



January 31, 2018

Mr. Josh Brown
Executive Director, Puget Sound Regional Council
1011 Western Avenue – Suite 500
Seattle, WA 98104-1035

Dear Mr. Brown:

The Draft Regional Transportation Plan (RTP) reflects a significant effort to incorporate the most recent revenue projections, project lists, costs, plans and modeled and actual performance data into the previously-adopted Transportation 2040 plan. As a partner, the Washington State Department of Transportation (WSDOT) appreciates the extensive work that went into preparation of the RTP.

With a few important exceptions, the draft RTP financial strategy provides an incremental update to strategies adopted in 2010 and again in 2014. One significant change that merits further explanation is the fundamental change in emphasis in the Draft RTP which moves away from the previous plan assumption of systemwide tolling and towards road user charges. To help show the impacts of that change the updated RTP should include a table that provides a detailed comparison of the existing plan and the updated plan. This should include the transportation performance measures used in prior RTPs, including separate measures of congestion on freeways and arterials, mode shares, etc.

As the region is in a period of rapid growth and profound change, and while it is helpful to have an update to the planning baseline, there are many urgent and emergent issues facing us as a region. It is not too soon to begin tackling the tough issues facing the next regional transportation plan update that will extend the planning horizon to 2050. Tremendous growth has brought with it severe congestion and housing affordability challenges. WSDOT would like to continue the conversation of how to achieve a safe, equitable and sustainable transportation system in anticipation of the new 2050 planning horizon. To this end, WSDOT looks forward to being substantially involved in the development of a VISION 2050 Plan.

WSDOT is embracing a Practical Solutions approach that calls for identifying the right investment, in the right location, at the right time. Fundamental to this approach is the collaboration with local partners and the recognition that it's not about fixing a problem on the state highway system, but instead, advancing to the next generation of transportation investment. WSDOT appreciates the partnership with PSRC on the new Appendix I, the State Facilities Action Plan. This crucial work will focus on ways to preserve and protect existing facilities and to create innovation mobility solutions now, and in the future.

Following are issues the draft RTP covers which are likely to dominate transportation planning in the Puget Sound region in the coming years:

- **Technology:** Technology is hard to predict and we applaud the efforts to anticipate future opportunities and impacts. We look forward to collaborating with the region to assess and anticipate the changes that advances in technology will bring in the coming decades.
- **Transportation-efficient land use in suburbs:** The region has long embraced urban growth boundaries and a centers approach. More recently Sound Transit 3 was passed by voters serving centers with high capacity transit throughout much of the region. These policies aim for transportation efficiency by concentrating employment in places served by transit, and replacing driving with walk and bike trips in walkable neighborhood business districts. The final step to leverage our mass transit investment and reduce the growth in car travel must include actionable strategies to make car-centric suburban neighborhoods more walkable and bikeable. To this end, suggested actions from the Active Transportation Plan (ATP), Appendix L, should be carefully considered and applied in order to effect appropriate and nonmotorized investments in our growing suburbs.
- **Transportation-efficient land use in suburbs:** The draft RTP would be improved by a discussion of mode share trends in suburban areas and the potential for on-demand services to meet anticipated mobility needs.
- **Congestion pricing and road use charges:** The 2010 Transportation 2040 Plan's major policy achievement was to propose a path to regional congestion pricing. That strategy was shown to raise significant revenues for transportation while reducing congestion in major corridors and greenhouse gas emissions. The 2018 update removes congestion pricing except of existing and planned managed lanes, but suggests road use charges can be implemented to have a similar effect. Some form of demand management through pricing is pivotal to the region's transportation strategy, and it is critical to understand operational opportunities and constraints in order to tee up decisions about whether, when and how to move forward. The draft RTP can illuminate the impacts and trade-offs by providing a detailed performance comparison of the new RTP with the existing plan.
- **Revenues for system preservation and local transportation:** Both the existing plan and 2018 update assume a very high level of revenues from road pricing in the outer years, filling substantial funding gaps for system preservation, local roads and transit. The 2018 update assumes road use charges will raise the equivalent of almost a \$2.00/gallon increase in fuel taxes after 2025, and that is in addition to a carbon tax on fuels, an increase in county road levies, and new MVET. In the next plan, these amounts need to be again examined to ensure the levels projected are

feasible and publicly acceptable. This RTP update should explain how those plan assumptions influence travel demand and system performance.

