Transportation Policy Board
Thursday, February 13, 2020 • 9:30 AM – 11:30 AM
PSRC Board Room • 1011 Western Avenue, Suite 500, Seattle, WA 98104

The meeting will be streamed live over the internet at www.psrc.org

1. Call to Order (9:30) - Mayor Becky Erickson, Chair
2. Communications and Public Comment
3. Report of the Chair
4. Director’s Report
5. Consent Agenda (9:50)
   a. Approve Minutes of Transportation Policy Board Meeting held January 9, 2020
   b. Routine Amendment to the 2019-2022 Transportation Improvement Program (TIP)
   c. Recommend Conditional Certification of Black Diamond Comprehensive Plan
6. Action Item (9:55)
   a. 2020 Regional Transportation Plan Amendment -- Kelly McGourty, PSRC
7. Discussion Item (10:10)
   a. East-West Intercity Passenger Rail Study -- Mark Foutch, All Aboard Washington
8. Discussion Item (10:30)
   a. I-976 Survey Results -- Ryan Thompto, PSRC
9. Discussion Item (10:50)
   a. Regional Transportation Plan Focus Areas -- Kelly McGourty and Gil Cerise, PSRC
10. Information Item
    a. Draft Supplemental Biennial Budget and Work Program (FY2020-2021)
11. Next Meeting: March 12, 2020, 9:30 - 11:30 a.m., PSRC Board Room
    Major Topics for March:
    -- Regional Transportation Plan - Data Overview
    -- FTA Annual Adjustments (Pending FY20 Authorization)
12. Adjourn (11:30)

Board members please submit proposed amendments and materials prior to the meeting for distribution. Organizations/individuals may submit information for distribution. Send to Casey Moreau, e-mail cmoreau@psrc.org; fax 206-587-4825; or mail.

Sign language and communication material in alternate formats can be arranged given sufficient notice by calling 206-464-7090 or TTY Relay 711.
MINUTES OF THE
TRANSPORTATION POLICY BOARD

January 9, 2020

[To watch a video of the meeting and hear the full discussion, please go to: https://www.psrc.org/boards/watch-meetings.]

CALL TO ORDER

The meeting was called to order at 9:34 a.m. by Mayor Becky Erickson, Chair.

Chair Erickson acknowledged outgoing members:

- Deputy Mayor Davina Duerr, Bothell

Chair Erickson welcomed new members and alternates to the board:

- Councilmember Lorena González, Seattle (member)
- Councilmember Debora Juarez, Seattle (member)
- Councilmember Alex Pedersen, Seattle (alternate)
- Mayor Mary Lou Pauly, Issaquah, representing King County Other Cities & Towns (alternate to member)
- Councilmember Wendy Weiker, Mercer Island, representing King County Other Cities & Towns (alternate)
- Councilmember John Wright, Lake Forest Park, representing King County Other Cities & Towns (alternate)
- Robin Mayhew, WSDOT (alternate)
- Rob Berman, Seattle Chamber of Commerce (reappointed non-voting member)
- Amy Grotefendt, Seattle Chamber of Commerce (non-voting alternate)
- Billy Hetherington, Laborers Local Union 242 (non-voting member)
- Dale Bright, Laborers Local Union 242 (non-voting alternate)
- Neil Strege, Washington Roundtable (non-voting member)

COMMUNICATIONS AND PUBLIC COMMENT

Alex Tsimerman and Marguerite Richard provided public comment.
REPORT OF THE CHAIR

Mayor Erickson shared that the Transportation Transit Caucus met this morning before the Transportation Policy Board (TPB) meeting.

DIRECTOR’S REPORT

Kelly McGourty, Director of Transportation Planning, PSRC, informed the board that there was an error in the agenda packet for consent agenda item 5c. There was a typo in the identification of funding sources. The federal funds should show as $2,882,030 for the project.

CONSENT AGENDA

a. Approve Minutes of the Transportation Policy Board Meeting held December 12, 2019
b. Routine Amendment to the 2019-2022 Transportation Improvement Program (TIP)
c. Recommend Authorizing a Change in the Regional Transportation Plan Project Status for the City of Bellevue’s Mountains to Sound Greenway Trail, 132nd Avenue SE to 142nd Place SE Project

ACTION: The motion was made by Councilmember Mike Todd and seconded by Councilmember Jennifer Robertson to adopt the Consent Agenda with correction to item 5c., federal funds total $2,882,030. The motion passed.

RECOMMENDATION OF 2020 POLICY FRAMEWORK FOR PSRC’S FEDERAL FUNDS

Ryan Thompto, PSRC, provided an overview of the work of the Project Selection Task Force, the upcoming project selection process and the Policy Framework that describes the process for awarding PSRC’s federal funds.

Ms. McGourty, PSRC, shared the details of the Project Selection Task Force recommendations. She provided an overview of the set-asides, project evaluation criteria and other administrative elements recommended by the Task Force.

Mr. Thompto briefed the board on PSRC’s project tracking program and the Task Force recommendations for revisions to the adopted project tracking policies. These include revisions to obligation deadline extension provisions and a hardship policy recommendation.

Ms. McGourty shared that the details contained within these Policy Framework recommendations have been vetted through a robust process, including discussions at the Project Selection Task Force, the Regional Project Evaluation Committee, Transportation Operators Committee and the four countywide committees. Overall the
recommendations are to retain the policies and procedures used in previous cycles with minor adjustments.

**ACTION:** The motion was made by Councilmember Kate Kruller and seconded by Councilmember Jennifer Robertson to recommend Executive Board approval of the policies and procedures for the 2020 project selection process (Attachment A). These policies and procedures will be documented in the 2020 Policy Framework for PSRC’s Federal Funds. The motion passed unanimously.

**PROJECT TRACKING RECOMMENDATION FOR AN EXCHANGE OF PSRC AND TIB FUNDS**

Ryan Thompto, PSRC, briefed the board on the request from the Transportation Improvement Board (TIB) to exchange funds between two projects funded by both agencies. The exchange of funds will allow the City of Lake Stevens to accelerate its 20th Street SE Phase II, Segment 1 project. Expedited delivery of the project will support rapid growth and other transportation improvements planned in the corridor.

TIB identified the City of Lynnwood 196th Street SW (SR-524) Improvements project as a viable project for an exchange of funds with the Lake Stevens project. The proposal is to exchange the 2022 PSRC federal funds awarded to the Lake Stevens project with the equivalent amount of TIB funding awarded to the Lynnwood project.

The request for the exchange does not fall within current policies. The Regional Project Evaluation Committee reviewed the proposal at its December meeting and recommended consideration by the board as it is consistent with the overall goals of the project tracking policies. Ashley Probart, TIB, was also present to answer questions from the board.

**ACTION:** The motion was made by Councilmember Bek Ashby and seconded by Councilmember Mike Todd to recommend Executive Board approval of an exchange of PSRC’s federal funds and TIB funds between the City of Lake Stevens’ 20th Street SE Phase II, Segment 1 Project and the City of Lynnwood. The motion passed unanimously.

**FEDERAL SAFETY TARGETS**

Gary Simonson, PSRC, shared that PSRC is federally required to establish regional targets for Safety Performance Management Measures by February 28, 2020. The Safety Performance Management targets are required to be updated on an annual basis, with the last established targets adopted in January 2018. The board discussed the targets at its December meeting in anticipation of approval. Mr. Simonson reviewed each of the five targets for Safety Performance Management and discussed the target-setting methodology. He also shared the next steps after approval and PSRC’s continuing work to go beyond federal requirements.
The board had a robust discussion of safety issues in general, and potential future work on this topic during the update of the regional transportation plan.

**ACTION:** The motion was made by Councilmember Jennifer Robertson and seconded by Councilmember Kathy Lambert to recommend that the Executive Board adopt the 2020 Regional Safety Performance Management targets identified in Table 1. The motion passed unanimously.

**PASSENGER-ONLY FERRY STUDY STATUS REPORT**

Gil Cerise, PSRC, shared that the Washington State Legislature provided funding for PSRC to complete a Passenger-Only Ferry Study. The study will be an update of a previous 2008 study led by PSRC. The study area will cover the 12-county area of the Puget Sound, including Lake Washington and Lake Union. Mr. Cerise shared initial outreach efforts to stakeholders. There was broad interest and agreement on the update of the study. Since the time the board last received an update on the project, PSRC has hired a consultant. Their first task is to develop a stakeholder engagement strategy and complete an assessment of existing conditions. The study is due to the legislature in January 2021. The board will be briefed at key milestones throughout the year.

