will cost 75 cents. In addition all capital costs for new trains and buses are bourne by taxpayers, while costs of buying a new car are the option of the consumer.

Page 1

**I-040-001**

Comment noted.

**I-040-002**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

Andy Goodwin.txt

I-040-006 The alternative you think best accomplishes our regional needs out to 2040: non of them. Build more roads, forget expensive to build expensive to operate transit. The cost will just rise and rise and become permanent.

I-040-007 Other comments: The following is also in 4. above:

We keep hearing "if you build more freeways and they will just fill up". Baloney! I saw how I-5 filled up as did everyone else who lived here for the past 50 years. For 20 years there were no backups, then you would occasionally have backups southbound starting at the ship canal in the 70s, sometimes all the way back to the university of Washington. Then it slowly got worse. The same thing happened to I-405. There is no evidence that this was any sort of "induced demand". The freeways filled up at exactly the rate you would expect as population grew and a certain percentage of people chose the suburbs.

We spend less than a penny per vehicle mile to maintain roads. We will spend about 40 cents per passenger mile operating cost for trains and about 75 cents for buses. The operating costs of transit will eventually grind this region to a halt. The idea that we could reduce vehicle miles traveled by half with transit is laughable. We will all be paying $5,000 to $10,000 a year in taxes just to support transit!

At 40 cents per vehicle mile a freeway will eventually pay for itself, in a couple of decades. Trains will continue to cost 40 cents per passenger mile forever, and buses will cost 75 cents. In addition all capital costs for new trains and buses are bourne by taxpayers, while costs of buying a new car are the option of the consumer.

Page 2

**I-040-003**

Comment noted.

**I-040-004**

Comment noted.

**I-040-005**

Comment noted. You raise several issues about the differential costs between roadways and transit. These costs, whether for roads or transit, include the initial capital cost for construction, and thereafter they include the cost of operating, maintaining, and preserving the system, as well as any financing costs (such as bond coverage). While the costs of individual elements of the system may vary, the region's goal is to provide a system that offers travel choice at reasonable cost.

**I-040-006**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline

and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-040-007**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

John Worthington.txt

From: info@fixieconsulting.com
Posted At: Monday, July 20, 2009 1:11 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: John Worthington

Address: 4500 se 2nd pl

City: Renton WA 98059

Email: worthington jw2u@hotmail.com

The various components in the six alternatives:

The environmental impacts of the alternatives:

I-041-001 Funding strategies, for raising revenue and paying for transportation needs: Cutting criminal justice funding

The information contained in the analysis:

I-041-002 The alternative you think best accomplishes our regional needs out to 2040: Levx,civic spectacles in the city center,and 3 dimensional parking for the next generation of clean burning SOV transportations,so they can drive fewer lane miles to link with express services.

I-041-003 Other comments: In the late 90's The federal government offered federal grants to fill in the city centers, and the local municipalities have been tailoring their transportation planning to filling in the city centers ever since.
To acquire the fill in, the transportation planners have targeted S.O.V. traffic with social engineering schemes to create a mode shift from commuter to urban dweller or Transit rider.
This process has interrupted not only disrupted the flow of goods, services, recreational travel, it has disrupted the state, county and city revenue as well, because It was impossible to target S.O.V. Traffic and not interfere with commerce and the ability to conduct it.
Planners have focused on disrupting travel habits to coerce people to drive fewer lanes miles so more lane miles wouldn't have to be built, which created a more limited customer base and killed transactions that would have otherwise been a sale.
Businesses need an out of area customer base too , Some People who may not be willing to conduct commerce in the same place today ,may be motivated to going someplace new for a change to spend their money. These are the transactions commerce used to thrive on, now those transactions have been suppressed.
The current planning is an extension of the old planning. We are continuing down the path of giving up on keeping up with the transportation infrastructure, and copping out on building a civic infrastructure that will enable commerce to be conducted without restrictions. The packed in public will acquire consumer fatigue of limited choices and repetitive experiences.

I-041-004 Instead of regressing to the old throwback concept of going back the days when we conducted commerce to biking and walking for everything no bigger than a bread box, we need to keep up with the demands of the consumer. We need to create civic spectacles and link those spectacles together with modern day transportation systems that out competes the automobile, and doesn't kill the transaction.
The planning that started in the 90's to restrict the consumer has cost us billions in lost revenue. Now we are in the position of restricting the consumer even more, at a time when we need money the most.

Page 1

**I-041-001**
Comment noted.

**I-041-002**
Comment noted.

**I-041-003**
Comment noted.

**I-041-004**
Comment noted.

**From:** Bruce Bryant [buffsupnorth@msn.com]
**Posted At:** Thursday, July 16, 2009 9:20 AM
**Conversation:** Transportation 2040 Public Comment
**Posted To:** Transportation 2040

**Subject:** Transportation 2040 Public Comment

Dear Transportation 2040,

I greatly appreciate the opportunity to comment on the Six Alternatives being studied and submit the following for your consideration:

**I-042-001** After reviewing Alternatives 1 through 5 I would have to say that the additional mobility benefits of alternatives 2 to 5 do not come close in value to the cost under a cost/benefits comparison. In other words, the cost far outweigh the benefits. I favor a somewhat modified Alternative 1 based on one simple ideal, get people out of their cars and into public transportation or pedestrian and bicycle modes of transportation. Here is how I would do that:

**I-042-002** 1) Do not spend a single penney rebuilding the Alaska Way Viaduct (AWV) or the 520 bridge.
2) Tear down the AWV and replace it with nothing except nice waterfront parks.
3) Take all the billions proposed to rebuild the AWV and put it into light rail systems to better connect the region. An early priority would be a line to West Seattle so the AWV is not even needed.

**I-042-003** 4) Take one side of the 520 Bridge and use it for light rail, use the other side for Bus and bicycle/pedestrian use. Don't spend a dime rebuilding it for automobile usage, this will just continue to encourage us to use our cars and make matters worse.

**I-042-004** 5) Open up almost all HOV lanes to full use by anyone at anytime, the exception is the I90 HOV lanes. It simply amazes me to spend so much money building all these roads and then nobody drives on them. This will significantly reduce congestion as auto users will get one to two more lanes and it won't cost a dime. It is time to simply admit that HOV lanes are a failure and have not encouraged car pooling, etc.

**I-042-005** 6) Take the I 90 HOV lanes and use them for light rail, There are already adequate parking facilties if you use the existing Park N Ride lots along I 90. Ridership will no doubt quickly exceed the parking infastructure so a good use of the funds that were going to be spent on the 520 bridge will be to build out additional parking facilities, as well as light rail stations.

**I-042-006** 7) Use one-half of 405 for light rail, Pedestrian and Bicycle use. The other half remains for vehicle travel.

**I-042-007** 8) Add a new "Inter City Car Tax" for anyone who wants to be able to drive a car in Seattle West of I-5 and make it expensive.

**I-042-008** This plan utilizes existing infastructure and right of ways, builds out public transportation by simply re-directing funds from bridge and highway construction to mass transit use, will encourage the use of public transit and costs a fraction of what is being proposed in the 2040 alternatives.

These are tough decisions and I applaud the efforts of the Puget Sound Regional Council. Thank you for allowing me to comment.

Bruce Bryant

**I-042-001**

Thank you for stating your preference among the alternatives.

**I-042-002**

Thank you for stating your preference among the alternatives. A common element in the transit modeling was the need for improved transit connections between downtown Seattle and West Seattle, as reflected in the BRT connection proposed in Alternative 1 that extends south to Burien.

**I-042-003**

Comment noted. During the development of the DEIS, initial transit modeling efforts identified a need for additional high capacity transit service between North Seattle/University of Washington and the Eastside, particularly Bellevue and Redmond. To address this need, a BRT line was added, connecting along SR 520.

**I-042-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs




for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-042-005**
Comment noted.

**I-042-006**
Comment noted.

**I-042-007**
Comment noted.

**I-042-008**
Comment noted.

Will Brandt.txt

From: info@fixieconsulting.com
Posted At: Thursday, July 16, 2009 11:55 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Will Brandt

Address:

City: Lake Stevens, WA, 98258

Email: william.brandt@clearwire.net

Add to mailing list?: yes

I-043-001 The various components in the six alternatives: Focus on non-road transit, aka rail.

I-043-002 The BNSF route along the eastside of King and Snohomish County (between Renton and Snohomish) MUST be maximized as a commute alternative to I-405; also, I am adamantly OPPOSED to HOT lanes anywhere. Instead of HOT lanes on 405, convert the existing HOV lane into a PERMANENT transit lane (buses, vanpools, 6+ riders), and have the lane next to it HOV between "commute" times. Isn't the goal to get people to think

I-043-003 more responsibly, rather than pay their way into convenience? I support tolling of major highways: I-5 between Smokey Point in Snohomish County and Dupont in Pierce County (which, by the way HOV lanes need to be extended to in both areas), 405, 90, 520, 512, 167, 2 (Snohomish to Everett segment) etc. I am cautious to support tolling of any non-divided highway/road.

I-043-004 The environmental impacts of the alternatives: Instead of building more roads, again, let's focus on non-road transit alternatives. Trains don't get stuck in traffic! The environmental impacts of focusing less on SOV cars has the greatest impact to creating a more environmentally-focused approach to transportation in this region.

I-043-005 Funding strategies, for raising revenue and paying for transportation needs: Again, full tolling of major arterials makes the most sense. If you drive on the road, you must pay to help support its maintenance and future improvements. Also, the roads listed above make up a majority of where congetion occurs. For "second-tier" arterials, I would support looking at transportation districts to fund. We cannot rely on gas taxes to fund roads any longer. The most sense is tolls. I know they are controversial, but often we must make these decisions even if they are not popular... it all comes down to education. Most people support a "use fee", and as such, that is exactly what a toll is.

I-043-006 The information contained in the analysis: I am very disappointed that the report made HOT lanes look so great. They are a nightmare on 167 that limit HOV vehicles from exiting, and make the diamond lanes just that... people should not be able to pay their way into the lane. The purpose is to reduce traffic, and this is sending the wrong message.

I-043-007 The alternative you think best accomplishes our regional needs out to 2040: I believe that would be 4 or 5, the one that focuses on major highway tolling (NO HOT lanes), extending HOV lanes up to Smokey Point and down to DuPont, creating a BNSF commute corridor between Snohomish and Renton, focusing on non-road transit such as rail.

I-043-008 Other comments: The one thing I think is missing that we have too many transportation entities. Why have we yet to create one single regional transportation entity that encompases SoundTransit, Community Transit, Everett Transit, Metro, Pierce Transit, etc... too many cooks in the kitchen will make this more challenging.

Page 1

**I-043-001**

Comment noted. Alternative 5 does focus on developing transit-only right of way for both rail (light rail and commuter rail) and bus (bus rapid transit in BAT lanes and queue jumps for arterials, and direct access ramps from HOV lanes).

**I-043-002**

Thank you for your comment. The objective of HOT lanes is to operate the roadway in the most efficient manor possible, while improving travel times for transit, vanpools, and other high occupancy vehicle.

**I-043-003**

Thank you for your comment.

**I-043-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized

under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-043-005**

Thank you for your comment. Consistant with your position the Preferred Alternative recognizes that gas tax is becoming a less reliable source of transportation funding and proposes moving to user fees primarily in the form of roadway tolls.

**I-043-006**

Comment noted. There are issues related to entry and exiting from the HOT lanes on SR 167. One of the purposes of the SR 167 HOT Lane Pilot Project, according to the WSDOT website, is as follows: "The HOT lanes pilot project is helping WSDOT learn how variable tolling can improve traffic flow. WSDOT will be asking both carpoolers and solo drivers how they feel about this new commuting option throughout the four-year pilot period."

**I-043-007**

Thank you for stating your preference among the alternatives.

**I-043-008**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region’s efforts to maintain, improve, and manage the transportation system can be found within the

combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

Jonathan Hudson.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 15, 2009 3:54 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Jonathan Hudson

Address:

City:

Email: hudsonjf@comcast.net

Add to mailing list?: yes

I-044-001 The various components in the six alternatives: I believe that the best option is Alternative 5. If the Puget Sound region is truly looking to become world class, able to lure corporate headquarters away from other North American and international cities, and able to foster new businesses here we must invest heavily in transit and focus on density in the existing urban areas of the region. Seattle should look to double its population base within the city limits over the next 30-40 years. Remaining population growth should be 90% directed to existing urban or suburban areas. Transit is the only way to make this possible. We need to become more Vancouver than Dallas. That is one of the few ways we have to make ourselves competetive against other international, world class cities.

I-044-002 The environmental impacts of the alternatives: Option 5 is the only option with any positive environmental impact. All other options increase emissions and will reduce the competetiveness of the puget sound region long term.

I-044-003 Funding strategies, for raising revenue and paying for transportation needs: Tolls need to be applied to all major highways, new tunnels, new bridges in the area.

The information contained in the analysis:

I-044-004 The alternative you think best accomplishes our regional needs out to 2040: Alternative 5

Other comments:

Page 1

**I-044-001**

Thank you for stating your preference among the alternatives.

**I-044-002**

Thank you for stating your preference among the alternatives.

**I-044-003**

Thanks for your comment. Consistant with your position the Preferred Alternative does propose to phase in tolls on limited access highways as a means to fund and better manage transportation facilities.

**I-044-004**

Thank you for stating your preference among the alternatives.

MattGangemi.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 15, 2009 11:07 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Matt Gangemi

Address: 1518 3rd Ave W

City: Seattle, WA 98119

Email: mgangemi@yahoo.com

I-045-001 The various components in the six alternatives: I see #5 as the only real option for our future world. I'd actually like to see much more transit than in #5, but it's a good start.

I-045-002 The environmental impacts of the alternatives: #5 and #1 are both reasonably good, but #1 will lead to restricted mobility.

I-045-003 I think our overall goal should be to concentrate people and jobs in dense areas, and connect these areas by rail. Roads should be maintained, let's just stop growing them - you just can't build your way out of traffic and we should stop trying.

I-045-004 Funding strategies, for raising revenue and paying for transportation needs: We need to remove the constitutional restriction on using fuel taxes only for roads. We don't use real estate taxes only for houses, or sales tax only on providing more goods. Fuel tax should be used to move people and goods - not just cars.

This being said, I'd be fine with any reasonable funding measure the legislature can think up.

The information contained in the analysis:

I-045-005 The alternative you think best accomplishes our regional needs out to 2040: #5, hands down.

I-045-006 Other comments: I know this is slightly out of your scope, but I'd like to see urban mass transit. Link is really a regional transit system - I would like to see it connect to lines that bring people quickly to all of Seattle's neighborhoods (and one day Bellevue's neighborhoods, Tacoma's neighborhoods...).

Page 1

**I-045-001**

Thank you for stating your preference among the alternatives.

**I-045-001**

Thank you for stating your preference among the alternatives.

**I-045-002**

Comment noted.

**I-045-003**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-045-004**

Thank you for your comment. As we move forward with Transportation 2040, we will be discussing a wide range of financial issues, such as the 18th Amendment restriction you mention.

**I-045-005**

Thank you for stating your preference among the alternatives.

**I-045-006**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

GeraldGieseke.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 15, 2009 9:52 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Gerald Gieseke

Address:

City:

Email: mac_the_fallen@hotmail.com

I-046-001
I-046-004

The various components in the six alternatives: Please move commuter rail service on the Woodinville Subdivision into all 6 alternatives. Please consider a slight variation in the routing that would increase ridership.
1. Obtain FRA waiver to share track between DMU and Link vehicles 2. Start the line at the Sounder Station in Tukwilla, with a station in Renton, all other stations (except Bellevue) will be as per the ESR latest study.
3. Once ESR crosses I-90, turn West on new track and connect to the Link alignment at the South Bellevue Park and Ride 4. Exit the Link Alignment where it crosses the ESR in North Bellevue 5. After passing through Kirkland (prior to Totem Lake) start decending into a cut trench, passing under all intersections in Totem Lake, following the existing ROW to the nearest point to the Redmond Woodinville spur, then cutting over to an alignment on the redmond Woodinville Spur (This may require Doubletracking from the join to the south woodinville station) 6. Replace the dual South woodinville station design with a single station as both alignments are now running on one set of track.
7. Connect the North end from Snohomish to Everett 7(alt). connect to a Everett, Snohomish, Monroe commuter line in Snohomish (simular to what is being evaluated for the Maple Valley, Black Diamond, Covington, Auburn area.
By following this set of alignments, the 3 major bridge replacements in the ESR proposal do not need to hapen (for commuter rail, the two in Bellvue should still happen for Freight mobility, and freight on the Eastside should be encouraged on rail)

I-046-002

The environmental impacts of the alternatives: Migrating the ESR (with DMU (possiable Diesel/Electric hybrid)) to phases other than 5, would potentially cut down a large amount of VMT, and reduce Carbon emisions

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

I-046-003

The alternative you think best accomplishes our regional needs out to 2040: Currently Alt 5, however if the ESR were incorporated into any of the other alternatives, I would definatly have to re-evaluate my stance

Other comments:

Page 1

**I-046-001**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-046-002**

Concur.

**I-046-003**

This project has been included in the Preferred Alternative.

**I-046-004**

Comment noted.

**From:** Sean Ardussi
**Posted At:** Wednesday, July 15, 2009 11:19 AM
**Conversation:** feedback on Transportation 2040 DEIS
**Posted To:** Transportation 2040

**Subject:** feedback on Transportation 2040 DEIS

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**From:** Allison Cox [mailto:ACox@tpchd.org]
**Sent:** Wednesday, July 15, 2009 11:17 AM
**To:** Sean Ardussi
**Subject:** feedback on Transportation 2040 DEIS

I-047-001

I think Alternative 2 is a worthy pursuit. The ferry system keeps losing numbers because the price keeps going up without improvement in services (just like taking a plane these days). More and more of us are telecommuting when possible or changing our work weeks to less days to save money. The ferries are our highways - how would the rest of WA state feel if we closed their roads intermittently. The Tahlequah/Vashon route seems to be the stepchild of the ferry system. Our small boat was taken away and lent to a much smaller Pierce County island while we were given an even smaller boat that could not handle the normal capacity. This same ferry service has closed for months at a time since I have lived on Vashon Island. What would you expect people to do when we cannot even count on our ferry to be there! Please do not abandon us on the islands - we are taxpayers who deserve a highway access like everyone else - and not only until 10 PM at night!

Allison Cox

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**I-047-001**

Comment noted.

**I-047-002**

Comment noted. The Transportation 2040 Plan recognizes the travel needs of those who live on the islands of our region. PSRC has worked with Washington State Ferries to identify cross-sound travel needs, and those needs are addressed in the region's transportation plan. In addition, in 2008 PSRC completed its first ever Regional Passenger Only Ferry (POF) study. This study was actively coordinated among key state, regional, and local agencies; transit agencies; private industry; labor; state legislators, and others. The POF study assessed travel demand for passenger ferries, evaluated numerous routes, and outlined a set of actions to move the region forward toward developing a regional passenger ferry system. Transportation 2040 has incorporated the work of the regional POF study as well as the WSF Long Range Plan for the ferry system.

Gary Powell.txt

From: info@fixieconsulting.com
Posted At: Wednesday, July 15, 2009 12:51 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Gary Powell

Address: 15805 140th CT SE

City: Renton, WA 98058

Email: gwpowell@hotmail.com

I-048-001
I-048-002
I-048-003

The various components in the six alternatives: Poor plans all of them. None of them meet the state's mandated reduction for Green house gases. None of them increase the usage of transit. None of them address the need to improve the electrical grid to run more electric vehicles.

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

The alternative you think best accomplishes our regional needs out to 2040:

Other comments:

Page 1

**I-048-001**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

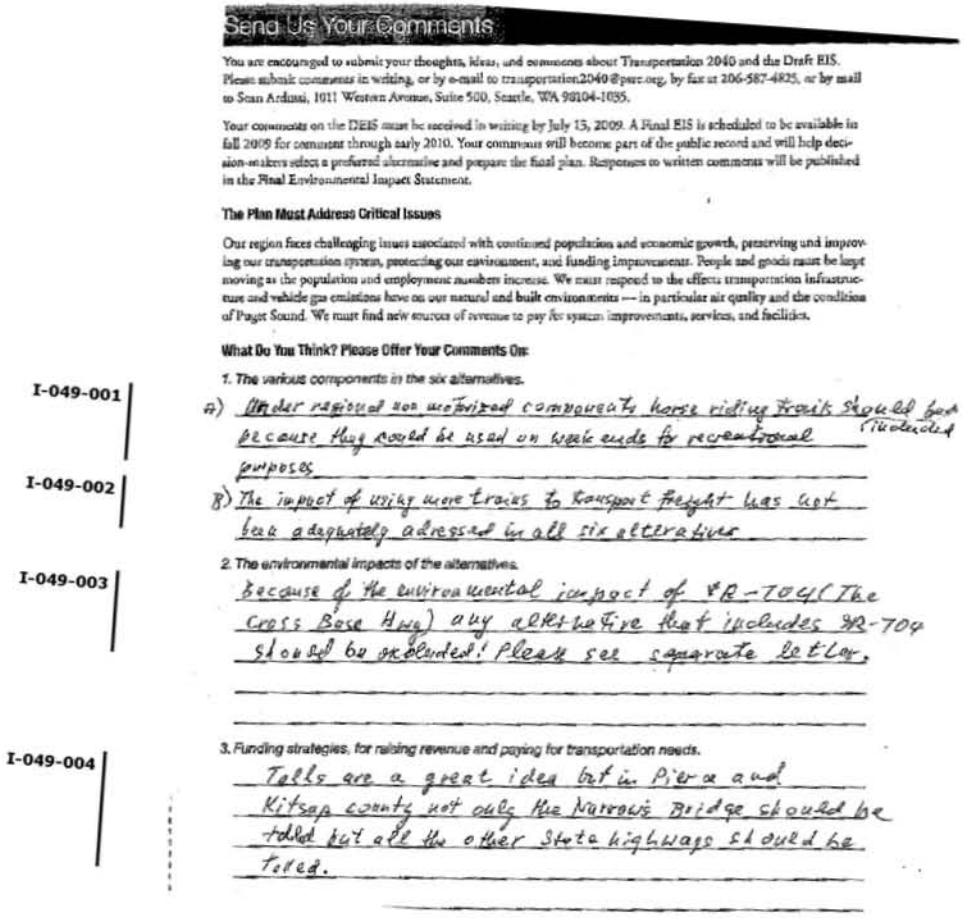
**I-048-002**

The six plan alternatives analyzed in the DEIS, including the Baseline,

were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-048-003**
Comment noted.



## Send Us Your Comments

You are encouraged to submit your thoughts, ideas, and comments about Transportation 2040 and the Draft EIS. Please submit comments in writing, or by e-mail to transportation2040@psrc.org, by fax at 206-587-4825, or by mail to Sean Arduini, 1011 Western Avenue, Suite 500, Seattle, WA 98104-1035.

Your comments on the DEIS must be received in writing by July 15, 2009. A Final EIS is scheduled to be available in fall 2009 for comment through early 2010. Your comments will become part of the public record and will help decision-makers select a preferred alternative and prepare the final plan. Responses to written comments will be published in the Final Environmental Impact Statement.

**The Plan Must Address Critical Issues**

Our region faces challenging issues associated with continued population and economic growth, preserving and improving our transportation system, protecting our environment, and funding improvements. People and goods must be kept moving as the population and employment numbers increase. We must respond to the effects transportation infrastructure and vehicle gas emissions have on our natural and built environments — in particular air quality and the condition of Puget Sound. We must find new sources of revenue to pay for system improvements, services, and facilities.

**What Do You Think? Please Offer Your Comments On:**

1. The various components in the six alternatives.

I-049-001

a) Under regional non motorized components horse riding trails should have been included because they could be used on week ends for recreational purposes

I-049-002

b) The impact of using more trains to transport freight has not been adequately adressed in all six alternatives

2. The environmental impacts of the alternatives.

I-049-003

Because of the environmental impact of SR-704 (The Cross Base Hwy) any alternative that includes SR-704 should be abolished! Please see separate letter.

3. Funding strategies, for raising revenue and paying for transportation needs.

I-049-004

Tolls are a great idea but in Pierce and Kitsap county not only the Narrows Bridge should be tolled but all the other State highways should be tolled.

**I-049-001**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-049-002**

Improving the performance of the entire transportation system demonstrates some of the strongest economic benefits for freight user classes in the FEIS analysis. Furthermore, specific projects that have been identified as having particular importance for freight have been included in the Preferred Alternative. It is beyond the scope of this analysis to determine the exact economic impact of specific transportation investments independent of all other externalities. The degree to which investments identified in Transportation 2040 benefit global supply chains is beyond the scope of this analysis.

**I-049-003**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and

I-049-005

4. The information contained in the analysis.

The Information is excellent

I-049-006

5. The alternative you think best accomplishes our regional needs out to 2040.

Any alternative that does not include SR-704 would be able to accomplish our regional needs out to 2040. (Please read the enclosed statement on the negative impact of SR-704 on the environment and the congestion on I-5)

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

Name Barbara GULLER MD. COL. MC. AUS. Retired

Organization Association of the United States Army ~~Clover Creek Community~~ Fredericksen Council.

Address

City, State, ZIP

Dr. Barbara Guller
17404 49th Avenue Ct. E.
Tacoma, WA 98446-2918

E-mail GullerTacoma@aol.com

*Check here if you would like to be added to the Transportation 2040 mailing list* ☑

**Other Ways to Comment and Participate**

- *Subscribe to the Regional VIEW Newsletter — subscribe me* ☑
- *Visit the Transportation 2040 webpage at psrc.org*
- *Attend any PSRC board or committee meeting (a public comment period is offered at the beginning of each meeting)*
- *Send an e-mail to transportation2040@psrc.org*
- *Contact the PSRC Information Center at 206-464-7532 or info@psrc.org*
- *Schedule a presentation on Transportation 2040 by contacting Marina King at 206-389-2878 or mking@psrc.org*
- *Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices*

industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

**I-049-004**

Thanks for your comment. Consistant with your position the Preferred Alternative does propose to phase in tolls on limited access highways as a means to fund and better manage transportation facilities.

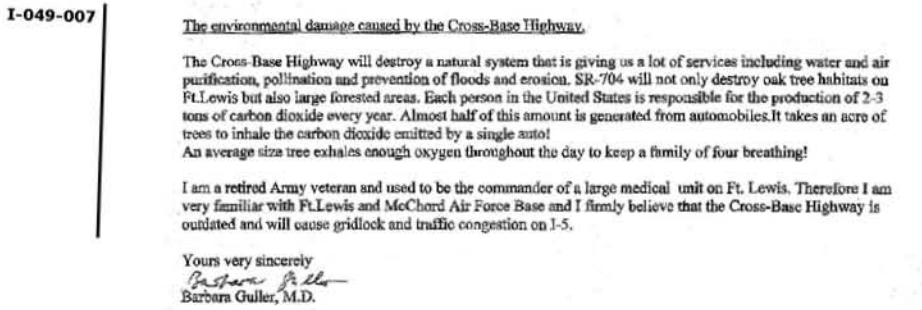
**I-049-005**

Thank you.

**I-049-006**

Comment noted.

I-049-007



The environmental damage caused by the Cross-Base Highway.

The Cross-Base Highway will destroy a natural system that is giving us a lot of services including water and air purification, pollination and prevention of floods and erosion. SR-704 will not only destroy oak tree habitats on Ft.Lewis but also large forested areas. Each person in the United States is responsible for the production of 2-3 tons of carbon dioxide every year. Almost half of this amount is generated from automobiles.It takes an acre of trees to inhale the carbon dioxide emitted by a single auto!
An average size tree exhales enough oxygen throughout the day to keep a family of four breathing!

I am a retired Army veteran and used to be the commander of a large medical unit on Ft. Lewis. Therefore I am very familiar with Ft.Lewis and McChord Air Force Base and I firmly believe that the Cross-Base Highway is outdated and will cause gridlock and traffic congestion on I-5.

Yours very sincerely
Barbara Guller, M.D.

**I-049-007**

PSRC will adopt Transportation 2040 as the transportation plan for the Puget Sound region. Choosing to move forward with planning and implementation of individual projects is the responsibility of city, county, state, and federal agencies; ports; transit agencies; tribal nations; and non-governmental organizations. The region's efforts to maintain, improve, and manage the transportation system can be found within the combined plans, projects, and programs of these project sponsors. Sharing responsibility for the region's future are the transportation system's users — the general public, institutions, businesses, and industries — whose daily transportation choices affect the region's character, environmental quality, and economic health.

The Transportation 2040 EIS evaluates the regional plan. Individual projects will go through the SEPA or NEPA process to evaluate environmental impacts by project.

Support Alternative 5- Please!-Max Benson.txt

From: Max Benson [mxbenson@gmail.com]
Sent: Thursday, June 25, 2009 6:11 PM
To: Transportation 2040
Subject: Support Alternative 5- Please!

Dear PSRC board members and other stakeholders,

I-050-001 I think you know that Seattle typically seen as a leader in the country. . .except in transportation. . .

I-050-002 with the light rail we are going in the right direction, but not fast enough, PLEASE support Alternative #5 so we can truly lead the country and the world in transportation policy. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Max Benson
Seattle, WA

Max Benson
1110 8th Ave #403
Seattle, WA 98101

Page 1

**I-050-001**

Thank you for stating your preference among the alternatives.

**I-050-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5!!-Dale Koetke.txt

From: Dale Koetke [koetke@isomedia.com]
Sent: Sunday, July 05, 2009 6:26 PM
To: Transportation 2040
Subject: Support Alternative 5!!

Dear PSRC board members & other stakeholders,

I-051-001 Please support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

I-051-002 It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

I-051-003 Please join me in supporting a more sustainable future. Thank you!!

Sincerely,
Dale Koetke

Dale Koetke
16639 NE 48th St
Redmond, WA 98052



**I-051-001**

Thank you for stating your preference among the alternatives.

**I-051-002**

Thank you for stating your preference among the alternatives.

**I-051-003**

Comment noted.

Support Alternative 5-amber monroe.txt

From: Amber Monroe [rmonroe@localaccess.com]
Sent: Thursday, June 25, 2009 6:33 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-052-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-052-002 emissions reduction. I know I would be bicycling more to get places if there were more bicycle trails to do so.

I-052-003 Bicycling from place to place is so prevalent in Holland because of bike trails; please make it more possible here and at the same time help our environment, help our society be more healthy and get more cars off the

I-052-004 I-052-005 freeways so we aren't congesting the freeways as much. Please join me in supporting a more sustainable future.

Sincerely,

Amber Monroe
630 NW Ohio Ave
Chehalis, WA 98532

Page 1

**I-052-001**

Thank you for stating your preference among the alternatives.

**I-052-002**

Comment noted.

**I-052-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-052-004**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the

Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally show travel time improvements on the selected routes relative to the Baseline.

**I-052-005**
Comment noted.

Support Alternative 5-Amy Easton.txt
From: Amy Easton [eastone@clearwire.net]
Sent: Thursday, June 25, 2009 7:19 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-053-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-053-002 emissions reduction. Please join me in supporting a more sustainable

I-053-003 future. Perhaps very soon - if cap and trade does come into being- we can use carbon credits from more bikes on the road and other provisions in

I-053-004 this option to off set and even earn money-- Also, more bikes and bike trails are the right way to go for a healthy and environmentally friendly future.

Sincerely,
Amy Easton
9610 15th Ave NE
Seattle WA 98115

Amy Easton
9610 15th Ave NE
Seattle, WA 98115-2212



**I-053-001**

Thank you for stating your preference among the alternatives.

**I-053-002**

Thank you for your comment.

**I-053-003**

Thank you for your comment.

**I-053-004**

Comment noted.

Support Alternative 5-Angela Espinosa.txt
From: Angela Espinosa [frou_frou@hotmail.com]
Sent: Friday, June 26, 2009 10:44 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-054-001 We urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and
I-054-002 emissions reduction. Please join us in supporting a more sustainable future.

Sincerely,
Griffin Becker & Angela Espinosa

Angela Espinosa
12041-A 33rd Ave NE
Seattle, WA 98125



**I-054-001**

Thank you for stating your preference among the alternatives.

**I-054-002**

Thank you for your comment.

Support Alternative 5-Ben Tramposh.txt
From: Ben Tramposh [tramposh@u.washington.edu]
Sent: Thursday, June 25, 2009 5:48 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-055-001 Please support Alternative Five proposed in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable -

I-055-002 goals in VMT and emissions reduction. Our region is extremely unique in that biking is an available alternative to driving almost every day of the year. We must act on this comparative advantage by doing everything possible to make biking an attractive and safe option for as many people as possible to keep our region moving.

Sincerely,

Ben Tramposh
1LT, US Army JAGC

Ben Tramposh
7407 Sand Point Way NE
Seattle, WA 98115



**I-055-001**

Thank you for stating your preference among the alternatives.

**I-055-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Bob Scheulen.txt

From: Bob Scheulen [bobs@exmsft.com]
Sent: Friday, June 26, 2009 6:15 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-056-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. I admit I don't know much about this, but still want to weigh in my support for sustainable development, more sustainable transportation, and in particular better support for travel by bicycle (which is about as low-carbon as you can get).

I-056-002

I-056-003

I-056-004 At some point, we will have to include zoning decisions in our transportation decisions, or we will always have a crippled transportation system that has to deal with poor land use policies.