Following are needed technical edits:

- **Executive Summary** – The Executive Summary states “and a new interchange at I-90 and Highway 18 will be built. This is not accurate. WSDOT will improve the existing interchange.
- **Executive Summary** - The top three projects (1, 2, and 3). This gives the impression that all these projects listed are funded. Please clarify that these projects are planned in the draft RTP, but all currently do not have funding.
- **Regional Capacity Projects List** – WSDOT SR 167 project # 1722 needs to be updated to reflect the most current information, summarized below:
 - Old Description: Construction of new four lane alignment on SR 167 between I-5 and SR 509. (early 2017)
 - New Description: Construction of new four-lane alignment on SR 167 between I-5 and SR 509 includes new interchanges at I-5, SR 509 and 54th Avenue. Work also includes replacing the 70th Avenue overpass at I-5. (January 2018)

- **Level of service versus Vehicle Miles of Travel** – The WAC in 468-86-110 specifies that regional transportation plans must identify regional transportation needs including “...comparing current usage, and operational characteristics to level of service standards”. WSDOT would like to partner with PSRC on ways to replace this metric with VMT to determine transportation system performance. The problem with the LOS metric is that it intensifies regional congestion, is hard to calculate, and focuses on expensive capacity investments. The benefits of a VMT metric is that it supports transit and active transportation investments, is easier to model, less costly to implement, has health benefits (including GHG reduction) and addresses growing regional congestion more effectively.
- **Regional Integrated Transit Network** – The Draft RTP would be improved by including a summary of standard performance metrics used to assess transit performance such as mode share, cost per rider, cost per service hour, transfer rate, revenue miles per service hour, etc. More emphasis on the new transit network, including a map of the integrated system, differentiating transit operator systems would be helpful as well as an explanation on how this new network will assist in future planning.
- **Technology** – For the next plan update, a sensitivity analysis would be helpful in terms of the potential impacts of technology, showing how the system would perform if:
 - Communication and transportation technology result in a decrease in peak period travel demand.
 - System management technology enables an increase in throughput on highways.
 - On-demand services replace low-productivity fixed route transit services (and complement transit service in high-demand corridors).
 - Technology results in greater dispersion of the population.
 - Predictive and real-time pricing and delay information shifted travel behavior.
- **Rail - Positive Train Control**: adding language to describe ongoing PTC work on the rail system is recommended. Additional comments on the rail section:
 - **RTP Pg. 55**, Reference to the region having two types of intercity passenger rail service is incorrect: Intercity service only pertains to Amtrak Cascades. Long distance service pertains to Coast Starlight and Empire Builder.
 - **RTP Pg. 55**, Stated growth in rail service by 2023 is incorrect: the growth in service by 2023 between Vancouver, BC and Seattle is a growth scenario identified in the State Rail Plan.
 - **RTP Pg. 56**, Reference to the 2018 State Rail Plan update suggests a defined scope – this is yet to be determined: tempering language is strongly encouraged.

