



King County

Department of Transportation

Harold S. Taniguchi, *Director*
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January 31, 2018

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

Dear Ms. McGourty:

Thank you for the opportunity to review and provide comments on the Puget Sound Regional Council's Draft Regional Transportation Plan (RTP). The RTP calls for developing an integrated strategy for addressing congestion and mobility, the environment, and transportation funding. These are critical elements that need to be integrated for the region to be successful as it faces unprecedented growth in both population and employment as well as environmental challenges.

The King County Department of Transportation supports the policies and priorities identified in the RTP. We are pleased that the plan includes sections on social equity, environmental justice and public engagement. We encourage the Puget Sound Regional Council to continue to incorporate and enhance its work in these areas. We support the financial framework included in the RTP that identifies guidance on how the region can meet its financial needs, including the move to a more user fee based system as a means to maintain and improve the region's transportation system.

On the following pages you will find our more detailed comments and suggested changes. Thank you for the consideration of these comments. If you have any questions, please contact Peter Heffernan, Intergovernmental Relations, at peter.heffernan@kingcounty.gov or by phone at 206-477-3814.

Sincerely,

Harold S. Taniguchi, Director
King County Department of Transportation

cc: Rob Gannon, General Manager, Metro Transit Division, King County Department of Transportation (KCDOT)
Brenda Bauer, Director, Road Services Division, KCDOT
Paul Brodeur, Director, Marine Division, KCDOT
Peter Heffernan, Intergovernmental Relations Administrator, KCDOT



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King County Comments to the Puget Sound Regional Council Draft Regional Transportation Plan

Comment Number	Page Numbers ⁽¹⁾	OPTIONAL Section (or Table or Figure)	Comment
1.		Overall	<ol style="list-style-type: none">1) We support using an equity lens in measuring all aspects of transportation outcomes. Given the additional emphasis on high-capacity transit in centers, it is particularly important to analyze and mitigate displacement risk of residents and small businesses as property values increase and connections to opportunity improve.2) We encourage PSRC to expand community representation on boards and committees and provide the financial and technical support needed to do so.3) We encourage the PSRC to monitor the combined transportation and housing burden index by income levels.4) We support PSRC for their efforts to include health, equity and a renewed focus on climate change.5) We recommend expanding the scope of improving and promoting health beyond air quality, physical activity and safety. Affordable and reliable public transit is critical for low-income populations to access work and school opportunities - living wage incomes support healthy lifestyles.

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2.		Chapter 2	<u>Highlight backlog of deferred maintenance earlier in the report.</u> The Maintenance, Preservation, and Operations chapter (Chapter 2) highlights recent investments and reviews the importance of maintenance, and project maintenance costs, but there is no specific mention of the backlog of deferred maintenance or breakout those related costs from general maintenance projections. These issues are mentioned much later in the plan. We would like to see a discussion of the importance and projected cost to address deferred maintenance in Chapter 2, including a mention of the financial constraints.
3.		Chapter 3	<u>Acknowledge bridge maintenance needs explicitly in infrastructure maintenance section.</u> The discussion of aging infrastructure doesn't call out bridge replacement and maintenance, which is a significant need for the region. Bridge infrastructure might have an equally important impact on safety and mobility as the HOV network discussed in the text. We would like to see the condition, importance, and needs of the region's bridges highlighted in the discussion of aging infrastructure in Chapter 3.
4.		Appendix J	<u>Additional topics related to freight and local needs.</u> We would like to see the plan acknowledge some additional issues: 1) The importance of truck safety on arterial, local, and rural roads; 2) Potential impact of trucks using local roads to bypass highway weigh stations; and 3) The growing trend in use of personal vehicles for on-demand goods delivery and the potential VMT, congestion, or greenhouse gas emissions impacts that may be associated with this.
5.		Appendix L	<u>Additional discussion of urban vs. rural context regarding active transportation.</u> The active transportation discussion should include more