Sincerely,
Bob Scheulen

Bob Scheulen
5803 43rd Ave NE
Seattle, WA 98105

Page 1

**I-056-001**

Thank you for stating your preference among the alternatives.

**I-056-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-056-003**

Comment noted.

**I-056-004**

Comment noted.

Support Alternative 5-Brad Throssell.txt
From: Brad Throssell [brad_throssell@dell.com]
Sent: Friday, June 26, 2009 8:36 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-057-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-057-002 emissions reduction. Please join me in supporting a more sustainable future.

I-057-003 I bike to work regularly and am tired of dodging cars. More bike trails would allow me to ride more frequently and feel much safer.

Sincerely,

Brad Throssell

Brad Throssell
15204 NE 8th St B2
Bellevue, WA 98007



**I-057-001**

Thank you for stating your preference among the alternatives.

**I-057-002**

Thank you for your comment.

**I-057-003**

Comment noted.

Support Alternative 5-Bruce Leaman.txt
From: Bruce Leaman [bruce@iphc.washington.edu]
Sent: Friday, June 26, 2009 8:54 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-058-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-058-002 emissions reduction. Please join me in supporting a more sustainable

I-058-003 future. Yes, this is part of an email campaign - that doesn't make it less meaningful or relevant to your decisions and it does represent the views of a taxpayer and cyclist.

Sincerely,
Bruce Leaman
17620 24th Lane NE
Shoreline WA 98155

Bruce Leaman
17620 24th Ln NE
Shoreline, WA 98155



**I-058-001**

Thank you for stating your preference among the alternatives.

**I-058-002**

Thank you for your comment.

**I-058-003**

Comment noted.

Support Alternative 5-Carl Uhlman.txt
From: Carl Uhlman [carluhlman@yahoo.com]
Sent: Friday, June 26, 2009 6:12 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-059-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-059-002 emissions reduction. Please join me in supporting a more sustainable future.

I-059-003 And do not build or repair any more bridges that don't have bike lanes(like 520)... THAT'S STUPID.

Sincerely,

Carl Uhlman
Seattle

Carl Uhlman
00000
Seattle, WA 98115



**I-059-001**

Thank you for stating your preference among the alternatives.

**I-059-002**

Thank you for your comment.

**I-059-003**

Comment noted.

Support Alternative 5-David L. Allen.txt
From: David Allen [cougardave92@hotmail.com]
Sent: Friday, June 26, 2009 9:26 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-060-001 My name is David L. Allen and I am a resident of Bellevue. I am a small business owner, home owner and I bicycle about 100 miles a week. I have serious concerns with the number of bicycle paths in our region.

I-060-002 Don't get me wrong, I appreciate that we have several long non-motorized paths, but in my commute from Bellevue to Belltown, I am constantly in the thick of traffic. It is dangerous and unnecessary and I urge you to prioritize bicycle only paths and lanes.

I-060-003 Alternative Five is the best option available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

David L. Allen
12121 SE 21st St
Bellevue, WA 98005

David Allen
12121 SE 21st Street
Bellevue, WA 98005

Page 1

**I-060-001**

Comment noted.

**I-060-002**

Comment noted.

**I-060-003**

Thank you for stating your preference among the alternatives.

**I-060-004**

Thank you for your comment.

Support Alternative 5-David Mildes.txt

From: David Mildes [fuji32dm@yahoo.com]
Sent: Thursday, June 25, 2009 9:16 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-061-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

Sincerely,
David Mildes

David Mildes
310 S 174th Pl #C
Burien, WA 98148

Page 1

**I-061-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-David O. Seal.txt

From: David Seal [davido28@comcast.net]
Sent: Friday, June 26, 2009 1:41 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-062-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-062-002 emissions reduction. Please join me in supporting a more sustainable future.

I-062-003 I've been bike-commuting 24 miles round trip for over four years now, once a week all year round. We need more streets, not necessarily arterials, that have bike lanes.

Sincerely,

David O. Seal

David Seal
4316 N 37th St
Tacoma, WA 98407



**I-062-001**

Thank you for stating your preference among the alternatives.

**I-062-002**

Thank you for your comment.

**I-062-003**

Comment noted.

From: Debbie Klosowski [kloslink@comcast.net]
Sent: Wednesday, July 01, 2009 4:51 PM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-063-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and
I-063-002 emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Debbie Klosowski
I-063-003 By providing safe bicycle linkages, we will encourage people to bike for work and recreation. It works well in other areas...now's the time to do it!

Debbie Klosowski
po box 64702
university place, WA 98467

**I-063-001**

Thank you for stating your preference among the alternatives.

**I-063-002**

Thank you for your comment.

**I-063-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Ellen Hanson.txt

From: Ellen Hanson [ehanson@telebyte.com]
Sent: Friday, June 26, 2009 9:39 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-064-001 A a member of Cascade Bicycle Club, and and older new cyclist I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

I-064-002 To plan for the next 30 years it is most important to get this right.

I-064-003 Alternative Five It is the only alternative that comes close to meeting statutory - and desirable - goals in

I-064-004 VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Ellen Hanson

Ellen Hanson
6948 Parshall Pl SW
Seattle, WA 98136



**I-064-001**

Thank you for stating your preference among the alternatives.

**I-064-002**

Comment noted.

**I-064-003**

Thank you for stating your preference among the alternatives.

**I-064-004**

Thank you for your comment.

Support Alternative 5-George Williams.txt
From: George Williams [geow2@comcast.net]
Sent: Thursday, June 25, 2009 7:52 PM
To: Transportation 2040
Subject: Support Alternative 5

I-065-001 Dear PSRC board members and other stakeholders,

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040
I-065-002 plan. We must reduce emissions that harm our environment...particularly those known to cause Global
I-065-003 Warming. We alsom MUST encourage Americans to GET OUT OF THEIR CARS and use mass transit,
mopeds, and bicycles more - as Europeans and Asians do!

Sincerely,

George Williams

George Williams
17618 162nd Ave SE
Renton, WA 98058

Page 1

**I-065-001**

Thank you for stating your preference among the alternatives.

**I-065-002**

Thank you for your comment.

**I-065-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

Support Alternative 5-Gwinn Shick.txt

From: Gwinn Shick [gwinn.shick@nordstrom.com]
Sent: Friday, June 26, 2009 8:32 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-067-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

I-067-002

I am an advocate for bicycle commuting. I was in Vancouver BC this summer and was very impressed with their extensive networkof safe and well-marked bicycle routes. My wish is for Seattle to offer the same level of support for our bicyclists.

Sincerely,
Gwinn Shick

Gwinn Shick
3323 W Armar St
Seattle, WA 98199

Page 1

**I-067-001**

Thank you for stating your preference among the alternatives.

**I-067-002**

Comment noted.

Support Alternative 5-Hans Gerwitz.txt

From: Hans Gerwitz [hans@gerwitz.com]
Sent: Sunday, June 28, 2009 9:57 AM
To: Transportation 2040
Subject: Support Alternative 5

I-068-001

I'm sure you've seen the boilerplate. Please support Alternative Five from the draft Transportation 2040 EIS, as the only one worth being labeled "2040".

Hans Gerwitz
130 Harvard Ave E Apt #502
Seattle, WA 98102



**I-068-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Jed Barden.txt
From: Jed Barden [jedbarden@gmail.com]
Sent: Monday, June 29, 2009 3:56 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-070-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

I-070-002 Your strength in leadership will help us to attain the future that we want for ourselves and for our children. That includes the ability to safely bike to work, to school, to the park, to the store, and to our friends and neighbors. I encourage you to fund and support bicycle transportation to the maximum extent possible.

Sincerely,

Jed Barden

Jed Barden
910 8th Ave #1518
Seattle, WA 98104

Page 1

**I-070-001**

Thank you for stating your preference among the alternatives.

**I-070-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Jim Walseth.txt

From: Jim Walseth [jim.walseth@gmail.com]
Sent: Sunday, June 28, 2009 9:21 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members,

I-071-001 Looking around it seems that few decisions about public policy are truly farsighted. At every turn we are dealing with out-moded, failed transportation infrastructure, destructive in so many ways. We are a mature community, we should be able to step up and do the right thing for the future, make the right investments now.

I-071-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

Sincerely,

James Walseth

Jim Walseth
3608 33rd Ave W
Seattle, WA 98199



**I-071-001**

Comment noted.

**I-071-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-John Engel.txt
From: John Engel [lookin44numbskull@yahoo.com]
Sent: Thursday, June 25, 2009 9:29 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-072-001 We need to support the Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions
I-072-002 reduction. Please join me in supporting a more sustainable future.

I-072-003 Carbon emissions and transportation alternatives are inevitable - let's make them happen now!

Sincerely,
John Engel
Fremont - WA

John Engel
3967 Phinney Ave N
Seattle, WA 98103

Page 1

**I-072-001**

Thank you for stating your preference among the alternatives.

**I-072-002**

Thank you for your comment.

**I-072-003**

Comment noted.

Support Alternative 5-John Gilbert.txt

From: John Gilbert [johngilbert2006@hotmail.com]
Sent: Friday, June 26, 2009 7:55 AM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-073-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-073-002 emissions reduction. Please join me in supporting a more sustainable future.

I-073-003 I ride my bicycle to work 8 months out of the year and take the bus the other 4. Let's encourage others to do likewise.

Sincerely,

John Gilbert
19504 se 21st Street
Sammamish WA 98075

John Gilbert
19504 SE 21st St
Sammamish, WA 98075

Page 1

**I-073-001**

Thank you for stating your preference among the alternatives.

**I-073-002**

Thank you for your comment.

**I-073-003**

Comment noted.

Support Alternative 5-Jonathan Freedman.txt
From: Jonathan Freedman [jonathan.freedman@mac.com]
Sent: Friday, June 26, 2009 5:15 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-074-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and
I-074-002 emissions reduction. The cost is small compared to other modes of transportation and the benefits are
I-074-003 enormous. Please join me in supporting a more sustainable future.

Sincerely,

Jonathan Freedman
8222 38th Ave. NE
Seattle, WA 98115

Page 1

**I-074-001**

Thank you for stating your preference among the alternatives.

**I-074-002**

Comment noted.

**I-074-003**

Thank you for your comment.

Support Alternative 5-Julia Majkrzak.txt
From: Julia Majkrzak [jmajkrzak@yahoo.com]
Sent: Tuesday, June 30, 2009 9:18 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-076-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

I-076-002 Furthermore, it is the only alternative that includes increases in bicycling as part of the solution. I ride my bike instead of a car everyday, rain, sun, wind or cold, so increased bicycle paths and bicycle use is something dear to my heart.

Sincerely,
Julia Majkrzak

Julia Majkrzak
1909 13th Street
Bremerton, WA 98337

Page 1

**I-076-001**

Thank you for stating your preference among the alternatives.

**I-076-002**

Comment noted.

Support Alternative 5-Krystene Smith.txt
From: Krystene Smith [kksmith@rei.com]
Sent: Friday, June 26, 2009 8:00 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-077-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-077-002 In the city of Sumner you have bike lanes that just end, then you have to deal with traffic including industrial

I-077-003 traffic. Not very healthy or safe for me and my family. Corvallis Oregon prides itself as a cycling community.

Sincerely,
Krystene Smith

Krystene Smith
532 Guptil Avenue
Sumner, WA 98390

Page 1

**I-077-001**

Thank you for stating your preference among the alternatives.

**I-077-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-077-003**

Comment noted.

Support Alternative 5-Lance Barr.txt

From: Lance Barr [lancenb@earthlink.net]
Sent: Thursday, June 25, 2009 6:16 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-079-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. As an avid biker it's easy to see and experience the areas of our transportataion system that are inadequate--and dangerous to both bikers and automobiles. Alternative Five is the only choice that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-079-002

I-079-003

Sincerely,

Lance Barr

Lance Barr
29203 NE 16th Street
Carnation, WA 98014



**I-079-001**

Thank you for stating your preference among the alternatives.

**I-079-002**

Transportation 2040 must be consistent with the goals and objectives of Target Zero, Washington State's strategic highway safety plan, and must address safety issues unique to the region. Target Zero promotes safer roadways, safer walkways/pathways for pedestrians and bicyclists, improved response systems, and passenger and driver behavior improvements.

**I-079-003**

Comment noted.

Support Alternative 5-Laura Ramirez.txt

From: Laura Ramirez [orangecloud@hotmail.com]
Sent: Friday, June 26, 2009 11:53 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-080-001 I passionately urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Laura Ramirez

Laura Ramirez
605 E Denny Way Apt 205
Seattle, WA 98122



**I-080-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Lawrence Petery.txt
From: Lawrence Petery [l.petery@comcast.net]
Sent: Thursday, June 25, 2009 7:09 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-081-001 I strongly urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Lawrence Petery

Lawrence Petery
2608 NE 164th Avenue
Vancouver, WA 98684

Page 1

**I-081-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Lief Zimmerman.txt
From: Lief Zimmerman [blief.z@gmail.com]
Sent: Thursday, June 25, 2009 8:05 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-082-001 As a bicyclist, driver, Sounder Train, walker, and bus commuter I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Lief Zimmerman

Lief Zimmerman
1012 S 30th Ct
Renton, WA 98055



**I-082-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Loren Szendre.txt

From: Loren Szendre [zorenlendry@yahoo.com]
Sent: Thursday, June 25, 2009 8:10 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-083-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

I-083-002 Bicycling has become a key part of my transportation repertoire. Having more trails and other support would make it even easier for myself and others to make the world a better place and make ourselves healthier.

Sincerely,

Loren Szendre

Loren Szendre
303 E. 10th Ave.
Kennewick, WA 99336

Page 1

**I-083-001**

Thank you for stating your preference among the alternatives.

**I-083-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Lori Williams.txt

From: Lori Williams [loriannewilliams@gmail.com]
Sent: Thursday, June 25, 2009 7:02 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-084-001 I ask you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. As a health scientist and a human who wants to breathe the best possible air, I support Alternative Five because it comes closest to meeting goals in VMT and emissions reduction. I hope you will choose the option that will allow all of us Puget Sound residents to breathe a little easier.

I-084-002

Sincerely,

Lori Williams, MPH, PhD

Lori Williams
922 31st Ave
Seattle, WA 98122



**I-084-001**

Thank you for stating your preference among the alternatives.

**I-084-001**

Thank you for stating your preference among the alternatives.

**I-084-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Matthew Pidgeon.txt
From: Matthew Pidgeon [pidgeon.matthew@gmail.com]
Sent: Friday, June 26, 2009 9:41 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-085-001 PLEASE, PLEASE support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Matthew Pidgeon

Matthew Pidgeon
8207 8th Ave S
Seattle, WA 98108

Page 1

**I-085-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Max Hepp-Buchanan.txt

From: Max Hepp-Buchanan [maxxhb@hotmail.com]
Sent: Friday, June 26, 2009 8:43 AM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-087-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. In my graduate-level Urban Economics and Policy Analysis classes at the University of Washington, I used the five alternatives in a policy analysis project to combat automobile dependency in the region. Alternative Five is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Max Hepp-Buchanan

Max Hepp-Buchanan
5210 12th Ave NE Apt B
Seattle, WA 98105



**I-087-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Melissa Gonzalez.txt
From: Melissa Gonzalez [monkimoon@gmail.com]
Sent: Friday, June 26, 2009 11:10 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-088-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable

I-088-002 future. Please enable our local cities and counties to be icons for safe non motor vehicle travel pathways.

Sincerely,

Melissa Gonzales

Melissa Gonzalez
3933 1st Ave Ne
#214
Seattle, WA WA

Page 1

**I-088-001**

Thank you for stating your preference among the alternatives.

**I-088-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Michael Williamson.txt
From: Michael Williamson [mikew@wassoc.com]
Sent: Friday, June 26, 2009 9:20 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-089-001 As a business owner and long-time bicycle commuter, I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Mike Williamson

Michael Williamson
3841 Woodlawn Ave N
Seattle, WA 98103



**I-089-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Mike Reynolds.txt
From: Michael Reynolds [reynolds@u.washington.edu]
Sent: Friday, June 26, 2009 8:52 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-090-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-090-002 PS. I bike to work every day, have traveled (by bike) in Europe and can attest that we can do A LOT BETTER supporting bicycling as a transportation method. More support for biking is a win-win -- everybody is encouraged to get out of their cars and live healthier, the environment benefits, and the Puget Sound area becomes a quieter, cleaner, people-friendly place to live!

Sincerely,

Mike Reynolds
life-long Puget Sound resident (AND VOTER!)

Michael Reynolds
2822 30th Ave S
Seattle, WA 98144



**I-090-001**

Thank you for stating your preference among the alternatives.

**I-090-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Nicole Nichols.txt
From: Nicole Nichols [nicnik@gmail.com]
Sent: Thursday, June 25, 2009 7:12 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-091-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-091-002 emissions reduction. Bicycle infrastructure is extremly important to our communities, as it provides both recreation and transportation, and the easier it is for people to commute to work on a bicycle the more people will take the opportunity. Please join me in supporting a more sustainable future.

Sincerely,

Nicole Nichols

Nicole Nichols
3956 1st Ave NE
Seattle, WA 98105



**I-091-001**

Thank you for stating your preference among the alternatives.

**I-091-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Paul Terjak.txt

From: Paul Terjak [paul.j.terjak@boeing.com]
Sent: Friday, June 26, 2009 11:04 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-092-001 I urge you to support Alternative Five, funding to build over 600 more miles of bicycle trails, among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Paul J. Terjak
17805 106th Street E
Bonney Lake, WA 98391

Paul Terjak
17805 106th St E
Bonney Lake, WA 98391



**I-092-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Paula and Jamie Sutherlin.txt
From: Jamie Sutherlin [voyagers2@wildblue.net]
Sent: Saturday, June 27, 2009 10:52 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-093-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions
I-093-002 reduction. All of us in Washington State need to step up to the plate
I-093-003 to address our transportation issues. Cycling needs to be included in the solutions tendered. Please join me in supporting a more sustainable future.

Sincerely,

Paula Sutherlin
314 Kroupa Rd
Curlew, WA 99118

Jamie Sutherlin
314 Kroupa Rd
Curlew, WA 99118



**I-093-001**

Thank you for stating your preference among the alternatives.

**I-093-002**

Comment noted.

**I-093-003**

Comment noted.

Support Alternative 5-Peggy Price.txt

From: Peggy Price [pprice@appraisalgroupnw.com]
Sent: Thursday, June 25, 2009 8:03 PM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-094-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-094-002 emissions reduction. I'm especially interested in promoting safe nonmotorized alternatives. In our region, the weather is rarely an obstacle, and people take the transportation that will provide the most efficiency for the dollar. For only a few miles, that would usually be a bicycle. For a few blocks, it's feet or the equivalent. LOTS of people can't or don't drive, for whatever reasons. Please join me in supporting a more sustainable future, and more safe choices.

Sincerely,

Peggy Price

Peggy Price
9131 122nd Pl SE
Newcastle, WA 98056

Page 1

**I-094-001**

Thank you for stating your preference among the alternatives.

**I-094-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Richard Rafoth.txt
From: Richard Rafoth [rrafoth@everettclinic.com]
Sent: Friday, June 26, 2009 5:47 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-095-001 I bicycle regularly both for recreation and occasionally to work. I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. This seems like a win- win for cyclists, the community which will have fewer cars on the road, and the environment. Please join me in supporting a more sustainable future.

Sincerely,

Richard Rafoth
10512 60th Ave W
Mukilteo, WA 98275

Page 1

**I-095-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Rick Blythe.txt

From: Rick Blythe [rb@rblythe.com]
Sent: Thursday, June 25, 2009 8:55 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-096-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

Please join me and my family in supporting a more sustainable future.

Sincerely,

Rick Blythe
Seattle, WA

Rick Blythe
1300 Lakeview Blvd E
Seattle, WA 98102

Page 1

**I-096-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Rob Watters.txt

From: Rob Watters [watters.robert@gmail.com]
Sent: Thursday, June 25, 2009 6:44 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-097-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-097-002

Encouraging cycling is good for reducing congestion, environmental impact, public health, and well-being. For such a nominal investment, increasing the amount of cycling we do in our everyday lives is a no-brainer.

It's not a complete solution, I understand its limitations, but it's an essential part of a comprehensive package, and therefore should be non-negotiable in any package.

Sincerely,

Rob Watters, Seattle, WA

Rob Watters
5010 7th Ave NE
Seattle, WA 98105



**I-097-001**

Thank you for stating your preference among the alternatives.

**I-097-002**

Comment noted.

Support Alternative 5-Roger Weinheimer.txt
From: Roger Weinheimer [rogwei@comcast.net]
Sent: Friday, June 26, 2009 6:52 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-098-001 I will bike no matter what, and I already do. But we need to encourage more people to bike and make biking a more normal means of transportation.

I-098-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Roger Weinheimer

Roger Weinheimer
123 Bjune Dr SE #303
Bainbridge Island, WA 98110

Page 1

**I-098-001**

Comment noted.

**I-098-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-sonia mcbride.txt

From: Sonia McBride [infantaofspain@gmail.com]
Sent: Thursday, June 25, 2009 5:45 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-099-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-099-002 Do you know how awesome biking is? You should try it, and help all the people who are already making a difference by making responsible transportation choices.

Sincerely,

Sonia McBride

Sonia McBride
1736 Summit Ave #203
Seattle, WA 98122



**I-099-001**

Thank you for stating your preference among the alternatives.

**I-099-002**

Comment noted.

Support Alternative 5-Steve Brien.txt

From: Steve Brien [spectraloz@aol.com]
Sent: Friday, June 26, 2009 12:43 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board ,

I-100-001

9 degrees, baby! That's the scientifically predicted increase in the earth's surface temperature in just 90 years.
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

Sincerely, Steve Brien

Steve Brien
8817 Fauntleroy Way SW
Seattle, WA 98136



**I-100-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Teresa Schoonejans.txt
From: Teresa Schoonejans [teresa.schoonejans@kingcounty.gov]
Sent: Friday, June 26, 2009 6:21 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-101-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-101-002 I-101-003 More people would get on their bikes if the roads were safer for them to travel on, ie bike lanes. Encourage employers with a tax incentive to promote and award alternative commuting choices to single occupancy vehicles.
Sincerely,

Teresa Schoonejans
Renton WA

Teresa Schoonejans
16305 134th Ave SE
Renton, WA 98058

Page 1

**I-101-001**

Thank you for stating your preference among the alternatives.

**I-101-002**

Comment noted.

**I-101-003**

Thank you for your comment. The Preferred Alternative includes TDM strategies targeted towards employers, commuters, and residents through a focus on urban centers, education, incentives, requirements, innovative partnerships, and policies that promote ridesharing and efficient land-use. These strategies were developed by an interagency group of stakeholders and recommended by PSRC's Transportation Demand Management Steering Committee. While Transportation 2040 contains specific programs and projects, the plan will be supportive of all demand management efforts from both the public and private sectors as they directly support regional environmental and congestion relief goals.

Support Alternative 5-Yael Yanich.txt

From: Yael Yanich [yaely@u.washington.edu]
Sent: Monday, June 29, 2009 10:42 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-102-001 Bicycling must be recognized as a real, valid form of transportation, and we must do ALL WE CAN to ensure the safety of cyclists.

I-102-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Yael Yanich
5208 17TH AVE NE
Seattle, WA 98105

Page 1

**I-102-001**

Comment noted.

**I-102-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Zachary Gayne.txt
From: Zachary Gayne [zach.gayne@gmail.com]
Sent: Tuesday, June 30, 2009 9:48 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-103-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction.

I-103-002 Traveling by bicycle offers one a unique and healthy perspective, and allows greater interaction with one's neighbors and community. To be an accessible and viable option for more people, it needs to be safe. This can be accomplished by creating more bike lanes and trails. Please join me in supporting a more sustainable future.

Sincerely,

Zach Gayne

Zachary Gayne
1712 Belmont Ave Apt 5
Seattle, WA 98122

Page 1

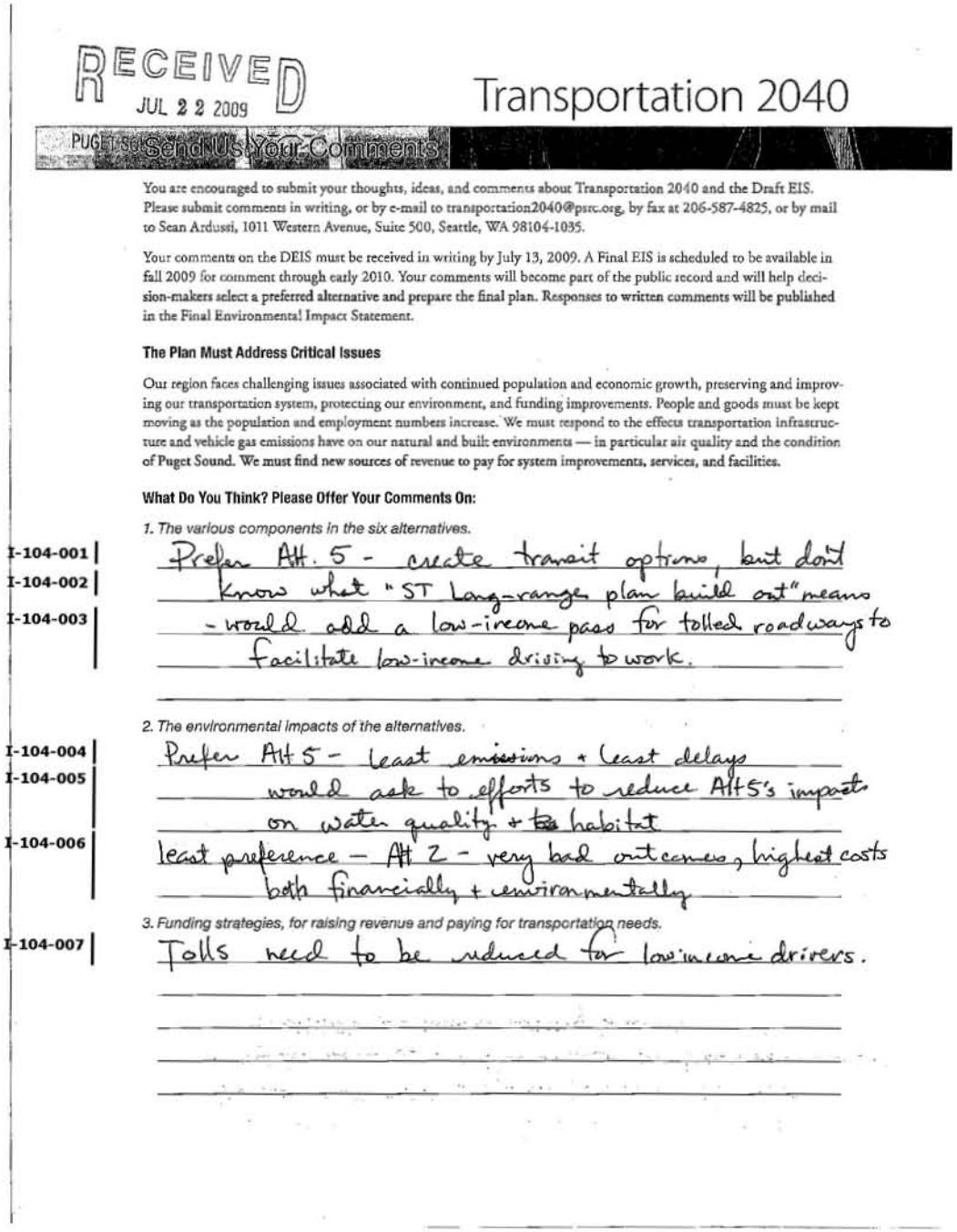
**I-103-001**

Thank you for stating your preference among the alternatives.

**I-103-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas



RECEIVED
JUL 22 2009

# Transportation 2040

PUGET SOUND Send Us Your Comments

You are encouraged to submit your thoughts, ideas, and comments about Transportation 2040 and the Draft EIS. Please submit comments in writing, or by e-mail to transportation2040@psrc.org, by fax at 206-587-4825, or by mail to Sean Ardussi, 1011 Western Avenue, Suite 500, Seattle, WA 98104-1035.

Your comments on the DEIS must be received in writing by July 13, 2009. A Final EIS is scheduled to be available in fall 2009 for comment through early 2010. Your comments will become part of the public record and will help decision-makers select a preferred alternative and prepare the final plan. Responses to written comments will be published in the Final Environmental Impact Statement.

**The Plan Must Address Critical Issues**

Our region faces challenging issues associated with continued population and economic growth, preserving and improving our transportation system, protecting our environment, and funding improvements. People and goods must be kept moving as the population and employment numbers increase. We must respond to the effects transportation infrastructure and vehicle gas emissions have on our natural and built environments — in particular air quality and the condition of Puget Sound. We must find new sources of revenue to pay for system improvements, services, and facilities.

**What Do You Think? Please Offer Your Comments On:**

*1. The various components in the six alternatives.*

I-104-001 Prefer Alt. 5 - create transit options, but don't
I-104-002 know what "ST Long-range plan build out" means
I-104-003 - would add a low-income pass for tolled roadways to facilitate low-income driving to work.

*2. The environmental impacts of the alternatives.*

I-104-004 Prefer Alt 5 - least emissions + least delays
I-104-005 would ask to efforts to reduce Alt 5's impacts on water quality + habitat
I-104-006 least preference - Alt 2 - very bad outcomes, highest costs both financially + environmentally

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-104-007 Tolls need to be reduced for low income drivers.

**I-104-001**

Thank you for stating your preference among the alternatives.

**I-104-002**

Thank you for stating your choice among the alternatives. The language you reference means that Sound Transit's Long Range Plan, which includes both Sound Move and ST2 but also project and programs beyond that, would be fully implemented.

**I-104-003**

Thanks for your comments. Currently the Washington State Transportation Commission is responsible for determining tolls on state facilities. The idea of some type of reduced fare for low income users of the system has been and will likely continue to be discussed as roadway tolling becomes more widespread in the future.

**I-104-004**

Thank you for stating your preference among the alternatives.

**I-104-005**

The Transportation 2040 plan endeavors to fulfill regional planning policies as laid out in VISION 2040 to ensure good environmental stewardship. These measures include practices that will safeguard the natural environment and preserve the beauty and natural ecological functions of the Puget Sound. Some of the measures include:

- Maintain and, where possible, improve air and water quality, soils, and natural systems to ensure the health and well-being of people, animals, and plants. Reduce the impacts of transportation on air and water quality and on climate change.
- Locate development in a manner that minimizes impacts to natural features. Promote the use of innovative, environmentally sensitive

4. The information contained in the analysis.

I-104-008 Need to see more than lowest + highest impacts on each item.

5. The alternative you think best accomplishes our regional needs out to 2040.

I-104-009 Alt. 5. - all ferries routes should begin + end in urban areas so as to prevent new rural development around new rural ferry terminals

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

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Check here if you would like to be added to the Transportation 2040 mailing list ☐

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- Subscribe to the Regional VIEW Newsletter — subscribe me ☐
- Visit the Transportation 2040 webpage at psrc.org
- Attend any PSRC board or committee meeting (a public comment period is offered at the beginning of each meeting)
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- Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices

development practices, including design, materials, construction, and ongoing maintenance.

- Use the best information available at all levels of planning, especially scientific information, when establishing and implementing environmental standards established by any level of government.
- Preserve and enhance habitat to prevent species from inclusion on the Endangered Species List and to accelerate their removal from the list.
- Identify and protect wildlife corridors both inside and outside the urban growth area.
- Preserve and restore native vegetation to protect habitat, especially where it contributes to the overall ecological function and where invasive species are a significant threat to native ecosystems.

**I-104-006**

Comment noted.

**I-104-007**

Thanks for your comments. Currently the Washington State Transportation Commission is responsible for determining tolls on state facilities. The idea of some type of reduced fare for low income users of the system has been and will likely continue to be discussed as roadway tolling becomes increasingly applied in the future.

**I-104-008**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**I-104-009**

Comment noted. Your comment is consistent with the intent of VISION 2040, as well as the direction of Transportation 2040, where transportation investments will be largely focused on urban areas.

**Initial, Draft and Personal Comment**
**by Dale Rudolph**
**Poulsbo City Council**
**PSRC Growth Management Policy Board**
**PSRC T-2040 Working Group**

**Comment on the Transportation 2040 Draft Environmental Impact Statement**

1. The various components in the six alternatives.
The range of alternatives presented certainly provoke the needed policy level discussion, including a wide range of technical and financial solutions.

I-105-001

As presented, it is very difficult to determine how the various alternative elements will be phased over the 30 year period. Any Preferred Alternative needs to clearly show the phasing of investments (especially ferries, roads and transit improvements), as well as, the phasing of funding measures, including tolling.

I-105-002

It is important to clarify the issue of equity. It needs to be clear that "equity" means fairly distributing both benefits and costs. Although this comment is primarily directed at geographic equity, the principle needs to also apply more broadly to ensure benefits are returning to those who are paying, generally to where they are paying, especially within corridors.

2. The environmental impacts of the alternatives.

I-105-003

The transportation plan needs to be careful to not over reach in resolving environmental issues. Land Use Planning and Transportation Planning can certainly have a positive impact on the environment; however, it is important to consider the cost/benefit aspect of recommendations. The vast majority of improvement in environmental impacts will clearly come from technology, that is, improved emission standards, gas mileage and alternative fuels. It would be a mistake to over reach and significantly over spend on transportation improvements to achieve environmental improvements, vice promoting alternative technologies for vehicles and the infrastructure they will need to be viable.