- **Freight - Pg. 58-59**, Growth in freight is discussed, but doesn't address some of the issues/concerns such as truck parking: sensibly carry the "Key Issues from Freight and Goods Movement" from Appendix J into the main body of the plan to inform readers not able to read all appendices.
- **Freight - Appendix J Pg. 40**, reference to freight funding appropriation is somewhat vague: recommend replacing "Funding from the first two fiscal years of the program was allocated to three projects in WSDOT's preservation program, two of which are in the region" with "Funding from the first two fiscal years was appropriated by the legislature to three projects in WSDOT's preservation program, two of which are in the region."
- **State Facilities Action Plan – Two edits:**
 - Correct typo in the Title of Section 4. This should refer to *Connecting Washington*, not *Connected Washington*.
 - Add reference to Guidance for Considering Impacts of Climate Change in WSDOT Plans. WSDOT conducted a vulnerability assessment of all state facilities, and considers ways to improve the resilience and durability of these facilities in asset plans and projects.
- **Active Transportation Plan** – PSRC has conducted thoughtful update to the Active Transportation Plan (ATP). This has been a complex and collaborative process and PSRC is to be commended. The Introduction section reads well on the first page of the ATP. This short summary succinctly lays out the context for the ATP, the four key goals, and the purpose of ATP. Very crisp and clear introduction for the reader. Thanks!

A number of technical edits follow:

- **Page 14** - First sentence: "In the central Puget Sound region, the number of fatalities and serious injuries for bicyclists and pedestrians has not seen a decrease in the trend as is the case with motor vehicles." This is an **extremely important** issue and finding with respect to bicycle and pedestrian safety needs and should be well noted in the Executive Summary upfront in the ATP.
- Any reference to "Rectangular Rapid Flash Beacons" (RRFBs) should be replaced with "Pedestrian Activated Flashing Beacons" pursuant to the termination of FHWA's policy of 1A-11 for RRFBs.
- We suggest it would be helpful to acknowledge that the U.S. Bicycle Route System will utilize the regional network identified in the PSRC's ATP. This will help accommodate inter-regional and statewide bicycle travel and bicycle tourism.

- **Page Six – Goal One:** “Support social equity in active transportation projects and programs” – It would be helpful to the reader to clarify what the focus of social equity is, in terms of “how” the plan will achieve “social equity”. Understand that “Social Equity” is a major focus throughout the RTP update, but it would be helpful to better understand the desired or needed target for achieving Social Equity in the ATP. The two supporting objectives under Goal One suggest actions to be undertaken in helping to achieve Social Equity. Perhaps another Objective / Action could include something like “Define/confirm Social Equity targets for bicycle and pedestrian modes in geographic areas within the PSRC that are underserved / underdeveloped for bicycle and pedestrian modes” (or something to that effect).
- **Page Six – Goal Two:** “Improve safety and comfort for people walking and bicycling.” What metric is being applied in order to determine how well (and how much) we are “improving safety” in the ATP? The three supporting Objectives below Goal Two suggest actions in how the ATP, the PSRC and its partners will help to achieve improved safety for bicyclists and pedestrians. Suggest addition of another supporting objective that confirms safety targets/metrics we are trying to achieve in this plan.
- **Page Six – Goal Three:** “Increase the Percentage of People walking and biking.” Again, suggest adding in one more supporting objective to confirm the percentage target or metric we are trying to achieve in this goal (e.g. what percentage increase target are we trying to achieve here?). Is there are certain percentage target we are trying to achieve here? Relative to other modes in the RTP? Relative to the previous (2014) ATP?
- **Page Seven –** Last sentence in the first paragraph: Add in the word “in” between the words “increase” and “active” in order to clarify sentence and for readability
- **Page 13 –** “The RTP results in an increase in the percent of people walking and bicycling for transportation purposes.” In the discussion below this introductory sentence and the supporting table, is there any data / information available from the previous PSRC regional plan update/ATP (2014) that could show readers what percentage biking and walking trips have increased since the adoption of the previous RTP (Relative increases/changes in the bike and pedestrian modes since the last plan update)?
- **Page 14 –** in the discussion about bicycle and pedestrian safety issues (injuries and fatalities), there is a bit of mixing of terminology here with the use of the terms ‘collisions’ and ‘crashes’ both mentioned in this section. Suggest either using one of the two terms or clearly describing the differences, if any, between the two terms. Also, if any WSDOT data sources are included in the ATP plan or elsewhere in the PSRC plan, the standard legal WSDOT disclaimer needs to be

included: *(Under 23 U.S. Code § 409, safety data, reports, surveys, schedules, lists compiled or collected for the purpose of identifying, evaluating, or planning the safety enhancement of potential crash sites, hazardous roadway conditions, or railway-highway crossings are not subject to discovery or admitted into evidence in a Federal or State court proceeding or considered for other purposes in any action for damages arising from any occurrence at a location mentioned or addressed in such reports, surveys, schedules, lists, or data.)*

