



To: Puget Sound Regional Council
From: Transportation Choices Coalition and Puget Sound Sage
Re: T2040 Draft Plan
Date: 1/31/2017

To whom it may concern:

Thank you very much for the opportunity to comment on the T2040 draft plan. Although this is the formal comment period, Transportation Choices and Puget Sound Sage have been very pleased at PSRC staff's willingness to work with and engage our and other organizations over the course of the plan update. Taking the time to explain the plan and solicit feedback starting early on in the process allowed us to familiarize ourselves with the plan elements and provide meaningful comments.

We understand that this update was relatively limited, and that the time frame was short to make many substantive changes. This is especially true for feedback provided during the comment period. Therefore, in our comments below, we propose several small changes or additions to language to strengthen policies pertaining to health, social equity, and the environment, and then ask for some additions that can serve as a roadmap for larger changes that PSRC staff have committed to and the board has voiced support for, either in subsequent long-range transportation plans or the Vision 2050 update.

Sincerely,

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<u>Document Section</u>	<u>Relevant Text</u>	<u>Comment</u>
Appendix A: Multicounty Planning Policies	Multicounty Planning Policies	<p>The MPPs laid out in T2040 are comprehensive, progressive, and visionary. However, we feel that sometimes there is not a clear explanation of how they are implemented, and how individual jurisdictions and the region as a whole are held accountable to achieving them. We believe that being able to measure and communicate how we are enacting these policies and reaching these goals is paramount.</p> <p>We highly recommend including some introductory text in this section that lays out how these policies will be folded into work on Vision 2050 to establish more comprehensive performance measures, set minimum thresholds, ensure robust implementation, and hold jurisdictions accountable for meeting these goals.</p> <p>Below are some examples of policies that are particularly important but may not be fully daylighted in performance measurement.</p>
	MPP-En-4 Ensure that all residents of the region, regardless of social or economic status, live in a healthy environment, with minimal exposure to pollution.	For discussion in Vision: how are we measuring this?
	MPP-DP-14 Preserve and enhance existing neighborhoods and create vibrant, sustainable compact urban communities that provide diverse choices in housing types, a high degree of connectivity in the street network to accommodate	For discussion in Vision: how are we measuring this?

	walking, bicycling and transit use, and sufficient public spaces.	
	MPP-DP-44 Incorporate provisions addressing health and well-being into appropriate regional, countywide, and local planning and decision-making processes.	What is meant by “appropriate” here? For discussion in Vision: how are we measuring this?
	MPP-DP-45 Promote cooperation and coordination among transportation providers, local government, and developers to ensure that joint- and mixed-use developments are designed to promote and improve physical, mental, and social health and reduce the impacts of climate change on the natural and built environments.	How are we doing this?
	<p>MPP-DP-54 Develop concurrency programs and methods that fully consider growth targets, service needs, and level-of-service standards. Focus level-of-service standards for transportation on the movement of people and goods instead of only on the movement of vehicles.</p> <p>MPP-DP-55 Address nonmotorized, pedestrian, and other multimodal types of transportation options in concurrent programs – both in assessment and mitigation.</p> <p>MPP-DP-56 Tailor concurrency programs for centers and other sub- areas to encourage development that can be supported by transit</p>	How are we doing this? And how can we fold into Vision?
	MPP-Ec-9 Ensure that the region has a high quality education system that is accessible to all of the region's residents.	Is this something T2040 can measure in the transit chapter?

	MPP-T-3 Reduce the need for new capital improvements through investments in operations, pricing programs, demand management strategies, and system management activities that improve the efficiency of the current system.	How do we measure our investment in TDM? What threshold or target is good enough?
	MPP-T-24 Increase the proportion of trips made by transportation modes that are alternatives to driving alone.	Can we identify a target mode split and make investments to achieve it?
	MPP-T-25 Ensure mobility choices for people with special transportation needs, including persons with disabilities, the elderly, the young, and low-income populations.	Can we identify a target threshold to work towards, and work with these populations to identify what is sufficient to “ensure mobility choices”?
	MPP-T-22 Implement transportation programs and projects in ways that prevent or minimize negative impacts to low-income, minority, and special needs populations.	We recommend expanding this policy to go beyond “minimize harm.” We should strive to identify existing disparities and proactively invest to bring greater benefits to these populations.
Appendix B: Equity Analysis Report	Center for Social Inclusion (CSI) recommendations	One very important part of the equity work that was done for T2040 included the partnership with Center for Social Inclusion. In order to capture and institutionalize that work, please summarize the work items and the findings included in the memo of recommendations.
	“Some examples of potential burdens include disruption of community cohesion (e.g., access to schools, parks, medical facilities, and religious institutions), adverse employment effects, decline in tax base or property values, displacement, increased noise and/or emissions, diminished aesthetics, and disruption to businesses. At the	Because it is challenging to evaluate burdens at the regional level, can we identify a work item to figure out how to capture collective impacts at the project level? What are opportunities in all project selection and reporting processes to do ongoing analysis and mitigation of these impacts?