**PREPARING FOR THE 2020 REGIONAL TRANSPORTATION PLAN**

Gil Cerise, PSRC, reviewed the federal and state requirements for developing the Regional Transportation Plan (RTP). He provided an overview of the current plan, and noted changes that have occurred since 2018, including completion of key projects, growth in transit ridership, regional population and employment growth and the work to update the regional growth strategy in VISION 2050. Mr. Cerise reviewed the draft plan work program and schedule.

Ms. McGourty, PSRC, shared that over the next six months staff will be working with the board to identify key focus areas of the plan update.

**ADJOURN**
The meeting adjourned at 11:31 a.m.
TRANSPORTATION POLICY BOARD
January 9, 2020

TPB MEMBERS & ALTERNATES PRESENT

Mayor Don Anderson, Local Transit – Pierce County (via remote)
Councilmember Bek Ashby, Other Cities & Towns in Kitsap County
Rob Berman, Seattle Metropolitan Chamber of Commerce
Don Cairns, Regional Project Evaluation Committee
Commissioner Ryan Calkins, Ports
Vicky Clarke, Cascade Bicycle Club
Councilmember John Clauson, Local Transit – Kitsap County (Alt.) (via remote)
Doug DeForest, Thurston Regional Planning Council
Mayor Becky Erickson, Local Transit – Kitsap County, Chair
Anne Eskridge, University of Washington
Jesse Hamashima, Regional Staff Committee
Billy Hetherington, Laborers Local Union 242
Councilmember Cynthia Jacobsen, Other Cities & Towns in Pierce County (Alt.)
Councilmember Mark James, Other Cities & Towns in Snohomish County
Peter Heffernan, Transportation Operators Committee
Craig Kenworthy, Puget Sound Clean Air Agency (Alt.)
Councilmember Kate Kruller, Other Cities & Towns in King County
Councilmember Peter Kwon, Other Cities & Towns in King County (Alt.)
Councilmember Kathy Lambert, King County
Robin Mayhew, WSDOT (Alt.) (via remote)
Kelsey Mesher, Transportation Choices Coalition
Mayor Dana Ralph, Other Cities & Towns in King County, Vice Chair
Dave Ramsay, WA State Transportation Improvement Board
Councilmember Doug Richardson, Pierce County (via remote)
Councilmember Jennifer Robertson, Metropolitan Center–Bellevue
Darrell Rodgers, Public Health Seattle/King County
Neil Strege, Washington Roundtable
Councilmember Mike Todd, Local Transit – Snohomish County
Councilmember Wendy Weiker, Other Cities & Towns in King County (Alt.)
Mayor Greg Wheeler, Metropolitan Center–Bremerton (via remote)
Councilmember Janice Zahn, Metropolitan Center–Bellevue (Alt.)
Brian Ziegler, Freight Mobility Strategic Investment Board (Alt.) (via remote)

TPB MEMBERS ABSENT (*alternate present)

Commissioner Shiv Batra, WA State Transportation Commission
Councilmember Chris Beale, Tacoma
Councilmember John Daniels, Jr., Muckleshoot Indian Tribe
*Dan Gatchet, Freight Mobility Strategic Investment Board
Commissioner Robert Gelder, Kitsap County
Councilmember Lorena González, City of Seattle
TPB MEMBERS ABSENT (*alternate present) continued

Representative Mia Gregerson, House Transportation Committee
Senator Steve Hobbs, Senate Transportation Committee
Councilmember Debora Juarez, City of Seattle
*Secretary Roger Millar, WSDOT
Councilmember Jay Mills, The Suquamish Tribe
Commissioner Helen Price Johnson, Island County
*Councilmember Paul Roberts, Metropolitan Center–Everett/Puget Sound Clean Air Agency
*Councilmember Terry Ryan, Local Transit – Snohomish County
Andrew Strobel, Puyallup Tribe of Indians
Councilmember Stephanie Wright, Snohomish County

GUESTS and PSRC STAFF PRESENT -
(As determined by signatures on the Attendance Sheet and documentation by staff)

Greg Armstrong, TIB
Ben Bakkenta, PSRC
Kelsey Beck, City of Seattle
Catherine Cato, PSRC
Gil Cerise, PSRC
Eric Durpos, City of Lake Stevens
Richard Gelb, Public Health Seattle/King County
Sarah Gutschow, PSRC
Kathrine Johnson, PSRC
Grace Kane, City of Lake Stevens
Andi Markely, PSRC
Kelly McGourty, PSRC
Casey Moreau, PSRC
Alisa O'Hanlon, City of Tacoma
Pavithra Parthasarathi, PSRC
Brian Perry, Sound Cities Associate
Gerri Poor, Port of Seattle
Ashley Probart, TIB
Margaret Richard
Gary Simonson, PSRC
Kalon Thomas, PSRC
Alex Tsimerman, SUP
Noah Tunick, Community Transit
Joanna Valencia, SDOT
Lacey Jane Wolfe, City of Bellevue
CONSENT AGENDA

February 6, 2020

To: Transportation Policy Board

From: Kelly McGourty, Director, Transportation Planning

Subject: Routine Amendment to the 2019-2022 Transportation Improvement Program (TIP)

IN BRIEF

Four agencies submitted five projects this month for routine amendment into the Regional TIP. These projects are summarized in Exhibit A. These projects were awarded local, state, and federal funding through various processes, such as Connecting Washington funds managed by the Washington State Department of Transportation. PSRC staff reviewed the projects for compliance with federal and state requirements, and consistency with VISION 2040 and the Regional Transportation Plan.

RECOMMENDED ACTION

The Transportation Policy Board should recommend Executive Board adoption of an amendment to the 2019-2022 Regional TIP to include the projects as shown in Exhibit A.

DISCUSSION

Under the Fixing America’s Surface Transportation (FAST) Act, PSRC has project selection authority for all projects programming regional funds from the Federal Highway Administration (FHWA) - Surface Transportation Block Grant Program (STP) and Congestion Mitigation and Air Quality Improvement Program (CMAQ) - and Federal Transit Administration (FTA) - Urbanized Area Formula Program (5307), State of Good Repair (5337), Bus and Bus Facilities Formula (5339), and Enhanced Mobility of Seniors and Individuals with Disabilities (5310).
While PSRC does not have project selection authority for other types of federal, state, or local funds, the Executive Board does have responsibility for adding these projects to the Regional TIP. Each project must comply with requirements regarding plan consistency, air quality, and financial constraint. The attached Exhibit A illustrates the action needed to amend the Regional TIP.

The recommended action would approve the TIP amendment request based on a finding of consistency with VISION 2040, the Regional Transportation Plan, and the air quality conformity determination of the Regional TIP. Approval is also based on a determination that funding is reasonably expected to be available to carry out the project. Information describing plan consistency, air quality conformity, and the funding basis for approving the request is described further below.

**Consistency with VISION 2040 and the Regional Transportation Plan**

The projects recommended for action were reviewed by PSRC staff and have been determined to be consistent with the multicounty policies in VISION 2040 and the Regional Transportation Plan.

**Air Quality Conformity**

The projects in Exhibit A were reviewed and it has been determined that a new air quality analysis and conformity determination is not required because each project falls into one or more of the following categories:

- It is exempt from air quality conformity requirements.
- It is an existing project already included in the current air quality modeling.
- It is a non-exempt project not able to be included in the regional model.

**Funding Reasonably Expected to be Available**

For the projects in Exhibit A, PSRC confirmed that the funds are reasonably expected to be available.

**PSRC’s Project Tracking Policies**

This month’s amendment includes no Project Tracking actions.

**Federal Fund Source Descriptions**

The following is a list of state and federal funding sources that are referenced in Exhibit A.

- **Connecting Washington** State Connecting Washington Account.
- **SRTS** Safe Routes To School Program.
Local Bridge Program providing assistance for eligible bridges on public roads.

For more information, please contact Ryan Thompto at 206-464-7122 or rthompto@psrc.org.