3. Funding strategies, for raising revenue and paying for transportation needs.

I-105-004

It is very important that the consideration of the technical alternatives be separated from the funding strategies. We need to choose the right technical solution, then the right funding strategy for that solution. As presented, these are mixed together, making, especially Alternatives 4 and 5 look like the technical solutions are tied to the broad tolling funding strategy.

Generally, there needs to be a nexus between the revenue source (cost) and the end user (benefit). This concept applies to corridors – income generated needs

**I-105-001**

Comment noted. Transportation 2040 includes a plan for phasing in major transportation investments plus a parallel funding plan that matches planned investments.

**I-105-002**

Over the next 30 years the state legislature and local governments will consider a variety of possible transportation funding mechanisms.

- Traditional tax financing (gas tax, etc.) will still play a central role, especially in the early years of the plan.
- An increased reliance on tolls should be phased in over time.
- Tolls should be set in a manner that strives to improve travel benefits to all users of the transportation system.
- There should be a nexus between the tax, fee, or toll and the use of the revenues.
- The use of toll revenues should also evolve over time, becoming increasingly broad.

**I-105-003**

Transportation 2040 strives to achieve and maintain a balance among all investments and priorities, and preserving the environment and reducing emissions of air pollutants is one important objective in both VISION 2040 and Transportation 2040. PSRC recognizes that technological improvements in both vehicles and fuels will play an important role in the long-term reduction of pollutants, particularly greenhouse gas emissions, but that these improvements are only one strategy among many that must be pursued. Towards that end, PSRC is developing a four-part greenhouse gas strategy that includes the implementation of VISION 2040's growth strategy, moving towards a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research

I-105-004 to stay within a corridor, such as, keeping toll revenue to the corridor in which it is generated, whether using for capacity improvements or alternative modes. This also needs to apply to geographies (i.e. fair share).

I-105-005 For system efficiency and maintenance, a more fair approach for supplemental funding would be to allow the establishment of "street utilities". This would allow jurisdictions the authority to more fairly collect revenues, locally, from users, based on use, and is more equitable than the current gas tax approach.

I-105-006 For strategic expansion, the current proposal for supplemental funding using tolling has the affect of making existing users pay for growth, vice growth paying for growth. A more fair approach would be to have a regional traffic impact fee. Furthermore, it is doubtful that voters will support tolling on existing travel lanes, including existing HOV lanes.

I-105-007 For gas tax replacement, a more fair approach for supplemental funds would be a VMT tax. Collection could be through self-reporting upon license renewal, much like the federal income tax process. Renewal applicants could be subject to random audit or visual verification of odometer readings by licensing offices. Perhaps technology could ultimately report odometer readings annually.

I-105-008 General comment on tolling – new capacity - OK, but impact fees are more appropriate for growth; conversion of existing general purpose or HOV lanes –
I-105-009 NO – voters are very unlikely to be willing to pay more for status quo; gas tax revenue replacement – NO – VMT tax is much more fair – if we want to punish gas/diesel users, then that should happen through an emissions tax, if we want to incentivize non-gas/diesel users, then retaining the current level of gas tax will do that.

4. The information contained in the analysis.

I-105-010 It has been very difficult to determine the impact of alternatives on my county and city. This needs to be much clearer in the Preferred Alternative, as well as, the analysis, discussion and record established during the development of the Preferred Alternative. It is quite possible that many jurisdictions, including Kitsap County and many smaller cities, wouldn't be significantly, differently impacted by Alternatives 3-5, especially in the first 20 years.

The cost/benefit information needs to be able to be combined and sorted by regional geography. Environmental cost/benefit information is needed. Again, the discussion of technical solutions and funding methods needs to be separated or clearly shown where they are necessarily tied together (such as, tolling for capacity improvements).

5. The alternative you think best accomplishes our regional needs out to 2040.

I-105-011 Technically, I prefer Alternative 3, for Kitsap County, including the Passenger

in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040.

**I-105-004**

Comment noted. We agree on the need to develop the best solutions for Transportation 2040 and to identify ways to fund them. However, some projects may simply not be feasible without tolls to finance them. On the issue of the nexus between where tolls are raised and where they are spent, the region has expressed a variety of views. Transportation 2040 seeks to find a balance.

**I-105-005**

Comment noted. Given the great financial need in the region, the Transportation 2040 Plan includes a broad and flexible range of financial options.

**I-105-006**

Comment noted.

**I-105-007**

Comment noted. A VMT charge may be an effective replacement of the gas tax. There are some technical and reporting issues to address before implementing a VMT tax, but these are relatively minor.

**I-105-008**

Comment noted.

**I-105-009**

Comment noted.

I-105-011

Only Ferry package. Plus the Bus Rapid Transit on SR 3, Poulsbo to Bremerton and SR 305, Poulsbo to Bainbridge, or Alternative 4 or 5, without the Suquamish and Port Orchard POF.

Financially, if forced to choose, I prefer Alternative 3. I consider tolling limited access highways and arterials infeasible in Kitsap County, except, perhaps, SR 16, Tacoma to Bremerton, and the SR 305/Agate Pass Bridge, and I oppose general tolling for anything other than capacity. A better financial package is discussed in my to question 3.

**I-105-010**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

**I-105-011**

Thank you for stating your preference among the alternatives.

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PUGET SOUND REGIONAL COUNCIL

# Transportation 2040

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**What Do You Think? Please Offer Your Comments On:**

*1. The various components in the six alternatives.*

I-106-001 Obviously, the components were well thought of.

*2. The environmental impacts of the alternatives.*

I-106-002 I like best alt. #5 because of Reduce Carbon Emission.

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-106-003 I believe the High Occupancy Toll is the way to go. I believe that if voters (Taxpayers) are made to believe that it's a necessary evil, they will pay Tolls as a source of revenue to fund Alt. #5. In my trip to Europe 3 summers ago, I noticed that FRANCE has the most Toll Revenu System and the people didn't mind. I noticed that every toll gate there are bathrooms that are well-maintained.

**I-106-001**
Thank you.

**I-106-002**
Comment noted.

**I-106-003**
Thank you for your comment. Both within the United States and internationally tolls are becoming more common as a means to fund transportation facilities.

4. The information contained in the analysis.

I-106-004 Again, the info contained in the analysis are/were prepared by technically savvy people. I doff my hat to them.

5. The alternative you think best accomplishes our regional needs out to 2040.

I-106-005 Alternative #5 - without a doubt

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

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Check here if you would like to be added to the Transportation 2040 mailing list [X]

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- Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices

**I-106-004**

Comment noted.

**I-106-005**

Thank you for stating your preference among the alternatives.

Comments on DEIS for PSRC's Transportation 2040 Plan.txt
From: David F. Plummer [pdf3@comcast.net]
Posted At: Monday, July 27, 2009 9:26 PM
Conversation: Comments on DEIS for PSRC's "Transportation 2040" Plan
Posted To: Transportation 2040

Subject: Comments on DEIS for PSRC's "Transportation 2040" Plan

Sean Ardussi
Puget Sound Regional Copuncil
1011 Western Avenue
Suite 500
Seattle, WA 98104-1035

Dear Mr. Ardussi:

Following are my additional comments on the DEIS for PSRC's "Transportation 2040" Plan:

I-107-001

1. In Appendix D, on page 51, the report states that Alternatives 1, 4 and 5 include rates that are set to "maximize efficiency;" however, "efficiency" is not explicitly defined, so that the meaning of this rate-setting objective is not understandable.

I-107-002

2. The DEIS should evaluate the impact of dispersing population and employment centers to the Region's hinterlands.

I-107-003

3. The cost information in various parts of the report are totally incomprehensible. Sources and rationale for "capital" and "ownership" (O&M, etc.) are not defined, and contain numerous unverified sources and costs. There is no explanation of how to rationalize the "costs" of the baseline and the 5 alternatives and their attendant "benefits." Costs and benefits for the baseline are not defined. There is no explanation of how "costs" ('capital', 'operating', and other costs) were determined, how they were adjusted to a common-year baseline, etc. It is not clear whether costs are "per year", "total" for the 2010-2040 time period, etc. There is no place in the DEIS where the results of PSRC's benefit/cost analysis are displayed and explained.

Please include my comments in your records, and provide responses in the final EIS for this plan.

Sincerely yours,

David F. Plummer

14414 NE 14th Place
Bellevue, WA 98007-4001

Page 1

**I-107-001**

The objective of the toll-rate setting analysis was to maximize user benefits across the roadway system. This entails setting toll rates in response to traffic conditions forecast for each roadway segment for each time of day so that, given the forecast demand conditions, the greatest possible total mobility benefits result. The calculation of mobility benefits accounts for travel time savings, improvements in reliability, and vehicle operating costs so this objective could also be phrased as minimizing the total cost of travel (time plus money) incurred across all users.

**I-107-002**

The VISION 2040 EIS, published by PSRC in April 2008, evaluated the potential benefits and impacts of a variety of regional land use configurations.

**I-107-003**

Detailed analysis results can be found in Appendix D: Policy Analysis and Evaluation Criteria Report. A discussion of the analysis methods can be found in Appendix E: Technical Description of the Modeling Framework.

Mr. Sean Ardussi
Puget Sound Regional Council
1011 Western Ave, Suite 500
Seattle, WA 98104-1035

July 28, 2009

Subject: Comments on Transportation 2040 DEIS

I-108-001 Dear Mr. Ardussi:

Thank you for inviting comments on the Transportation 2040 DEIS. I begin with your invitation to comment on the "the various components in the six alternatives"

## Transit System Components

Since 1990 the PSRC relinquished regional transit planning to the forthcoming Regional Transit Authority – now dba Sound Transit. But Sound Transit was created with a primary mission to build HCT systems that it has come to define as rail transit on exclusive ROW. And the HCT system capital investment is primarily directed to a Seattle-oriented light rail system that merely overlays the already best-served bus transit routes to downtown Seattle. The PSRC has been accepting the Sound Transit light rail Master Plan as its regional rail elements of the MTP.

I-108-002 Transportation 2040 needs to return long-range regional transit planning to the PSRC with an open slate to plan and propose an optimal most cost-effective regional transit system that better focuses on the job access needs of the entire service region and includes all transit modes as most cost and rider effective. Since 1990 the PSRC has sided with Sound Transit to totally reject the development and comparison of an optimized bus/rail transit system. The optimized bus-rail system should place less focus on more regional transit service to the already well-served central Seattle and more emphasis on serving the 85% of the region's jobs located outside of central Seattle.

I-108-003 To test transit system efficiency in **Alternative 1**, the Sound Transit ST2 light rail program should be reduced to a north-south spine from a logical park-ride/bus-rail transfer station north of Northgate to a logical park-ride/bus-rail transfer station south of the Airport. Cost savings for Snohomish, North and South King should be invested in enhancements of the BRT Lite system (using shared HOV/HOT lanes). Since the light rail line will eventually totally preempt bus use of the former downtown Seattle bus tunnel (DSTT), unfortunately all regional bus routes from Snohomish, Pierce and Southwest King County may need to be truncated at the rail terminus stations (as expected with ST2).

I-108-004 East Link should be eliminated and an optimized north-south BRT Lite system substituted in the I-405/SR-167 corridor to better serve Eastside employment access needs, as adopted in the I-405 Corridor Program. By 2030 downtown Bellevue will host as many jobs and residents as did downtown Seattle in 1985 when the bus tunnel was committed for implementation. Alt 1 would need to include an exclusive north-south BRT tunnel under downtown Bellevue by 2030, like the former downtown Seattle bus tunnel.

## Does Exhibit 4-19 accurately reflect the transit systems modeled?

I-108-005 The exhibit shows 70 miles of light rail for the Baseline Alt and Alts 1 and 3. Yet the Sound Move and ST2 light rail programs at most will only provide 53 miles plus Tacoma Link. Alternatives 2 and 4 show 97 miles of light rail. But with extensions of the 53 miles to Everett, downtown Redmond and Tacoma Dome, the system would only total 82 miles plus Tacoma Link. Please explain the differences between Exhibit 4-19, the LRT systems described in Chapter 3, and what was included in the models.

**I-108-001**

Thank you for your detailed comments on the Transportation 2040 DEIS. Per your comments, corrections have been made in the FEIS, as noted below. Hopefully the responses below have helped to clarify the results from the alternatives analysis. The Preferred Alternative includes expanded use of vanpools, as you have suggested.

**I-108-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. The updated Transportation 2040 plan will increase local transit service by approximately 90%, while achieving opera-tional efficiencies to reduce long-run costs; emphasize additional all-day service with high frequencies. This service will be local and regional. The plan will also include the completion of transit supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**I-108-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

## Need to Reconstruct System Alternatives

The alternatives are improperly constructed. The major areas of cost and efficiency comparison are: Streets and Roads, Local and Regional Transit, and Road Tolling. By mixing these together in each alternative we totally lose effective comparisons.

I-108-006 **The 2040 Baseline Alt** is a necessary future base for comparison, assuming it fully reflects current law funding and approved development programs. It needs to be updated to reflect the adjusted Sound Transit ST2 LRT program after the recession tax revenue reductions are made known.

I-108-007 **Alternative 1 – Emphasize Efficiency of the Existing System.** Generally retain as currently proposed. This is a test of a HOT lane system in addition to TSM and TDM. To test transit efficiency, Alt 1 should include the optimized bus/rail regional transit system proposed above with a reduced ST2 rail program and increased express service with focus on suburban employment access needs.

I-108-008 **Alternative 2 - Emphasize Roadway Capacity Expansion.** Maintain all roads elements currently included in the DEIS Alt 2 and in the currently approved MTP road plan. Add additional road capacity expansions that meet the Transportation 2040 Objectives and primary Challenges of "reducing congestion for all types of freight and person travel", outlined on pages 4 and 6 of the DEIS Executive Summary. Set goal to reduce congestion to levels no worse than 2006. The "regional" transit elements should include the same as devised for Alt 1 above.

I-108-009 **Alternative 3 – Emphasize Transit System Expansion.** Retain the road system carried in the Baseline Alt. It should include an optimized BRT Lite system with light rail substituted where justified. The light rail system should include the 55-mile ST1 and ST2 system, and it should only include further (ST3) extensions that would be fundable and buildable by 2040. This is very likely no more than an 82-mile light rail system reaching Everett Station, Tacoma Dome Station and downtown Redmond by 2040. It could include the proposed commuter rail extensions from Lakewood to Dupont and from Tukwila to Snohomish via the BNSF rail corridor included in DEIS Alt 5 to such extent as fundable and implementable by 2040.

I-108-010 **Alternative 4 – Limited Road Tolling.** Same as DEIS Alt 3 for tolling. This is a road system funding alternative with some effect on changing social behavior toward regional transportation choices.

I-108-011 **Alternative 5 – Maximum Road Tolling.** Same as DEIS Alt 4 for tolling. This is a total transportation system funding alternative that seeks to also effect a major change in social behavior toward regional transportation choices.

I-108-012 **DEIS Alt 5 should be eliminated**. It contains rail transit system expansions to 163 miles that could never be funded and constructed by 2040. It makes the erroneous assumptions that rail systems are cleaner than future private vehicles. It is unrealistic and must be eliminated.

## Car/van Pooling Needs More Focus

I-108-013 The DEIS provides minimal emphasis on car/van pooling. The mode share findings, such as in Exhibit 1-10 of the DEIS Executive Summary, show minimal change in "Carpool – HOV" mode share from the 2006 current base. Van pooling is a necessary major consideration for suburban employment that cannot be fully or partially served by conventional transit services. A WSDOT study [need cite and date] found that vanpooling could be increased [by a factor of 10], IF some agency would place higher priority in promoting and supplying vanpool services and vehicles. Transportation 2040 must focus on support and enhancement of the vanpool element of plan. Specific actions need to be proposed for inclusion on some or all system alternatives.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-108-004**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including representatives from the City of Bellevue and Sound Transit. These stakeholders approved the inclusion of light rail in the form of East Link as the high capacity transit mode for downtown Bellevue.

**I-108-005**

Thank you for your comment. The FEIS includes the appropriate edits. Alternatives 1, 3, and 5 contain 80 miles of light rail plus Tacoma Link. Alternatives 2 and 4 contain 53 miles of light rail plus Tacoma Link.

**I-108-006**

Long term revenue forecasts extend to 2040, beyond the completion of

Program Investments

**I-108-014** A major DEIS deficiency is its lack of presentation of costs by travel mode and sub mode similar to tables presented in the previous MTP Update documents. Exhibits 1-3 and 3-3 present bars showing Program Investments without any dollar scales or alternative totals.

What is needed is a table for each alternative arranged by transportation mode and sub mode showing estimated 2006-2040 capital costs and O&M costs in 2010 dollars. Roads should be broken down by State Freeways/Highways sub-totaled by GP lanes and HOV lanes, County Roads, and City Streets. Transit should be broken down by Sound Transit, Local Transit, and WSDOT P&R Lots and other support. The other modes are State Ferries, Local Ferries, Bike and Ped Facilities, and TDM/ITS/Other.

Exhibit 4-19 should be offered as a companion table preceding the cost summary tables in three locations – the Exec Summary, Chapter 3 and Chapter 4.

Submitted by,
James W. Macisaac

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Bellevue, WA 98005

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the ST2 LRT program. The economy will continue to change in the years ahead, requiring additional revisions of the long term revenue forecast.

**I-108-007**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including representatives from Sound Transit and from the cities and counties located on the light rail alignments planned in ST2. These stakeholders approved the inclusion of the ST2 light rail network in Alternative 1.

**I-108-008**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders approved the inclusion of the road and transit projects included in Alternative 2.

Though Alternative 2 does not reduce congestion (as measured by delay per capita) below 2006 levels, the Preferred Alternative does.

**I-108-009**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders approved the inclusion of the road and transit projects included in Alternative 3.

**I-108-010**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including all Regional

Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders approved the inclusion of the tolling program included in Alternative 4.

**I-108-011**

As noted in I-108-002, the plan alternatives were designed through lengthy consultation with many stakeholders, including all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders approved the inclusion of the tolling program included in Alternative 5.

**I-108-012**

Thank you for stating your preference among the alternatives.

**I-108-013**

Thank you for your comment. Transportation 2040 includes approximately 55% more vanpools on the ground every day than are included in the baseline.In addition to capital expansion, the Preferred Alternative includes the maintenance and operation of the existing and future fleet, life cycle replacement costs for rolling stock, a small amount of funding for marketing and incentives, and policy language related to rideshare vehicle parking. Transportation 2040 includes these strategies as well as acknowledging the fact that there are emerging markets for this important service and that the region should take steps to realize the full potential of vanpooling.

**I-108-014**

Please refer to Appendix D for detailed information about costs by travel mode.



Solutions

Solutions for Humanity, Community, and the Environment
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Chair, Board of Directors

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*2661 North Pearl Street, Box 344*
*Tacoma, WA 98407*
*(253)961-4590*
*bates.amy@gmail.com*


July 27, 2009

Puget Sound Regional Council
Norm Abbott AND/OR SEPA Responsible Official
1011 Western Avenue, Suite 500
Seattle, WA 98104-1035

Dear Mr. Abbott:

I-109-001

Thank you for the opportunity to respond to the Draft Environmental Impact Statement (DEIS). I truly appreciate the time, resources, and expertise expended in the generation of this important document.

As an expert in the field of Environmental Justice, my focus will be predominantly upon the aspects of this draft that are intended to prevent injustices as evinced by disproportionate burdens (in terms of pollution, toxic exposure, etc.) upon various populations.

I-109-002

In the DEIS, Environmental Justice (EJ) is defined in a manner that contradicts the EPA's definition, omits the spirit and intent of EJ objectives, and too, in a manner that negatively characterizes minority communities. The definition states that "Environmental justice is an approach that is meant to avoid decisions that can have disproportionately greater negative human and environmental effects on low income or minority communities than on the population as a whole." (DEIS, Chapter 17). However, a correct definition of Environmental Justice is as follows:

*"Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies." (EPA, 2009)*

Using the correct definition, Environmental Justice is intended to ensure that **all** people are included in decision making processes, and it defines these processes as the "development, implementation, and enforcement" of environmental laws. A correct definition and interpretation of EJ must be used in the DEIS in order to ensure that Environmental Justice is an intentional outcome:

- Definition: Correct the definition of Environmental Justice. Environmental Justice is both an objective and a subject. The incorrect definition provided, and the subsequent labeling of minority and low-income communities as "environmental justice groups or populations," proliferates bias and a misunderstanding of the intent of this objective. Environmental Justice is relevant and applicable to all, and is intended to promote inclusion. The negative connotations of this usage are unacceptable and regressive.

I-109-003

- Implementation of Environmental Justice: In Chapter 17 the DEIS states that "due to improved travel times and reliability, each action alternative would be more beneficial than that Baseline Alternative," however it provides no analysis with regards to the true issues surrounding environmental injustices, which include environmental burdens, community health, relative impacts, and process inclusion. This must be corrected.

**I-109-001**

Thank you for your detailed comment letter. Hopefully the responses provide below will explain the reasoning behind the environmental justice framework used in the EIS. PSRC appreciates the importance of the issues you raise in your letter, and supports the dialogue that will follow the adoption of Transportation 2040 as projects move toward project-level environmental review and implementation.

**I-109-002**

This EIS uses the definition of environmental justice as outlined by Executive Order 12898 and USDOT Order 5610.2, as excerpted below.

Executive Order 12898 requires each Federal agency, to the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects, including interrelated social and economic effects, of its programs, policies, and activities on minority populations and low-income populations in the United States.

USDOT Order 5610.2 provides that disproportionate impacts on low-income and minority populations are to be avoided, if practicable.

**I-109-003**

The Environmental Justice chapter in the FEIS includes an expanded discussion of environmental burdens, community health, relative impacts, and process inclusion.

**I-109-004** Environmental Justice is intended to ensure that no population experiences disproportionate burdens in terms of chemical exposure, air pollution, noise, etc. While factors such as pollutions, toxic exposure, noise, etc. are addressed in other chapters of the DEIS, nowhere in the document is there any indication that relative burdens are considered, a critical underpinning of Environmental Justice. This is particularly troublesome because, as outlined in Chapter 6, the document recognizes the nonattainment area in Tacoma, and too, the leaking underground storage tanks (in Tacoma) in Chapter 13, however it fails to consider the environmental burdens of each, their impacts upon human populations, and possible impacts if additional burdens are added. In essence, there are questions that must be answered in order to determine the potential for Environmental Injustices as manifest through disparate environmental burdens, relative impacts/exposure. These questions may include the following:

- How will communities be impacted by noise, toxic exposure, and pollution?
- What other factors may contribute to the potential for disproportionate burdens of noise, toxic exposure, and pollution?
- What do we already know about communities in terms of environmental burdens? (e.g. nonattainment area, proximity to freeways, railways, etc.)
- How might the DEIS contribute to current pollution problems within communities?
- How is this being addressed?
- How are communities encouraged to participate during the planning, implementation, development, and enforcement of environmental policies that will impact their communities?
- What methods are being used to ensure inclusion by all?
- Should the precautionary principle be used in areas wherein disproportionate burdens (in terms of exposure to environmental pollution, toxins, etc.) can be reasonably anticipated?

Other global questions that may be generated with regards to the impacts of the DEIS include the following:

- What benefits will a community, city, or county experience as a result of implementing one of the alternatives provided?
- What are the relative burdens to communities, cities, and counties? Are these being addressed?
- How will increased tolling impact the following populations: rural, low-income, distance travelers, etc?
- How will local communities guide the implementation of the plan to ensure that needs are met at the local level?

**I-109-005** In closing, in order to promote Environmental Justice for all a number of foundational assumptions in the DEIS must be corrected. Too, the conclusions that are drawn based upon the faulty framework used not only circumvent the purpose, spirit and intent of Environmental Justice, but further serves to stigmatize minority populations, while providing none of the critical factors necessary to protecting populations from disproportionate environmental burdens, which can result in a number of poor health impacts.

I welcome the opportunity to dialog with you more about this critical issue and would be happy to offer additional information upon request.

Sincerely,

Amy

Amy Bates, MA, BA, AAS, Registered Sanitarian
Solutions for Humanity, Community, and the Environment – Chair
Puget Sound Clean Air Agency Advisory Council Member
Black Policy Foundation – Chair
Human Rights Commissioner, City of Tacoma
Health Coalition for Communities of Color, Board Member
Citizen's Advisory Board, Pierce County
Lead CAP Advisory Committee, ECY
Criminal and Social Justice Committee – HRC, City of Tacoma
Court Appointed Special Advocate, Pierce County
Gov. Interagency Council on Health Disparities – Education Advisory Committee
Honorable Veteran, US Army Military Police

**I-109-004**

The EIS is a plan-level (rather than a project-level) EIS. Accordingly, alternatives are defined and environmental effects are evaluated at a relatively broad level. More detailed project-specific environmental review will be developed as appropriate in the future for projects identified in the Transportation 2040 plan that are selected for implementation by their sponsors: WSDOT, transit agencies, counties and cities.

In other chapters, the EIS discusses the potential effects on the natural and built environment that could result from the Transportation 2040 alternatives and describes the methods that could be used to mitigate these impacts. The EIS is not intended to identify all effects likely to result from the hundreds of projects and programs contained in each of the Transportation 2040 alternatives. Rather, the EIS seeks to identify the types of effects that could result from the implementation of these projects. Whether these effects from individual projects would have a disproportionate impact on minority or low-income populations would be determined in future project-level environmental reviews.

**I-109-005**

Hopefully the responses provide above have explained the reasoning behind the environmental justice framework used in the EIS. PSRC appreciates the importance of the issues you raise in your letter, and supports the dialogue that will follow the adoption of Transportation 2040 as projects move toward project-level environmental review and implementation.

**From:** Angel Ortiz Hernandez [AOrtiz-Hernandez@commhealth.org]
**Posted At:** Wednesday, July 29, 2009 11:43 AM
**Conversation:** [SPAM?] Comments
**Posted To:** Transportation 2040

**Subject:** [SPAM?] Comments

**Importance:** Low

Hi sorry for the late response for giving a comment on the future transportation for Piece County. I am a member of the Cross Cultural Collaborative in Pierce County.

**I-110-001**

I would like to comment that the future of Pierce County transportation should be a strong emphasis on public transportation. More roads and tolls is not the answer.

Ángel Ortíz Hernández, MCC
Community Health Care
101 East 26th St
Tacoma, WA. 98421
Tel. 253-722-1541
Fax: 253-597-4556

**I-110-001**

Comment noted.

Lynn Abegglen.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 5:01 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Lynn Abegglen

Address: 4107 357th Street South

City: Roy, WA 98580

Email: PeaceWorks@ywave.com

Add to mailing list?: yes

The various components in the six alternatives: The Priorities seem out of order to me.:

The environmental impacts of the alternatives: Priorities out of order, to me

**I-111-001** Funding strategies, for raising revenue and paying for transportation needs: User Fees: only after bus, rail, and other transp linkages have been successfully implemented and expanded.

Until then, statewide income tax.

The information contained in the analysis: Current circumstances are the natural consequences of previous priorities, and

The alternative you think best accomplishes our regional needs out to 2040: I don't have enough time - or I'll miss your 5pm deadline!

**I-111-002** Other comments: Greatly appreciate the concerted effort to directly contact, encourage feedback from, and listen to more of the diverse sub-segments within the Puget Sound region - and even extend the public input deadline.

As a society, we have always put our financial resources where our 'hearts,' our highest priorities are. This is clearly reflected now in the quality and quantity of feasible transportation options throughout the Puget Sound region (and the lack, thereof). My goal is not to assign blame for today's multitude of transportation-related challenges - it is to plead that we summon the courage needed to truly learn from the "lessons" of the past, and commit to undertaking an ambitious and dramatic change in the ways Washingtonians will be able to get from one location to another.

**I-111-003** My priorities line up quite differently from those I find in the 2040 Plan Alternatives. In my opinion, it is a matter of social justice that we provide the greatest increase in access to transportation services to those who have historically had the fewest resources, and the least access before now.

**I-111-004** Consideration and incorporation of the environmental impacts of our decisions should weigh heavily in how the plan is crafted in its final form. The tremendous damage done to the quality of our water, air and even the soil from which our food is grown, must be reversed if we are to stop the declining health of our populations, wildlife, and environment as a whole. Our current methods of transportation are among the greatest sources of this degradation.

But we are truly in a unique position to intervene - to stop ourselves from indulging in our destructive habits. Please, utilize whatever options will have the least possible adverse impacts on our region!

Page 1

**I-111-001**
Comment noted.

**I-111-002**
Thank you.

**I-111-003**
As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**I-111-004**
Comment noted.

# Transportation 2040

## Send Us Your Comments

You are encouraged to submit your thoughts, ideas, and comments about Transportation 2040 and the Draft EIS. Please submit comments in writing, or by e-mail to transportation2040@psrc.org, by fax at 206-587-4825, or by mail to Sean Ardussi, 1011 Western Avenue, Suite 500, Seattle, WA 98104-1035.

Your comments on the DEIS must be received in writing by July 13, 2009. A Final EIS is scheduled to be available in fall 2009 for comment through early 2010. Your comments will become part of the public record and will help decision-makers select a preferred alternative and prepare the final plan. Responses to written comments will be published in the Final Environmental Impact Statement.

### The Plan Must Address Critical Issues

Our region faces challenging issues associated with continued population and economic growth, preserving and improving our transportation system, protecting our environment, and funding improvements. People and goods must be kept moving as the population and employment numbers increase. We must respond to the effects transportation infrastructure and vehicle gas emissions have on our natural and built environments — in particular air quality and the condition of Puget Sound. We must find new sources of revenue to pay for system improvements, services, and facilities.

### What Do You Think? Please Offer Your Comments On:

*1. The various components in the six alternatives.*

I-112-001

ENVIRONMENTAL IMPACT IS OF GREAT CONCERN TO ME. THE LEAST AMOUNT OF NOISE AND EMISSION IN THE ENVIRONMENT THE BETTER.

*2. The environmental impacts of the alternatives.*

I-112-002

WHOEVER DESIGNS THIS PLAN SHOULD TAKE INTO ACCOUNT THE AREAS OF PIERCE COUNTY THAT WILL BE MOST AFFECTED. POORER NEIGHBORHOODS SHOULD NOT HAVE TO BEAR THE IMPACT(S) DUE TO THESE ALTERNATIVES

*3. Funding strategies, for raising revenue and paying for transportation needs.*

I-112-003

-TOLLS.

**I-112-001**

Comment noted.

**I-112-002**

Please refer to FEIS Chapter 17: Environmental Justice for a discussion of impacts borne by low-income and minority populations.

**I-112-003**

Comment noted.

4. The information contained in the analysis.

Good

I-112-004

5. The alternative you think best accomplishes our regional needs out to 2040.

ALT. 5

**Contact Information**

*At a minimum, please provide your name and ZIP Code. If you would like to be added to the Transportation 2040 mailing list, please fill out the rest of the contact information and check the box below.*

Name WM LANCASTER GROSS

Organization

Address

City, State, ZIP 98499

E-mail

Check here if you would like to be added to the Transportation 2040 mailing list ☐

**Other Ways to Comment and Participate**

- Subscribe to the Regional VIEW Newsletter — subscribe me ☐
- Visit the Transportation 2040 webpage at psrc.org
- Attend any PSRC board or committee meeting (a public comment period is offered at the beginning of each meeting)
- Send an e-mail to transportation2040@psrc.org
- Contact the PSRC Information Center at 206-464-7532 or info@psrc.org
- Schedule a presentation on Transportation 2040 by contacting Marina King at 206-389-2878 or mking@psrc.org
- Attend an open house and courtesy hearing on the morning of July 9, 2009 at PSRC offices

**I-112-004**

Thank you for stating your preference among the alternatives.

**Marina King**

**From:** Judy and Joe Clark and Zorich [judyjoe48@hotmail.com]
**Posted At:** Friday, July 31, 2009 6:15 PM
**Conversation:** [SPAM?] Comment on DEIS
**Posted To:** Transportation 2040
**Subject:** [SPAM?] Comment on DEIS
**Importance:** Low

Please see attached comment regarding road pricing policies.

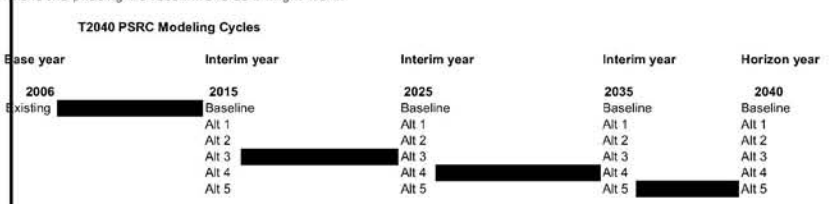
Judy & Joe Zorich

8/3/2009

I-113-001

Pricing as a transportation policy is a good thing to introduce in our region for which we can make a long term commitment.

This is the phasing we recommend as it might work:




Shading indicates stategic path of alternative implementation

It would not be viable to go "full bore" in first years. This phasing in of the pricing means to keep our current tolling policy to replace or add key infrastructure to 2015, then move to add tolling per Alt 3, through 2025, then move to tolling per Alt 4 through 2035, then move to tolling per Alt 5.