	regional scale, many of these potential burdens can be difficult to assess, and are more appropriately evaluated at the project level.”	
	Special needs and transit	If we acknowledge that transit is the backbone of serving “special needs” populations, we believe it would be helpful to measure transit speed and reliability compared to cars, and figure out how to align our investments to best serve these populations.
	Chapter 4 - Summary what input from EJ populations	We strongly recommend laying out a work plan or a commitment to develop a work plan to address the issues raised here, either through Vision 2050 or through a separate process. What are the mechanisms and authority that PSRC has to help remedy issues around, say, lack of access to transit and safe walking projects? Low-income rates for user fees? Transportation cost burden?
	“[transit access] increases for both groups to nearly 60 percent by 2040, which is a larger improvement compared to regional changes. These results suggest that transit investments, which make up a core of the plan, are already serving marginalized populations relatively well, and will improve service to these residents in the coming decades”	This is a great achievement, yet still leaves a large portion, 40%, of these populations unserved. Can we commit to not only continuing to monitor performance in this area, but settling an acceptable threshold and working towards it in the next update? This is especially relevant as it was identified as a need by outreach to these populations.
	% biking and walking	This is a good metric to measure. How can we expand on this measure to show sufficiency and safety of these networks, not just choices people are making (that may or may not be safe or comfortable if they don’t have other options)?

	<p>VMT reductions</p>	<p>Can we expound a bit more on what VMT reductions *mean* for people of color and low-incomes? Why are these going down - is it better housing options? More transit access? Or are people not traveling because they have no options? Would be helpful to explain.</p>
	<p>“While many benefits accrue to the entire region, greater than average positive changes are generally seen for areas with higher concentrations of people of color and people with low incomes. Forecast improvements in accessibility, access to frequent transit, transit usage, active transportation, and relative costs, show these groups experience greater than average benefits through implementation of the plan.”</p>	<p>This is great news, but it may be helpful to acknowledge existing deficits for these populations. Do these greater positive changes actually lead to overall equitable outcomes that help make up for past disparities?</p> <p>It may also be helpful to acknowledge the limitations of the analysis that assumes people of low-income and communities of color remain in the same location. It would be helpful to have a disclaimer that noted that if these populations are pushed out due to displacement, these benefits may be lower.</p> <p>Additionally, PSRC should work with equity consultants going forward to better define “benefits” and explore further how they are measured - do benefits as measured by PSRC align with what these populations identify as a benefit? Does measuring outcomes in the aggregate “minority” census tracts do a sufficient job of understanding baselines and benefits accrued?</p>
<p>Appendix C: Public Involvement and Outreach</p>	<p>General</p>	<p>PSRC did great work trying new and innovative outreach methods during this plan. Can we add a lessons learned here that captures what worked and what didn't? For example, it would be great to record the importance of resourcing groups and communities to participate, but also note that engaging these folks very early on is critical in order to identify the best way</p>

		<p>to deal with capacity and other constraints. Other lessons learned discussed in our Community Partners meeting include: engaging earlier to provide more time for outreach, clarity on how the information will be used, and reliable translation and interpretation (e.g. Google Translate has not performed well).</p> <p>This can help provide a good roadmap for continuing to improve for the Vision update.</p>
	Demographics	How many people in each organization were interviewed? And what was the demographic distribution?
	Meeting goals/objectives	It would be very helpful to see the goals/objectives and the “meeting goals/objectives” sections aligned more explicitly, so we can better understand how the specific goals laid out were achieved and to what extent. Perhaps through a chart? For instance, how did PSRC “Include a feedback loop for those commenting to know how their comments will be addressed”? It was not clear from the meeting goals/objectives section.
Appendix E: Climate Change Analysis	Page 1 “Choices: continue to provide travelers options to the single-occupant vehicle; ”	Suggest using the term “alternatives” instead of “options” (which makes it sound like providing options for driving).
	Regional targets	My understanding was that the board directed staff to adopt the newer, stronger science-based regional targets in this plan, but I don’t see a lot of language to that effect. We support the regional accountability of adopting our share of emissions reductions goals.