Attachments:
Exhibit A
### Project(s) Proposed for Routine Amendment to 2019-2022 TIP

#### Exhibit A

<table>
<thead>
<tr>
<th>Sponsor</th>
<th>Project Title and Work Description</th>
<th>Funding</th>
<th>PSRC Action Needed</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1. King County Department of Transportation (Road Services)</strong></td>
<td><strong>Fifteen Mile Creek Bridge (#493C) Replacement</strong>&lt;br&gt;New project adding preliminary engineering, right of way, and construction funds to replace existing structurally deficient bridge with new single span concrete bridge and reconstruct approaches.</td>
<td>$3,457,369 Federal BR&lt;br&gt;$600,531 Local</td>
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<tr>
<td><strong>2. Kitsap County</strong></td>
<td><strong>Central Valley Road</strong>&lt;br&gt;New project with preliminary engineering and construction funds for sidewalk, curb, gutter, bike lane, illumination, stormwater drainage, curb ramps, crosswalk markings, and rectangular rapid flashing crosswalk beacons.</td>
<td>$2,044,637 Federal Safe Routes To School&lt;br&gt;$1,605,198 Local</td>
<td></td>
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<tr>
<td>Sponsor</td>
<td>Project Title</td>
<td>Work Description</td>
<td>Funding</td>
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<tr>
<td>3. Seattle</td>
<td>Roosevelt RapidRide</td>
<td>New right of way phase in project to build a new bus rapid transit (BRT)/RapidRide corridor along Roosevelt Way, Eastlake Ave, and Fairview Ave which will expand King County Metro’s RapidRide brand. The project includes key features such as business access and transit (BAT) lanes or exclusive transit-only lanes, signal modifications, channelization changes, bus stop consolidation, parking changes, bus bulbs, transit signal priority (TSP), bicycle and pedestrian access improvements, and protected bike lanes and/or parallel neighborhood greenways. Improvements will also include transit stop amenities such as real-time arrival information, lighting, wayfinding, off-board fare payment options, and bicycle and pedestrian access improvements.</td>
<td>$4,000,000 Local</td>
</tr>
<tr>
<td>4. Snohomish County</td>
<td>Jordan Creek Bridge</td>
<td>New project with preliminary engineering, right of way, and construction funds to replace existing bridge with new structure meeting current standards including six-foot shoulders to accommodate plans for future Jordan Road ped/bike lanes.</td>
<td>$4,623,486 Federal BR $1,155,872 Local</td>
</tr>
<tr>
<td>5. Snohomish County</td>
<td>Swamp Creek #503 Bridge Replacement</td>
<td>New project with preliminary engineering, right of way, and construction funds to replace existing bridge with new structure meeting current standards.</td>
<td>$3,222,193 Federal BR $805,549 Local</td>
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</tbody>
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CONSENT AGENDA

February 6, 2020

To: Transportation Policy Board

From: Paul Inghram, Director of Growth Management

Subject: Recommend Conditional Certification of Black Diamond Comprehensive Plan

IN BRIEF

Consistent with PSRC’s adopted plan review process, PSRC staff reviewed and recommend conditional certification of the City of Black Diamond 2018 comprehensive plan update.

RECOMMENDED ACTION

The Transportation Policy Board should recommend that the Executive Board conditionally certify that the transportation-related provisions in the City of Black Diamond’s 2018 comprehensive plan conform to the Growth Management Act and are consistent with the multicounty planning policies and the regional transportation plan.

Conditional status is in place until the city amends the comprehensive plan to ensure consistency with the Regional Transportation Plan in regards to SR 169, and adopts a resolution committing the city to work to narrow the gap between the plan’s anticipated housing and employment growth to align with adopted countywide targets, and to manage growth from vested projects. These conditions are described on pages 2-4 of the certification report.
DISCUSSION

Certification Process Background

The Washington State Growth Management Act calls for coordination between local, regional, and state planning efforts. To advance this coordination, state law requires PSRC to certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies in VISION 2040 have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local comprehensive plans is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process for reviewing and certifying local, countywide, regional, and transit agency policies and plans (Adopted Policy and Plan Review Process, Revised September 2003). This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, Regional Transportation Plan, and Growth Management Act requirements.

The adopted plan review process calls for the Executive Board to take certification action on comprehensive plans on recommendation from the Growth Management and Transportation policy boards. Options for Executive Board action are to:

- **Certify** that the plan is consistent with multicounty planning policies and the Regional Transportation Plan and conforms to Growth Management Act requirements for transportation planning, or
- **Conditionally certify** that the plan addresses most provisions of regional plans and policies and the Growth Management Act, with a requirement that a limited set of outstanding issues be addressed prior to full certification, or
- **Do not certify**

Based on previous board direction and the adopted 2020 Policy Framework for PSRC’s Federal Funds, jurisdictions with plans that are certified or conditionally certified are then

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1 The certification requirement is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
eligible to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program.

If new board members would appreciate more information about PSRC’s plan review and certification process, please let staff know.

**Conditional Certification of Comprehensive Plans**

Overall, the City of Black Diamond’s comprehensive plan is well prepared and meets a majority of planning requirements for consistency with the multicounty planning policies, the Regional Transportation Plan, and the Growth Management Act. The plan is based on thorough research and analysis, responds to community input, and advances important regional policy issues. However, the plan requires additional work in order to be fully consistent.

Conditional certification is recommended where a limited amount of additional work is necessary to bring the plan into full conformity with criteria for certification, and where the jurisdiction and PSRC have agreed upon a path to make the necessary amendments. Jurisdictions that are conditionally certified will be fully eligible to apply for regional funding and may proceed with projects submitted into the Regional Transportation Improvement Program as long as they are following the agreed-upon schedule. Coordination between the jurisdiction and PSRC ensures progress is made toward addressing the identified issue(s). A conditionally certified plan would revert to “not certified” status if the jurisdiction fails to meet the conditions.

**City of Black Diamond 2018 Comprehensive Plan**

The City of Black Diamond is one of the final cities in the region to complete the 2015 major periodic plan update, adopting the update to the plan on May 2, 2019. PSRC staff reviewed the update and found the plan to be largely consistent with the multicounty planning policies and the Regional Transportation Plan, and to conform to the majority of transportation planning requirements in the Growth Management Act. However, the plan as adopted does not fully meet requirements related to growth targets and consistency with the Regional Transportation Plan. Therefore, staff recommends certification with conditions.

In King County, cities and the county work cooperatively to establish 20-year housing and employment targets to coordinate growth expectations. The City of Black Diamond expects substantial growth that will exceed its adopted targets for 2035 – 7,674 housing units are anticipated by the city compared to an adopted target of 2,204 housing units, largely due to the potential development of the “Lawson Hills” and “The Villages” Master Planned Developments (MPDs). This inconsistency stems, in part, due to a history of land use decisions, including an agreement with King County and property owners that set the urban growth area in the mid-1990s, annexation in 2005, and issuance of the MPD permits in 2010. Growth that substantially exceeds adopted targets has the potential to result in unmitigated traffic impacts on neighboring communities and other potential impacts.
The plan includes language on SR 169 and contingency funding that is inconsistent with the Regional Transportation Plan. The plan should be amended to indicate that the transportation demand modeling and project list do not assume a widening of SR 169 and to acknowledge the route as a highway of statewide significance and the associated level of service. Additionally, the plan should be amended to provide a more detailed explanation of contingency plans to address any funding shortfalls that may occur if the planned improvements through the Master Planned Developments are not fulfilled.

The city’s anticipated growth significantly exceeds its adopted growth targets. The plan acknowledges the inconsistency between the anticipated growth in Black Diamond, the growth targets, and the Regional Growth Strategy and commits the city to work with PSRC, King County, and neighboring jurisdictions to manage growth and mitigate its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system. While the language included in the plan is important, this does not resolve the inconsistency between anticipated growth and the adopted growth targets. As such, the City of Black Diamond should commit through a council resolution to continue to work with regional, county, and local planning agencies to ensure the impacts of the Master Planned Developments are managed appropriately, specifically to:

- Coordinate with King County and other jurisdictions during the 2021 target setting process to narrow the gap between growth targets and anticipated growth.
- Avoid increases in development capacity that would significantly surpass adopted targets.
- Continue to coordinate with other jurisdictions regarding unanticipated growth levels, and to assess and mitigate traffic impacts from growth.

During the review process, staff heard from residents who expressed concern about the comprehensive plan; see attached letter and matrix.

For more information, contact Laura Benjamin at 206-464-7134 or LBenjamin@psrc.org, or Paul Inghram at 206-464-7549 or PInghram@psrc.org.