**I-113-001**

Thank you for your thoughtful ideas about how the region could phase in tolling over time. The Transportation 2040 planning effort recognizes the need for a phased approach to implementing our financial strategy. In the short term we continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately lead to tolling the entire highway system or the highway and arterial system.

Georgine Foster.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 9:15 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: georgine foster

Address:

City:

Email: georginef@msn.com

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

**I-114-001**

The alternative you think best accomplishes our regional needs out to 2040:
Alternative 4....it is the most balanced and will serve the needs of more people.

Other comments: Earlier today I signed a petition that Cascade Bicycle Club endorsed (supporting Alternative 5).....please remove my endorsement for #5!!! I did more reading on your website....I SUPPORT ALTERNATIVE 4...it is more balanced approach which will serve more people. Sorry for my mistake....and thank you!

Page 1

**I-114-001**

Thank you for stating your preference among the alternatives.

I-115 Tim Gould.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 5:22 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Tim Gould

Address: 4411 Woodland Park Ave. N. #1

City: Seattle, WA 98103

Email: 4cleanair@usa.net

**I-115-001** The various components in the six alternatives: All new limited-access general purpose highway lanes should be dropped from the region's future transportation plan. Such egregious projects include the Cross-Base Highway and SR-509 extension. Greater emphasis on expanded high capacity transit and connections to it are favorable elements. The plan needs to better emphasize how dense urban centers can be used to create a greater use of walking and biking as the favored mode to access the "stuff of life".

**I-115-002** The environmental impacts of the alternatives: I find it disappointing that even an alternative with heavy reliance on demand management and transit such as Alt. 5 still only accomplishes less than 10% reduction in GHG emissions by design year 2040. The impact of Alt. 2 in this regard is truly scary. This shows that we need to make our land use patterns more climate friendly. We cannot expect to solve environmental impacts by operation of the transportation system alone.

**I-115-003** Funding strategies, for raising revenue and paying for transportation needs: We will need other sources besides the motor fuel tax and local option sales tax to fund the region transportation system. Adopting regional tolling is an excellent strategy for both raising revenue and managing demand at the same time. It is essential that transit service be funded by this tolling revenue as well. Fuel taxes should be replaced with carbon emission fees levied on fuels based on the amount of GHG emissions that result from their use. We cannot expect gasoline to be the dominant vehicle fuel of the future. Funding mechanisms must keep pace.

**I-115-004** The information contained in the analysis: The use of latest mobile emission modeling tools is very forward-looking and no doubt helps improve the accuracy of these forecasts given how much uncertainty they tend to introduce. Use of consistent assumptions for growth and transportation is important, but the analysis does not appear to adequately consider potential scenarios for rising fuel costs and energy availability. Too much of the analysis relies on continuation of recent trends which does not adequately consider the effects of climate change and peak oil.

**I-115-005** The alternative you think best accomplishes our regional needs out to 2040: Alternative 5 comes closest to meeting the needs over the long term. It provides the greatly increased resources for transit service that the region will need to combat climate change impacts and respond to rising costs of energy.

Other comments:

Page 1

**I-115-001**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-115-002**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-115-003**

Comment noted. Thank you for your thoughtful ideas about how the region could utilize new funding mechanisms. The Transportation 2040 planning effort recognizes the need for new funding sources. In the short term we will continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project specific tolls. This approach could ultimately lead to tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge.

**I-115-004**

Thank you for your comment. As part of PSRC's four part greenhouse gas strategy, research is being conducted into the potential for vehicle and fuel technology improvements over the next 30 years to contribute towards emissions reductions.

**I-115-005**

Thank you for stating your preference among the alternatives.

I-117 F N Harvey.txt

From: fnharvey [fnharvey@zipcon.net]
Posted At: Friday, July 31, 2009 9:14 AM
Conversation: comments on EIS due today
Posted To: Transportation 2040

Subject: comments on EIS due today

Greetings,
I read the executive summary and think it seems reasonable but when I delved into sections of the main report that I know something about, I found inconsistency.

**I-117-001**

When referring to Metro's plan for moving commuters from West Seattle to downtown, the route culminates with using SR99. But due to the recent decision to make SR99 a deep-bored bypass tunnel rather than a magnificent elevated viaduct, the whole section must be rewritten.

I offer the following to help influence a rewrite.

I think that an improved elevated SR99 should be part of transportation2040 plan considering all the projections for increased population in the Puget Sound region.

The existing viaduct should be replaced, not by any tunnel with less functionality, but rather with an improved elevated viaduct using the "rebuild-in-place" (not retrofit) plan that permits diminished use of the existing viaduct while new construction is occurring. This information was available on the WSDOT website but the media did not dig deep enough to present it; unquestionably accepting PR releases from politicians does not serve the citizenry of the state well.

The view is many times better when traveling on the viaduct, particularly heading north. Though not as extensive as the views discussed in the April 6, 2008 edition of the "Seattle Times Pacific Northwest Sunday Magazine" for rich condo buyers and businesses, the views that riding on the viaduct provides are dynamic, offering a splendid slice of Seattle.
Furthermore, this is public, not just for car users but open to anyone who can afford bus fare. Unlike land acquisition problems with monorail, this right-of-way is already in use; improving viaduct wouldn't require buying up lots of land. However, demolishing and not replacing the viaduct with another elevated solution steals valuable views from the people.

Don't buy into the downtown developer/architect/real-estate attorney propaganda that the existing Alaskan Way Viaduct
(AWV) "separates" the city from the waterfront. As a pedestrian who goes from downtown to the waterfront and back and as a vehicle user who appreciates being able to get into, out of, or through Seattle, I have never felt that the AWV separated me from anything but rather that it made transportation easier, even, or particularly, when I was still able to bicycle. And I'm not the only one:

http://www.westseattleherald.com/articles/2007/08/21/interact/opinion/opinion.txt

Pedestrians had to dodge much more vehicle traffic before the AWV was built than now. That traffic separated "city"
from waterfront.

SR99 Alaskan Way Viaduct(AWV) is a vital regional transportation corridor that contributes more to the
downtown Seattle economy than the mayor realizes. In
fact, none of Mayor Nickles, King County Executive Sims, and Director Grace Crunican of Seattle Department of Transportation seem to understand that downtown Seattle is only part of an interdependent region. They implore locals to replace their private vehicles by using bicycles and/or mass transit. During the extended cold snap with snow and ice during December 2008 many commuters did just that and went to Metro buses (transit) to get to their jobs either in downtown Seattle and/or to downtown Seattle to transfer to another route. Rather than showing inter-agency cooperation by clearing the routes for transit, said "leaders" reduced service, much to the inconvenience and discomfort of waiting riders who justifiably complained. Because these officials showed such poor judgment regarding winter transportation, I think this indicates a general lack of grasping the transportation needs for the region. This example of ineptitude should discredit their choice of a deep-bore tunnel and desire to demolish AWV SR99.

Page 1

**I-117-001**

Transportation 2040 does not make any assumptions regarding the type of facility that will replace the Alaska Way Viaduct, only that the capacity will be replaced.

**I-117-001**

The only vote on the AWV with all options open to all resulted in people wanting either to retrofit the existing AWV or to rebuild it with better functionality and esthetics (quieter pavement, better runoff, shoulders, etc.) by a 30 to 1 ratio. Check at:

http://seattlepi.nwsource.com/saturdayspin/181511_bqweb10.html

The Seattle-only vote of March 2007 was inconclusive because it was so poorly devised. If one accepts Nickels, et al. argument that voters in the March 2007 Seattle want NO elevated solution, then by the same argument, we must conclude that the voters in that election want NO tunnel since almost half voted for an elevated replacement while less than one third voted for a tunnel.

The viaduct project website has exact breakdown of AWV usage. They measured with cameras at all entrances and exits and compared license plates. They also found that more than half of vehicles using AWV were licensed outside of Seattle city-limits.

http://www.wsdot.wa.gov/Projects/Viaduct/library-meetingmaterials.htm

Presentation was at August 28, 2008 meeting. Look at "Origin and Destination Information" presentation and at "Meeting Notes" for that meeting. "Public Comments" was also interesting.

The majority of AWV users, the true "stakeholders", want, preferably, a retrofit, and if not, then a rebuild that retains the Seneca and Columbia ramps. The main reason some people accept the deep-bore tunnel is because it allows continued use of AWV until the tunnel is ready. But that belies the main reason that the public was given for removing the viaduct -- safety. If this AWV was such a safety concern, why not start a rebuild in place" from S. Holgate St. to Battery St. tunnel immediately rather than trying to make the AWV last longer?
Clearly, aside from a downtown few, (who spearheaded the insidious "Moving Forward" scheme involving breaking up the AWV into north, central, and south sections to deny an elevated replacement), most want to retain an elevated AWV, either retrofitted or rebuilt with many improvements.

Developers and downtown architects ask derisively "if there were not the AWV, would you put a highway on the waterfront today?" Obviously, if the need were great enough, and I believe it is today, the answer is yes we would.
I've spoken with several long-time Seattle residents who told of having to buy homes in other parts of town when their homes were taken by eminent domain for I-5. The AWV footprint already used today requires buying very little property, if any, to build an improved AWV that solves many of the complaints that environmentalists have.

Environmentalists prefer the tunnel because they think that it will mean fewer vehicles which means less green house gases.
I see a better solution to be not burning fossil fuel but rather converting waste vegetation (not food crops) and/or algae to biodiesel, or to convert to electricity for running vehicles.
Since we are in an economic depression, that would be a better use of "bailout" funds.

The population of Seattle is over 500000 of whom less than 10% live downtown; even more who live outside Seattle city limits use the AWV. The population of the Puget Sound region is several times that. The administration and policies of George W. Bush have shown that giving benefits to the "have mores" at the expense of the rest of us is a recipe for disaster.

Though a deep-bored tunnel can be done while viaduct is still in use, such a tunnel is more a relief for I-5 than a replacement for the functionality of the AWV. I emphasize "rebuild in place" because this plan has less effect on AWV traffic than most of the others but addresses the safety issue sooner than most, particularly than the deep-bore tunnel.
WSDOT studied several "rebuild-in-place" options but politicians (Mayor Nickels) refused to allow any on ballot.

A WSDOT studied solution (rebuild-in-place) that provides construction to modern

**I-117-001**

federal safety standards, that retains the Columbia and Seneca ramps, that provides shoulders, that provides better runoff treatment, that uses quieter pavement and acoustic tiles, while still allowing traffic flow (albeit reduced while construction is happening) on the viaduct is deeply buried on the WSDOT website.

http://www.wsdot.wa.gov/NR/rdonlyres/8A69CCB4-348F-487C-8E42-8032FE97452A/0/SDEISAppendixBAlternativesandConstructionMethods.pdf

or
[ For those interested in checking one of the several WSDOT rebuild-in-place plans, these instructions worked as of
15April2009 -- browse to

http://www.wsdot.gov/Projects/Viaduct/library-environmental.htm

Then scroll down to "Supplementary Draft Environment Impact Statement (July 2006)"

From there, look at the pdf file "Appendix B" and start at page 91. ]

Why are Washington citizens being forced to accept an uber-expensive deep-bored tunnel with less functionality than a less expensive elevated AWV? Removing an elevated AWV would be a major detriment to the character of Seattle and the Puget Sound region. Don't let the downtown interests cripple a major transportation corridor and steal AWV public transit views.

**From:** Linda Berry-Maraist [lberrymaraist@cityofpoulsbo.com]
**Sent:** Wednesday, July 22, 2009 4:05 PM
**To:** Marina King; Charlie Howard; Don Willott
**Cc:** Mary McClure; John Willett; Andrzej L. Kasiniak; Ryan D. Farncomb; Dale C. Rudolph; Steve Bauer; BabineP@wsdot.wa.gov; Jon Rose; hilary@hilaryfranz.com; Kjell Stoknes; Darlene Kordonowy; Tom Curley; Becky Erickson
**Subject:** Comments on PSRC's T-2040

**Follow Up Flag:** Follow up
**Flag Status:** Red
Charlie Howard, PSRC

Charlie,

In reviewing the T-2040 transporation alternatives, I think the non-motorized routes shown in Kitsap County need substantial refinement. I also believe that the various pieces should be detached from the funding decisions and other issues. An emphasis on non-motorized transportation should not be completely dependent on tolling or any specific funding option.

I-118-001

**North Kitsap Non Motorized routes**: Given the import and emphasis on connecting centers and key destinations, I think it is important non-motorized routes reflect that. In North Kitsap, the 305 corridor to the Bainbridge ferry terminal is an extremely key commute route and is heavily used despite the accompanying heavy traffic and dangerous conditions. Many of us have been talking about prioritizing a shared use trail that would connect from the Bainbridge Island Ferry terminal along the 305 corridor, across the Agate Pass Bridge, along 305 via Lemolo/Fjord drives, through Poulsbo to Big Valley Rd and on to the Hood Canal Bridge. We have been calling this the Sound to Olympics Trail. This could become a key commute route as well as a significant missing link in the cross state trail. We have had several discussions at PRTPO about linking this route with the very successful Olympic Discovery Trail in Clallam and Jefferson Counties. A local group including Bainbridge Council members, leaders of our non-motorized groups and NKTA members also met w/ TJ Nedrow of WSDOT to discuss this earlier this spring. I am attaching a map showing this route.

KRCC has recently created a Trail Committee to focus on key connections and non-motorized priorities but we are just beginning work and no projects have been prioritized. I am also a board member of the North Kitsap Trail Association and we are partnering with Olympic Property Group and Kitsap County in our trail planning efforts. A secondary key route that NKTA has been exploring is a shared use path that would head east from the Sound to Olympics Trail route at Big Valley north of Sawdust Hill Road, it would primarily be off road, passing east through Olympic Property Group lands, low traffic roads, our North Kitsap Heritage Park, OPG's Arborwood Development and would connect to the Kingston Ferry. This connection requires access across OPG properties, but as a board member of NKTA, OPG's president Jon Rose is very supportive of this concept and this route provides an extremely attractive and safe option compared to the current options.

Again, the Sound to Olympics route as a unit is not adopted in offiicial plans yet, though virtually all of the various pieces along the route are. It is both a key commute route and a primary route used by recreational users. There currently is no safe route to bicycle to the Kingston Ferry from anywhere but the south. An off road E-W route would provide that connection. There have been several bicycle fatalities of cyclists using both the 305 corridor and Bond Rd. to connect to Kingston.

I would like to see these key connections reflected in the alternatives for further study, as well as a route south connecting from Poulsbo to Silverdale connecting through the existing Clear Creek Trail system.

**Bond Road**:

I-118-002

Another issue discussed at our Poulsbo Council meetings has been the lack of emphasis in the alternatives on improvements on Bond Rd. As Clallam and Jefferson Counties grow, all of that traffic, in additiona to our own passes through Kitsap to the WSF ferry terminals. Especially if we are to add passenger ferry service, we need to plan for and accomodate additional traffic safely to those ferry destinations.



**I-118-001**

The trail system along the SR 305 corridor from the Bainbridge ferry terminal in Winslow to the Hood Canal bridge is included in the Preferred Alternative. This has been called Puget Sound to Hood Canal Trail and is listed in various sections. We are also aware of the efforts of the Olympic Property Group. PSRC has worked with Kitsap County to represent some of the segments that Kitsap felt comfortable adding to the plan at this time. This is being referred to as the "String of Pearls" and is listed in various segments (as well as the unprogrammed portion of the plan). We currently do not have any trail projects in the plan that connect Silverdale to Poulsbo but the plan can be amended by Kitsap County if a project becomes developed. We do have some segments of the Mosquito Fleet Trail included in the Preferred Alternative in the Poulsbo area (as well as in Bremerton).

**I-118-002**

Comment noted.

**305 capacity**

I-118-003 The Bainbridge Island Ferry terminal is a major destination, though there is a future BRT route shown, there is a need for interim measures like a reversible lane for transit/HOV. Currently our busses sit in the same backups as the SOV, if we can get them moving faster, they will attract more riders. If our transportation plans allow for incremental improvements, they will both be more achievable and start improving conditions sooner.

**Tolling/VMT/Gas tax**

I-118-004 Tolling in Kitsap County has both limited viability and a potentially significant downside. Poulsbo has taken definitive steps to encourage through traffic to stay on hwy 305 and prioritzed efficient travel along the highway corridor and slower/pedestrian friendly speeds throughout our neighborhoods. Placing a toll on the hwy. would provide a clear financial incentive for the through traffic to cut through our neighborhoods and historic downtown.

I-118-005 The Gas tax provides a financial incentive to drive a more efficient vehicle thus reducing global warming and our country's dependence on foriegn oil in addition to providing transportation funding. Though the day may come when we have so many electric or hybrid cars that we need to explore VMT, I do not think that we are anywhere near there currently. I believe that expanding the gas tax should continue to be explored as a simple and currently very viable solution.

Thank you for your consideration.

Linda Berry-Maraist

*Linda Berry-Maraist, City Council Position 1, City of Poulsbo lberrymaraist@cityofpoulsbo.com*



**I-118-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-118-004**

Currently the State Legislature is responsible for determining what facilities are tolled and where the revenues will be spent. The alternatives were developed to evaluate policy choices that can be used to develop regional guidance that can be transmitted to the Legislature and governor.

**I-118-005**

Comment noted. The Transportation 2040 planning effort recognizes the




need for a phased approach to implementing our financial strategy. In the short term we will continue to rely largely on traditional sources of revenue, such as gas tax and sales tax. Over time, the plan would expand the HOT lane concept and fund major highway improvement projects with project-specific tolls. This approach could ultimately evolve into tolling the entire highway system or the highway and arterial system. In addition, the plan's financial strategy may include VMT charges as well as a carbon charge. Whatever we ultimately adopt as our long range financial strategy, we need to address the shrinking gas tax revenue issue, the evolving vehicle fleet, and numerous other issues.

**From:** Sean Ardussi
**Sent:** Monday, August 03, 2009 5:28 AM
**To:** Marina King
**Subject:** FW: Transportation 2040 comments

**Follow Up Flag:** Follow up
**Flag Status:** Red

-----Original Message-----
From: Wkredlk@aol.com [mailto:Wkredlk@aol.com]
Sent: Fri 7/31/2009 4:58 PM
To: Sean Ardussi
Subject: Transportation 2040 comments

I-119-001

The Puget Sound Regional Council's expensive-and-wasteful Transportation 2040 program, process and nominal plan yield a series of counterproductive alternatives for the Puget Sound basin that all suffer from that regional agency's direct defiance for, and escalating suppression of, our state's statutory requirement for its paramount transportation planning duty, which has at all times since July 1, 1994 legally mandated genuinely systematic development of, and fully regular updating for, "a regional transportation plan" that must be "based on a least cost planning methodology that identifies the most cost-effective facilities, services, and programs" simply to be lawful here.

Thus, Transportation 2040 is not merely unlawful - and willfully so through patent misfeasance in public office at common law both by PSRC's officers and also by its senior managers - but PRSC's studied refusals to employ basic comparative cost-benefit analyses at the core of least cost planning for transportation systems, since no-later-than 336 B.C., have not just corrupted its entire planning process for over 15 year now, but also largely bankrupted regional transportation finances by massively over investing in modalities with very limited usage potentials in the real world over the last 15 and next 30 years, and similarly under investing in essential infrastructure.

In short, rather than implementing "least cost planning" as indisputably required legally, comparative cost-benefit analyses as its logical core for transportation planning and operations for at least the last 2300 years or so, and the systematic applications of old economic principles and of powerful new economic tools for optimally allocating finite public resources to optimize transportation here with wise use of finite financial resources, PSRC has engaged repeatedly for over 15 years in sleights-of-a-hand and other double talk continued in this intellectually dishonest and financially ruinous Transportation 2040 exercise in order to disguise its intentional wrongdoing.

PSRC's Transportation 2040 plan is not merely a bloated counterproductive nonplan for transportation here, at immense expense of limited public resources in terms of time, tax dollars and wasted opportunities, but it also (1) worsens global warming at much greater expense than "least cost planning" option from complying with law, and (2) degrades the region's economy as well.

In short the most serious question requiring attention is whether Transportation 2040 is merely misfeasant and totally corrupted or whether its underpinnings within PSRC have now become malfeasance and criminal after more than 15 years of total defiance for state law as clearly stated in statute by the state Legislature.



**I-119-001**

As a Metropolitan Planning Organization, PSRC is required to prepare a Metropolitan Transportation Plan that meets the following requirements:

- Plans must be developed through an open and inclusive process that ensures public input and seeks out and considers the needs of those traditionally under-served by existing transportation systems.
- Plans must extend for a period not less than 20 years into the future.
- Plans must reflect the most recent assumptions for population, travel, land use, congestion, employment, and economic activity.
- Plans must be financially constrained, and revenue assumptions must be reasonable in that funds can be expected to be available during the time frame of the plan.
- Plans must conform to the Clean Air Act and its amendments, and to applicable state implementation plans for regional air quality.

**I-119-001**

Multibillion-dollar transportation projects as diverse as a replacement for or reductions in vehicle-and-freight capacities on the dangerous Alaskan Way viaduct, as upgrading of the likewise unsafe Evergreen Point floating bridge to add high-occupancy-vehicle lanes, and as slowing vital shipments to the Port of Seattle from eastern Washington to a crawl across the already-congested Interstate 90 bridge to impose light rail there - as well as interactions among those "planned" degradations for mobility - have not received required "least cost planning" review because that chief legal duty has been deliberately garroted by PSRC's officials.
Simply put, since "a least cost planning methodology" based on comparative cost-benefit analyses, and on further uses of core economic methodologies, has never been developed by PSRC - since July 1, 1994 - it could not be utilized to identify the "most cost-effective facilities, services, and programs" to meet our environmental, safety and traffic needs in Transportation 2040.
**********A Good Credit Score is 700 or Above. See yours in just 2 easy steps!
(http://pr.atwola.com/promoclk/100126575x1222846709x1201493018/aol?redir=http://www.freecreditreport.com/pm/default.aspx?sc=668072&hmpgID=115&bcd=JulystepsfooterNO115)

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Douglas B. MacDonald
902 North 79th Street
Seattle WA 98103
July 31, 2009

Sean Ardussi
Puget Sound Regional Council
1011 Western Ave., Suite 500
Seattle WA 98104-1935

**Comments: *Transportation 2040* Draft Environmental Impact Statement**

**I-120-001**

There is a fundamental problem with the DEIS. It lies in the Baseline Alternative (the "No Action Alternative" for SEPA analysis). The Baseline Alternative has turned out, as the DEIS has been developed, to be fundamentally flawed in relation to SEPA requirements. Therefore, the DEIS cannot be adequate for its evaluative purpose within *Transportation 2040,* no mater how microscopic an examination it offers of potential beyond-the-Baseline strategies that have been bundled into the Action Alternatives.

If the Baseline Alternative/No Action Alternative is *not* sound, an evaluation process founded upon it will not properly inform and lead public officials and citizens to the identification of action strategies that will meet the purpose and need of the DEIS, let alone the stated broader goals of *Transportation 2040.*

**The Baseline Alternative is not an adequate No Action Alternative for the DEIS.**

Following SEPA guidelines,[1] the Baseline Alternative is intended to be a SEPA No Action alternative, that is: "... what would be most likely to happen if the proposal [the Action Alternatives] did not occur."

For the DEIS to be a satisfactory presentation of the choices to be made among strategies in the Action Alternatives for beyond-Baseline policies and investments in transportation, the Baseline Alternative must indeed meet the requirements of SEPA.

There are two reasons why the Baseline Alternative does not meet the SEPA guidance for a satisfactory No Action Alternative.

[1] Draft Environmental Impact Statement ("DEIS"), Appendix A, 3.



**I-120-001**

Thank you for your comments. The SEPA rules allow the lead agency some discretion in its design of the Baseline Alternative. The Baseline Alternative was designed to be consistent with an historical pattern of financing of transportation. This historical pattern of funding has involved the identification of additional revenue over time, and has not been a static snapshot of current law. Recent new revenue sources have included property tax measures for cities, sales tax measures for local and regional transit, and new statewide funding packages for locals, ferries and highways. The Baseline Alternative is a characterization of investments that could be made under conservative assumptions about the availability of revenue in an effort to represent a scenario that does not involve new actions.

The Baseline Alternative was developed in collaboration with multiple agencies, including the Washington State Department of Transportation, Sound Transit, Washington State Ferries and many other local and regional agencies and with public input. It was presented and discussed with decision makers and was endorsed by both the Transportation Policy Board and Executive Board as an alternative to be analyzed in the DEIS. Information on the issue of Baseline Alternative adequacy has been provided to decision makers through public testimony and distribution of the DEIS comments and no request has been made by either Board to reconsider the Baseline Alternative.

I-120-001

**1. *It is not supportable that the Baseline Alternative is "most likely to happen" in light of significant shortfalls in financial resources to achieve it.***

The DEIS states that the Baseline Alternative will be funded "mostly with 'current law' traditional sources – gas tax, sales tax, state and federal grants and loans, local general fund revenues, permit and license fees and limited tolling (on the Tacoma Narrows Bridge and the ferry system)."[2] These are revenue sources now authorized in law.

Appendix D to the DEIS explicitly concedes the existence of a financial shortfall,[3] the rough scale of which has been described in recent presentations b PSRC staff.[4] The scale of the shortfall (see below) is very large and may even be larger than PSRC has now conceded.

Despite the importance of this issue, the DEIS seems not to include a specific discussion of the overall size and calculation of the shortfall or the precise locations of the resource shortfall among the different supports for different programs. Nor is there any discussion of the specific projects or type of projects in the Baseline that current law revenue sources seemingly will not in fact pay for.

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[2] DEIS, 3-10. The DEIS Executive Summary puts it slightly differently:

> The Baseline Alternative is funded *almost completely* with "current law" traditional revenue sources – gas tax, sales tax and state and federal grants and loans, local general fund revenues, permit and licensing fees and limited tolling . . . Beyond "current law funding the Baseline assumes the region would find sufficient additional revenue to fully maintain and preserve the existing transportation system.

DEIS, Executive Summary, 8 (emphasis supplied).

[3] See DEIS, Appendix D, 66.

> The Baseline was designed to represent conditions given that transportation investment and policies are constrained by current law. As a consequence of an iterative design process, the Baseline does include some select investments that are likely beyond the reach of currently authorized revenue sources. But these were kept to a minimum.

An insight into what must have been the "iterative process" is yielded in DEIS Appendix D, page 7, stating the consideration of alternatives "*began* by defining a baseline which includes both existing transportation facilities plus future transportation investments that can be implemented with funds available through currently authorized transportation revenue instruments" (emphasis supplied). Changed conditions may account for the fact that what once was envisioned as a Baseline Alternative with sufficient revenue support became significantly unsupported as the DEIS was developed.

[4] See *A Conversation on Regional Transportation* (June 9, 2009), Slide 24. http://students.washington.edu/adambp/PSRC_OGA.pdf

I-120-002

Materials from PSRC offer the overall estimate of the total current law sources available to support Baseline projects at approximately **$126 billion** (2008 constant dollars).[5] According to the very limited discussion in the DEIS, the cost over the period 2010 – 2040 to achieve the Baseline Alternative (in 2008 constant dollars) is approximately **$143 billion.**[6]

The shortfall between sources of $126 billion and uses of $143 billion therefore is about **$17 billion** (2008 constant dollars). Accordingly, the scale of current law sources would have to be about 13.5% greater than it is to fully fund the Baseline Alternative.

I-120-003

These circumstances throw the entire Baseline Alternative into an irretrievable muddle. The DEIS struggles with the issue in a variety of ways:

- The DEIS tries to make the problem disappear by offering an unsupported comforting assumption, at least as to the maintenance and preservation portion if not to the system expansion portion of the Baseline Alternative:

  > "Beyond current law funding, the Baseline Alternative assumes that the region would find sufficient additional revenue to fully maintain and preserve the existing transportation system."[7]

I-120-004

- The DEIS delves into the problem with informed opinion that cities and counties will be unable to fund preservation and maintenance of their transportation assets, perhaps beginning as early as 2022.[8] But to cover the problem of an underfunded Baseline, PSRC adopts an assumption that preservation and maintenance of existing facilities could be maintained through 2040 with current law revenue.[9]

I-120-005

- The DEIS concludes that despite adverse trends in operating cost growth and downturns in revenue forecasts from sales taxes, local transit operators will be able to maintain current service and achieve at most modest increases in services.[10] This is in the face of widespread and well-documented concern from local transit operators to the contrary. There appears to be no discussion of how, in the face of fiscal constraints and resource shortfalls, service expansions could be supported such that the bus transit service

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[5] *Id.*

[6] DEIS, Appendix D, 74.

[7] DEIS, 3-10.

[8] DEIS, Appendix D, 13

[9] DEIS, Appendix D, 14.

[10] DEIS, Appendix D, 13.



**I-120-002**

Comment noted.

**I-120-003**

The Baseline Alternative includes more than just maintenance, preservation, and operations of the existing system. For example, there is a programmatic estimate of very modest growth in bus services, and estimates for growth in investments in the local road networks that keeps pace with historical practices in expenditures and revenue availability. Historically, some modest new revenues are periodically dedicated to transportation beyond any given static view of current law. This has been essential in order to overcome limitations on the growth of revenues for certain sources that do not keep pace with growth in the economy (size of the economy and inflation). It is reasonable to expect these same periodic adjustments on the part of implementing agencies in a Baseline Alternative.

**I-120-004**

Comment noted.

**I-120-005**

In the Preferred Alternative, the estimate of current law revenue is adjusted down approximately $1 billion to reflect the current state of the economy. The financial strategy also recognizes and supports securing additional near term revenues that will be needed to return to 2006 levels of service and provide for additional growth in the transit systems.

I-120-005 hours (AM and Mid-day) could increase by almost 40% from 2006 to 2040 as a component of the Baseline Alternative.[11]

I-120-006
- The DEIS assumes without demonstration that Sound Transit can fund the ST2 program approved by voters in November 2008, notwithstanding recent downward revisions to Sound Transit's revenue forecasts.[12] It assumes that ST regional express bus service levels will increase by 17% for the period from 2010 to 2020, with the no further increase thereafter to 2040. This implies, when juxtaposed with the overall Baseline assumption of bus transit service hour growth on the order of 40% by 2040 that much the lion's share of bus transit expansion will have to fall on the shoulders of the county transit agencies whose revenue resources are so severely strapped under current law sales tax provisions.

I-120-007
- The DEIS asserts that current law revenues for Washington State Ferries can fund the maintenance of existing service (which it assumes to include maintaining and replacing existing terminal and, between now and 2040, placing into service thirteen new ferry boats to retire ferry bots now in the fleet[13]). The recently published WSDOT Ferries Division *Final Long Range Plan* 2009-2030) suggests an expected net operating deficit of almost a half billion dollars (YOE dollars) and suggests a much more aggressive vessel procurement plan than in the DEIS to meet asset management and service goals (including seven 144 car vessels) between 2009 and 2030, for which the plan indicates a vessel capital spending requirement of $3.2 billion as part of an overall *net* capital funding need of over $3 billion even taking account of current law resources. [14]

I-120-008
- The DEIS has presumed to rely on probably fictional outcomes for describing their place in the Baseline Alternative for two big projects, the SR 99 viaduct replacement and the SR 520 bridge replacement. Specifically, it assumes availability of financial resources in the Baseline Alternative only sufficient for (a) preserving the Alaskan Way Viaduct or replacing it in was that would be equivalent to the current viaduct's capacity (three lanes in each direction

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[11] DEIS, 4-66.

[12] Sound Transit May 2009 Update.

[13] DEIS, Appendix D, 13; see also DEIS, Appendix A, 10

[14] DEIS, Appendix A, 10; WSDOT Ferries Division, *Final Long-Range Plan* (June 30, 2009), Executive Summary ES-5. This discussion must bear the caveat that the Washington State Ferries System plan covers the system as a whole, only a portion (but a very significant portion) of which operates within the PSRC region. The recent *Final Long-Range Plan* has not been ratified by the state Legislature and many of its elements are not wholly incorporated into long range spending plans that accompany current WSOT budget programs enacted by the Legislature.



**I-120-006**

As indicated, the reduction in sales tax revenue has also impacted Sound Transit's revenues related to development of ST-2. To date, Sound Transit has not proposed modifications to their approved program.

**I-120-007**

Comment noted. The vessel replacement program and financial information published in the Final Long Range Plan for the Washington State Ferries is being incorporated into Transportation 2040. We're aware of the financial implications of implementing the state's long range plan within the PSRC region, and extending their planning horizon another ten years, to 2040. The general public and the Legislature wrestled with the issue of reduced ferry service as part of the WSF long range plan process, and chose to maintain existing ferry routes and levels of service. With this as the state and region's ferry system investment vision for the next 30 years, we will need to develop a financial plan to implement this vision.

**I-120-008**

The representation of the SR 520 Bridge Replacement and the Alaskan Way Viaduct reflects the general commitment to preserve the functionality of the corridors. These two projects have consistently been top priorities for state funding, so it is reasonable to assume that they will be funded.

I-120-008

through the downtown core) and (b) preserving he SR 520 bridge in ways that would maintain the current capacity (two lanes in ach direction at the middle of Lake Washington on the bridge section).[15] The nexus between these assumptions and what is "most likely to happen" is never developed (and is seemingly contrary to legislative policy decisions). The effect these assumptions would on significantly *understate* the cost of the Baseline Alternative for what is most likely to happen by 2040, at least if the state Legislature is to have a say in the decision process.