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			discussion/explanation of urban vs. rural context, especially as related to implementation of complete streets concepts. The plan should more fully acknowledge that implementation of these concepts will look different in urban versus rural portions of the region. For example, a complete rural street may include a multi-purpose wide shoulder instead of a sidewalk or bike lane, small block sizes are not appropriate or necessarily feasible in the rural area, and many PSRC regional bike network segments on rural roads won't be all ages and ability rural facility types (trails and side paths) identified in the plans' typology.
6.	52		The report should include a mention of the growing ridership trend that the King County Water Taxi service has been experiencing
7.		Appendix O	Resilience - there is no mention of ferries or passenger only ferries as being a component of a robust regional response and resiliency system.
8.		Appendix L - Chapter 3	We are pleased to see that the Active Transportation Plan now includes background on All Ages and Abilities bicycle facilities. It is important to introduce that concept in the plan and use it to evaluate facilities later in the plan.
9.		Appendix L - Chapter 4	<p>We appreciate the listing of the Regional Bicycle Network (RBN) Criteria (e.g., regional centers, regional transit destinations, etc.). It helps provide background rationale for our current mobility connection strategies and projects;</p> <p>We appreciate the acknowledgement of the necessity for RBN Built-in Flexibility. In many instances exact network alignments have yet to be finalized and this flexibility provides greater opportunities to meet the intent of the RBN;</p>

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			<p>We also appreciate the recognition of the preferred All Ages and Abilities approach to RBN development;</p> <p>King County Department of Natural Resources and Parks ongoing efforts to create a safe and pleasant all ages and abilities active transportation network through the development of shared use paths and in-road mobility connections includes the redevelopment of legacy path facilities (e.g., Burke-Gilman Trail) to meet the County's most up-to-date design guidelines or upgrading to improve network usability. In some instances the RBN shows these existing legacy routes, but it may not indicate that planned redevelopment is anticipated, thereby overlooking the importance of these improvements to the RBN. Chapter 4 should briefly acknowledge redevelopment activities with a note like the following:</p> <p style="text-align: center;">Ongoing Bicycle Network Improvements</p> <p>Segments of the Regional Bicycle Network are continuously under improvement to provide greater all ages and abilities bicycling opportunities. While the RBN illustrates a network of existing Completed Segments, these links may also be slated for important planned improvements or redevelopment along with the Planned Segments identified on the RBN map.</p>
10.	16 – 17		<p>Additional text could be added making a stronger linkage between emerging technologies and public transit systems.</p> <p>Text should be added stating that the new mobility options should complement fixed route bus service, not compete.</p>

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			As the PSRC works to analysis the effects of the new emerging technologies it should highlight the need for standard data and trip planning and marketplace for trips (MaaS).
11.	28-29		With the number of fatalities and serious injures for bicyclists and pedestrians not seeing the same decrease as vehicles incidents a stronger link to investment in non-motorized infrastructure as a strategy to increase bicyclist and pedestrian safety should be included.
12.	31 – 32		Missing a discussion of roadway and parking pricing as a TDM strategy
13.	41		<p>#3, ‘add strategic parking capacity’ – consider adding note about changing travel patterns and vehicle technology and need to consider flexible approaches to adding parking supply</p> <p>Add need for state RCW to enable management of state owned lots</p>
14.	73		Add paid parking revenue as funding source for transit agencies
15.	1 – 2	Appendix E	<ul style="list-style-type: none"> • The four-part Greenhouse Gas Strategy does not acknowledge the integration of actions and the fact that many actions to reduce GHG emissions are inextricably linked. Equity and social justice should be referenced more strongly as an underlying reasons to take action against transportation pollution and be interwoven into the rationale behind the four parts. • “Washington’s emissions have been relatively flat the last several years, and the state appears to be on track to meet the 2020 limits” (pg. 1) <ul style="list-style-type: none"> ○ Is this a true statement? This is not the case in King County, where emissions have increased by 4% compared to 2007.