Attachments:
A - Black Diamond Comprehensive Plan Certification Report
B - Letter from Citizens Technical Action Team, dated January 16, 2020
C - Matrix of Responses from Citizens Technical Action Team, dated November 30, 2019
BACKGROUND
The Washington State Growth Management Act calls for coordination between local, regional, and state planning efforts. To advance this coordination, state law requires PSRC to certify that regional transit plans, countywide planning policies, and local comprehensive plans within the central Puget Sound region conform to: (1) established regional guidelines and principles, (2) the adopted long-range regional transportation plan, and (3) transportation planning requirements in the Growth Management Act. Within the central Puget Sound region, the multicounty planning policies in VISION 2040 have been established as the regional guidelines and principles under Revised Code of Washington (RCW) 47.80.026. Certification of local comprehensive plans is also a requirement for jurisdictions and agencies that intend to apply for PSRC funding or proceed with any project submitted into the Regional Transportation Improvement Program, regardless of funding source.

Within the central Puget Sound region, local governments and PSRC have worked together to develop an overall process (Adopted Policy and Plan Review Process, Revised September 2003) for reviewing and certifying local, countywide, regional, and transit agency policies and plans.1 This process also provides an opportunity to coordinate and share information related to local and regional planning. A set of materials, compiled in a Plan Review Manual, provides details on the review and certification process, background, and framework. The manual also provides guidance and checklists for aligning plans and policies with VISION 2040, the Regional Transportation Plan, and Growth Management Act requirements.

DISCUSSION
This report summarizes the findings and recommendations regarding the periodic update to the comprehensive plan for the City of Black Diamond, adopted by the city on May 2, 2019. PSRC last certified the City of Black Diamond’s comprehensive plan in 2010. PSRC staff reviewed the 2018 major update and coordinated with city staff in the development of this report and the city acknowledges and understands the conditions outlined on pages 2-4.

In King County, cities and the county work cooperatively to establish 20-year housing and employment targets to coordinate growth expectations. The City of Black Diamond expects substantial growth that will exceed its adopted targets for 2035 – 7,674 housing units are anticipated by the city compared to an adopted target of 2,204 housing units, largely due to the potential development of the “Lawson Hills” and “The Villages” Master Planned Developments (MPDs). This inconsistency is due, in part, to a history of land use decisions, including an agreement with King County and property owners that set the urban growth area in the mid-1990s, annexation in 2005, and issuance of the MPD permits in 2010. Growth that substantially exceeds adopted targets has the potential to result in unmitigated traffic impacts on neighboring communities and other potential impacts.

1 The certification requirement in the Growth Management Act is described in RCW 47.80. The specific requirements for transportation elements in local comprehensive plans are spelled out in RCW 36.70A.070. PSRC’s Interlocal Agreement, Section VII, also provides direction for the review of local comprehensive plans and countywide policies (Resolution A-91-01, amended March 1998). The Council’s Executive Board last updated its process for Policy and Plan Review in September 2003. The process is also described in VISION 2040, Part IV: Implementation.
While PSRC looks for cities’ comprehensive plans to be substantially consistent with their adopted targets, this certification report recommends conditional certification as a means to recognize the unique circumstances of the City of Black Diamond and its ongoing work to address the implications of growth that significantly exceeds the adopted targets.

**CERTIFICATION RECOMMENDATION**

Based on the review of the City of Black Diamond comprehensive plan, the following action is recommended to the PSRC Growth Management Policy Board, Transportation Policy Board, and Executive Board:

The Puget Sound Regional Council conditionally certifies that the transportation-related provisions in the City of Black Diamond 2018 Comprehensive Plan conform to the Growth Management Act and are consistent with multicounty planning policies and the Regional Transportation Plan.

Conditional status is in place until the city amends the comprehensive plan to ensure consistency with the Regional Transportation Plan in regards to SR-169, and adopts a resolution committing the city to work to narrow the gap between the plan’s anticipated housing and employment growth to align with adopted countywide targets, and to manage growth from vested projects. The schedule for addressing the conditions is:

1. Council adoption of a work plan that addresses the conditions identified in the certification report by April 30, 2020.
2. Submission of draft comprehensive plan amendments and supporting documents that address the conditions to PSRC for review and comment in advance of adoption.
3. Submission of a draft council resolution committing the city to work to align housing and employment growth with adopted countywide targets to PSRC for review and comment in advance of adoption.
4. Once the conditions are adequately addressed, submission of the adopted amended comprehensive plan, council resolution and supporting documents by December 31, 2020, for review and certification by PSRC.

Discussion of the conditional requirements is provided in Part 1, below. Additional recommendations for future work are provided in Part 2, which may be considered during the next comprehensive plan update or during other planning efforts and are not required to satisfy the conditional certification. Under each heading, the scope of the certification review, as guided by the Plan Review Manual and Local Comprehensive Plan Checklist, is listed in high level bullets. Discussion in each topic area highlights exemplary provisions of the plan, as well as issues identified through the certification review where future work on the part of the city is needed to more fully address VISION 2040, the Regional Transportation Plan, and Growth Management Act planning requirements.
Part I: Conformity with Growth Management Act Transportation Planning Requirements

SCOPE OF REVIEW

The Growth Management Act (RCW 36.70A.070(6)) includes several requirements related to transportation elements in local comprehensive plans. These requirements are summarized as follows:

**Land use assumptions and forecasts of travel demand** that are internally consistent and consistent with growth targets.

**Service and facility needs**, including inventories of existing facilities, and level-of-service standards and concurrency provisions that address multiple modes of travel, planned land uses and densities, and state highways.

**Financing and investments**, including a multiyear financing plan and reassessment strategy to address potential funding shortfalls.

**Intergovernmental coordination** with neighboring cities, counties, and regional and state agencies.

**Demand management**, including programs to implement the Commute Trip Reduction Act.

**Pedestrian and bicycle planning**, including project funding and capital investments, education, and safety.

**Land uses adjacent to airports**, identifying relevant facilities, existing and planned uses, and policies that discourage incompatible uses.

Air quality is largely an interjurisdictional issue in which each jurisdiction's travel behaviors, measured through vehicle emissions, affect the regional airshed. The Washington Administrative Code (WAC) requires local transportation elements and plans to include "policies and provisions that promote the reduction of criteria pollutants" for mobile sources (WAC 173-420-080). When PSRC reviews plans, it also certifies that the comprehensive plans include air quality policies and provisions, including a commitment to meeting the requirements of applicable federal and state air quality legislation.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The City of Black Diamond’s comprehensive plan effectively addresses many of the transportation planning requirements of the Growth Management Act and includes adequate air quality policies and provisions. Highlights include:

- The plan demonstrates a substantial focus on developing the city into a more walkable and bikeable community. Policy LU-6, for instance, requires new developments to be designed around alternative modes of transportation and Policy PRT0-4, specifically, outlines continued development of a trail system interconnected with the city’s historic center and the regional trail system. Planning for greater walking and bicycle access will be one important way to help offset transportation impacts.

DISCUSSION: AREAS FOR FURTHER WORK

The following provides additional discussion regarding the conditional certification the city should address by December 31, 2020, through comprehensive plan amendments and a council resolution:

- The plan includes information about the potential widening of SR-169 that is inconsistent with the Regional Transportation Plan. The plan should be amended to indicate that a route development plan has not been completed for SR-169, and the transportation demand modeling and project list do not assume a widening of SR-169.