I-120-009

The scale of the fiscal shortfall problem is underscored by the fact that the investments on projects and programs in the Baseline Alternative that go to *expansion* of the transportation systems is less than a third of the total cost of the Baseline Alternative (probably about $44 billion out of $143 billion). A shortfall of $17 billion in the funding of the Baseline Alternative obviously would have dire effects on the expectation of delivering expansion projects.

Either (a) projects will have to be cut from the Baseline list and the Baseline performance indicators (against which the Action Alternatives are to be compared) must be revised, or (b) more money must be found for those projects (say, $17 billion, more or less).

One approach or the other must be settled *before* embarking on the quest for yet more funds for regional transportation investment as suggested by the Action Alternatives. The Action Alternatives, depending on how they are fashioned into a Preferred Alternative, would add anywhere from more than $20 billion to almost $60 billion to the cost of regional transportation investment in 2008 constant dollars. if not even more in a hybrid Preferred Alternative.

I-120-010

One of the three key strategic questions for Transportation 2040 and its relation to the DEIS is stated in the DEIS Executive Summary as follows:

> Information of transportation financing issues is included as an optional item under WAC 197-11-440(8). Sustainable funding is a critical issue in the implementation of any of the alternatives and a part of the region's federal requirement to produce a financially constrained plan.[16]

*A financial strategy to secure transportation's future in 2040 must first solve the problem of the shortfall to achieve the Baseline Alternative. That must be done before it moves to the creation of sustainable and financially constrained choices among beyond-the-Baseline Action Alternatives. The DEIS does not appropriately acknowledge this issue or provide the basis for its consideration.*

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[15] DEIS, 3-15; see also DEIS, Appendix A, 4.

[16] DEIS, Executive Summary, 6.



**I-120-009**

The Preferred Alternative, as the basis of the Metropolitan Transportation Plan, contains a financial strategy that can fund all the investments in the Alternative, including those plan components that constitute the Baseline.

**I-120-010**

The Baseline Alternative is one alternative among the six alternatives analyzed within the DEIS. The DEIS presents information about the costs of each of these alternatives, and the Preferred Alternative forms the basis of the Metropolitan Transportation Plan. It is the Metropolitan Transportation Plan that must include a financial strategy that is based upon reasonable assumptions about the availability of new funding. The Baseline Alternative was designed to be consistent with an historical pattern of financing of transportation. This historical pattern of funding has involved the identification of additional revenue over time, and has not been a static snapshot of current law. Recent new revenue sources have included property tax measures for cities, sales tax measures for local and regional transit, and new statewide funding packages for locals, ferries and highways. The Baseline is a characterization of investments that could be made under conservative assumptions about the availability of revenue in an effort to represent a scenario that does not involve new actions.

I-120-010

Simply hoping for more bullish performance from current revenue sources cannot solve the problem. The prospects there are dim. Across the horizon to 2040 there are significant obstacles to generating higher revenues, either at the state level or in the region's return from the state, from gas tax revenues. There are major pressures from other government needs and tax-increase resistance on all local general fund tax revenue sources. There are already very high levels of local sales tax commitments to Sound Transit for its programs and to the other transit systems (as to which there is significant awareness of stress on operating costs even to sustain current levels of service). There is no indication of materially larger investments in local transportation systems from federal sources.

The most likely outcome probably is that the shortfall will severely truncate the delivery of projects that are said to be included in the Baseline.

In sum, the Baseline Alternative is not likely to be fiscally achievable with strategies and resources now in place. The Baseline Alternative is not what is "most likely to happen." Rather than being what is "most likely to happen," the Baseline Alternative is highly *unlikely* to happen, at least under any reasonable expectation of revenue instruments current authorized.

I-120-011

**2. *The Baseline Alternative is also not "most likely to happen" in light of its assuming that future demographic and land use patterns will match the regional growth strategies contained in Vision 2040.***

*Vision 2040* is a growth strategy document covering the 2000 – 2040 period that was adopted by PSRC in 2008. *Vision 2040* posits the overall scale of population growth and employment growth in the region from 2000 to 2040 (for example, that the region will see added population of 1,712,000 over that period of time) and further posits where growth in population and employment will be located geographically within the region.[17]

The Baseline Alternative makes the fundamental assumption as to demographic and land use that "[p]opulation and employment growth and distribution through 2040 will occur per the regional land use vision described in the VISION 2040 plan."[18]

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[17] *Vision 2040* is not a regulatory instrument. The assertions offered at one point in the DEIS that *Vision 2040* "directs a major portion of new development into communities with regional growth centers" or that it "provides long-range direction for allocating population and employment growth" (see, *e.g.*, DEIS 2-8) are not literally a correct expression of its force or power. A more accurate statement is found at DEIS Appendix D, 75: "VISION 2040 provides guidance for the distribution of growth to *regional geographies*, which are defined by the distinct roles they will play in the region's future."

[18] Appendix A, page 12. This point is not free from confusion. The DEIS also refers to efforts at integrated transportation and land use modeling which according to the DEIS, "produced forecasts of the future distribution of jobs and population across the region and the future performance of the region's transportation system". See DEIS, 3-37. See also DEIS, 3-9: "each alternative was analyzed



**I-120-011**

PSRC would like to acknowledge the comments that recommend using future projections of past growth patterns as the basis for Transportation 2040's land use assumptions instead of the patterns prescribed by the Regional Growth Strategy.

PSRC considered the approach recommended by the comments, but determined that the Regional Growth Strategy is appropriate to use as the basis for future land use projections because it is adopted regional policy. By adopting VISION 2040, the region's cities and counties have agreed to revise their existing land use plans with the intention of supporting the growth patterns in the Regional Growth Strategy. In the short time since the adoption of VISION 2040 in 2008, many cities and counties have not yet revised their land use plans. Once the revisions are complete, more years may pass before land use patterns begin to reflect the intent of the revised plans.

I-120-011

There are, however, strong indications that between now and 2040, population and employment growth and distribution in the region will *not* occur along the lines proposed in *Vision 2040*.[19]

These indications may be briefly and partially summarized as follows:

- *Actual* distribution of population growth in the region in the first nine years (22% of the plan period), judging from population estimates for cities and counties prepared by the state Office of Financial Management, are dramatically at variance with trend lines that would support the achievement of the *Vision 2040* demographic distributions. Nevertheless, the trends toward the aggregate predicted levels of region-wide population growth are right on target. It looks like all the people *Vision 2040* predicts for 2040 will be here, but they won't be living where *Vision 2040* says they will.

- Real-world drivers of the location of population and employment growth are *not* consistent with drivers that would have to be in place if *Vision 2040's* proposed distribution of population and employment were to be realized.

There are numerous examples to support the foregoing points. Several that are crucial to the reference to *Vision 2040* population and employment allocations as a likely outcome under the Baseline Alternative (let alone the Action Alternatives) include:

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using the same assumptions for future land use policies and strategies for growth management as established in VISION 2040."

However, a table at DEIS, Appendix D, 77 seems to suggest that the Baseline Alternative actually produce, population distributions by 2040 that substantially underperform the *Vision 2040* Regional Growth Strategy goals for "Urban Core" and overshoot the Regional Growth Strategy goals for "Outlying Urban." In juxtaposition with the table on DEIS, Appendix D, 75, this raises an important question. If, as the table at Appendix D, 75, states, there is "no significant change among any of the alternatives," is it correct to say (as that table continues), "All of the action alternatives appear to be consistent with and support the Regional Growth Strategy. " The discussion in the DEIS (DEIS, 5-10 and see Appendix D, 77) deals quite inadequately with this problem simply by suggesting that a high level of growth within the designated Urban Growth Area, therefore avoiding a disproportionate growth outside the Urban Growth Area, is a fair mach with the guidance provided by the Regional Growth Strategy. That is by no stretch not what the Regional Growth Strategy in *Vision 2040* has set out to achieve, particular in light of the emphasis on Designated Growth Centers. Do the Baseline Alternative or the Action Alternatives support the Regional Growth Strategy for population distribution, or do they not? A big improvement in the coherence and transparency of the DEIS would be the inclusion of the Regional Growth Strategy goals in the population table at Appendix D, 76, to allow a direct comparison of the specific variances between the Regional Growth Strategy goals and the outcome analysis from the DEIS.

[19] Arguably, these indications are supported by the DEIS results themselves. See footnote 18 and the DEIS discussion in Chapter 4 of the DEIS t which it relates.

I-120-011

- The *Vision 2040* "metropolitan cities" individually and as a group are adding population at a far slower rate than would be necessary to achieve their 32% shares of population growth as posited in *Vision 2040.*

- Eighteen cities in the region include areas named in *Vision 2040* as Designated Growth Canters and those cities are posited in *Vision 2040* to capture 53% of population growth as the growth strategy concentrated population growth in the Designated Growth Centers.[20] However, nine years into the *Vision 2040* forecast period only a handful or fewer of those cities[21] have grown at even the average rate of the region's growth, and it is possible that in one or more of those five instances the growth of population to put them in positive territory in relation to average regional growth may only have been achieved by annexation of population from previously unincorporated adjoining areas, not by "real" growth.

- Cities at the periphery of the region's main population concentrations have generally shown the highest percentage rates of growth.[22] This is precisely the opposite of the conditions that would need to exist for the overall allocation strategies in *Vision 2040* to achieve the land use and demographic patterns that underlie the use of *Vision 2040* as a foundation for the baseline of a No Action Alternative against which to judge future transportation investments.

I-120-012

- In Pierce County, growth in unincorporated and rural areas has far outrun any trend that could achieve the population distributions posited in Vision 2040. A similar pattern may be occurring in Snohomish County.

I-120-013

- Incentives at the local level tend to place development and lack of development in areas not consistent with *Vision 2040* presumed outcomes. Circumstances include:

  - ✓ Revenue needs of individual cities that force development whether or not consistent with *Vision 2040* strategic outcomes;

  - ✓ Land prices, development and re-development costs and other market forces that encourage or discourage development in ways not consistent with *Vision 2040* strategic outcomes;

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[20] PSRC Brochure, *Vision 2040 and Centers,* 1.

[21] Everett, Redmond. Renton, Auburn and Puyallup

[22] For example, at least Covington, Duvall, Issaquah, Maple Valley, Sammamish, Snoqualmie, Bonney Lake, DuPont, Arlington, Lake Stevens and Marysville..



**I-120-012**

The assumptions for regional geographies from VISION 2040 are standardized across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

**I-120-013**

The assumptions for regional geographies from VISION 2040 are standardized across the entire four county region. While it is expected that individual geographies will each perform in a unique fashion, it is beyond the scope of this effort to reevaluate the analysis and assumptions made under VISION 2040.

I-120-013

- ✓ State and local regulatory structures favoring and disfavoring development and re-development in ways not consistent with *Vision 2040* strategic outcomes;
- ✓ Infrastructure investment choices, made and not made (including in regional and local transportation), that do not favor development and re-development patterns consistent with *Vision 2040* strategic outcomes.
- ✓ And perhaps, consumer preferences as to lifestyle choices and values (for example, desired choices in school system attributes for families with children) that are not consistent with *Vision 2040* strategic outcomes.

These are observable realities – they could be more elaborately documented and added to --affecting what is or is not most likely to happen by 2040. They show that reliance on *Vision 2040's* suppositions about demographic and land use conditions in 2040 is not consistent with the SEPA test of "what is most likely to happen" for use as a foundation of the SEPA No Action Alternative.

I-120-014

**The failure of the Baseline Alternative to meet the needs of a SEPA No Action Alternative disqualifies the balance of the DEIS "alternatives analysis" as a basis for informed decision-making about the environmental outcomes of proposed actions.**

I-120-015

The two chief flaws in the Beeline Alternative – its lack of a likely financial achievability, and its grounding in unrealistic suppositions about future demographic and land use patters -- leads inevitably to this conclusion:

> *A realistically designed No Action Alternative would show that in 2040 the transportation system will offer less (because of lower level of investment between now and then in operations, maintenance, preservation or expansion of the system) and be required to respond to transportation demands from a more dispersed population than the projections claimed in the DEIS.* For example:[23]

[23] Other forces and factors not considered in any depth may throw the future into uncertainty in yet other ways. For example, PSRC has recently made prominent the concession that *none* of the alternatives developed in the DEIS would lead to outcomes achieving state policy goals for the reduction of greenhouse gases, or even come close. Release of Draft Environmental Impact Statement (July 9, 2009), Slides 17-19 http://www.ci.sammamish.wa.us/files/document/5704.pdf. If policy drivers (for example, demand/supply pressure on fossil fuel costs for private transportation, or regulatory constraints, or forceful demand management tools in transportation pricing) actually push the region toward state greenhouse gas emission reductions, the DEIS will have proved largely irrelevant or even counter-productive for making transportation investment choices, whether or not directed to *Vision 2040* demographic and land use outcomes. It is hard to understand this failure of



**I-120-014**

PSRC believes the Baseline Alternative adequately meets the needs of a SEPA No Action Alternative. See responses to comments I-120-001 and I-120-010.

**I-120-015**

The Baseline Alternative represents a reasonable scenario where periodic adjustments to transportation funding have been the norm. These adjustments have been made to suitably maintain and operate transportation systems. The periodic adjustments to the state tax on fuel is an example of this practice. Failing to represent some historically demonstrated commitment to maintain and operate the transportation systems would favorably bias any action alternative by making the Baseline Alternative appear to be more unattractive than would be expected under a continuation of the existing practices.

I-120-015

- The number of vehicles owned are likely to be higher in 2040 than the 40% gain over 2006 predicted in the DEIS (Appendix D, page 101).

- Trip times and trip distances are likely to be greater than the 6% gain in trip times and 8% *reduction* in trip distances predicted in the DEIS. (DEIS, Executive summary, Exhibit 1-7, 16; Appendix D, 101)

- Vehicle miles traveled (VMT) are likely to be greater in 2040 than the gain from 2006 shown in the DEIS and the slight easing of per capita VMT predicted for some of the Action Alternatives is likely to be less favorable, and possibly reversed, from the comparisons shown in the DEIS. (DEIS, Executive Summary, Exhibit 1-8, 17).

- Bus transit services levels are likely to be lower than shown for the Baseline in the DEIS (DEIS, Exhibit 4-27,4-66). Transit ridership is likely to be lower than shown in the DEIS. (DEIS, Executive Summary, Exhibit 1-11m 19). Mode split characteristics are likely to differ from the evaluations made in the DEIS. (DEIS, Executive Summary Exhibit 1-10, 19).

- Ferry system services are likely to be lower than shown in the DEIS and ferry boardings are likely to be lower than characterized in the DEIS (DEIS Executive Summary, Exhibit 1-23, 20). It is instructive, by comparison, to see that the WSDOT Ferries Division, *Final Long Range Plan* (June 30, 2009) expects that ridership (system-wide) from 2006 to 2030 will grow by 37% whereas the DEIS forecasts that ferry ridership (region) will grow by 88% from 2006 to 2040 – a comparison that calls out for detailed explanation.

- Travel delay is likely to be higher than shown in the DEIS. (DEIS Executive Summary, Exhibit 1-8, 17). The DEIS already predicts that *total hours* of delay will grow 72% from 2006 to 2040 (more people, more travel; the effect on the system) and that *total per capita* hours of delay will grow by over 20% (the effect on individuals).

I-120-016

*Corrections to transportation system performance expectations for the Baseline Alternative or the beyond-the-Baseline Action Alternatives must be made. This will fundamentally alter the information and understandings*

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the DEIS when one of the three main challenge areas PSRC sets out to address in the *Transportation 2040* plan includes reducing greenhouse gas emissions. DEIS, Executive Summary, 6.



**I-120-016**

Comment noted.

I-120-016 *needed by citizens and officials to properly evaluate choices for transportation strategies and investments that should be made for the future.*

I-120-017 **Conclusion**

A great deal of effort, money and, dearest of all, time and energy spent in citizen and public agency discussion and comment, has been invested in moving towards strategic decision-making by regional leaders and citizens through *Transportation 2040.*

SEPA requires that this kind of decisional exercise be subjected to a rigorous look to evaluate the environmental effects, broadly construed, of the alternative proposed action strategies in relation to a No Action Alternative.

Under SEPA, good decision-making cannot be conducted if the No Action Alternative is not a good analytic proxy for the conditions that would prevail if one or another of the proposed actions were not taken.

That, unfortunately, is the case here. The right step to be taken at this point is the preparation of a Supplemental DEIS that offers a better No Action Alternative—tied more analytically to what is "most likely to happen -- than the Baseline Alternative case in the current DEIS.

Respectfully submitted,

Douglas B. MacDonald



**I-120-017**

The No-Action Alternative definition is not a reason for requiring a SEIS. This is counter to WAC guidance:

WAC 197-11-600(3)(b) For DNSs and EISs, preparation of a new threshold determination or Supplemental EIS is required if there are:

(i) substantial changes to a proposal so that the proposal is likely to have significant adverse environment impact.
(ii) new information indicating a proposal's probable significant adverse environmental impacts.

-----Original Message-----
From: Douglas MacDonald [mailto:dbmacdonal@earthlink.net]
Sent: Saturday, August 01, 2009 7:24 AM
To: Charlie Howard
Subject: DEIS Comments

I-121-001

Charlie. I think the PSRC document is stitched together in ways that reveal an unhappy failure of triangulation between the vision team (Norm), the transpo team (you) and the money team (Matt).

I'm sorry for my sense that the disconnects with Vision 2040 and the problem presented by the money shortfalls really have to be called out. But it seems to me that the idea I've been pushing for awhile, that there has to be a Reality check, simply won't go away So, I continue to push.

Here's your own copy. At least you and Mike can have the satisfaction that somebody not paid to do it actually read and tried to digest the document, or at least most of it! It certainly doesn't look for evidence of a lot of hard, hard work.

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**I-121-001**

Thank you.

John Niles.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 4:19 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: John S. Niles

Address: 4005 20th Ave West, Suite 111

City: Seattle, WA 98199

Email: jniles@alum.mit.edu

I-122-001 The various components in the six alternatives: I stand with any other commenters who may note that the baseline alternative for 2040 is not meeting SEPA requirements, and that an amendment with a more robust baseline case needs to be prepared.

The various policy bundles in the five action alternatives muddle together too many different policies and do not sufficiently educate the public and electeds on the impacts.

I urge modeling the following more pure alternatives that would be educational:

I-122-002 1. A "war on cars" massive expansion of light rail even beyond alternative 5, combined with repression of automobile travel by any and all means, including punitive tolls, much higher parking taxes, expanded car-free zones, conversion of arterial lanes to bus and/or bicycle use. This should first be done just for the City of Seattle, where 15 out of 15 City Council candidates declared support for a "War on cars" at a political rally Tuesday evening July 28 organized by The Washington Bus. But this "war on cars" alternative policy should also be modeled region-wide.

I-122-003 2. A "we can build our way out of congestion" alternative as advocated and modeled privately by senior transportation engineer Dr. Bill Eager and his client Kemper Development Corporation, adjusted to be covered by a funding plan that meets PSRC requirements for staying below a ceiling level of personal income. This alternative is probably an adjustment on the draft Alternative 2 without the transit expansion beyond ST2.

I-122-004 3. As I commented in the public hearing on July 9, an alternative that doubles all-trips public transit market share, say from 4% to 8%, should be be modeled.

I-122-005 4. To meet the original spirit of the State's Least Cost Planning mandate, an alternative focused on motivating higher levels of ride sharing, van pooling, and transit use with no light rail beyond ST2 should be modeled.

I-122-006 5. With additional assumptions as needed, an alternative that meets the State's VMT reduction goals and CO2 emission goals should be modeled. If attempted and found to be impossible, that outcome should be reported.

I-122-007 6. An adjustment to Alternative 5's forward looking all-roads, all-the-time road use fees should be modeled that focuses on re-investment in roads, bike trails, and rubber-tire transit and ridesharing modes. PDF mark up of a PSRC PowerPoint slide illustrating a recommended mix is sent separately to Sean Ardussi and should be attached as an integral part of these comments.

I-122-008 7. I have read and endorse the comments on additional and modified alternatives submitted by professional engineer Jim MacIsaac, except I support modeling alternatives like I suggest above that MacIsaac would avoid as unrealistic.

I-122-009 The environmental impacts of the alternatives: Technology changes in motor vehicles between now and 2040 are likely to make PSRC forecasts of 2040 air quality and GHG emissions in the present day irrelevant.

I-122-010 Funding strategies, for raising revenue and paying for transportation needs: The PSRC emphasis on road use fees with off-peak discounts is a useful emphasis given the recommendations of recent national study commissions. Good advantage is being

Page 1

**I-122-001**

The identification of a no-action alternative can sometimes be difficult. It is typically defined as what would be most likely to happen if the proposal did not occur. There are other methods of defining the no-action alternative, such as "no new government action," or the "lock the gate and walk away" scenario where all current activities are also ceased. As the SEPA rules do not define what the no-action alternative must look like, the lead agency has some discretion in its design.

**I-122-002**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

I-122-010 made of the pioneering Traffic Choices study.

It would be useful for PSRC to prepare an objective analysis of the pros and cons of using road use fees for support of other than roadway infrastructure construction, maintenance, and operations management.

I-122-011 The information contained in the analysis: What is seemingly missing that I would like to see:

In all alternatives, a breakdown of transit trips into all-bus, bus-rail, bus-rail-bus, and rail-bus.

Some sort of geographic map representations showing for each alternative where the forecast transit trips, bike trips, and walking trips occur. Perhaps color coding could indicate the mode share that each of these gets in the various geographic regions.

A map showing the 2040 assumption for where major retail trip destinations are located, with some color code indication of daily intensity of use.

More information -- charts and other graphics -- from the most recent PSRC Household Travel survey could be integrated into the T 2040 materials. This great resource is underexploited locally as an educational tool for regional citizens, even though world famous in the transportation professional community.

A page or two describing the potential of Intelligent Transportation Systems in 2040 would be helpful, using material from the Intelligent Transportation Society of America.

I-122-012 The alternative you think best accomplishes our regional needs out to 2040: Forced choice: Alternative 3.

Other comments: I am submitting these comments as an individual, not representing any organization.

I-122-013 I appreciate the hard work of PSRC staff on transportation planning, and recognize that much useful information has been generated. The emphasis in planning on helping the community to understand the impact of road use fees adjusted hour by hour to spread peak loads is praise worthy.

It would be worthwhile to create a Lite version of the ST computer models which members of the public could run with adjusted policy parameters.

My overall emphasis is on using the PSRC metropolitan planning process to educate the public on the reality of what's going on now, and the likely limits on what is possible to achieve with future investment.

Thank you for the opportunity to provide input!



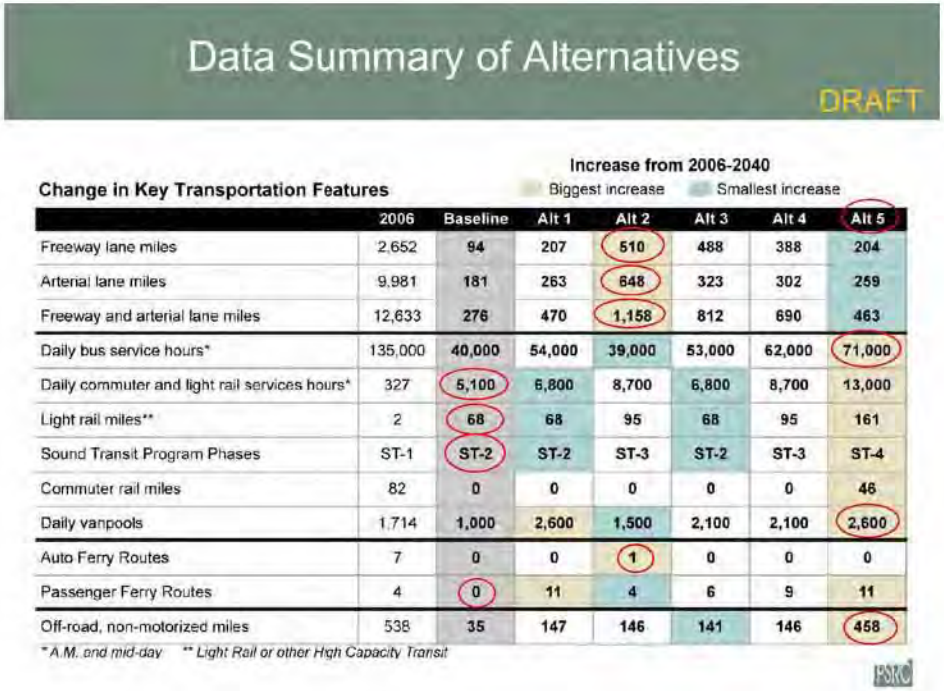
**I-122-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**I-122-004**

Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and




(4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.

Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

**I-122-005**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-122-006**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**I-122-007**

The six plan alternatives analyzed in the DEIS, including the Baseline,

were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**I-122-008**
Comment noted.

**I-122-009**
Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**I-122-010**

A discussion of user fees is included in the FEIS.

**I-122-011**

Thank you for these suggestions. Unfortunately, producing these materials would require staff resources beyond those currently available at PSRC. PSRC has prioritized the materials requested by the Boards and Committees responsible for designing and approving the Transportation 2040 plan.

**I-122-012**

Thank you for stating your preference among the alternatives.

**I-122-013**

Comment noted.

I-123 Gordon Padelford.txt

From: info@fixieconsulting.com
Posted At: Thursday, July 30, 2009 7:18 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Gordon Padelford

Address: 610 36th ave east

City: Seattle, WA 98112

Email: gordon.padelford@gmail.com

I-123-001

The various components in the six alternatives: As a third generation Seattlite who hopes to raise his own family in the region it seems obvious that the only real option is either option 5 or one very similar to option 5. We simply can no longer afford the environmental, social, and economic consequences of gridlock from more lanes and thus more traffic. Sprawl is a very real and present danger to our region and we risk losing our precious natural land and farmland as subdivisions slowly encroach. Furthermore people should not have to drive to afford. Transportation is important for people of all incomes, but benefits the the least of us the most. We must move to a more sustainable solution. option 5

The environmental impacts of the alternatives: Option 5 is the best for the environment.

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis: Easy to understand, well done.

The alternative you think best accomplishes our regional needs out to 2040: 5! Five. Definitely five.

Other comments:

Page 1

**I-123-001**

Comments noted. Thank you for stating your preference among the alternatives.

**From:** Dave Russell [dave98033@verizon.net]
**Posted At:** Friday, July 31, 2009 2:24 PM
**Conversation:** Transportation2040 DEIS
**Posted To:** Transportation 2040

**Subject:** Transportation2040 DEIS

Thank you for the opportunity to comment on the Transporta on 2040 DEIS. Excellent work has been done. However, the defining issue of the century is climate change, and the alterna ves studied fall short in this cri cal environmental area.

**I-124-001**

Alterna ve #5 offers the strongest response of the six investment strategies analyzed in the DEIS. It provides the largest percentage of commute trips by transit (19% by 2040), the smallest increase in VMT (18% by 2040), and the largest decrease in VMT/capita (16% by 2040). System-wide tolling contributes to this performance, provides a logical funding source, and is a bold step forward.

It is arguable whether the VMT/capita of this alterna ve meets the benchmarked reduc ons required by RCW 47.01.440. The region has a significantly lower VMT/capita than the state as a whole. It is only by using a state baseline rather than a regional one that the RCW can be met, but this approach would make the legisla on una ainable elsewhere.

RCW 70.235 (and execu ve order 09-05), require a 25% reduc on in state greenhouse-gas produc on from a 1990 baseline by 2035. Alterna ve #5 offers a 24% regional increase from 2006 to 2040, or approximately a 50% increase from 1990 to 2035. Thus the best of the 6 investment strategies does li le to help meet greenhouse gas statuary-benchmarks.

The Final EIS should address this by developing a preferred alterna ve based on an extended version of alterna ve 5 that can be reasonably expected to meet transporta on's share of the greenhouse-gas reduc on required by current law. This should include:

- Clearly stated projec ons and bounds for vehicle and fuel technology.
- A greater transporta on investment using a broader mix of user fees.
- A discussion of how this investment will re-enforce the land-use goals of Vision 2040.

Mee ng the challenge of climate change will require aggressive planning and deliberate ac on. Difficult as it will be to meet current state law, the latest scien fic evidence suggests that even more stringent standards will be needed to prevent irreparable harm.

Dave Russell

4507 105th Ave NE

Kirkland, WA 98033

dave98033@verizon.net



**I-124-001**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**From:** Corky [corkysrocks@isomedia.com]
**Posted At:** Thursday, July 30, 2009 6:00 PM
**Conversation:** Regional transportation Plan for 2040
**Posted To:** Transportation 2040

**Subject:** Regional transportation Plan for 2040

I am a resident of Sammamish, WA. Today I got our local newspaper as was surprised to read the article titled, "Planners look into their crystal balls", it is an article about the Regional transportation plan 2040. One part that I found unbelievable that anyone would even be considering it, was the alternative that all arterials and freeways would have tolls, the article states that if this alternative be adopted, the 228th Avenue was be tolled. I don't understand how that would be possible, are you planning to put up a toll both at every road that intersects or adjoins 228th Avenue. I guess the same thing could be asked about every arterial and freeway. I would think the cost of putting up these temporary toll booths would be prohibitive. I find it hard to believe the forecasted population and the fact that Sammamish would increase that much, where will these people live, there are not that many planned housing developments on the plateau to accommodate those numbers. If there are, it should be part of the permitting process to tax developers to pay for any improvement needed to the area's transportation system affected by the housing that they are building. That onus should not be placed upon the people who are currently living in that area, but will be impacted by any new housing impact on their transportation system. It seems that politicians should not take a simplistic approach, and simply tax the populous, who are already over burdened with tax. The cost of improvement should be placed upon those who are causing the need for the improvement to be made.

I-125-001

I-125-002

Gordon L Russell
3024 229th Place NE
Sammamish, WA 98074



**I-125-001**

If in the future arterial tolling is implemented it would be fully electronic. Current technology that has been tested for this purpose uses satellite based systems (GPS) similar to navigation systems in cars or cell phones. There would be no toll booths.

**I-125-002**

Thank you for your comments. Regarding the use of toll booths, it's very likely, given current and emerging technology, that the vast majority of tolled roadway users would not be required to use toll booths.

You also raise the issue of growth paying for growth, specifically in the case of the city of Sammamish. Impact fees could be used to help generate revenues from areas in the region where growth is occurring, and these fees could be used to help pay for transportation improvements needed to serve growth. This is an option the region could consider as part of its financial strategy for Transportation 2040.

I-126 David Swindale.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 12:06 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: David Swindale

Address: 3715 Bridgeport Way

City: University Place, WA 98466

Email: DSwindale@Cityofup.com

Add to mailing list?: yes

The various components in the six alternatives: Thank you for the opportunity to comment on the Draft Environmental Impact Statement for Destination 2040 (DEIS). The City of University Place recognizes the importance of planning for the region's transportation needs today and into the future. As a "Large City" according to Vision 2040's Regional Geographies, we anticipate accommodating a significant number of people and jobs in the next thirty-two years. With two-thirds more people than we have today, some 52,000 in all by 2040, the City of University Place will have a population and employment base larger than what several existing regional centers have today.

I-126-001

To accommodate an additional 20,500 people and 6,000 jobs by 2040, our transportation infrastructure including transit services needs to be expanded to support this growth. VISION 2040 does not address how this needed infrastructure would be funded on a regional basis. Absent regional support in terms of transportation system upgrades including transit, makes it unlikely that University Place could begin to meet the regional growth strategy targets for 2040.

A light rail extension along the Bridgeport Way corridor would greatly assist the City in realizing its goal of developing a Regional Growth Center. Light rail would support higher housing density and greater economic activity. The City believes the addition of high capacity transit would make a crucial difference in the City's ability to meet the employment targets identified in the Vision 2040 Regional Growth Strategy.

I-126-002

It is no secret that the City of University Place is seeking designation as the next Regional Center in Pierce County. With the help of Ivan Miller and others at the Puget Sound Regional Council (PSRC), University Place staff took the lead role in developing the process and criteria for the designation of new regional centers in Pierce County. These amendments to the Countywide Planning Policies have been ratified by the requisite number of jurisdictions, and are now scheduled for adoption by the County Council.

In anticipation of adoption of the Countywide Planning Polices for a Center Designation, the City is forming a Regional Center Ad-Hoc Advisory Committee to develop the plans and regulations needed for Regional Center designation. It is our intent to submit a request to the Pierce County Regional Council to be designated a Candidate Regional Center by the end of this year and then shortly thereafter request a Regional Center Designation from the PSRC.

Most of the alternatives analyzed in the DEIS involve connecting Regional Growth Centers. Given the long term nature of Transportation 2040 and the City's efforts to be designated a Regional Growth Center to support anticipated growth and development, the City requests that transportation alternatives be extended to University Place between Tacoma and Lakewood. For example:

I-126-003

1. Extend the light rail to University Place in the Baseline and Alternative 3 rather than ending the line at Tacoma Community Collage or Downtown Tacoma respectively.
2. Extend bus-rapid transit to University Place rather than or in addition to Titlow Beach.
3. In all alternatives, extend bike-pedestrian routes to University Place and Lakewood.