	<p>Equity</p>	<p>Because “equity” is a measure that we are supposed to evaluate plan alternatives using, we should make sure to include a discussion of equity in the climate change section, both in the possible (and heretofore) impacts of climate change, and the equity impacts of the possible strategies to address climate change. This was raised several times during the board discussion and community partners meetings.</p>
	<p>“Based on the work of PSRC’s Growing Transit Communities program, the baseline assumption for growth around transit stations in the region by 2040 is approximately 30%. If that new growth were focused even further – such that 50-75% of growth by 2040 is concentrated around transit stations – it is anticipated that emissions could be reduced an additional 2-4%. ”</p>	<p>Given our need to lower emissions, this seems like a good strategy. What are the next steps to commit to this additional reduction? Is it feedback during this T2040 process? A commitment to doing so in Vision? Further board discussion and votes?</p>
	<p>“Modest changes in the current plan assumptions, for example increasing the price per mile by \$.05, have the potential to generate an additional 5% in greenhouse gas emissions reductions.” and this? “Examples of additional steps that could be taken to further reduce emissions include the expansion of the pedestrian network, particularly to transit stops, and greater usage of alternative work schedules, lowering the burden on the system during peak commute hours. Based on national and regional data, these types of activities could provide an additional 1-2% reduction in emissions. ”</p>	<p>Given our need to lower emissions, this seems like a good strategy. What are the next steps to commit to this additional reduction? Is it feedback during this T2040 process? A commitment to doing so in Vision? Further board discussion and votes?</p>
<p>Appendix I: State Facilities Action Plans</p>	<p>HOV plan > “Recognizing that more work is needed to develop agreement on HOV and managed lanes operation, WSDOT recommends that the Regional</p>	<p>This is a big assumption, given that we know that HOV lane performance is currently unacceptable, yet the political challenges of managing these lanes remains.</p>

	<p>Transportation Plan be modeled to assume HOV lanes will be managed appropriately to achieve desired performance, coupled with a commitment to work together with regional partners on the best implementation approach to achieve that outcome.”</p>	<p>If this is the basis for projected travel times in the plan, this could be very misleading. We should at least model options of doing nothing vs. managed appropriately, and make very clear what we would need to do to see that level of performance.</p>
	<p>HOV plan > “HOV solutions and congestion management strategies”</p>	<p>HOV Strategies considered should also be looking for gaps or other places where the HOV system could be expanded, both at the state level and also locally where it could help support the state system by offering alternatives.</p> <p>Because of board direction to further incorporate social equity into the plan, strategies should include discussion of equity/income benefits or impacts of expanding and managing the HOV system (or at least a commitment from WSDOT to research them).</p>
	<p>Prioritization and state goals > “Exemption from concurrency: Because highways of statewide significance are exempt from concurrency requirements development is allowed to go forward even without improving congested highways in the immediate area.”</p>	<p>Is this something we can explore further to understand and highlight the impacts?</p>
	<p>Prioritization and State goals > What policies guide planning for local priority state highways?</p>	<p>We should also list the WSDOT/WSTC Washington Transportation Plan here.</p>
	<p>Prioritization and State goals > “Improvements that increase capacity by adding lanes will be considered if policy change, local network improvements, operational improvements, or</p>	<p>It seems that there is general consensus at the regional level that demand management and other TDM strategies are the best first line defense. WSDOT’s practical solutions is a great statewide</p>