- In 2006, HB 3266 designated SR 169 as a highway of statewide significance. The plan should be amended to acknowledge this designation and the associated level of service. More information is available at [https://www.psrc.org/level-of-service](https://www.psrc.org/level-of-service), including a map available at [https://www.psrc.org/sites/default/files/los_hss_king.pdf](https://www.psrc.org/sites/default/files/los_hss_king.pdf).
The plan should be amended to provide a more detailed explanation of contingency plans to address any funding shortfalls that may occur if the planned improvements through the Master Planned Developments are not fulfilled. (RCW 36.70A.070(6)(a)(iv)(C))

The city’s anticipated growth significantly exceeds its adopted growth targets. The plan acknowledges the inconsistency between the anticipated growth in Black Diamond, the growth targets, and the Regional Growth Strategy and commits the city to work with PSRC, King County, and neighboring jurisdictions to manage growth and mitigate its impacts, including on surrounding communities, rural and resource lands, and the regional transportation system. While the language included in the plan is important, this does not resolve the inconsistency between anticipated growth and the adopted growth targets. As such, the City of Black Diamond should commit through a council resolution to continue to work with regional, county, and local planning agencies to ensure the impacts of the Master Planned Developments are managed appropriately, specifically to:

- Coordinate with King County and other jurisdictions during the 2021 target setting process to narrow the gap between growth targets and anticipated growth.
- Avoid increases in development capacity that would significantly surpass adopted targets.
- Continue to coordinate with other jurisdictions regarding unanticipated growth levels, and to assess and mitigate traffic impacts from growth.
Part II: Consistency with Regional Plans and Policies

OVERVIEW
This section discusses consistency with the adopted multicounty planning policies (established regional guidelines and principles under RCW 47.80.026) adopted in VISION 2040 and the Regional Transportation Plan. In addition to the multicounty planning policies, VISION 2040 contains a regional growth strategy with a preferred distribution of the region’s residential and employment growth, as well as a number of implementation actions for local governments to carry out. Each policy area addressed in VISION 2040 is discussed in turn below.

VISION 2040 Context Statement
VISION 2040 calls for local plans to include a context statement that describes how the comprehensive plan addresses regional policies and provisions adopted in VISION 2040. The plan includes policies emphasizing consistency with VISION 2040.

Environment

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following environmental policy topics:

- **Stewardship**, including addressing the natural environment throughout the plan, decisions based on best-available science, and regional environmental initiatives.
- **Earth and habitat**, including open space protection, restoration and protection of native vegetation, and coordination with adjacent jurisdictions.
- **Water quality**, including actions that maintain hydrologic functions and reduce water pollution in ecosystems, watersheds, shorelines, and estuaries.
- **Air quality and climate change**, addressing federal and state laws, reduction of pollutants, Puget Sound Clean Air Agency policies, and reduction of greenhouse gas emissions and adaptation to climate change.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The Black Diamond comprehensive plan addresses the environmental policy topics in VISION 2040 with strong goals and actionable policies. Highlights include:

- The plan includes policies (Goal NE 10) for restoring native vegetation in and around the city.
- Goal NE-1 demonstrates a great appreciation for the natural environment and includes policies for developing in environmentally sensitive ways.
- The plan includes policies (Goal LU 13) for protecting and acquiring open space and establishing a well-maintained network of trails throughout the city. This network of trails also aims to make the city more walkable, bikeable, and climate friendly.
- The plan includes policies (Policy NE-5) for intergovernmental coordination with adjacent jurisdictions and tribes to protect and enhance a network of natural habitat and wetlands.

DISCUSSION: AREAS FOR FURTHER WORK
To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- Though the plan takes steps to reduce harmful air pollutants (Goal NE 8), VISION 2040 asks cities in the region to offer significant measurable steps to reduce criteria pollutants beyond adopted standards. (MPP-En-17). The city is encouraged to strengthen polices on air pollution.
Development Patterns – Including Regional Growth Strategy

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following development patterns policy topics:

- **Urban areas**, including targets for housing and employment growth, compact communities that support transit and walking, and provisions for redevelopment of underused land.
- **Centers**, including planning for one or more central places as locations for compact, mixed-use development, with policies that prioritize funding to centers to advance development.
- **Unincorporated urban areas**, including policies that advance annexation and orderly transition of governance.
- **Resource lands**, including identification of steps to limit development.
- **Regional design**, addressing local provisions that apply the Regional Transportation Plan Physical Design Guidelines, energy efficient building, historic preservation, and enhanced sense of community.
- **Health and active living**, addressing healthy environment, physical activity and well-being, and safety.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The city’s comprehensive plan effectively addresses many of the development patterns policies in VISION 2040. Highlights include:

- The plan demonstrates an appreciation for the preservation of regional historic, visual, and cultural resources. Land use policies such as LU-17 protect views of Mt. Rainier as the city grows and expands.
- Many aspects of the plan emphasize the importance of physical activity and recreation for the health and well-being of Black Diamond residents. Policies such as LU-5 incorporate opportunities for physical activity and recreation into development proposals.

DISCUSSION: AREAS FOR FURTHER WORK
To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- VISION 2040 supports the development of centers within jurisdictions, including town centers and activity nodes (MPP-DP-11) and the city is commended for including policies to advance its town center. The city is encouraged to do additional planning for the neighborhood centers identified in the plan.

Housing

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following housing policy topics:

- **Increased housing production opportunities**, including diverse types and styles for all income levels and demographic groups.
- **Affordable housing needs**, including an assessment of existing and future housing needs based on regional and local factors, including household income, demographics, special needs populations, and adequacy of existing housing stocks.
- **Regional housing objectives** in VISION 2040, including promotion of housing diversity and affordability, jobs-housing balance, housing in centers, and flexible standards and innovative techniques.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The city’s comprehensive plan effectively addresses the housing provisions contained in VISION 2040. Highlights include:
The plan includes policies and goals to promote a variety of affordable housing types and levels within the city. Goal 1 outlines a series of policies to support the creation of affordable and diverse housing options, such as Policy H-4, which provides for flexible zoning and subdivision regulations.

Policies such as Policy H-8 promote the construction of affordable housing in coordination with transportation options to ensure residents of Black Diamond can easily access local services.

**DISCUSSION: AREAS FOR FURTHER WORK**

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

- RCW 36.70A.070(2) requires comprehensive plans to include an inventory and analysis of existing and projected housing needs and adequate provisions for existing and projected needs of all economic segments of the community. The plan presents a number of relevant data points that describe housing need. The city should consider supplementing this analysis with a comparison of: (1) the need for housing that is affordable to that share of the county’s households earning 80% and 50% of AMI, and (2) the share of the existing housing stock in the city that is affordable at these income levels. This information will enable more direct comparisons with other jurisdictions and provide useful guidance for implementation strategies. Additional guidance on the housing element and needs assessment can be found in WAC 365-196-410 and PSRC’s Housing Element Guide ([http://www.psrc.org/assets/11660/Housing_Element_Guide.pdf](http://www.psrc.org/assets/11660/Housing_Element_Guide.pdf)).

**Economy**

**SCOPE OF REVIEW**

VISION 2040 calls for local comprehensive plans to address the following economic development policy topics:

- Include an economic development element that addresses: business, people, and places.
- Retention and recruitment efforts that support family wage jobs, industry clusters that export goods and services, and small businesses that are locally owned.
- Equitable benefits and impacts, including provisions and programs that promote economic vitality in distressed areas or areas with disadvantaged populations.
- Adequate housing growth in centers through collaboration with the private sector and provision of infrastructure.

**DISCUSSION: EXEMPLARY PLAN PROVISIONS**

The city’s comprehensive plan effectively addresses many of the economic provisions of VISION 2040. Highlights include:

- The plan promotes the creation of local businesses. Policy ED-1.2 encourages the city to take an active role working with businesses to identify and promote possible sites for local employment opportunities.
- The plan creatively addresses the creation of new businesses of all scales, from providing guidelines for home-based businesses (ED-1.3) to enabling and encouraging light industrial businesses such as commercial kitchens and small-scale manufacturers (ED-1.4).

**DISCUSSION: AREAS FOR FURTHER WORK**

The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on the economy.
Transportation

SCOPE OF REVIEW

VISION 2040 and the Regional Transportation Plan call for local comprehensive plans to address the following transportation policy topics:

Maintenance, management, and safety, including clean transportation with reductions in pollution and greenhouse gas emissions, environmental factors, health and safety, stable and predictable funding sources, system and demand management strategies, and security and emergency response.

Support for the Regional Growth Strategy, including system improvements that align with planned growth, prioritized investments that support compact development in centers, joint- and mixed-use development, complete streets and improvements to promote biking and walking, and context-sensitive design.

Improved transportation options and mobility, including alternatives to driving alone, facilities and services for special needs transportation, avoidance of new or expanded facilities in rural areas, and financing methods.

Linking land use and transportation, including integrating Regional Transportation Plan physical design guidelines in planning for centers and transit station areas, and land development tools that promote transportation alternatives.

DISCUSSION: EXEMPLARY PLAN PROVISIONS

The Black Diamond comprehensive plan addresses the major transportation emphases in VISION 2040 and the Regional Transportation Plan, including maintenance, management, and safety; support for the Regional Growth Strategy; and providing greater options and mobility. Highlights include:

LU Goal 10 outlines policies to encourage mixed-use development and create self-sufficient neighborhoods such as policy LU-46, which outlines the Town Center as multi-purpose and pedestrian oriented.