It is our understanding that once the EIS is finalized the PSRC will consider which



**I-126-001**

The updated Transportation 2040 plan increases local transit service by approximately 50%, while achieving opera-tional efficiencies to reduce long-run costs; emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

Once the City of University Place grows into a regional growth center with a higher concentration of jobs, the transit services to the regional growth center would be re-evaluated to support that regional center designation. Several of the regional centers are proposed to be served by BRT lines and core bus routes that operate at 15 minute headways or less, resulting in frequent bus service and options.

**I-126-002**

Comment noted.

**I-126-003**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific

alternative or hybrid of alternatives to adopt. The City Council will be submitting a resolution in support for an alternative or hybrid at that time. Please keep us informed of your progress including any plans to extend transportation alternatives to and through University Place.

Should you have any questions, please do not hesitate to contact me at (253) 460-2519.

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

The alternative you think best accomplishes our regional needs out to 2040:

Other comments:



projects that have already completed design or environmental processes and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

**From:** John Tatum [jtatum@marysvillewa.gov]
**Posted At:** Friday, July 31, 2009 1:57 PM
**Conversation:** 2040 DEIS Comment
**Posted To:** Transportation 2040

**Subject:** 2040 DEIS Comment

I-127-001

I guess this falls under item 6: Other. I have been quite frustrated as a smaller agency representa ve in compe ng for funding against the larger agencies for opera onal/ITS type improvements such that I have quit trying to compete at this level for these transporta on dollars. Not un l the energy efficiency community block grant under the s mulus funding did I realize that someone had come up with a way ("formula") to appor on funds by popula on to service the large fairly but s ll have a block set aside for the small where only the small compete for/against peers.

I will personally **never** have the resources to go up against a large city.....not the staffing .....nor the clout....nor the centrality of loca on. Without some form of formula set aside, I will never have a chance and in fact have pre y much given up trying (unless so directed by management).....Regional grant funding applica ons appear to be a waste of my valuable me (and probably the regions as well). The size of my Cost/Benefit will never stand on its own merit under the current methods of dollar distribu on.

I think the formula as used by the EECBG from both the Feds and as applied by CTED has a lot going for it in terms of equitability and should be considered as a model for funding distribu on strategy to fairly distribute funding alloca ons that balances regional needs and the le out.

This is an opinion I have not asked management to ok. It is my personal experience and opinion and I do not represent it as the official opinion of the agency I work for.

John Tatum
Traffic Engineer
City of Marysville
80 Columbia Ave
Marysville, WA 98270
360 363 8287

**I-127-001**

Comment noted.

I-128 Josef C. Taylor.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 9:42 AM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Josef C. Taylor

Address: 5043 Brooklyn AVE NE

City: Seattle, WA, 98117

Email: josef.taylor@gmail.com

The various components in the six alternatives:

The environmental impacts of the alternatives:

Funding strategies, for raising revenue and paying for transportation needs:

The information contained in the analysis:

**I-128-001**

The alternative you think best accomplishes our regional needs out to 2040:
Alternative five is definitely most attractive. We've got to get people out of their cars and make bicycling and walking safer- not by placing restrictions on those activities, but by taking dangerous cars off the road.
Tolling roads allows local control over driving demand, instead of leaving it in the hands of oil companies.

Other comments:



**I-128-001**

Thank you for stating your preference among the alternatives.

A Vote for Alternative Five-Tom Furtwangler.txt
From: Tom Furtwangler [tomfurt@gmail.com]
Sent: Thursday, July 30, 2009 8:22 PM
To: Transportation 2040
Subject: A Vote for Alternative Five

Dear PSRC board members and other stakeholders,

PICK NUMBER FIVE!!

I-130-001 As a daily bicycle commuter from West Seattle to downtown, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-130-002 Many studies have shown that biking gets safer when more people bike, and more people bike when you make explicit plans for infrastructure and support.

I-130-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Tom Furtwangler
West Seattle
http://www.bikejuju.com

Tom Furtwangler
3707 SW Southern Street
Seattle, WA 98126

Page 1

**I-130-001**

Comment noted.

**I-130-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-130-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Alfred Luongo.txt
From: Alfred Luongo [alfredluongo@yahoo.com]
Sent: Thursday, July 30, 2009 4:21 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-131-001
I-131-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-131-003
After 4 years of commuting by car, I can say that the growth of bicycle-friendly alternatives in the Seattle area encouraged me to try riding my bike to work once or twice a week. Combined with transit options, I've increased that to 3 times a week. I'm proof that these changes do make a positive difference and have seen many others make healthier choices for both themselves and the environment.

I-131-004
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Alfred Luongo

Alfred Luongo
455 N 44th St Apt 302
Seattle, WA 98103



**I-131-001**

Thank you for stating your preference among the alternatives.

**I-131-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-131-003**

Comment noted.

**I-131-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Amy Murry.txt
From: Amy Murry [murryfamilyof5@msn.com]
Sent: Thursday, July 30, 2009 4:43 PM
To: Transportation 2040
Subject: Please support Alternative Five

I-132-001 Dear PSRC board members and other stakeholders,
My family of 5 use our local bike trails several times a week. Recently I even did the STP ride, and the best part of the whole ride was the trails near my home. I was so proud of our community for providing something we can all use!

I-132-002 I-132-003 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-132-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Amy Murry
2732 58th CT SE
Olympia, WA 98501

Page 1

**I-132-001**

Comment noted.

**I-132-002**

Thank you for stating your preference among the alternatives.

**I-132-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-132-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Ann Davis.txt

From: Ann Davis [anndav@comcast.net]
Sent: Thursday, July 30, 2009 10:24 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-133-001
I-133-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-133-003
The success of May's Bike to Work month shows how many local cyclists are willing to ride to work. The number of participants were way up this year despite the horrible wet weather we experienced. It would be great to have a much safer and convenient ways to be able to ride a bike and use public transportation to get to work.

I-133-004
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Ann Davis

Ann Davis
23819 SE 186th St
Maple Valley, WA 98038

Page 1

**I-133-001**

Thank you for stating your preference among the alternatives.

**I-133-002**

Comment noted. The Preferred Alternative expands bike and walk infrastructure to fully connect the bicycle network to, within, and between regional centers (3 mile access) and provide full sidewalks and pedestrian networks in all cities (1 mile access). It includes more than 580 miles of additional off-road regional trails and focuses bike and walk improvements in regional growth centers, along facilities with one terminus in a center, or within ¾ mile of transit passenger facilities, and locations that overcome a barrier (such as crossing I-5) or provide a missing link. It would complete approximately 350 miles of the envisioned regional off-road trails. A key goal is to improve pedestrian and cyclist access to transit with improved terminal access, terminal facilities, and bike racks on transit vehicles. The plan would also add online regional nonmotor trip planning services, fund education/outreach programs, and make roadside investments to improve bicycle and pedestrian safety. The plan will promulgate both a “no net loss” policy to ensure that construction or modification of other transportation facilities does not diminish the supply or connectivity of the bicycle and pedestrian networks and a new way of thinking about the use of public right-of-way that gives full attention to the needs of all users. Finally, the plan proposes to explore the concept of a regional bike sharing program.

**I-133-003**

Comment noted.

**I-133-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Barbee & George Pigott.txt
From: Barbee & George Pigott [barbeepigott@yahoo.com]
Sent: Friday, July 31, 2009 2:21 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-134-001
I-134-002

Please support alternative five when making your decision on the future of our region. We are active seniors who enjoy walking. To reduce air pollution and congestion, realize the public health benefits of increased physical activity, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-134-003

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Barbee & George Pigott
4525-105 Ave. NE
Houghton, WA 98033-7637

Page 1

**I-134-001**

Thank you for stating your preference among the alternatives.

**I-134-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-134-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Benjamin Johnson.txt
From: Benjamin Johnson [benjamin.c.johnson@gmail.com]
Sent: Friday, July 31, 2009 1:41 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-135-001
I-135-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit. Since bicycling facilities are much cheaper than motorized vehicle or transit improvements, it makes sense to support the growing number of cyclists in our region with state-of-the-art bikeways.

I-135-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Benjamin Johnson
9456 21st Ave SW
Seattle, WA 98106

Page 1

**I-135-001**

Thank you for stating your preference among the alternatives.

**I-135-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-135-003**

Thank you for stating your preference among the alternatives.

I-129 Todd Woosley.txt

From: info@fixieconsulting.com
Posted At: Friday, July 31, 2009 5:04 PM
Conversation: Comment on T2040 DEIS
Posted To: Transportation 2040

Subject: Comment on T2040 DEIS

Name: Todd R. Woosley

Address: 12001 N.E. 12th Street, Suite #44

City: Bellevue, WA 98005

Email: todd@woosleyproperties.com

**I-136-001** The various components in the six alternatives: I support the overall goal of accommodating the mobility needs the 1.4 million new people expected in our region by 2040. It is interesting to note that in all alternatives, the same number of personal vehicles are expected. Therefore, a final (possibly hybrid) alternate that has the greatest capacity expansion would have the least increase in congestion.

**I-136-002** The environmental impacts of the alternatives: It is important to note virtually all of the infrastructure is planned in the "URBAN" portion of the PSRC territory. Adequate additional transportation capacity is most consistent with the overall intent of the GMA to accommodate growth in urban areas. Having enough capacity for the reported additional vehicles will help curb sprawl. In addition (as demonstrated in the I-405 FEIS), congestion relief through general purpose lane expansion offers significant air quality improvement. Highway expansion projects offer the additional environmental benefits of improved surface water management and water quality (as improved SWM facilities are built as part of road projects), as well as fish habitat improvement (as culverts are improved and access increased as a component of road expansion projects).

**I-136-003** Funding strategies, for raising revenue and paying for transportation needs: Research (focus groups and polling) show that a "user pays" revenue system has significant public support. Conversely, diversion of revenues for other uses causes a loss of support for transportation funding. As other funding sources are considered to replace gas tax revenues, these sources should have similar protections as to how the revenues are invested.

**I-136-004** The information contained in the analysis: The basic information about the growing need for more capacity (due to increased demand) appears accurate. However, the assumption that most alternatives will have the same economic impact appears inaccurate. Increased congestion has demonstrated direct negative economic impacts. Therefore, there should be a more direct relationship between overall mobility and economic vitality.

**I-136-005** Also, the assumption that air quality/green house gas emissions/etc. will be most significantly impacted by the largest increase in non-automobile capacity is inconsistent with the NEPA analysis for I-405, as well as the carbon impact of construction study re: Sound Transit LINK Light Rail Phase 1 construction (which states it will take 70- 90 years to offset the construction impacts). A cost/benefit analysis to determine which transportation improvements (based on actual mode splits and facility utilization) have the best air quality improvements could be performed in the FEIS.

**I-136-006** The alternative you think best accomplishes our regional needs out to 2040: A hybrid that 1. Increases the region's highway and arterial capacity, 2. has a funding system that is most equitable to the users who pay and 3. provides the most trip accommodation for each public dollar invested.

Other comments: Thank you for the work done so far on Transportation 2040.

Page 1

**I-136-001**

Thank you for stating your preference among the alternatives.

**I-136-002**

Comment noted.

**I-136-003**

Thank you for your comment. These issues were carefully explored in the Transportation 2040 planning process.

**I-136-004**

Mobility benefits for users of the regional transportation system have been calculated for all six alternatives in the DEIS as well as the Preferred Alternative.

**I-136-005**

Thank you for your comment. Currently, PSRC does not have the tools available to perform an accurate analysis of construction impacts on a regional scale. Further, a cost-benefit analysis has been performed on the regional packages of projects and investments, but such an analysis on individual projects would be conducted as part of a project-level EIS or other evaluation document.

**I-136-006**

Between May 2009 and November 2009, following the release of the DEIS, the Regional Council's Transportation Policy Board led the process to develop Transportation 2040, in coordination with other Regional Council boards and committees. During this time, the Board used four tools to develop the Preferred Alternative: (1) the findings in the DEIS; (2) input received during a public review and comment period; (3) staff analysis of the potential Preferred Alternative, including input from a technical advisory group made up of local jurisdiction staff; and

(4) application of the evaluation criteria for selecting a Preferred Alternative published in the DEIS.

Using these tools, PSRC staff developed a Preferred Alternative for a future transportation system that includes elements from all the DEIS alternatives. The draft Preferred Alternative was evaluated by a technical advisory group composed of staff from around the region. This group met over the summer of 2009, and used a series of technical evaluation measures to develop a reasonable final Preferred Alternative.

Please support Alternative Five-Charles Redell.txt
From: Charles Redell [cmonster@gmail.com]
Sent: Thursday, July 30, 2009 5:20 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-137-001
I-137-002

Please support alternative five when making your decision on the future of our region. I ride my bike to and from work everyday and am lucky to have one trail to ride most of the way on. But, if I change my route only slightly, or if I decide to go to a friend's house, out for a night on the town or really anywhere but work, riding means being on the streets. While I don't mind, this dissuades my wife from riding her bike and thus puts us in the car much more often than we'd like.

Not only is this bad for us, it adds to traffic congestion, air pollution and regional costs for street repairs. Bikes are low-impact, high reward modes of transport and should be supported more by our government.

I-137-003

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Charles Redell
3700 25th PL W #301
Seattle, WA 98199

Page 1

**I-137-001**

Thank you for stating your preference among the alternatives.

**I-137-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-137-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-David Rapp.txt
From: David Rapp [rappocean@gmail.com]
Sent: Friday, July 31, 2009 9:03 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-138-001
I-138-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-138-003
Alternative Five seems to me to be the obvious choice of good conscience, and I encourage you to make every possible effort to support this choice. Please do right by our children, and make them proud of our choices.

Thank you,

David Rapp
6004 27th Ave NE
Seattle, WA 98115

Page 1

**I-138-001**

Thank you for stating your preference among the alternatives.

**I-138-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-138-003**

Comment noted. Thanks for stating your preference among the alternatives.

Please support Alternative Five-Doraine Raichart.txt
From: Doraine Raichart [dorainer@gmail.com]
Sent: Thursday, July 30, 2009 5:16 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-139-001
I-139-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

Look at European communities for a perfect example of walking and biking routes that provide greatly enhanced livability. Europeans walk and bike to their errands, to cafes and restaurants, and enjoy the journey as well as the destination. This is such a beautiful region with fantastic potential for very scenic tree-shaded paths. I've even found a few. However, they really aren't functional if they're fragmented, as so many of our neighborhood paths are. The best commuter path in the world won't get used if there is a large unsafe section making it impassable.

Let's start now in teaching current generations about the joys of walking and biking to where they want to go.
I-139-003
Developers and residents alike need to understand the value of shared space. It goes beyond having viable bike and pedestrian routes -- it is a healthier more connected way of life, and encourages greater community.

I-139-004
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Doraine Raichart
12702 NE Hollyhills Dr.
Bothell, WA 98011-2513

Page 1

**I-139-001**

Thank you for stating your preference among the alternatives.

**I-139-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-139-003**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-139-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Elizabeth Umbanhowar.txt
From: Elizabeth Umbanhowar [eumbanhowar@usa.net]
Sent: Friday, July 31, 2009 9:15 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-140-001
I-140-002
Please support alternative five when making your decision on the future of our region. As a commuter and recreational bicyclist, I believe this mode should be encouraged for both human and climate health and effective transportation.

I-140-003
Offering people as many options as possible is integral to a healthy and economically lively transportation system and community. Supporting cycling, walking and transit contributes to the reduction of air pollution and traffic congestion, decreasing obesity and other serious and chronic health challenges, and contributes to moving people and goods efficiently and economically.

I-140-004
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Elizabeth Umbanhowar

Elizabeth Umbanhowar
8040 Meridian Avenue North
Seattle, WA 98103-4527



**I-140-001**

Thank you for stating your preference among the alternatives.

**I-140-002**

Comment noted.

**I-140-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-140-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Glenn Herlihy.txt
From: Glenn Herlihy [glennherlihy@speakeasy.net]
Sent: Thursday, July 30, 2009 3:57 PM
To: Transportation 2040
Subject: Please support Alternative Five

I-141-001

Dear PSRC board members and other stakeholders,
I no longer feel safe biking with my child in a bike trailer because of the lack of bike lanes and too many over sized vehicles. We need bike only streets as corridors between popular destinations throughout the city. We could close one lane on two way streets to be used by bikes and pedestrians. If families could go by bike and feel safe we would probably be very surprised at how many more people would choose an alternative to cars.

I-141-002
I-141-003

Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-141-004

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Are you ready to be apart of the solution?

Thank you,
Glenn Herlihy

Glenn Herlihy
2337 18th Ave S
Beacon Hill, WA 98144



**I-141-001**

Comment noted.

**I-141-002**

Thank you for stating your preference among the alternatives.

**I-141-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-141-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Janet Fleck.txt
From: Janet Fleck [janet.fleck@gmail.com]
Sent: Thursday, July 30, 2009 8:21 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-142-001 I'm a fairly new bicyclist and we definitely need to support both bicyclist, walkers and runners along with cars which pollute less. And we need safe trails and pathways!

I-142-002 I-142-003 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-142-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Janet Fleck
15922 SE 46th Place
Bellevue, WA 98006-3263

Page 1

**I-142-001**

Comment noted.

**I-142-002**

Thank you for stating your preference among the alternatives.

**I-142-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-142-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Jennifer Youngman.txt
From: Jennifer Youngman [jsytrace@earthlink.net]
Sent: Friday, July 31, 2009 12:15 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-143-001 Before participating in the Green Bike Program in King County this past year, I was not a bicyclist at all. Successful participation in the Green Bike Program radically changed my view of the practicality of bicycling as a serious form of transportation. Now when I need to get somewhere, I routinely pull out my bike map and consider whether it's practical and safe to get there by bike.

I-143-002 Consequently, I'm writing to urge you to support Alternative Five in the draft EIS of the Transportation 2040 plan.

I-143-003 Alternative Five should be encouraged for transportation and health reasons. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it's imperative that we invest in walking, bicycling and transit.

I-143-004 Alternative Five is the only alternative that comes close to meeting the goals in VMT and emissions reduction that have been enacted into state law. Please join me in supporting a more sustainable future.

Thank you,

Jennifer Youngman
15828 14th Ave. NE
Shoreline, WA 98155-6324

Page 1

**I-143-001**

Comment noted.

**I-143-002**

Thank you for stating your preference among the alternatives.

**I-143-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-143-004**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Jill Carlsen.txt
From: Jill Carlsen [jillcarlsen@gmail.com]
Sent: Thursday, July 30, 2009 2:27 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-144-001
I-144-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations (in turn reducing the costs of health care), and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-144-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Jill Carlsen
5636 42nd Ave. SW
Seattle, WA 98136

Page 1

**I-144-001**

Thank you for stating your preference among the alternatives.

**I-144-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-144-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Julian Davies.txt
From: Julian Davies [Totcycle@me.com]
Sent: Thursday, July 30, 2009 11:00 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-145-001 Please support alternative five when making your decision on the future
I-145-002 of our region. As a bicyclist and pediatrician, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-145-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Julian Davies
6003 30th Ave NW
Seattle, WA 98107

Page 1

**I-145-001**

Thank you for stating your preference among the alternatives.

**I-145-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-145-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Karen Rasmussen.txt
From: Karen Rasmussen [korasm@comcast.net]
Sent: Friday, July 31, 2009 11:44 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-146-001
I-146-002
Please support alternative five when making your decision on the future of our region. As a walker, runner and bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-146-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Karen Rasmussen
10333 NE 55th St.
Kirkland, WA 98033

Page 1

**I-146-001**

Thank you for stating your preference among the alternatives.

**I-146-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-146-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Kerstin Bjork.txt
From: Kerstin Bjork [kbjork@hermanson.com]
Sent: Friday, July 31, 2009 8:09 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-147-001
I-147-002
Please support alternative five when making your decision on the future of our region. As a 50+ female bicyc commuter, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-147-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable

I-147-004
future. I'm particular in favor of more bikelanes within the city of Kent where lack of sidewalks and bikelanes makes bicycling particularly hazardous. I would especially favor a good bikeline from downtown Kent up to East Hill Kent so one does not have to fight cars in addition to gravity.

Thank you,

Kerstin Bjork
22016 128th Place SE
Kent, WA 98031-3935

Page 1

**I-147-001**

Thank you for stating your preference among the alternatives.

**I-147-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-147-003**

Thank you for stating your preference among the alternatives.

**I-147-004**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes

and secured significant amounts of funding. The stakeholders cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives as set forth in VISION 2040, and the analysis results from alternatives in which the proposal had been tested. Ultimately the Transportation Policy Board recommended the investments included in the plan to the Executive Board, which forwarded the plan for adoption to the General Assembly.

Please support Alternative Five-Linda Kovic-Skow.txt
From: Linda Kovic-Skow [alskow@comcast.net]
Sent: Friday, July 31, 2009 11:12 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-148-001
I-148-002
Please support alternative five when making your decision on the future of our region. I want to see a Communter Trail along the BNSF Corridor to promote GREEN, HEALTHY LIFESTYLES!

I-148-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Linda Kovic-Skow
6712 104th Ave NE
Houghton, WA 98033

Page 1

**I-148-001**

Thank you for stating your preference among the alternatives.

**I-148-002**

Thank you for stating your preference.

The following three concepts guided the development of the regional nonmotorized transportation system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-148-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Marcia Lupton.txt

From: Marcia Lupton [mailto:gingko48@msn.com]
Sent: Thursday, July 30, 2009 7:14 PM
Posted To: Transportation 2040
Conversation: Please support Alternative Five
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-149-001 Please support alternative five when making your decision on the future of
I-149-002 our region. As a bicyclist, I believe this mode should be encouraged for
both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods
efficiently, it is imperative that we make investments in walking, bicycling
and transit.

I-149-003 I urge you to support Alternative Five among the options available in the
draft EIS of the Transportation 2040 plan. It is the only alternative that
comes close to meeting goals in VMT and emissions reduction that have been
enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Marcia Lupton
8044 41 Ave. NE
Seattle, WA 98115

All e-mail correspondence to and from this address are subject to the Washington State Public Records Act, which may result in monitoring and archiving, as well as disclosure to third parties upon request.



**I-149-001**

Thank you for stating your preference among the alternatives.

**I-149-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-149-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Mark Libby.txt
From: Mark Libby [mklibby@earthlink.net]
Sent: Thursday, July 30, 2009 5:02 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-150-001 Please support alternative five which includes bike lanes in the North Kitsap area. Bike riding is an important recreational and physical fitness activity for me, and we need bike lanes to make this a safe and enjoyable activity. In North Kitsap we have great natural beauty, and with safe bike routes we will promote access in a way environmental manner.

I-150-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

Thank you,

Mark Libby
PO BOX 7301
Kingston, WA 98346

Page 1

**I-150-001**

Thank you for stating your preference among the alternatives.

**I-150-002**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Melinda Minch.txt
From: Melinda Minch [melinda@melindaminch.com]
Sent: Thursday, July 30, 2009 2:02 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-151-001
I-151-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I ride my bicycle to go grocery shopping, to go to work (I live in Belltown and work in Bellevue), to visit friends... anywhere I need to go- and I'm not alone. Every day, more people get on bikes.

I-151-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Melinda Minch
2100 3rd Ave # 1002
Seattle, WA 98121

Page 1

**I-151-001**

Thank you for stating your preference among the alternatives.

**I-151-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-151-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Pat McDermott.txt
From: Pat McDermott [pamdgj@hotmail.com]
Sent: Thursday, July 30, 2009 5:49 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-152-001
I-152-002
Please support only alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution from motor vehicles that causes asthma for many of us,reduce traffic congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-152-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Pat McDermott
17780 15th Ave NW
Shoreline, WA 98177-3303

Page 1

**I-152-001**

Thank you for stating your preference among the alternatives.

**I-152-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-152-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Peder Johansen.txt
From: Peder Johansen [dgjpam@hotmail.com]
Sent: Thursday, July 30, 2009 5:53 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-153-001
I-153-002
Please support only alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution from motor vehicles that causes asthma for many of us,reduce traffic congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-153-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Peder Johansen
17780 15th Ave NW
Shoreline, WA 98177

Page 1

**I-153-001**

Thank you for stating your preference among the alternatives.

**I-153-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-153-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Phil Evans.txt
From: Phil Evans [evanspc@gmail.com]
Sent: Thursday, July 30, 2009 10:42 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-154-001 Let's be healthy, wealthy, and wise: please support alternative five when making your decision on the future of our region.

I-154-002 As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-154-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Phil Evans
2107 47th Ave SW
Seattle, WA 98116-2107

Page 1

**I-154-001**

Thank you for stating your preference among the alternatives.

**I-154-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-154-003**

Thank you for stating your preference among the alternatives.

Please support Alternative Five-Rein Attemann.txt
From: Rein Attemann [reinattemann@yahoo.com]
Sent: Friday, July 31, 2009 7:12 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-155-001

I am an avid bicyclist, commuting 3-5 days a week to work and take bike rides regularily throughout Seattle. My experience is that Seattle has huge potential for better pedestrian and bicycle friendly transportation opportunities. BUT you need to make the right decision to point us in the right direction.

I-155-002
I-155-003

Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Rein Attemann
316 NW 86th ST
Seattle, WA 98117

Page 1

**I-155-001**

Comment noted.

**I-155-002**

Thank you for stating your preference among the alternatives.

**I-155-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5- Gary Powell.txt
From: Gary Powell [gwpowell@hotmail.com]
Sent: Friday, June 26, 2009 9:19 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members,

I-156-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the one alternative that supports bicycling in our region the best.

Sincerely,

Gary Powell

Gary Powell
15805 140th CT SE
Renton, WA 98058-7811



**I-156-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Brian Hanson.txt
From: Brian Hanson [brian.hanson@theplatform.com]
Sent: Friday, June 26, 2009 12:05 PM
To: Transportation 2040
Subject: Support Alternative 5 - I''m a daily bicycle commuter!

Dear PSRC board members and other stakeholders,

I-157-001 As a daily bicycle commuter, I urge you to support Alternative Five among the options available in the draft

I-157-002 EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Brian Hanson

Brian Hanson
3101 Western Ave
Seattle, WA 98121



**I-157-001**

Thank you for stating your preference among the alternatives.

**I-157-002**

Comment noted.

Support Alternative 5-Bruce Blackburn.txt
From: Bruce Blackburn [bwblackburn@msn.com]
Sent: Monday, June 29, 2009 11:06 AM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-158-001 I have been a bike commuter for 5 years and a land use planner for 20 years. Bike commuting is an easy, affordable (compared to motorized options) and rewarding means of getting to and from work,. It is also a positive and cheap way to reduce both traffic congestion and green house gas emissions. I started bike commuting as an out-of-shape-overweight 47 year old. Now I am an out-of-shape-overweight 52 year old. Anyone can do this! But, it takes viable bike lanes and other improvements to accomodate bikes in the overall transportation system.

I-158-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Bruce Blackburn
15615 63 Ave NE
Kenmore, WA 98028

Page 1

**I-158-001**

Comment noted.

**I-158-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Carl Berkowitz.txt
From: Carl Berkowitz [cdberkowitz@charter.net]
Sent: Thursday, June 25, 2009 9:54 PM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC,

I-159-001 | As someone who greatly enjoys visiting Seattle, I hope you will give serious consideration to Alternative Five of the draft EIS of the Transportation 2040 plan. I spend much of my Seattle time (and money!) seeing your city from a bicycle, and think Alternative Five is the most supportive

I-159-002 | of this form of recreation. It is also my understanding that Alternative Five is the option that comes closest to meeting statutory - and desirable - goals in VMT and emissions reduction.

Thank you.

Sincerely,

Carl Berkowitz

Carl Berkowitz
544 Franklin St
Richland, WA 99354



**I-159-001**

Thank you for stating your preference among the alternatives.

**I-159-002**

Comment noted.

Support Alternative 5-Cathy Collins.txt

From: Kathy Collins [kathy.collins2@comcast.net]
Sent: Friday, July 31, 2009 5:53 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-160-001
I-160-002

Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation.

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. If we are going to redue the use of fossil fuels we need to plan for alternative transportation

Thank you,

Kathy Collins
3865 NE 155th st
Forest Park, WA 98155



**I-160-001**

Thank you for stating your preference among the alternatives.

**I-160-002**

Comment noted.

Support Alternative 5-Chris McNulty.txt
From: Chris McNulty [csmcnulty1@hotmail.com]
Sent: Friday, June 26, 2009 12:41 PM
To: Transportation 2040
Subject: [QUARANTINE] Support Alternative 5

Dear PSRC board members,

I-161-001 A 1 percent investment in bicycling trails and related improvements is good for traffic, the environment, and
I-161-002 the health of Puget Sound residents. I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

Very truly yours,
Chris McNulty

Chris McNulty
3805 NE 96th St
Seattle, WA 98115



**I-161-001**

Comment noted.

**I-161-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Chris Thoreen.txt

From: Chris Thoreen [lcthoreen@gmail.com]
Sent: Sunday, June 28, 2009 12:06 PM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-162-001 As a result of the increasing gas prices of 2008, I invested in a new, custom-fit bicycle and now cycling has become my primary mode of transportation. The increase in designated bike routes in the Seattle region has made biking easier, safer and much more enjoyable. I am a middle school teacher and my students and I often discuss the individual impact we have on the environment, and what we can do to make a positive impact. Having more opportunities in the future, like what Alternative 5 proposes, will only promote well-being for all.

I-162-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,

Chris Thoreen

Chris Thoreen
4802 S Garden St
Seattle, WA 98118



**I-162-001**

Thank you for stating your preference among the alternatives.

**I-162-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Christopher Clifford.txt
From: Christopher Clifford [cclifford@wamail.net]
Sent: Thursday, July 02, 2009 10:26 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC,

I-163-001 I'm writing to express my support for Alternative Five among the options in the draft EIS of the Transportation 2040 plan. This is because of its provisions for bicycling and its goals in VMT and emissions reduction. It's time for our transportation planning to focus on moving people--not cars!

I-163-002

Sincerely,

Christopher Clifford

Christopher Clifford
1820 N Shirley St
Tacoma, WA 98406



**I-163-001**

Thank you for stating your preference among the alternatives.

**I-163-002**

Comment noted.

Support Alternative 5-Chuck Dolan.txt
From: Chuck Dolan [chucklesd2@hotmail.com]
Sent: Saturday, August 01, 2009 1:50 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-164-001
I-164-002

Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, realize the public health benefits of increased physical activity, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

As bike commuter, incentive programs really work and need funding so on those rainy days it would nicer to drive, there is a monetary reward for riding. Creating more trails and improving current ones are essential.

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Chuck Dolan
1220 NE 97th St
Seattle, WA 98115

Page 1

**I-164-001**

Thank you for stating your preference among the alternatives.

**I-164-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Craig Callewaert.txt
From: Craig Callewaert [callewaert@alum.bradley.edu]
Sent: Friday, June 26, 2009 7:20 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-165-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-165-002 Increasing bicycle transportation options is the best sustainable choice. Thanks for choosing 5.

Sincerely,

Craig Callewaert
22850 NE 8th Street #312
Sammamish, WA 98074

Page 1

**I-165-001**

Thank you for stating your preference among the alternatives.

**I-165-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Dan Allison.txt

From: Dan Allison [danallison@yahoo.com]
Sent: Thursday, June 25, 2009 6:04 PM
To: Transportation 2040
Subject: Please Support Alternative 5

Dear PSRC board members and other stakeholders,

I-166-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. If we build trails, they will get used!

Sincerely,

Dan Allison
unk
Unknown, WA 00000

Page 1

**I-166-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Danielle Abbott.txt
From: Danielle Abbott [daniela_abbott@yahoo.com]
Sent: Friday, June 26, 2009 8:53 AM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-167-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Recently, it was found that our air locally is harmful to breathe, especially for our residents that live closest to highways and flight paths. Please join me in supporting a more sustainable and healthier future.

I-167-002

Sincerely,

Danielle Abbott
29 Etruria St. #403
Seattle, WA 98109

Danielle Abbott
29 Etruria St #403
Seattle, WA 98109

Page 1

**I-167-001**

Thank you for stating your preference among the alternatives.

**I-167-002**

Thank you for your comments.

Support Alternative 5-Devon Brewer.txt

From: Devon Brewer [devon.brewer@yahoo.com]
Sent: Thursday, June 25, 2009 9:41 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-168-001

I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction, not to mention the only alternatie that reduces dependence on foreign sources of energy. Please join me in supporting a more sustainable future.

Sincerely,

Devon Brewer

Devon Brewer
3827 NE 93rd St
Seattle, WA 98115



**I-168-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Dirk Heniges.txt

From: Dirk Heniges [dheniges@gmail.com]
Sent: Thursday, June 25, 2009 5:56 PM
To: Transportation 2040
Subject: Support Alternative 5

To: PSRC board members and stakeholders

Re: EIS Transportation 2040

I-169-001 Please choose Alternative Five in the draft EIS for the Transportation 2040 plan. It is the only real option for reducing emissions and having any real impact.

Sincerely,
Dirk Heniges

Dirk Heniges
6162 NE Radford Dr Apt 1322
Seattle, WA 98115



**I-169-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Edward M. Yoshida.txt
From: Edward Yoshida [edward_yoshida@merck.com]
Sent: Thursday, July 30, 2009 4:48 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-170-001
I-170-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged as a beneficial and practical means of transportation for improved health, both for the cyclist and the community. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling, and transit.