	demand management strategies don't address identified mobility needs.”	approach to this. How can we make a case for this when developing packages at the legislature? How can we also ensure we are doing the same at the regional level?
Appendix K: System Performance Report	Inclusion of health and equity	We are very supportive of the Board direction to include health and equity in the system performance measures.
	“This approach provides context for understanding how overall trends affect vulnerable or historically marginalized communities over time, and how these impacts compare to effects to the region as a whole. Incorporating this analysis throughout the planning process is important to understanding how equity objectives are being met across many different metrics.”	We agree that this is a great step. We would love to see some language that commits PSRC to developing a plan that identifies performance targets in these areas and improves overall outcomes for these groups, in addition to continuing to measure them.
	“How the plan performs”	These metrics measure “how the plan performs”, but this appendix could be clearer on what they are measuring. In other words, how is “the plan” defined? The set of investments? The financial strategy? It would be helpful to better understand the assumptions that go into the model.
	Transit trips and VMT	The aggregate numbers are a helpful overview, can we also show VMT or transit trips per person in order to better understand the change to individual behavior change over time?
	“access to frequent transit” and “access to jobs by transit”	These are great metrics for understanding communities’ access to reliable transportation and work opportunities. Given the Board direction to better

		incorporate health into the plan, can we lay out a work plan to better understand access to other services, in particular social services, healthcare, and education?
	People who walk or bike for transportation	Please explain how this is defined. People that walk or bike for a certain distance? A certain number of times per week? As a commute method? Number of minutes? (Also, there is a small typo - "of" should be "or")
	Stormwater	Stormwater is listed here, but we believe the metrics are not a great proxy (% built within the UGA may not capture the stormwater impacts of infrastructure built within the UGA that has, say, large swaths of impervious surface), and that project selection still does not capture impacts/benefits to stormwater runoff. Would be good to commit to better addressing this in Vision 2050.
	Safety	Because the Board directed staff to better incorporate social equity in the performance measures, it would be very helpful to disaggregate safety data by race and income as well (like we are doing for costs, VMT, and more). Can we commit to looking into this going forward? At the very least, it would be helpful to call out the fact that there are known disparities by these demographics if we can't measure them in this update. Here are two example studies with these kinds of findings: https://www.sciencedirect.com/science/article/pii/S0749379708000883 https://www.sciencedirect.com/science/article/pii/S0091743514002291

	Safety	Please also include non-motorized data per capita as well.
	Safety	The charts that show crash data with Vision Zero targets are misleading. Those are TARGETS, not projections. We should instead include two lines on that graph - targets AND projections, based on past trends. This will help us take accurate steps to address ongoing safety issues. At the very least, the graph should be amended to call these targets rather than projections.
	Travel time/reliability	Because many people don't have access to a car, it would be helpful to disaggregate this by mode in order to show relative performance across different modes.
	Jobs	This metric defines a 10-minute walk as a distance of ¼ mile. However, most models I'm familiar with say that a mile takes 20 minutes to walk, which would make a 10-minute walk ½ mile. Are we using a different kind of standard?
Appendix P: Financial Strategy Background	Investment type	It would be helpful to understand not only what kind of investments were made, but where they were made. In particular, what has investment been like in vulnerable neighborhoods, especially around safety, air quality, access, and physical activity? What are the opportunities to quantify or at least daylight this information - either in this section or the equity analysis?
	Emerging and ongoing issues	We support a continued focus on the issues highlighted in this section, especially: <ul style="list-style-type: none"> the diversification of transit revenues

		<ul style="list-style-type: none"> ● focus on maintenance and preservation over road expansion. ● consideration of cost burden on users by ability to pay
	<p>Principles for new revenue</p>	<p>We highly support continuing to use principles of social equity and performance (congestion, health, environmental impacts, etc) when considering and developing new revenues.</p> <p>In particular, going forward, we would like to see a commitment to further tying need/costs by jurisdiction based on the investment needed *to attain regional performance outcomes*</p> <p>This work has already been started by PSRC staff and member jurisdictions, with a particular focus on maintenance and preservation. In order to maximize the impacts of our investment, we should be doing similar calculations across all regional outcomes. For example, in order to reach Vision Zero safety targets, what investments does each jurisdiction need to make and what are the total costs?</p>
	<p>RUC / congestion pricing</p>	<p>We support the exploration of this new revenue source based on its ability to better achieve equity (progressive rates), environmental (charging to help drive down GHG emissions), and funding flexibility goals (funds as a more stable transit and transit access funding source). However, done poorly it could be just as regressive and restricted as the gas tax. If it becomes compulsory, how can we make sure that its equitably calculated and implemented?</p>

		<p>This section should call attention to the great efforts and recommendations of the Transportation Futures Task Force, which did a lot research and thinking on these issues.</p>
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