The pedestrian and bicycle components of the plan outline a safe, full network of trails and paths throughout the city while promoting health and recreation. Policy T-10 in the plan promotes cleaner travel choices by creating infrastructure and safety measures for bicyclists, pedestrians, and transit riders.

DISCUSSION: AREAS FOR FURTHER WORK

To continue to work towards the goals of VISION 2040, the city should consider addressing the following through future planning work:

The Growth Management Act requires level-of-service standards for all locally owned arterials and transit routes, and the multicounty planning policies call for other modes, such as biking and walking, to be addressed as well (RCW 36.70A.070(6)(a)(iii)(B)). PSRC commends the city for including policies that are supportive of walking, biking and transit and encourages Black Diamond to continue developing policies, standards, and regulatory approaches that incorporate multiple travel modes. The plan should include level-of-service standards that address multiple modes of transportation. This analysis will help with the evaluation of needs when comparing the inventories to the standards, as well as respond to the MPPs on multimodal concurrency. The Washington State Department of Commerce’s Transportation Element Guidebook has information on how to set level-of-service standards and identify system needs (pages 143-150 and 183-189) (http://www.commerce.wa.gov/Documents/GMS-Transportation-2012.pdf).
Public Services

SCOPE OF REVIEW
VISION 2040 calls for local comprehensive plans to address the following public services policy topics:
- **Promote more efficient use of existing services**, such as waste management, energy, and water supply, through conservation – including demand management programs and strategies.
- **Promote renewable energy and alternative energy sources**.
- **Plan for long-term water needs**, including conservation, reclamation and reuse.

DISCUSSION: EXEMPLARY PLAN PROVISIONS
The Black Diamond comprehensive plan update contains policies that address the public services provisions of VISION 2040. Highlights include:
- The plan outlines multiple policies and strategies to conserve water and meet long term water needs. Policy U-10, for instance, encourages high volume, non-potable water users such as parks and schools to reuse and reclaim water.

DISCUSSION: AREAS FOR FURTHER WORK
The certification review did not identify any major areas for improvement of the plan to better align with regional guidelines and principles on public services.

COMMENTS AND GUIDANCE
PSRC staff thanks the city for working through the plan review and certification process. PSRC is available to provide assistance for future plan updates. Additional planning resources can also be found at https://www.psrc.org/our-work/plan-review. If the city has questions or needs additional information, please contact Laura Benjamin at (206) 464-7134 or lbenjamin@psrc.org.
Citizens’ Technical Action Team

January 16, 2020

To: Members of the Growth Management Policy Board

Subject: Comments—City of Black Diamond’s Comprehensive Plan Update (2015-2035)

Introduction

Thank you for allowing us to address the PSRC Growth Management Policy Board (GMPB). We are a Citizens’ Technical Action Team (TAT) comprised of local (either live in or near the City of Black Diamond) technical people—Chief and Principal Engineers, Research Scientists, and Development Managers (former Boeing, State Department of Ecology, etc.). We research facts and data and develop comments based thereon.

We write to you today with regards to the City of Black Diamond’s recently adopted Comprehensive Plan 2015-2035 Update (Update). For the past 10 years we have conducted detailed analyses and provided both oral and written comments to the City regarding the massive growth associated with its two Master-Planned Developments (MPDs). Since April 2014, when the City embarked on a major update to its Comprehensive Plan, we have reviewed and commented on various drafts of same including the City’s final draft this past April (2019). The City Council gave its final approval to the Update in May 2019.

We believe, and our research shows, the City’s May 2019-adopted Update contains deep flaws and omissions and, thus, does not meet several State RCW requirements, nor long-term responsibilities to citizens—which we summarize herein. For the past ~18 months we have maintained contact with and provided our detailed comments and concerns to PSRC’s Director of Growth Management Planning Paul Inghram and PSRC’s Director of Transportation Planning Kelly McGourty.

The City, besides undergoing a ~5-yr-long process to conduct its Update, chose in the fall of 2019 to use its Annual Docket Amendment process to modify that May 2019 Update. That is why we rescinded our original August 26, 2019, letter to you on the subject and have continued to try to engage the City in fixing its Update. Unfortunately, all our attempts to garner any changes whatsoever failed. Finally, on January 2, 2020, we corresponded with City Community Development Director, Barbara Kincaid, inquiring about the process going forward in terms of PSRC certification and was told the City is: “working with PSRC to conditionally certify this version of the plan with the intent to work PSRC conditions into our proposed 2020 docket.”

This is not the normal Comprehensive Plan update process with which we are familiar. Why would the city adopt a major Comprehensive Plan Update, then immediately state it is modifying it. While we certainly are happy the City, at least, plans to consider PSRC concerns, we are perturbed it has and continues to ignore all Public Comment. Our concerns are not few, not petty, and certainly do not constitute a complaint. As you will see herein, they are detailed, technically based, pertinent, and refer to RCWs that must be met.

Herein we provide a top-level summary of our most critical concerns—just on the Transportation Element of the Plan. The City, as well as Mr. Inghram and Ms. McGourty, have received our detailed comments which comprise over 100 pp.

PSRC Policy and Plan Review Process

We have studied PSRC’s Plan Review Process. We concentrated on PSRC’s Type 1: Review of Local Comprehensive Plans, Including Certification of Transportation Elements. We believe our thorough review of the City’s Update is consistent with PSRC’s process, which calls for certification of transportation-related provisions in local comprehensive plans based on, in part:

1. Conformity with the Growth Management Act (GMA) based on: “(1) consistency with the land use element, (2) identification of facilities and service needs, (3) discussion of financing for
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transportation facilities and services, (4) description of intergovernmental coordination efforts, and (5) development of transportation demand management strategies” (RCW 36.70A.070). Herein we detail some of the gross deficiencies in the City’s Update.

2. Consistency with the Regional Transportation Plan (RTP) determined through a comparison of the transportation-related provisions with the policies and provisions in the adopted RTP. This includes: Consistency with Established Regional Guidelines and Principles. Per RCW 47.80.026 these guidelines address, in part: “…circulation systems, access to regional systems, effective and efficient highway systems, the ability of transportation facilities and programs to retain existing and attract new jobs and private investment and to accommodate growth in demand, transportation demand management, joint and mixed use developments, present and future railroad right-of-way corridor utilization, and intermodal connections.” Herein we detail inconsistencies in the City’s Update with these guidelines.

Specific Concerns with Transportation Element

In August 2018 we provided our detailed comments to both Mr. Inghram and Ms. McGourty. Below is a brief summary of our detailed comments on Appendix 7 — Transportation (the most voluminous and, clearly, most critical part of the Update). Our highlighting delineates those items we believe the Update must, but does not, address:

1. Traffic Modeling: SYNCHRO normally is used to evaluate macro-level performance (e.g., time delays) and can be used to design intersections to serve a given level of demand at the level of design and operations, but it does not forecast the demand itself (a fundamental input, which is an assumption given to SYNCHRO to test and usually comes from a traffic-demand model). No information (What was done? How was it done? What were the results? How were the results used?, etc.) on such modeling has been provided.

2. SR-169: There is a major disconnect in what is assumed and what actually is planned in PSRC’s Regional Transportation Plan (RTP)—the successor to Transportation 2040—adopted in May 2018. The RTP (see Executive Summary, p. 5) shows only a small portion of SR-169, just through part of the City of Maple Valley, as slated for widening by 2040. The Update does not recognize this reality. Not only must SR-169 (the backbone of the city’s transportation system) be included in a projection of state and local system needs to meet current and future demand (RCW 36.70A.070(6)(a)(iii)(F) and WAC 365-196-430(2)(f)), but so must King County arterials beyond the city limits, such as Issaquah-Hobart-Ravensdale-Black Diamond Rd and Auburn-Black Diamond Rd—all of which will be stretched far beyond their capacities due to the MPDs. The Update does not recognize this reality.