I-170-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Edward M. Yoshida

Edward Yoshida
17930 Brittany Dr SW
Normandy Park, WA 98166-3618

Page 1

**I-170-001**

Thank you for stating your preference among the alternatives.

**I-170-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-170-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Elizabeth Larios.txt
From: Elizabeth Larios [eclarios@gmail.com]
Sent: Thursday, July 30, 2009 12:57 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-171-001
I-171-002
Please support alternative five when making your decision on the future of our region. As a bicyclist and pedestrian, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-171-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Please join me in supporting a more sustainable future.

Thank you,

Elizabeth Larios
2219 NE 82nd St
Seattle, WA 98115-4559

Page 1

**I-171-001**

Thank you for stating your preference among the alternatives.

**I-171-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-171-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Jeffrey Parker.txt
From: Jeffrey Parker [jeffreysparker@gmail.com]
Sent: Thursday, June 25, 2009 8:23 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-172-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and

I-172-002 emissions reduction. A new study by the EPA shows the cancer risk of breathing air is 75 in 1 million in my neighborhood, nearly to the unacceptable threshold of 100 in 1 million. Please join me in supporting a more sustainable future.

Sincerely,
Jeff Parker
Seattle, WA

Jeffrey Parker
709 1/2 N 74th St
Seattle, WA 98103



**I-172-001**

Thank you for stating your preference among the alternatives.

**I-172-002**

Comment noted.

Support Alternative 5-Jeremy D Hahn.txt

From: Jeremy Hahn [sqrmy1@hotmail.com]
Sent: Friday, July 31, 2009 8:34 AM
To: Transportation 2040
Subject: [QUARANTINE] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-173-001
I-173-002

Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-173-003

I ask you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. As a bicyclist from Seattle to Everett and throughout the Puget Sound, better bicycling avenues will encourage others to try it and keep current bicyclers safe. Join me in supporting a more sustainable future.

Thank you,
Jeremy D Hahn
Bicyclist and Boeing Engineering

Jeremy Hahn
924 N 90th St
Greenwood, WA 98103

Page 1

**I-173-001**

Thank you for stating your preference among the alternatives.

**I-173-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-173-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Joel Ray.txt

From: Joel Ray [tomahak1@msn.com]
Sent: Friday, July 31, 2009 7:51 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-174-001 Along with the reasons listed below, to make biking a mode of transportation that is culturally acceptable, it has to be safe and connect several strategic points. It starts with families riding together and encouraging their children. In our area of Puyallup, our bikes have to be transported to reach safe riding conditions. I fully support measures that will improve biking as a feasable mode of safe transportation.

I-174-002 I-174-003 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-174-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Joel Ray
7003 140th ST CT E
Puyallup, WA 98373

Page 1

**I-174-001**

Comment noted.

**I-174-002**

Comment noted.

**I-174-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-174-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-John Enthoven.txt
From: John Enthoven [john.h.enthoven@boeing.com]
Sent: Friday, July 31, 2009 7:22 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-175-001 As a regular bicycle commuter, any thing that can be done to encourage more bicycle use should be done. Trails encourage novice riders to start using a bike. A small percentage of those new riders also start commuting to work via bicycle. A little bit less car traffic benefits everyone.

I-175-002 I-175-003 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, realize the public health benefits of increased physical activity, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-175-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

John Enthoven
1605 S. 245th Pl.
Des Moines, WA 98198

Page 1

**I-175-001**

Comment noted.

**I-175-002**

Thank you for stating your preference among the alternatives.

**I-175-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-175-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Jon Howell.txt
From: Jon Howell [jonh@jonh.net]
Sent: Thursday, July 30, 2009 5:31 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-176-001
I-176-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, increase fitness, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-176-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Jon Howell

Jon Howell
6827 18th Ave NE
Seattle, WA 98115



**I-176-001**

Thank you for stating your preference among the alternatives.

**I-176-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-176-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Julie Coryell.txt

From: Julie Coryell [julie@coryellmartin.org]
Sent: Sunday, July 05, 2009 10:55 AM
To: Transportation 2040
Subject: Support Alternative 5

I-177-001 Dear PSRC board members and other stakeholders,
GET US OUT OF OUR CARS! BUSSES are flexible, reasonable, and timely alternative.

I-177-002 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Sincerely,
Julie Coryell and Seelye Martin

Julie Coryell
5217 NE 43rd St
Seattle, WA 98105



**I-177-001**

The updated Transportation 2040 plan increases local transit service by approximately 50% while achieving opera-tional efficiencies to reduce long-run costs, and emphasizes additional all-day service with high frequencies (generally every 15 minutes). The plan also includes the completion of transit-supportive and efficiency investments in local roads, and access to and within centers, with the addition of a limited number of strategic projects.

**I-177-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Karen Watts.txt

From: Karen Watts [karenlwatts@yahoo.com]
Sent: Friday, July 31, 2009 12:12 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-178-001
I-178-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-178-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

I-178-004
My family and I are regular cycle-commuters who would cycle even more frequently if there were improved paths and safety measures.

Thank you,

Karen Watts
2223 N 44th
Seattle, WA 98103



**I-178-001**

Thank you for stating your preference among the alternatives.

**I-178-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-178-003**

Thank you for stating your preference among the alternatives.

**I-178-004**

Comment noted.

Support Alternative 5-Kristin Poinar.txt
From: Kristin Poinar [vegas1b@yahoo.com]
Sent: Thursday, July 30, 2009 4:35 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-180-001 Please support Alternative Five when making your decision on the future of our region. I believe bicycling for transportation should be encouraged.

I-180-002 I urge you to support Alternative Five of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. From a risk management perspective, it only makes sense to heed climate change warnings and to do what we can to combat emissions. We need to promote a lower-energy-use lifestyle as soon as possible, and Alternative Five is one solid step.

Thank you,
Kristin Poinar

Kristin Poinar
4831 Terrace Dr. NE
Seattle, WA 98105



**I-180-001**

Thank you for stating your preference among the alternatives.

**I-180-002**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Kristin Trace.txt
From: Kristin Trace [KTrace@gmail.com]
Sent: Friday, July 31, 2009 11:46 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-181-001 Biking / Pedestrian trails improve our quality of life! They are a GREAT commuter solution, with successful examples all around our region. This the best way to get cars off the road in the immediate future.

I-181-002 I-181-003 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-181-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Kristin Trace
10409 NE 60th St
Houghton, WA 98033

Page 1

**I-181-001**
Comment noted.

**I-181-002**
Thank you for stating your preference among the alternatives.

**I-181-003**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-181-004**
Thank you for stating your preference among the alternatives.

Support Alternative 5-Manda Williams.txt
From: Manda Williams [mandysw@u.washington.edu]
Sent: Thursday, July 30, 2009 5:46 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-182-001 I have benefitted greatly from the presence of the Burke-Gilman trail, using it both for recreation and my daily commute. Having more interconnecting bikeways would be an incredible asset to the region.

I-182-002 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this
I-182-003 mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-182-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Manda Williams
6255 NE Radford Dr. Apt 2701
Seattle, WA 98115

Page 1

**I-182-001**

Comment noted.

**I-182-002**

Thank you for stating your preference among the alternatives.

**I-182-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-182-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Margaret Nomi.txt
From: Margaret Nomi [margaret.l.nomi@boeing.com]
Sent: Friday, June 26, 2009 10:01 AM
To: Transportation 2040
Subject: Please Support Alternative 5

Dear PSRC board members and other stakeholders,

I-183-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

Thanks for listening.

Sincerely,

Margaret Nomi
13754 223rd Avenue SE
Issaquah, WA 98027

Page 1

**I-183-001**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Mary Beth Hasselquist.txt
From: Mary Beth Hasselquist [mbhpvg@earthlink.net]
Sent: Friday, July 31, 2009 5:20 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-184-001
I-184-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, and someone who has regularly commuted to work by bike for 18 years, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-184-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Mary Beth Hasselquist
604 NW 178th Place
Shoreline, WA 98177-3819

Page 1

**I-184-001**

Thank you for stating your preference among the alternatives.

**I-184-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-184-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Matthew Evans.txt

From: Matthew Evans [mattzart@hotmail.com]
Sent: Friday, July 31, 2009 3:17 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-185-001 Please support alternative five when making your decision on the future of our region.

I-185-002 I commute to work on a bicycle six months out of the year and enjoy using trails for part of my commute route. I am lucky enough to have trails available for my commute, but I know from experience that trails are not available to people who live in other cities and towns.

I-185-003 As a bicycle commuter, I believe bicycling should be encouraged for both health and transportation. To reduce air pollution and congestion, realize the public health benefits of increased physical activity, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-185-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Matthew Evans
Sammamish, WA

Matthew Evans
4123 211th Ct NE
SAMMAMISH, WA 98074



**I-185-001**

Thank you for stating your preference among the alternatives.

**I-185-002**

Comment noted.

**I-185-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-185-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Michelle Cvitkovie.txt
From: Michelle Cvitkovie [mcvitko@rei.com]
Sent: Friday, June 26, 2009 10:31 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-186-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-186-002 Please focus our transportation spending on increasing mass transit and bike lanes: we've cleared enough trees and laid enough asphalt.

Sincerely,

Michelle Cvitkovie
2020 Grant Ave S B202
Renton, WA 98055



**I-186-001**

Thank you for stating your preference among the alternatives.

**I-186-002**

Thank you. The plan recognizes the need for investments in transit and non-motorized facilities. The Preferred Alternative includes significant enhancements to serve non-SOV travel.

Support Alternative 5-Neal Freeland.txt

From: Neal Freeland [nealfreeland@msn.com]
Sent: Thursday, July 30, 2009 10:12 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-187-001 Please support alternative five when making your decision on the future
I-187-002 of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-187-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

I-187-004 Make Seattle unique - build more pathways!

Thank you,

Neal Freeland
4314 Eastern Ave N
Seattle, WA 98103

Page 1

**I-187-001**

Thank you for stating your preference among the alternatives.

**I-187-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-187-003**

Thank you for stating your preference among the alternatives.

**I-187-004**

Comment noted.

Support Alternative 5-Richard L. Wieneke.txt
From: Richard Wieneke [richardwieneke@yahoo.com]
Sent: Thursday, July 30, 2009 7:56 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-188-001
I-188-002
Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit. Oil in in finite supply and by 2020 it will be too expensive for many people.

I-188-003
We need to concentrate growth in central areas around public transportation nodes and provide walking an bike paths for access to these locations.

I-188-004
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Please join my family and me in supporting a more sustainable future.

Thank you.

Sincerely,

Richard L. Wieneke

Richard Wieneke
2211 Blarney Pl SE
Bellevue, WA 98004

Page 1

**I-188-001**

Thank you for stating your preference among the alternatives.

**I-188-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-188-003**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**I-188-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-RJ Conn.txt

From: RJ Conn [rjconn@hotmail.com]
Sent: Thursday, July 30, 2009 8:19 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-189-001 I have had enough of the Puget Sound's transportation nightmare over the last three decades. We're all aware this mess could have been resolved long ago with a little forward thinking and commitment to modes of transportation other than the infernal combustion engine.

I-189-002 I-189-003 Please support Alternative Five when making your decision on the future of our region. As an avid and long-time cyclist, I believe in encouraging this alternative for both health and transportation. To reduce air pollution and congestion, reduce obesity in future generations, and move people more efficiently and pleasantly, it is imperative that we make investments in walking, bicycling and transit.

I-189-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

RJ Conn
Transportation Coordinator
Children's Hospital

RJ Conn
14235 SE 37th
Bellevue, WA 98006

Page 1

**I-189-001**

Comment noted.

**I-189-002**

Thank you for stating your preference among the alternatives.

**I-189-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-189-004**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Rosanna Snyder.txt
From: Rosanna Snyder [rosannaj@gmail.com]
Sent: Friday, July 31, 2009 10:06 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-190-001 *Please* support alternative five when making your decision on the
I-190-002 future of our region. As an avid bicyclist, I
believe this mode should be encouraged for both health and
transportation. To reduce air pollution and congestion,
reduce levels of obesity in future generations, and move people and
goods efficiently, it is imperative that we make
investments in walking, bicycling and transit.

Our city has the opportunity to do something great for our future and I
urge you not to set our sights short. We need
this!

I-190-003 I urge you to support Alternative Five among the options available in
the draft EIS of the Transportation 2040
plan. It is the only alternative that comes close to meeting goals in
VMT and emissions reduction that have been
enacted into state law. Join me in supporting a more sustainable
future.

Thank you,

Rosanna Snyder

Rosanna Snyder
8441 35th Ave SW
Seattle, WA 98126

Page 1

**I-190-001**

Thank you for stating your preference among the alternatives.

**I-190-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-190-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Ross Macfarlane.txt
From: Ross Macfarlane [ross@climatesolutions.org]
Sent: Friday, July 31, 2009 8:29 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-191-001
I-191-002
Please support alternative five when making your decision on the future of our region. As a bicyclist and an advocate for reductions in global warming pollution, I believe this mode should be encouraged for both health and transportation. To reduce global warming pollution, and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-191-003
I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Ross Macfarlane
12571 Corliss Ave. N. #A
Seattle, WA 98133



**I-191-001**

Thank you for stating your preference among the alternatives.

**I-191-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-191-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Ryan Selby.txt

From: Ryan Selby [rs@lemondfitness.com]
Sent: Monday, June 29, 2009 10:17 AM
To: Transportation 2040
Subject: [SPAM?] Support Alternative 5

Dear PSRC board members and other stakeholders,

I-192-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-192-002 Perhaps the most intriguing aspect of Alternative 5 is the funding for bicycle transportation. I believe that investing in safe, maintained trails for bikes will reduce pollution and have the added benefit of increasing the health of the overall population.

Sincerely,
Ryan Selby

Ryan Selby
13540 Burke Ave N
Seattle, WA 98133



**I-192-001**

Thank you for stating your preference among the alternatives.

**I-192-002**

Comment noted.

Support Alternative 5-Sara Longworth.txt
From: Sara Longworth [pacificpuffin@yahoo.com]
Sent: Sunday, June 28, 2009 8:42 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-193-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-193-002

I-193-003 Please be sure all new transportation plans and enhancements make bicycling a more viable alternative form of transportation. Many other places in other states and countries have done it, and so could we if we really tried.

Sincerely,

Sara Longworth,
Anacortes, WA 98221

Sara Longworth
4219 Mitchell Dr
Anacortes, WA 98221



**I-193-001**

Thank you for stating your preference among the alternatives.

**I-193-002**

Comment noted.

**I-193-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

Support Alternative 5-Shari Hogshead.txt

From: Shari Hogshead [skimntr@aol.com]
Sent: Friday, July 31, 2009 12:00 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members,

I-194-001
I-194-002

Please support alternative five of the draft EIS options. As a cyclist and former resident of several European countries where cycling to work, for play, for health and recreation are a part of normal everyday life, I would like to see more or our citizens using cycling in the same manner. I look forward to seeing cycling become a safer and more healthful way of getting from place to place in our own country and feel that Alternative Five will facilitate this. I truly believe that if we make this type of transport more cycle friendly, many more people will embrace this transport option.

I-194-003

Another important issue that this addresses is the reduction in pollution and the dependence on fuel sources.

Thank you,

Shari Hogshead
3251 W. Lake Sammamish SE
Bellevue, WA 98008

Page 1

**I-194-001**

Thank you for stating your preference among the alternatives.

**I-194-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-194-003**

Comment noted.

Support Alternative 5-Shawn Etchevers.txt

From: Shawn Etchevers [setchev@comcast.net]
Sent: Friday, July 31, 2009 10:18 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-195-001 I ask you to plan for the creation of attractive urban villages in Puget Sound, where people WANT to LIVE, that means, with lots of large connected parks and trails so that people of all ages can safely and quietly walk, run, bike, and skate. Do NOT create more Seattles and Bellevues in the region, grow them and make them more appealing instead!!!

I-195-002 Please support alternative five when making your decision on the future
I-195-003 of our region. As a Walker, Skater and Bicyclist, I believe these modes of transportations should be encouraged for both health and movement around the various urban areas. Also, to reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-195-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040
I-195-005 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Shawn Etchevers
4119 107th PL NE
Kirkland, WA 98033-7918

Page 1

**I-195-001**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of development pattern that was judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth.

**I-195-002**

Thank you for stating your preference among the alternatives.

**I-195-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-195-004**

Thank you for stating your preference among the alternatives.

**I-195-005**

Comment noted.

Support Alternative 5-Stacy Brodzik.txt

From: Stacy Brodzik [srbrodzik@comcast.net]
Sent: Friday, July 31, 2009 1:28 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-196-001 Please support alternative 5 when making your decision on the future of
I-196-002 our region. As a bicyclist, I believe this
mode should be encouraged for both health and transportation. To reduce
air pollution and congestion, realize the
public health benefits of increased physical activity, and move people
and goods efficiently, it is imperative that we
make investments in walking, bicycling and transit.

I-196-003 I urge you to support Alternative 5 among the options available in the
I-196-004 draft EIS of the Transportation 2040 plan. It
is the only alternative that comes close to meeting goals in VMT and
emissions reduction that have been enacted
into state law. Join me in supporting a more sustainable future.

Thank you,

Stacy Brodzik
3247 41st Ave SW
Seattle, WA 98116

Page 1

**I-196-001**

Thank you for stating your preference among the alternatives.

**I-196-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-196-003**

Thank you for stating your preference among the alternatives.

**I-196-004**

Comment noted.

Support Alternative 5-Suzanne Skadowski.txt
From: Suzanne Skadowski [skadowski.suzanne@epa.gov]
Sent: Friday, July 31, 2009 9:24 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members,

I-197-001 I strongly urge you to please support alternative five when making your decision among the options available in the draft EIS of the Transportation 2040 plan.

I-197-002 As a daily bicyclist (commute and recreation), I believe this mode should be encouraged for both health and transportation. To reduce air pollution, traffic congestion, reduce obesity in children and adults, and move people and goods more efficiently, we must make investments in safe walking, bicycling and transit.

I-197-003 I strongly urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Please help support a more sustainable future for us all.

Thank you,
Suzanne Skadowski
(206) 553-6689
Seattle, WA

Suzanne Skadowski
309 Belmont Ave E, #305
Seattle, WA 98102



**I-197-001**

Thank you for stating your preference among the alternatives.

**I-197-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-197-003**

Thank you for stating your preference among the alternatives.

Support Alternative 5-Tyler Williams.txt
From: Tyler Williams [tanissoz@hotmail.com]
Sent: Friday, June 26, 2009 7:30 AM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-198-001 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting statutory - and desirable - goals in VMT and emissions reduction. Please join me in supporting a more sustainable future.

I-198-002

I-198-003 Bikes are one of the few ways we can make a difference to the environment and our own health.

Sincerely, Tyler Williams

Tyler Williams
13016 96th Pl NE
Kirkland, WA 98034



**I-198-001**

Thank you for stating your preference among the alternatives.

**I-198-002**

Comment noted.

**I-198-003**

Comment noted.

Support Alternative 5-Zach Gayne.txt

From: Zach Gayne [zach.gayne@gmail.com]
Sent: Thursday, July 30, 2009 3:00 PM
To: Transportation 2040
Subject: Support Alternative 5

Dear PSRC board members and other stakeholders,

I-199-001 Please support alternative five when making your decision on the future
I-199-002 of our region. As a bicyclist, I believe this
mode should be encouraged for both health and transportation. To reduce
air pollution and congestion, reduce
levels of obesity in future generations, and move people and goods
efficiently, it is imperative that we make
investments in walking, bicycling and transit.

I-199-003 I urge you to support Alternative Five among the options available in
the draft EIS of the Transportation 2040
I-199-004 plan. It is the only alternative that comes close to meeting goals in
VMT and emissions reduction that have been
enacted into state law. Join me in supporting a more sustainable future
and freeing the region from auto-centric
transportation options.

Thank you,

Zach Gayne

Zach Gayne
1615 15th Ave, Apt 38
Seattle, WA 98122



**I-199-001**

Thank you for stating your preference among the alternatives.

**I-199-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-199-003**

Thank you for stating your preference among the alternatives.

**I-199-004**

Comment noted.

Support Alternative Five-Hugh Geenen.txt

From: Hugh Geenen [buckywunder@yahoo.com]
Sent: Friday, July 31, 2009 10:27 AM
To: Transportation 2040
Subject: [SPAM?] Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-200-001 I-200-002 Please support alternative five when making your decision on the future of our region. As a bicyclist, bus rider and pedestrian, I believe this mode should be encouraged for both health and transportation reasons. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-200-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan.

I-200-004 It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Hugh Geenen
1529 NW 58th Street Unit C
Ballard, WA 98107-5624

Page 1

**I-200-001**

Thank you for stating your preference among the alternatives.

**I-200-002**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-200-003**

Thank you for stating your preference among the alternatives.

**I-200-004**

Comment noted.

Please support Alternative Five-Carl Kamenzind.txt
From: Carl Kamenzind [carl@rideyourbike.com]
Sent: Friday, July 31, 2009 6:41 AM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-201-001 As a proud tax payer and avide bicycle commuter, I would feel rightfully represented if our region evolved to include suffisticated bicycle ways. My desire to not drive, but instead to ride a bicycle is greatly supported by having increased SAFE route to choose from.

I-201-002 Please support alternative five when making your decision on the future
I-201-003 of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, reduce levels of obesity in future generations, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-201-004 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Carl Kamenzind
7910-30th Ave S.W.
Seattle, WA 98126

Page 1

**I-201-001**

Comment noted.

**I-201-002**

Thank you for stating your preference among the alternatives.

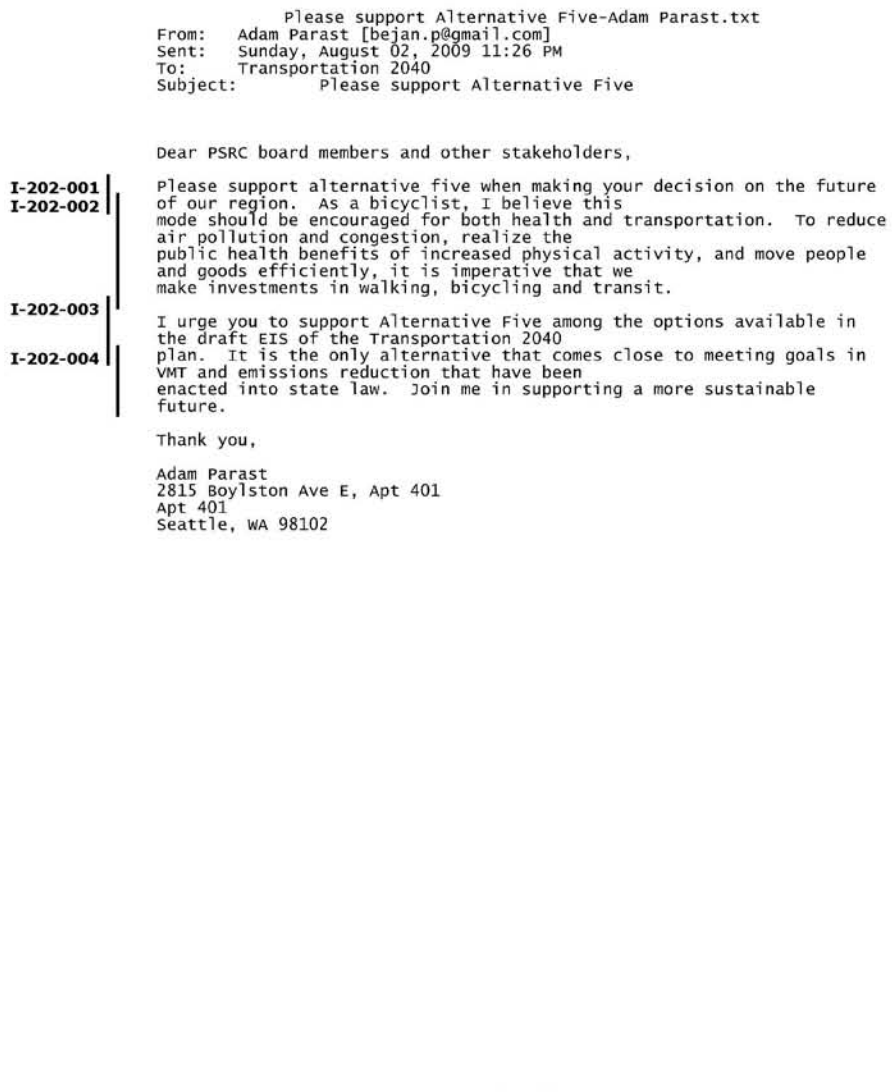
**I-201-003**

All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-201-004**

Thank you for stating your preference among the alternatives.



Please support Alternative Five-Adam Parast.txt
From: Adam Parast [bejan.p@gmail.com]
Sent: Sunday, August 02, 2009 11:26 PM
To: Transportation 2040
Subject: Please support Alternative Five

Dear PSRC board members and other stakeholders,

I-202-001 I-202-002 Please support alternative five when making your decision on the future of our region. As a bicyclist, I believe this mode should be encouraged for both health and transportation. To reduce air pollution and congestion, realize the public health benefits of increased physical activity, and move people and goods efficiently, it is imperative that we make investments in walking, bicycling and transit.

I-202-003 I urge you to support Alternative Five among the options available in the draft EIS of the Transportation 2040

I-202-004 plan. It is the only alternative that comes close to meeting goals in VMT and emissions reduction that have been enacted into state law. Join me in supporting a more sustainable future.

Thank you,

Adam Parast
2815 Boylston Ave E, Apt 401
Apt 401
Seattle, WA 98102

Page 1

**I-202-001**

Thank you for stating your preference among the alternatives.

Please note: This identical letter was submitted by the following 264 commenters:

Rodrigo Aceves, Daphne Adair, Doug Adams, Joshua Adler, Imtiaz Alam, Mark Anable, Tommy Arends, Nicholas Arndt, Rance Arnold, Kathleen Arthur, Tom Atkinson, Alexander Babanov, Michael Bagwell, Eric Bailey, Andrew Baker, Christian Becker, Gregg Bergstrom, Jennifer Berliln, Marc Besman, Eric Bisset, Ross Bleakney, Mimi Boothby, Brian Bothomley, Andrew Bound, Bruce Bowman, Ted Browning, Glen Buhlmann, John Butler, Rick Butzberger, Ryan Byars, Ruby Cacchione, Rebecca Caldwell, Reylaureano Canonizado, Shane Carr, Brian Cary, Gregg Cato, Pablo Celi, Ming Chen, Tom Chwojko-Frank, Heidi Clary, James Clement, Lee Colleton, Connie Compton, Steve Cross, Bill Currie, Kelli Currie, Neil Dahmen, Peter Dane, Mark Darling, Andrew Davidson, Jeff Day, Matthew Dean, Kay Dees, Lou Deleon, Darren Dencklau, Robert Diercks, Travis Dougan, Sarah Driggers, Rodney Dwyer, Sheila Dye, Peter Eby, Peter Ellis, Jeff Elrod, Stephen Estep, Michael Fagan, John Fawcett, Greg Flaucher, Albert Foster, Georgine Foster, Marjolijn Francissen, Andy Friedlander, David Gackenbach, Thomas Gaffney, Thomas Gallagher, Chris Garcia, Nathan Garnett, Sara Gilbert, David Glickerman, Julie Goldberg, Roman Golovin, Emily Gonzales, James Goodman, Barbara Gordon, Natalie Greco, Cindy Greenig, Susan Griffith, Michael Grisaffi, Annie Groeninger, David Habib, Bruce Hale, Jeff Hall, Daniel Hanlon, Ryan Harrison, Peggy Hawkins, Stephen Hawksford, Theresa Haynie, Daniel Herron, Glenn Hinrichsen, Kimberle Hoff, John Hopkins, Katie Van Horne, Vince Houmes, Robert Hoyt, Drew Hunt, Dayle Iverson, Matthew Jaffy, Darcy Jayne, Emily Jewell, M Johnson, Mikio Kang, Jacob Kasper, Stephen Katz, Jeff Kauffman, Emily Keegans, Mary Jane Kelly, James Kennedy, Klaus Kerl, Carol Killingsworth, Daniel Kinney, Laila Kinnunen, Naomi Knoble, Tim Kornegay, Michael Krasnow, Cynthia Krass, Deepak Kumar, Jason

Land, Matthew Landkamer, Dan Larkin, Dieter Laskowski, Dan Ledbetter, Roxanne Lenahan, Douglas Lewis, Peter Liljengren, Pat Limberg, Kim Lokan, Brian Loos, Corwin Loreman, Jessica Lundin, Cameron Macdonald, Barbara Mack, Carlos Madrid, Josh Mahar, Lisa Marfa, Dennis Mcafee, Oscar Mcbride, Liz Mccarthy, Thomas Mcelroy, Sarah Mcgann, Cindy Mcguiness, Dave Mckee, Barbara Mckernan, C Mealy, Jacob Mellinger, Laureen Miki, Josh Miller, Julie Miller, Matthew Miller, James Minstrell, Donald Missel, Hideki Mizutani, Daniel Moorman, Joff Morgan, Colin Morrison, Peter Morrison, Tim Van Mouwerik, James Murphy, Arunkumar N, Dolly Neumann, Vu Nguyen, Joel Niemi, Sean O'Connor, Allan Ohlsen, Daniel Oliver, Joanne Olsen, Monica Paolini, Adam Parast, Sean Parent, Peter Parker, Rob Patton, Tom Patton, Jo-Ann Payne, Sarah Peshkin, Timothy Petersen, Christina Petrie, Steven Philips, Carry Porter, Juan Posada, George Pressley, Francisco Ragland, Steve Railing, Ajoy Raj, Rick Reininger, Deling Ren, Kris Rhodes, Richard Ribellia, Scott Riggs, Russ Ringer, Brett Roberts, David  Rosenbaum, Robb Rough, Mike Roze, Scott Satter, Matthew Saunders, Michael Scavezze, Bob Scheulen, Andrew Schlotfeldt, John Schmied, Ted Schmitt, Steve Schneider, Kiira Schoessler, Daniel Schremser, Jim Schwend, Kent Scott, David Seelig, Dan Shumow, Robert Sims, Doug Sluis, Chad Smith, Patrick Smith, Patrick Smith, Michael Snyder, Nick Spang, Oren Sreebny, Erin Stamper, Marya Stanfield, Brooks Stanfield, Kate Stewart, Ryan Stickney, David Stockman, Kate Stoll, John Streich, Graham Summerlee, Perri Sutton, Anne Symonds, Bryan Terry, Caryn Thomas, George Thompson, Norm Tjaden, Elena Tolkova, Everett Tsang, Sean Tufts, V Foss Turcan, Rick Valdes, Mark Vanderveen, Nicole Vela, Chad Waldman, Alex Walker, Paul Wallace, Andrew Walter, Todd Ward, Allison Warren, Erica Weiland, Ariel Wetzel, Steve Wilhelm, Brandon Wilhite, Joe Williams, Andy Williams, Dean Wilson, Jocelyn Woolsey, David Yao, Fred Young, Cristine Zacher, Dan Zasloff, and Lief Zimmerman.

**I-202-002**
All of the Transportation 2040 alternatives include investments in the regional nonmotorized transportation system. The following three concepts guided the development of this system:

- Link communities at the regional level
- Substitute walking and bicycling trips for vehicle trips at the local level
- Provide intermodal connections at rail, ferry, and other transit station areas

**I-202-003**
Thank you for stating your preference among the alternatives.

**I-202-004**
Comment noted.

**BRIAN ZIEGLER**
Director of Public Works and Utilities for Pierce County

COUNCILMEMBER PATTERSON: The first speaker signed up today is Brian Ziegler from Pierce County.

MR. ZIEGLER: Thank you, Madam Chair and members of the committee. My name is Brian Ziegler. I'm the director of Public Works and Utilities for Pierce County, Washington. I'm pleased to be invited to testify at a courtesy public hearing. I'm not sure what that means; I have to be courteous or you have to be courteous or what.

COUNCILMEMBER PATTERSON: Everyone in this room has to be courteous. Actually, what it means is that we're not required to provide this public hearing, so it's a courtesy public hearing.

MR. ZIEGLER: Courtesy to us?

COUNCILMEMBER PATTERSON: Yes.

MR. ZIEGLER: We appreciate the courtesy. Thank you very much.

**H-001-001** I serve as the chief engineer for our county. And a little bit about county roles in transportation, we provide rule connectivity to most of the state, just like state highways do. We also provide access to urban development, just like cities do. So we're a little bit schizophrenic at times. We struggle like all local government does to meet our basic maintenance, operations and preservation needs. I'm hopeful, although I don't know for sure, that this plan will ensure that local government transportation needs are funded in the future.

**H-001-002** In the last 20 years of transportation increases, the state has received substantial amounts of money; local governments about five percent of that amount, even though local governments operate five times the mileage of roads and streets as the state Department of Transportation. Five times the mileage. Less than five percent of the revenue increase the state has received. There's a huge inequity there. We're hopeful the plan will help raise that issue and make sure local governments are treated fairly in the revenue allocation process.

**H-001-003** Our county participated in VISION 2040. We're very grateful to be participating in the transportation process as well. We're in the middle of a transportation update ourselves. In fact, we put that on hold because it's likely that this regional plan will include a large reliance on tolling, and we've not yet figured out how in a local comprehensive plan to factor in toll revenues and toll collections in our transportation plan. So we're looking to the region for guidance on that.