- **Page 26** – “According to the 2014 PSRC Household Travel Survey, 1,626,000 daily trips were taken by people walking.” Has the 2014 PSRC HH Travel Survey been updated and completed? If so, is there more current data to provide here from the PSRC HH Travel Survey? It is possible this figure could be even higher for a more recent year (2016/2017).
- **Page 27** – The sentence describing limitations to survey results related to transit access mode share: “However, there are some differences in the survey methods that likely exaggerate the changes in walking shares between 2014 and previous surveys, so changes might not be quite as dramatic as suggested by the results in this table, though the general trend in increased walking shares is still evident.” Therefore, the reader should take caution in interpreting and understanding this data and what it is saying. A couple of extra sentences explaining the context of this and the survey limitations such that readers and ATP users do not misuse or misunderstand this point and its context would be most helpful.
- **Page 31** – “Aspirational Routes” – Good summary of the focus and intent of “Aspirational Routes” in the ATP. It is important to emphasize as suggested in the second bullet item that “Aspirational Routes” do not necessarily tie or commit an agency or entity to a specific action or commitment to a proposed nonmotorized trail development along its facility. This is an important issue for WSDOT since many nonmotorized trails and facilities, and especially ‘aspirational’ trail proposals along or on state routes frequently cannot be accommodated within constrained WSDOT project scopes and budgets. Ongoing maintenance and liability of these facilities is also an issue for WSDOT and sometime can inhibit viable nonmotorized facility proposals from moving forward. Simply put, WSDOT must be cautious about expectations that can arise from an aspirational facility need/proposal and what they commit to the agency.
- **Page 34** – The first sentence in the second paragraph on page 34 indicates the average bicycle trip being about three miles. Is this data point from the PSRC 2014 Household Travel Survey? Is this average trip length expected to change or increase with the updated (2017/18?) PSRC Household Survey?

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- **Page 48** – Under Goal Two, Objective Three, good suggestion to confirm coordination with WSDOT in promoting our “Target Zero” program in improving access to bicyclist and pedestrian data as well as their reporting. As a follow-up action item to this objective, it will be important to identify the gaps in this effort, many of which are related specifically to data and reporting. Suggest that it will be important to prioritize these actions with consistent data collection and analysis methods perhaps being most important. Crash reporting gaps and issues will need to be coordinated with WSDOT Traffic as well as Washington State Patrol (WSP) as well as by local PSRC partners with their law-enforcement agencies.
- **State and Federal Active Transportation Funding Sources Available** (summary table at the end of the ATP, page five of the table): In the summary of State Funding programs in the State and Federal Funding sources summary appendix, the TIB Funding Programs summary should include reference to its (TIB) ‘Complete Streets’ (funding) program. In the description of the Safe Routes to School program, change Eligible Project Sponsors to read: All public agencies in Washington (including tribal governments), and nonprofit entities responsible for the administration of local transportation safety programs. In the description of the Pedestrian and Bicycle Safety Program, add the Eligible Project Sponsors to read: Public agencies, including tribal governments.

Thank you for the opportunity to comment on the Regional Transportation Plan. If you have questions about these comments please contact Robin Mayhew at (206) 464-1264.

Sincerely,



Roger Millar, PE, AICP
Secretary of Transportation

RM:jd

cc: Patty Rubstello, WSDOT
Robin Mayhew, WSDOT