3. Funding Plans and Sources: There are see no Contingency Plans (required by RCW 36.70A. 070 Comprehensive Plans—Mandatory Elements.(6)(a)(iv)(C)) in place should potential Grant monies fall short or simply not materialize. Should probable funding fall short of meeting identified needs, a discussion is required of how additional funds will be raised or how land use assumptions will be reassessed to ensure that LOS standards will be met (RCW 36.70A.070(6)(a)(iv)(C) and WAC 365-196-430(2)(l)(ii)). Although maintaining existing and new transportation facilities is discussed in Chapter 7—Transportation (e.g., Policy T-5), the means to finance same also must be identified. This is especially important for the city as it will have many, many more transportation facilities (e.g., lane-miles, intersections, sidewalks, etc.) to maintain in the coming years. Further, because new traffic modeling and analyses are required per the MPD Conditions of Approval (i.e., once a 850-building-permit-issued threshold is reached), we understand predicting what will be needed in future financing plans remains a moving target. The City should recognize this reality, yet makes no mention of it. The Master Developer-Funded Transportation Projects table (now labeled the first “Table 0-10”) is not described in the text (nor referenced) and is mostly blank. Such information is necessary to evaluate whether future traffic
projects will mitigate MPD impacts and whether or not the Update is adequate to meet the city’s Vision and the future needs of its residents. The MPD Development Agreements will expire in 2026—far before full MPD buildout is achieved. This must be recognized and assessed accordingly. We found no discussion of any of this. Finally, Cost Estimates are not provided, but should be, for all transportation capacity-adding projects for both the short term thorough 2021 and the long term through 2035. In summary, a specific financial plan that demonstrates how the transportation improvement program can be funded must be included, but is not.

4. Population Estimates: The city’s estimate for future population growth is deficient—it assumes ~2.5 people per new residence in the MPDs (e.g., 6,050 residences x 2.5 people per residence = 15,125 people). The current city ratio of 2.7 (2014: 4.361/1,627) reflects a relatively older population. However, since the MPDs will undoubtedly reduce the average age of the City’s population (e.g., more younger families with children), a factor of at least 3.0 should be used, which would result in a city population in 2035 at least 17% higher than assumed. Such a population forecast discrepancy can have profound effects on traffic modeling and analyses, yet this is not recognized. Further, the City’s “Travel Forecasts” (Appendix 7—Transportation, p. 18) for both 2014 and 2035 are based only on the MPDs, not any infill development discussed in Chapter 5—Land Use. This clearly can be seen in its 2014 “household” projection of 1,627 compared to the 2035 “household” projection of 7,674—an increase of 6,047, which is almost identical to the projected 6,050 MPD households! Consequently, all other expected development—based on land capacity and in-the-pipeline rezoning applications and related impacts on future transportation infrastructure needs—is completely ignored.

5. Transportation Improvements: The city should not address road and intersection improvements “incrementally with developments as traffic volumes increase,” as this frequently leads to undersized improvements, which will require retrofitting in an already-developed area. The State GMA calls for identifying the long-term scope in advance, then assigning reasonable proportion of those improvements to each development. We remain concerned the verbiage is not consistent. Several 2022-2035 intersection projects listed in Table 7-9 are not shown as transportation improvements in Figure 7-6. Because of these discrepancies, it is not clear these projects are sufficient to ensure the city’s LOS standards are met. Further, although traffic volume predictions, etc. are provided, there is insufficient explanation of the 2035 scenario. Figure 7-7 shows such predictions at 10 key intersections. These must be consistent with the road network shown in Figure 7-6 and LOS performance listed for each in Table 7-11 (please note: in the approved Update, table numbers start with “0” not “7,” in addition, there are two tables labeled “Table 0-10,” the Table we refer to above, “Table 7-11,” is now the second “Table 0-10.” We would expect this all to be connected and sufficiently explained in the text, but it is not. In fact, the text simply states: “…additional arterial roads will be needed….” It must be kept in mind the information provided in Figure 7-7 is critical to evaluating future traffic impacts and whether or not this Update is adequate to meet the city’s Vision and the future needs of its residents; unfortunately, at a minimum, we have many concerns with the traffic volumes predicted at several key intersections in Figure 7-7.

6. Housing / Job Imbalance: This could continue to plague the city for years to come and get progressively worse as the MPDs are built out, especially if much of the commercial space that is planned does not materialize due to market forces and/or primarily results in low-paying retail and related jobs. Those jobs most likely will not allow families to afford to purchase homes in the MPDs. Consequently, many new MPD residents will be commuting from the City, while many infill jobs will be filled by those commuting into the city. This will directly exacerbate traffic woes and must be properly evaluated in all traffic-demand modeling—there is no discussion on this. Further, the City’s two MPDs will be totally car-dependent, the exact opposite of the PSRC RTP’s call for “building transit communities.”

7. Transportation Concurrency: It is stated (and DKS Associates’ transportation experts have stated same in meetings): “The City’s strategy to tie concurrency directly to THE major
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developer within the City should give the City a step ahead of most communities that struggle to keep up with maintaining concurrency requirements. "This is true to a point, but it is not a "get out of jail free card," as it depends heavily on MPD Condition of Approval 20—Traffic Monitoring Plan, which has several flaws. The city’s Hearing Examiner recognized these flaws and clearly pointed them out in his Recommendations on the MPD Development Agreements, which were not heeded and subsequently rejected by the 2011 City Council. In fact, the city’s Hearing Examiner enumerated major concerns with how concurrency was handled in the MPD Application Permit Conditions of Approval and the Development Agreements. These Concurrency concerns are not addressed and should be. The MPD Traffic Monitoring Plan is to specify when engineering and design is to begin, not actual construction to mitigate the problem. Such timing of mitigation is a critical path for the city and its residents and businesses. The city must recognize, but does not indicate so in its Update, that the MPD Master Developer will be providing the bare minimum to meet its local direct impacts, so that cumulative long-term growth could be ignored until it is too late to address transportation infrastructure needs in a cost-effective and timely manner—a lose-lose proposition for both the city and the public.

8. **Level of Service**: The Update states, based on the traffic analysis information it has so far: “With the installation of the capacity adding projects as identified in Table 7-13 facilities meet the LOS standards based on existing, 6-, and 20-year forecasts.” However, it cannot be overemphasized that the MPDs have yet to be subjected to technically sound and accurate Traffic-Demand Modeling used to inform Traffic-Impact Analyses, as enumerated in painstaking detail by the city’s Hearing Examiner’s MPD Environmental Impact Statement Hearing Decision and MPD Application Hearing Recommendations. Consequently, the City has no reasonable assurance, at this time, that “capacity adding projects” will, in any way, be sufficient to meet the needs identified, since the true needs are not really known to any degree of accuracy.

9. **Transportation-Demand Management**: The Transportation Element must also describe existing and planned Transportation-Demand Management (TDM) strategies, such as HOV lanes, parking policies, etc. ([RCW 36.70A.070(6)(a)(vi), WAC 365-196-430(2)(i)]). There is no Commute-Trip Reduction (CTR) Plan to achieve reductions in the proportion of single-occupant vehicle commute trips per [RCW 70.94.527](RCW 70.94.527). This is especially important since approval of the MPDs was partially predicated on the assumption of achieving an Internal Capture Rate (ICR) of 18% (suspect at the time and still suspect). Since ICRs have a direct influence on the evaluation of traffic volume, trip distribution, travel times, and queue lengths, they are, possibly, one of the most important assumptions that feed the TDM and subsequent analyses. There is a concern that some Institute of Transportation Engineers (ITE) methods (the Master Developer’s Transportation Consultants used these in assessing the MPDs) for ICRs may not be applicable to large MPDs (KCDOT [now King County’s Department of Local Services, Road Services Division] testified to this during the MPD Public Hearings, but were ignored).

10. **Inter-Governmental Coordination**: This is required by [RCW 36.70A.0740(6)(a)(v)]:

    “Intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions;” The discussion on such coordination is grossly deficient and simply talks about participating on various transportation boards—which is necessary, but clearly not sufficient. At a bare minimum, the City needs to discuss with both the cities of Maple Valley and Covington what can be done by all three to minimize traffic impacts of their combined developments. The three cities share several major roads and, thus, share several major problems today and into the future. Further, the City and its transportation consultants should sit down with their counterparts from the cities of Maple Valley and Covington to better understand their traffic-demand models and assumptions—where do they dovetail, where do they conflict. Further, the City needs to sit down with King County to discuss impacts to its road infrastructure. None of this is discussed.
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PSRC’s Comments

Finally, we were very surprised when the city, in its May-approved Update, also ignored PSRC’s November 19, 2018, comments on the city’s draft, which included: “...anticipated growth significantly exceeds the adopted targets;” the need for “...contingency plans to address any funding shortfalls that may occur if the planned improvements through the MPDs are not fulfilled;” and inconsistencies with “the Regional Transportation Plan.” Every point PSRC made in its comments should have been addressed then, but were not.