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16.	3	Appendix E	Transportation Choices (pg. 3): <ul style="list-style-type: none"> • No mention of King County’s Water Taxi. Consider referring to Kitsap and King County’s ferry service in a regional passenger-only ferry context. • Recommend that information be included on the number of new service hours expected to be implemented by 2040 by all of the regions transit agencies.
17.	3	Appendix E	<ul style="list-style-type: none"> • Technology (pg. 3): <ul style="list-style-type: none"> ○ Corporate Average Fuel Economy (CAFÉ) standards are currently under review by the US EPA and the Trump administration expressed interested in rolling back these standards. Consider revising language or including CAFÉ as a keystone element in emission reduction. ○ No initial mention of the robust actions at the state and federal level to electrify transit fleets. King County has committed to transition transit fleets to zero-emission technology by as early as 2034 and other regional agencies are following suit by investing in battery bus technology. ○ No mention of future changes in utility load due to transit electrification and implications for regional emissions if PSE continues to rely on coal and natural gas. ○ Is there an opportunity to also mention Green Direct and other innovative renewable energy purchase opportunities that have helped reduce regional greenhouse gas emissions?
18.		Appendix H	The Plan has identified the growing need and high demand for more service for people with special transportation needs such as seniors/people with

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			<p>disabilities (who are too frail to use Access or the bus OR not frail enough to be eligible for Access but would have great difficulty getting to a bus or riding a bus independently). The lack of funding provided both nationally and locally for this growing population who have limited mobility and are often on a limited income.</p> <p>King County Metro has provided some funding for populations with special transportation needs via the Community Access Transportation program, but more funding is necessary to address the growing gaps in service identified in the report. The funding would be target to help fill the gaps in service and not just divert service off the more expensive ADA Paratransit service. The CAT program could be expanded – taking advantage of existing and new community partnerships and the infrastructure that already exists to increase service or develop new ideas. Community shuttles are expensive – so looking into other models that may include partnership with the taxi/TNC industry or technology to expand volunteer ridesharing programs (using apps to match rides for the volunteers) may be more cost effective. A high priority County wide for seniors and people with disabilities who cannot ride a bus or afford a taxi are rides to medical appointments and affordable same-day service.</p>
19.	31 & 34	Appendix H	<p>Pg 31: “There is a need for better coordination between transportation providers and human service agencies...” and Pg: 34 “Cross-county trips within and outside the region are difficult”</p> <ul style="list-style-type: none"> • What’s not mentioned in the discussion of these items is the lack of common digital standards (e.g. classification of customer disabilities, mobility aids, mobility devices, etc.) that limit the seamless exchange of information between programs and transportations providers and are a major blocking element to increased coordination. Our lack of common

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			standards and exchange protocols limits our ability to reduce duplication of services. (e.g. DART & Access operate in overlapping service areas; We're unable to assign trips onto lower cost options (Taxi & TNC seamlessly.)
20.	34	Appendix H	<p>“Transportation providers and brokers use different scheduling, dispatching and reporting software, making information sharing difficult.”</p> <ul style="list-style-type: none"> • The issue is not that agencies utilize different software, but that no protocols or data standards have been established. These issues would not be resolved if we all used the same software.
21.	35	Appendix H	<p>“Traveler information technologies”</p> <ul style="list-style-type: none"> ○ The statement that transportation technologies are too difficult isn't accurate for capturing the future needs of customers with disabilities. While this is the case for many, the next generation of users will be more adapt during the time period that this plan is to cover. ○ Traveler information technologies are really good a providing information for able bodied individuals, but do not provide information that's needed by individuals with disabilities. This includes barriers on the path of travel that would prevent a person from traveling, location of curb ramps, information about the bus stop itself, information about construction along the path, any reroutes, etc. Without this information, customer with disabilities cannot plan a trip with confidence, which limits their ability to use transit for their mobility needs.
22.	43	Appendix H	“Promote increased coordination between transportation providers and human service agencies to provide more seamless service and increase mobility options.”

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			<ul style="list-style-type: none"> ○ Near Term (by 2024): Common regional data schema describes attributes necessary to transport individuals with specialized transportation needs. ○ Longer Term (by 2040): Common regional data exchange protocol is used to facilitate and efficiently coordinate transportation for individuals with specialized transportation needs.
23.	44	Appendix H	<p>“Develop and deploy innovative technology...”</p> <ul style="list-style-type: none"> ○ Near Term (by 2024): Common regional data schema to describe the barriers and accessibility attributes of pathways and transportation infrastructure.

¹ For comments pertaining to the document overall, write in “overall” rather than a specific page number(s).