**H-001-004** We have a little concern still about jobs, housing, population balance, and I'll talk about that when I get to our five comment areas. We're very grateful that VISION 2040 provided us some relief so that when our transportation plan does come here, we're not going to be held to a

**H-001-001**
Comment noted.

**H-001-002**
Comment noted. We agree that local transportation needs have not been adequately addressed historically. In the Transportation2040 plan (and with your help) we've identified local roadway needs (city and county roads) and within the planning process we'll need to identify sustainable sources of funding to implement those needs. This may mean new sources of funding are required, or it could mean a new approach to allocating revenues is needed. As we move toward plan adoption we intend to continue the conversations we've begun on sustainable funding.

**H-001-003**
Comment noted. The transportation plan contains the region's financial strategy for implementation. This strategy provides local agencies with useful information as they undertake their own local planning efforts.

**H-001-004**
Comment noted.

H-001-004 specific number; that there will be some flexibility in assessing our transportation plan and ensuring consistency.

H-001-005 We're going to send a letter with these comments hopefully by Monday. If you give us an extension, we'll probably send you a signed letter, which would be great too. We appreciate PSRC's involvement in informing us, coming to go our county, talking to our elected officials and our executive. It's hard for us not to support all the objectives of this plan, so we're here to say we support all the objectives. It's in the details where we have some comments and I'd like to give you five of those:

H-001-006 The first comment is: Translating the regional plan to the local plan is a problem. And let me give you an example of that. The urban growth area population under VISION 2040 is limited in Pierce County. We don't think we can achieve the necessary residential commercial densities with that population allocation in order to ensure high quality transit between our local centers. Certainly your plan considers the regional centers. We have to work with Pierce Transit and ensure that our local centers have sufficient densities as well. That's the problem with the current altercation.

H-001-007 Secondly, not all alternatives in this plan consider important missing links in the Pierce County freeway system. These are not replacements of links. These are not widening of links. These are missing links that have been on plans for the last 20 years and have not been complete because of state inaction. And those two particularly are SR-704, the Cross-Base Highway, which has been on plans for 20 years, and extension of SR-167 to the Port, which has been on plans for almost 30 years. Two missing links that are critical and should be in any alternative.

H-001-008 The third comment: Rail transit. We're very supportive of this ST2 expansion, the long-range plans for Sound Transit, we're supportive of. However, we don't see enough light rail south of Tacoma. Certainly commuter rail is there, but not enough light rail.

H-001-009 My fourth comment is about tolling and tolling equity particularly. I'd like to quote my good friend Aubrey Davis on this, "Tolling's a great idea, but let's get moving and take the first step." Pierce County leads the way in this. As Councilmember Farrell has said, not only are we the only county that's currently tolling a facility, but in the foreseeable future likely the only one until the Alaskan Way Viaduct or 520 happens. And even when that happens, our county is paying 100 percent of the cost of our toll facility. Alaskan Way Viaduct's maybe 15 percent. Eastside corridor's maybe less than that. Pierce County is paying 100 percent of the cost of Tacoma Narrows Bridge through tolling.

H-001-010 And my fifth comment: You've neglected our very efficient Pierce County ferry system in the plan, and we'd like to see it highlighted. Thank you.

COUNCILMEMBER PATTERSON: Perfect timing. Thank you very much.

**H-001-005**

Comment noted.

**H-001-006**

Land use assumptions for all alternatives, including the Preferred Alternative, are based on and implement the VISION 2040 Regional Growth Strategy. This strategy was adopted as a description of a development pattern judged to do the most to enhance existing communities, preserve the natural environment, and provide a wide variety of choices for different types of neighborhoods in which to live. The Regional Growth Strategy was designed around the concept that additional transportation infrastructure and services are to be provided to areas that accept an increased share of the region's growth. These are high priority areas for the region's transportation investments. The Regional Growth Strategy also places a high priority on development in metropolitan and core cities that contain regional growth centers. Adopted regional policies state that regionally significant centers should receive priority in regional and local investments in the infrastructure and services that are critical for supporting growth.

**H-001-007**

Both of these projects appear in the Preferred Alternative.

**H-001-008**

Currently Sound Transit operates commuter rail to Tacoma. Expansion of light rail to Tacoma is part of Sound Transit's long-range plan. Alternatives 2, 4, and 5 increased light rail beyond Sound Transit's currently funded programs, Sound Move and ST2.

**H-001-009**

Comment noted.

**H-001-010**

Thank you for bringing this oversight to our attention. We have included the Pierce County ferries in the Transportation 2040 plan.

**PAUL W. LOCKE**

COUNCILMEMBER PATTERSON: Next is Mr. Paul W. Locke.

H-002-001 MR. LOCKE: I'm Paul W. Locke. This plan has to come up with a way to get the job done with the money that's available already. Coming up with additional tolls, whatever, is not going to do it.

H-002-002 The transit deal -- the Japanese had an article in their newspaper years ago wanting to know why they were running rail service on their transit system. The answer from the newspaper was that the 25 million people who lived in the area were not enough people to bring in the revenues necessary to run the transit agency. So they were -- after they shut down the transit operation, they turned the rail system over to the railroad company to deliver goods and that to the merchants in town to cover operating costs and the replacement of equipment.

H-002-003 I don't believe that in any of these plans the reliability -- relying on public transportation -- is going to do us much good. The costs when you got operation operations like King County's where you got drivers who will be able to retire using a hundred-thousand-dollar-a-year salaries for the basis for their retirement, the retirement funds needed will probably take every dime you can collect in tolls. And by the way, tolls, if you go out and bond that money, if I held one of those bonds, I'd make absolutely sure that every dime you collected was going to cover the payments to me as the bond holder. In fact, I think I heard the state treasurer make that statement to the transportation commissioners; that that money would go to the bond holders instead of a transportation.

H-002-004 This program, as I see it, has no real solution in what you're doing here. Environmental, they got one they're building between Los Angeles and San Francisco --

COUNCILMEMBER PATTERSON: You're going to have to wrap up, Mr. Locke. You can finish.

MR. LOCKE: No, I'm finished.

**H-002-001**

Comment noted.

**H-002-002**

Comment noted.

**H-002-003**

Comment noted.

**H-002-004**

Comment noted. Thank you for taking the time to comment.

**DONNETTA WALSER**
Mayor, City of Monroe

COUNCILMEMBER PATTERSON: Next is Donnetta Walser. Are you still here Donnetta? There you are.

MS. WALSER: I'm changing hats.

COUNCILMEMBER PATTERSON: Are you speaking on behalf of more than one jurisdiction?

H-003-001 MS. WALSER: Yes, I am. I'm speaking on the behalf of the City of Monroe, of which I am mayor. I am also speaking for the City of Sulton and the City of Snohomish, as well as I serve as vice chairperson of the US-2 Safety Coalition. I also have comments that I'm going to read and I will submit them and, hopefully, by Friday you will have them signed by all three mayors. We were a little rushed at the last minute.

The cities of Monroe, Snohomish and Sulton in Snohomish County have reviewed the Draft EIS for Transportation 2040 and would like to offer the following comments.

H-003-002 The DEIS addresses five action alternatives in addition to the baseline alternative. The alternatives are designed around various funding options including the use of tolling and transportation demand management to fund various combinations of transportation improvements.

It is not fully clear from the description of the alternatives which one or ones would include all needed safety and capacity improvements to US-2. There are references to US-2 capacity improvements in both Alternative 2 and Alternative 3 as referenced in the Appendix A, [Addendum] B on page 77 of the Draft EIS.

This interstate highway provides a vital link for all three above communities to I-5 and the rest of Puget Sound and remains the only transportation corridor connecting the greater Puget Sound area to Eastern Washington and the rest of the country in the event Interstate 90 is closed, as occurred in 2007 and 2008. The reasons for maintaining and improving this highway corridor are numerous; among them, great mobility, homeland security, economic development and emergency access.

Our cities remain supportive of transportation funding alternatives which provide for construction of those improvements identified several years ago in the US-2 corridor study prepared and adopted by the Washington State Department of Transportation in cooperation with the cities along this corridor. In addition, the US-2 Safety Coalition has spent most of the last decade educating state and federal legislatures about safety hazards and capacity deficiencies on US-2.

**H-003-001**
Comment noted.

**H-003-002**
Several of the alternatives analyzed in the Draft EIS included a mix of improvements on the US 2 corridor. The Draft Plan also includes significant investments on the US 2 corridor in response to numerous comments by groups and agencies concerned about the need for safety and capacity improvements along much of the corridor. A list of US 2 projects can be found in the Final EIS Appendix A.

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included the Transportation Operators Committee, the Regional Transportation Operations Committee, the Freight Action Strategy and Rountable groups, the Special Needs Advisory Committee, the Bicycle/Pedestrian Advisory Committee, the Travel Demand Management committee, PSRC member agencies, PSRC governing boards, and through these venues and other outreach efforts numerous public, nonprofit, and private entities. With PSRC staff assistance all the various suggestions were collated and brought before both the Regional Staff Committee (RSC) and the combined Pricing Task Force/Working Group (PTF/WG) accompanied by the alternative analysis results.

The stakeholders cited above were given several opportunities to review and propose changes to the full details of the plan alternatives. The RSC in particular went through several review cycles; it and the PTF/WG separately forwarded their recommendations from each cycle to the PSRC Transportation Policy Board (TPB) for ultimate endorsement (the PTF/WG is a subcommitee of TPB). The TPB made its final recommendation on a Preferred Alternative to the PSRC Executive

H-003-002

As the PSRC moves forward with selection of a preferred alternative and preparedness of a final EIS, we urge inclusion of an analysis of an impact of funding alternatives on necessary US-2 safety and capacity improvements.

This morning we experienced another fatality on US-2. It was closed. This is what we face frequently.

H-003-003

Besides the tragedy involving deaths on this highway, it's also gridlocked at times. And it doesn't seem to fall in any of the categories that we look at.

So I appreciate your time. We will submit these.

COUNCILMEMBER PATTERSON: Thank you.

Board which in turn forwarded the plan to the PSRC General Assembly for adoption.

Stakeholder proposals included strategies from multiple areas such as roadway, transit, system management, pricing, bicycle/pedestrian, and demand management programs. In many cases these proposals were taken from existing plans and programs but the maturity of the proposals ranged from general statements of an emerging issue through specific projects that have already completed design or environmental processes and secured significant amounts of funding. The groups cited above considered many aspects of the proposals in the course of recommending inclusion in the plan including proposal maturity, proposal support for regional policies and objectives, and the analysis results from alternatives in which the proposal had been tested.

**H-003-003**

Comment noted.

**JOHN NILES**
Technical Director and Co-Chair of the Coalition for Effective Transportation Alternatives (CETA)

COUNCILMEMBER PATTERSON: There are three individuals left to speak to us today. The next is John Niles.

H-004-001 MR. NILES: Good morning, ladies and gentlemen. My name is John Niles. I'm the technical director and co-chair of the Coalition for Effective Transportation Alternatives, known as CETA, and I'm speaking for the organization today.

I want to express general pleasure at what I'm seeing and what all members of CETA are seeing in the Transportation 2040 effort. I mean, it's obviously a lot of work. I've had the opportunity to go to a lot of the briefings and I'm following it pretty closely, probably more closely than the average person. I want to make a couple of broad comments.

H-004-002 One is, I think it's very important to treat this as a very important educational opportunity along a number of lines. I think it's important to generate much more information about what the future of transportation seemingly looks like.

Let me just give you a very specific -- I think this applies in a lot of different areas, but I think in particular it applies in the area of transit, namely over the next 30 years or so, between now and 2040, what transit can do and cannot do in terms of attracting market share.

I note with interest that across the five alternatives there's really a great deal of difference in the treatment so to speak. I know these treatments were carefully wrought in terms of how much investment was put in transit, for example, and how much reliance on what I like to call instead of tolls, road use fees with off-peak discounts. That's how I like to call theses tolls, road use fees with off-peak discounts. And I think these treatments are all very interesting. But what's really interesting, what's really interesting is, after running all this through a model, that I understand from staff takes around 24 hours to do a run, we have the following results on transit market share. This is for 30 years from now. Alternative 1 generates 4.8 percent market share. This is across all trips. Alternative 2 generates 4.2 percent market share. Alternative 3 generates 4.4 percent market share. Alternative 4 generates 4.5 percent market share. And Alternative 5 generates 5.2 percent market share. It's kind of interesting. Thirty years of effort. Over 50 percent of resources to transit. I'm not saying this is necessarily good or bad, but it's
H-004-003 interesting. And I think it's a pretty important thing to educate people on, especially, especially when this very hard fought law to get CO2 generation down through more use of transit, it's not met. As I understand it, the writers of this plan says we do not meet the goals. Again, that's just very interesting that we can work for months and months and months and run models, not solve the problem and have some results on transit market share that you might argue 30 years from now aren't that much different. I mean, they really aren't much different. You could argue that's margin of error.

**H-004-001**
Comment noted.

**H-004-002**
The total daily transit mode share forecast for the Preferred Alternative is 5.4% and the work trip mode share is over 19% (see Appendix D). This almost doubles the base year transit shares in both categories. These figures are greater than the current national averages and comparable to those in similar regions' long range plans. The travel model used for these forecasts was calibrated to observed data in the PSRC region and the transit network inputs were crafted with input from many stakeholders including the region's transit agencies. All identifiable prospective route-level transit service changes for major routes (commuter rail, light rail, and bus rapid transit) were incorporated into the model inputs. Local transit routes were treated more generically by adjusting service frequency in three different groups: core, community connector, and specialized service.
As is true with travel demand management strategies, there are other programs in the plan that would affect transit usage to which the models are not sensitive. The plan discusses these qualitatively.

**H-004-003**
Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system,

**H-004-004**

So I think it's very important to perhaps in the months remaining to go back into this plan and find a way to tweak the model and maybe do some radical things that would create some real differences in these things, even if they're impractical. I'm talking about an educational effort here. What would it take to double market share, for example. What would it take? Can it be done? Is it impossible? Let's tell the public, maybe it just can't be done.

**H-004-005**

I think this is an important role for this organization to do this kind of education and use the powerful tools you have to create some new understanding of what the limits are, and maybe the limits are high the barriers are high and we can't do that much. But I think the public ought to know that. Because I have to tell you, as one who's engaged in the transit battle, and I rode a crowded bus standing room only down here, off peak, and who is waiting with interest to see how transformational light rail is around here. There's a lot of very high hopes. I think it's quite an opportunity to really tell people what the future holds.

Thank you very much.

COUNCILMEMBER PATTERSON: Thank you.

expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**H-004-004**

Comment noted.

**H-004-005**

Comment noted.

**MS. VIVIAN HENDERSON**
Kitsap Alliance of Property Owners (KAPO)

COUNCILMEMBER PATTERSON: Vivian Henderson.

**H-005-001** MS. HENDERSON: Good morning. Thank you for offering us this opportunity. My name is Vivian Henderson. I'm representing the Kitsap Alliance of Property Owners and so far we've prepared 40 pages dealing exclusively with the tenets of the Draft Environmental Impact Statement, but I'd like to sum it up with these comments.

**H-005-002** The Draft EIS must be revised to add an alternative that evaluates the costs and impacts of constructing the new lane miles actually needed to relieve traffic congestion in the region over the next 25 years.

**H-005-003** The Draft EIS must also be revised to reflect the latest information on man-made carbon dioxide and climate change.

**H-005-004** The Puget Sound Regional Council has taken upon itself the task of planning the region's transportation infrastructure out to the year 2040. Unfortunately, what the public actually wants and needs in its transportation system is not what the plan provides in any of its various alternatives. Instead, the PSRC presents a planner's utopian vision that assumes people can be forced to abandon the convenience of their automobiles, be forced to live in dense urban areas and made to ride public transportation. The PSRC has the arrogance and plans increasingly disconnected from reality to dictate that people must change their way of living to conform to their vision of this new government-controlled future. This is a direct affront to the Washington State Constitution which holds that, "All political power is inherent in the people, and governments derive their just powers from the consent of the governed, and are established to protect and maintain individual rights."

**H-005-005** When the people of the region are asked what they personally need in transportation infrastructure, the predominant answer is congestion relief. None of the Transportation 2040 alternatives provides this. Even Alternative 2, which builds the most new lane miles, does not come close to providing the capacity necessary to relieve congestion over the next 25 years. This, despite the fact that studies by the Reason Foundation and Kemper Freeman, Junior show that the needed lane miles can be built at a fraction of the cost being spent on public transportation projects such as light rail.

**H-005-006** For example, the Reason study shows that the Seattle area could actually reduce congestion by adding as few as 704 lane miles to the existing roadways over the next 25 years at a cost of $4.8 billion in today's dollars. The report noted that this investment would save 200 million hours of delay per year that would otherwise be spent stuck in traffic.

**H-005-007** But the PSRC is on a different track. They believe that the solution to congestion is to get people out of their cars. The goal is to reduce vehicle miles traveled by 50 percent by 2050. To do this they propose to make it very difficult to drive anywhere. Major roads will be

**H-005-001**

Thank you for providing comments on the Transportation 2040 DEIS. As explained in the following response, all Transportation 2040 alternatives reduce congestion below the 2040 Baseline Alternative. The FEIS contains an expanded discussion of greenhouse gas emissions.

**H-005-002**

The six plan alternatives tested a variety of strategies to address mobility and congestion concerns. Strategies included roadway efficiency efforts, roadway tolling (as a system management tool), adding roadway capacity, adding transit service, adding bicycle and pedestrian infrastructure, and adding demand management programs. Each of these strategies affects transportation system performance in different ways. The alternatives analysis captures the cumulative effect of the strategies in each individual alternative to the extent possible with the modeling tools available.

Appendix D of the FEIS illustrates congestion effects with tables and charts describing the resultant mobility benefits (of which time savings and travel reliability benefits are most relevant to congestion) and delay findings (see Appendix D pp. 67-70 and pp. 104-105). Relative to the Baseline all other alternatives show both large total mobility benefits and notable reductions in hours of delay (with the exception of delay on arterial roadways in Alternative 4, which still decreases overall delay compared to the Baseline). Annual time savings alone range from almost $2 billion per year for Alternative 1 to almost $4 billion per year for Alternative 5 in 2040. All alternatives therefore show, at a regional scale, meaningful positive effects on congestion. Additional detail is available at a sub-regional scale in the form of selected travel times and their changes across alternatives as shown in FEIS Appendix I: Congestion Management Process Report. While the travel times are not a comprehensive picture, with certain exceptions they generally

H-005-007 electronically tolled with higher rates to discourage driving at peak traffic hours; gasoline will become very expensive with the imposition of increased taxation or cap-and-trades costs; cars will costs thousands more due to every increasing mileage and emissions requirements; city parking will be eliminated; new bridges and tunnels will have no more capacity than the infrastructure they replace.

H-005-008 But will any of this work? History resoundingly says, no. The region, like many of the country, has neglected road building for the last 30 years. The funds have been diverted instead toward public transportation. The somewhat ironic result is that public ridership has actually gone down from about 6 percent of trips to less than 3 percent in the last 20 years. And studies show that the failure to upgrade the highway system hasn't achieved the goal of fewer cars on the road; it has simply induced congestion on major highways and forced cars onto secondary streets.

H-005-009 PSRC seems to be having a hard time understanding that public transportation simply doesn't work for most people.

H-005-010 The Draft EIS also needs to include new credible information that questions the need to reduce man-made carbon dioxide. Over 30,000 reputable scientists have signed a petition saying, "There is no convincing scientific evidence that human release of carbon dioxide, methane, or other greenhouse gases is causing or will in the foreseeable future cause catastrophic heating of the earth's atmosphere and disruption of the earth's climate." The latest IPCC data shows the worldwide temperature to actually have decreased over the last decade, with no end in sight, in direct relationship to solar activity, not the rising carbon dioxide levels. And in any case, the developing countries are producing carbon dioxide at a rate that makes U.S. reduction attempts meaningless. It is completely irresponsible for the Draft EIS to ignore this information.

H-005-011 Likewise, contrary to the conventional wisdom of the EIS, there is little hard science to connect storm water runoff with actual biological harm to Puget Sound.

H-005-012 I have another paragraph here, but I've used my time. I will be submitting copies. And if anybody wants a copy, just let me know. Thank you very much.

COUNCILMEMBER PATTERSON: Thank you.

show travel time improvements on the selected routes relative to the Baseline.

**H-005-003**

Transportation is one of many sectors in the state that need to achieve reductions to assist the state in meeting its greenhouse gas emissions reduction goals. According to national and state experts, within the transportation sector a combination of vehicle miles traveled reduction and improvements to vehicle technologies and fuels is necessary to achieve meaningful reductions in emissions.

PSRC is working toward a four-part greenhouse gas strategy as part of the long-range transportation planning process. This strategy includes the implementation of VISION 2040's growth strategy, moving toward a user fee roadway pricing system to both manage and fund the system, expanding travel choices to reduce reliance on the automobile, and conducting research in concert with the Department of Ecology on cleaner vehicle and fuel technologies that could be realized by 2040. The land use, user fee, and transportation choice strategies included in the Transportation 2040 alternatives could reduce greenhouse gas emissions forecasts for most alternatives below the 2040 Baseline Alternative. While the region's vehicle and fuel technological advancement is not subject to PSRC's long-range planning process, advancements in technology independent of the Transportation 2040 planning process could reduce emissions for all alternatives below 2006 levels. However, without knowing what portion of the overall emission reduction is expected of the transportation sector and what portion is expected of the Puget Sound region, it is difficult to determine whether any Transportation 2040 alternative would reach the 1990 statewide greenhouse gas reduction goals.

**H-005-004**

The Transportation 2040 alternatives laid out a series of options for investing in our future transportation system. Neither the alternatives contained in the Transportation 2040 DEIS nor the Preferred Alternative dictate how individuals must travel within the region. Nothing in our transportation plan requires people to use transit or any other specific travel mode. To the contrary; one of the goals of the Transportation 2040 plan is to provide improved travel options for all users of the transportation system. All the alternatives being considered in the planning process, including the Preferred Alternative, would invest in a broad range of modes, including state and interstate highways, city streets and county roads, several forms of transit, bike and pedestrian facilities, freight facilities, and state and local ferries.

**H-005-005**

As noted in the response to comment H-005-002, all alternatives show both large total mobility benefits and notable reductions in hours of delay.

**H-005-006**

Comment noted. The Preferred Alternative includes 958 new roadway lane miles.

**H-005-007**

The VMT reduction benchmarks were not set forth by PSRC, but are established in state legislation (House Bill 2815). Research has shown that one of the most effective strategies to accomplish VMT reduction involves pricing of the transportation system, combined with providing alternatives to driving alone.

**H-005-008**

The six plan alternatives analyzed in the DEIS, including the Baseline,

were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**H-005-009**

Providing mobility options for all users of the transportation system is consitent with federal, state, and regional policies. Since many people--for many reasons--cannot drive a car for themselves or choose not to, having viable options in place allows central Puget Sound residents to get to and from essential life activities.

**H-005-010**

The State of Washington has adopted legislation calling for greenhouse gas emissions reductions to 50% below 1990 levels by 2050. Since

transportation is a significant contributor to these emissions, PSRC has been called upon to address the state legislation and pursue opportunities to reduce emissions as part of the Transportation 2040 update.

**H-005-011**
The Puget Sound Partnership, in their review of water quality issues in the region, concluded that the primary transporter of pollution throughout the Puget Sound basin is surface water runoff.

**H-005-012**
Thank you.

**MARGE TULLY**
Member of PSRC's Special Needs Transportation Committee

COUNCILMEMBER PATTERSON: Marge Tully.

H-006-001 MS. TULLY: Good morning, everyone. My name is Marge Tully. I'm a member of the Puget Sound Regional Council Special Needs Transportation Committee, and I also work with the Pierce County Coordinated Transportation Coalition. As such, I represent the needs of elderly, disabled, and low-income individuals in the region.

First of all, I'd like to acknowledge all the hard work that's gone into the preparation of the plans, and especially the Draft Environmental Impact Statement, and again to sort of applaud the wonderful combined efforts that all of the participants have made.

H-006-002 I would also, though, like to inform you, as a member of the Special Needs Committee, that as the plans have been presented to the committee, we have expressed our concerns about the planning process that's been used, because one third of the population that has a greater need for transportation is due to age, disability or income, has not adequately been included in the planning. And I'm quoting that number that's published on the PSRC's website included in their regional coordinated transit and human services plan.

Through each step of the process as the plans have been presented to the Special Needs Committee, we have raised this concern and we have been told that transportation models that include special needs transportation needs don't exist or they don't adequately represent this population. And I'd like to suggest that there's a vast amount of information available about the money that we're spending right now on special needs transportation and the people who are using the services, and that we really could include this information in the models that are being used.

H-006-003 And so what I'm here to say this morning is that a plan that doesn't include one third of our population is really not an adequate plan.

H-006-004 I'd also like to point out that the opportunities for people who would be affected by the plan to participate in its development or to comment on it have really been quite minimal. I know that in Pierce County there was one public meeting. It took place during the day and it was held during the regular monthly meeting of a group of human services professionals. And while it was a well-attended meeting and there was a lively discussion, this is hardly enough of an effort to solicit public opinion.

H-006-005 I also think it's an important point because the plan is well on its way to defining tolling as the only alternative for new financing for roads and transit, and this will have a disproportionate affect on people who need special needs transportation.

So I'd like to mention a couple of our concerns. And you can find this in the coordinated plan that I previously mentioned. I'm going to quote from it. It says, "One of the primary

**H-006-001**
Thank you for your comments on the Transportation 2040 DEIS. The FEIS contains an expanded discussion of the effects of tolling on low-income and minority populations. The Preferred Alternative contains a larger expansion of transit facilities and service than any other alternative. Special Needs Transportation is addressed in the FEIS in Chapter 4: Transportation.

**H-006-002**
Transportation 2040 includes a significant investment in public transportation, including special needs transportation. Investments in all forms of transit (local transit, Sound Transit, and ferries) account for over 50% of the total included in Transportation 2040. The final Transportation 2040 plan incorporates an updated Coordinated Transit-Human Services Plan as required by federal statute.

**H-006-003**
Comment noted.

**H-006-004**
The PSRC follows its Public Participation Plan for the Puget Sound Regional Council as adopted in 2007. The PSRC has provided briefings on Transportation 2040 at more than 440 meetings since 2007.

The PSRC received more than 1200 comment letters, and more than 3700 individual comments, during the DEIS comment period. All of these comments have been considered and responded to in the FEIS. Shortly after the close of the public comment period, key boards and committees at the PSRC were briefed on what the comments generally said, and had the opportunity to review and discuss these as the Preferred Alternative was developed.

H-006-005

difficulties associated with special needs transportation is that these individuals are not centrally located, and in most cases they are disbursed throughout the county, often in rural or isolated areas, due to the soaring housing costs in the urban's region areas. Unfortunately, these high-cost areas are also usually where necessary and sometimes critical services are located, therefore creating long and expensive trips from outlining locales." So the point is, some people have no choice but to live in outlying areas, and then they have to drive a long distance to get to work, to get to the doctor, to get to the grocery store. And please remember, in this region, according to the PSRC's statistics, 10 to 15 percent of the population is low income. And we know that transportation puts a tremendous strain on low-income families' budgets. In fact, the poorest 20 percent of households, and that's people making less than $14,000 a year after taxes, they spend over 40 percent of their take-home pay already on transportation. This is way above the two percent that's listed in the plan, and it's part of the problem about not being able to include these populations in the models. Because if you're building a plan that's based on spending, as this plan is, two percent of the personal income, that is not the impact it's going to have on low-income people, especially those in outlying areas.

H-006-006

I also want to say that while we're being told that these tolls are going to help manage congestion, the only way the tolling actually works is if you have free alternatives already in place when the tolling starts. And, yet, if you read transportation plan 2040, and I quote, "Although all of the alternatives assume the continued operation of existing assets, only a portion would improve during the 30-year planning horizon." So not only will there not be adequate public transportation before tolling starts, the plan doesn't have really any remedy of increasing transportation considerably.

H-006-007

And that hasn't even mentioned the tsunami of elders that are on the horizon for us. Many of us in the room are going to be part of that group. I think you know the statistics that between the last Census and 2030, a 77 percent increase in the number of people over age 65.

And it's just important to mention briefly before I run out of time, that one in five people over the age of 65 don't drive. And, in fact, people generally outlive their ability to drive by 6 to 11 years. But you also have to realize that seniors who don't drive, give up using public transportation for the same reasons they stop driving. That they lose their vision, their cognitive ability, their physical ability. It's also important to know that only about half of the people over 65 even have access to public transportation.

I see that my time is up. I thank you very much, and I will also submit written comments.

COUNCILMEMBER PATTERSON: Thank you.

**H-006-005**

As discussed in Chapter 17 of the FEIS, all alternatives would result in positive user benefits to environmental justice populations. A discussion of the analysis methods used to produce this result can be found in Appendix E: Technical Description of the Modeling Framework.

**H-006-006**

The six plan alternatives analyzed in the DEIS, including the Baseline, were designed through lengthy consultation with many stakeholders to test different mixes of investments. Those consulted included all Regional Council standing committees and boards, technical committees formed for the plan update process, and numerous nonprofit or private entities. These stakeholders proposed many strategies across multiple program areas.

With assistance from staff and the standing committees the Transportation Policy Board ultimately collated these suggestions into alternatives that deliberately covered a broad range of actions in each program area, guided by the goals and policies in VISION 2040. Investments in roadway infrastructure, transit infrastructure, walk and bike infrastructure, ferry infrastructure, system management programs for all modes, demand management programs, and operations of all modes were varied from low to high levels. For example, the Baseline and Alternatives 1 and 3 include only light rail investments authorized under current law; Alternative 2 contains 1,208 new roadway lane-miles, while the Baseline Alternative contains 348. The final plan actions, which include substantial investments in all programs, were chosen by the Transportation Policy Board and the Executive Board. The scale of these investments can be seen in Exhibit 4-20, Section 3.2 of Appendix D, and in Appendix A of the FEIS.

**H-006-007**

Comment noted.

**MARK WEED**
Chair, Seattle Chamber of Commerce Transportation Committee

COUNCILMEMBER PATTERSON: Mr. Mark Weed.

MR. WEED: As most of you know, I am chair of the Seattle Chamber of Commerce Transportation Committee. And in that is where I'm standing with this comment today. Although we, as a Chamber, have not taken an official position on the alternatives presented, we'd like to provide some general thoughts to the plan and hope it will inform your thinking.

H-007-001 The Seattle Chamber is committed to advocating for a successful comprehensive statewide and regional solution to the transportation challenges that face us. We believe our regional future safety and economic health is fundamentally linked to the efficient transportation infrastructure and the ability to move people and goods and must enhance our region to be able to realistically compete for jobs in this ever increasing competitive marketplace.

H-007-002 The considerable investments made in the past decade have laid a great foundation that we can build on, and we intend to continue the progress we have made in the recent years toward ensuring that the Puget Sound region's economic and transportation needs are met through our efforts.

As you go forward with the transportation plan under the 2040, we ask that you recognize the need for an effective multimodal investment strategy that uses an integrated approach and provides a balance between roads, highways, transit and freight mobility.

H-007-003 We ask you to prioritize at-risk facilities for funding and for completion. So that means 99, that means 520, that means the Spokane Street, that means all of the bridges that we're talking about that are at risk.

H-007-004 We ask that you support increased capacity and the balance between roads, highways and mass transit.

H-007-005 We also ask for a two-week extension to the comment period to go along with this so that we can more formalize a comment in writing. I hope you consider our comments, and thank you for the opportunity to speak today.

COUNCILMEMBER PATTERSON: Thank you. You were the last one to actually sign up.

**H-007-001**

The Preferred Alternative was developed using a number of important criteria including the economy as well as safety. The Preferred Alternative for Transportation 2040 produces significant safety and mobility benefits to the region. In the year 2040, the constrained portion of the plan would produce some $3 billion in net annual benefits (benefits in excess of all plan costs--both capital and operations). In addition, the preferred alternative produces significant annual user benefits for the region's key industry clusters, which indicates the transportation investments are indeed supporting the region's economy.

**H-007-002**

Thank you for your comment. With the approval of the Sound Transit Phase 2 plan and the Nickel and TPA highway programs, the state and region have made excellent progress toward meeting our multi-modal transportation needs. As you can see by the makeup of the Transportation 2040 alternatives, and by the composition of the Preferred Alternative, we are using an integrated and balanced approach to making long range investments in the region's transportation system.

**H-007-003**

Thank you for your comment. Preservation, maintenance, and operation of the existing system as well as safety and security are top priorities, and will use most of the available funding. Mobility improvements will include a major emphasis on improving system efficiency with limited new capacity. System efficiency includes creating “smart corridors” with advanced technology, user information, demand management programs, and variable pricing on tolled facilities. Capacity improvements will strategically expand roadway, transit, and nonmotorized facilities, with new roadways limited to a few missing links.

**H-007-004**

VISION 2040 provides the policy framework for long-range transportation planning in the region by calling for a multimodal transportation system that integrates freight, ferries, highways, local roads, transit, bicycling, and walking. The Preferred Alternative responds to this policy direction, and includes a balanced mix of a variety of transportation investments.

**H-007-005**

Comment noted.