Annual Docket Amendment Process

In the Fall of 2019 we informed PSRC the City would be conducting an “update” to its already submitted May 2019 Comprehensive Plan Update using its 2019 Docket Amendment process. Unfortunately, after beginning that process—one in which we heavily participated, the City decided it was running out of time before the end of the year and chose to roll all 2019 Docket Amendments into its 2020 Docket process. Consequently, the City has made relatively minor changes to its May 2019 Comprehensive Plan submission—none of which include any of the detailed concerns we describe herein.

We still fail to understand why the City, after having gone through a 5-yr-long process (April 2014 to May 2019—those are not typos) to “complete” its Comprehensive Plan Update, chose to use its Annual Docket Amendment process to make a few changes to the May 2019 City Council-adopted Update. Using this annual process to “complete” its Update—that had already been approved by the City Council—is unusual to say the least. It also denigrates the so-called “public participation process” in which so many citizens submitted comments, only to be ignored.

The only transportation-related “amendment” offered by Staff has to do with SR-169—apparently trying to address one of PSRC’s comments (also one of our comments on which we are happy PSRC agreed). The City states in its proposed “amendment” that “The analysis in this plan does not assume widening of SR-169 at this time” and then presents as “remedies” to: “seek additional Right-of-Way (ROW)” and “work on access management.” We do not believe this is a realistic plan to address the city’s ever-burgeoning SR-169 congestion problems. Regarding ROW, it could take a very long time to acquire all the ROW needed for a continuous corridor through the city, since such ROW only could be acquired when there is an active development proposal. While many cities and counties have used this type of practice to accumulate ROW on a slow incremental basis, it rarely gets the whole job done until decades have elapsed. Of course, this doesn’t even begin to address ROW along the SR-169 corridor north of the city.

We have met with City Staff multiple times, but none of the Update’s many deficiencies have been fixed. We proposed Docket Amendments to fix many of the glaring omissions of the Update’s Transportation Element to ensure the city meets RCW 36.70A. 070(6): Comprehensive plans—Mandatory elements. (Transportation Element).

Attached please find a Matrix that shows: each of our proposed Transportation Element Docket Amendments submitted to the City, City Staff’s Response, and our Rebuttal [please note: we have chosen not to submit our Rebuttal to the City, as we expect it would be fruitless]. Amazingly, the city’s entire Response to our Docket Amendments on its Transportation Element—Appendix consists of: “Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.” (this simply is repeated in the 3rd column on pp. 1-6 of the attached Matrix). Clearly, the City conducted a Public Participation and Engagement Process in name only (see next section) and, for all intents and purposes, admitted it in writing!

This also is in consonance with what we learned when we met with City Staff on September 26, 2019, and asked at the start of the meeting: “Why was the Update’s Transportation Element (Chapter 7 & Appendix 7) completely unchanged since the summer of 2018?” (that date is not a typo). It was explained to us that, since the City had Transportation Consultant DKS Associates under contract, it was relying completely on it for transportation matters. However, when we asked if Public Comments, including our very detailed transportation-related comments, had been provided to DKS, we were told “No, because it was not in DKS’ statement of work.” We asked if our comments had even been read by
Citizens’ Technical Action Team

anyone, we were told “Staff looked at them and briefly verbally summarized them to DKS, but no changes were made.” We remain very skeptical of the process employed, as not a single sentence, word, etc. was changed in the Transportation Element—not even the typos, page numbering, and figure/table mis-numbering, etc. that we had painstakingly pointed out alongside our detailed comments.

Public Participation Process

Although we provided the City detailed comments on all elements of its Update, including: Parks, Recreation, Trails, and Open Space; Natural Environment; and Land-Use, our most in-depth comments dealt with its Transportation Element (i.e., Chapter 7 and Appendix 7, especially the latter), which, clearly, is its most important element with the greatest impacts on the city and communities throughout southeast King County. Unfortunately, the City ignored all our Transportation Element comments when it approved its Update in May—we cannot fathom why except, possibly, for expediency, as no explanation was given.

It appears the City simply went through the motions of a “public participation process”. This certainly is a concern. However, all we care about is the City meets its obligations to itself, its residents, nearby cities, and surrounding unincorporated areas. Unfortunately, we believe the City is not doing so—to the detriment of citizens.

Conclusion

We request the GMPB weigh all these concerns as it considers the City of Black Diamond’s Comprehensive Plan 2015-2035 Update. We would hope the GMPB determines the City’s Update is unacceptable, since it does not meet the minimum requirements all other jurisdictions strive to and do attain, and that it requires the City to make significant changes.

Thank you for your time and careful consideration of our research and detailed reviews.

Dr. Gil Bortleson  Cindy Proctor  Jack Sperry
Environmental Focal  Development & Schools Focal  Public Services Focal
Technical Action Team  Technical Action Team  Technical Action Team

Peter Rimbos
primbos@comcast.net
Leader and Transportation Focal
Technical Action Team

cc: Paul Inghram, PSRC, Director of Growth Management: pinghram@psrc.org
Kelly McGourty, PSRC, Director of Transportation Planning: KMcGourty@psrc.org
Kristin Mitchell, PSRC, GMPB Administrative Assistant: kmitchell@psrc.org
Ivan Miller, Comprehensive Planning Manager, King County: ivan.miller@kingcounty.gov
## Transportation Element, Appendix 7

- **Travel Forecasts**
  
  p. 18, 1st para, under “Travel Forecasts”:
  
  The 2nd bullet shows “land-use projections” for “year 2035” that do not even fully take into account the planned 6,050 homes in the MPDs, let alone any other development over the 19-yr period covered.
  
  Those “land-use projections” for “year 2035” are not consistent with the City’s agreed-to Growth Targets, nor either PSRC’s Regional Transpiration Plan (20189) or PSRC’s VISION 2050 (now being finalized).
  
  Regarding the statement about “existing traffic-demand models” the City must take care in recognizing that the TDM used to support approval of the MPDs was completely rejected by the City’s Hearing Examiner and creation of a new one to evaluate the impacts of the MPDs on the City’s and region’s traffic patterns and volumes was put off by the City Council until 850 building permits have been issued. Consequently, the City can have no confidence or reasonable assurance with any travel forecasts based on the discredited TDM, as enumerated in painstaking detail by the city’s Hearing Examiner’s MPD Environmental Impact Statement Hearing Decision and MPD Application Hearing Recommendations.

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<td>This is necessary to meet the requirements of RCW 36.70A070(6)(a)(iii)(E); “Travel forecasts should be based on adopted regional growth strategies, the regional transportation plan, and comprehensive plans within the region to ensure consistency.”</td>
<td>City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment.</td>
<td>Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.</td>
<td>As with the TAT’s exhaustive comments provided to the city (which appeared to be not even technically reviewed by the City or its “reputable transportation consultants”), TAT’s proposed Docket Amendments again have been not technically reviewed by the city as evidenced by the City Staff’s response: “The City hired reputable transportation consultants to develop Appendix 7. We have confidence in the work they performed.” This constitutes a non-response, which is intellectually vacuous and professionally insulting.</td>
<td>Then, the City Staff recommends that ANY input received from the Public on “The Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.” This is not a realistic Public Participation Plan. The City cannot state it has held many Public meetings/accepted numerous Public comments and then state it has not, and will not, even consider those Public comments—and admit same in writing as it has done!</td>
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<td>BDCP Proposed 2019 Docket Amendments</td>
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## Funding Sources

The table does not constitute a realistic assessment of the cost risks to the city and its taxpayers. Under the “Transportation Benefit District” item there is nothing in the Comments column. Yet, under the Realistic Acceptance column it states: “In-place but could be raised.” On what basis would this be contemplated (all five “potential use of funds” are identified, i.e., footnotes 1 thru 5), especially when nearly all impacts to the City’s transportation infrastructure are the result of the MPD buildout?

Under the “State and Federal Grants” item in the Comments column it states: “Once the City has their comprehensive plan approved they will also be eligible for more grants including Federal.” However, since the city’s Comprehensive Plan Update reflects a gross exceedance of its agreed-to Growth Targets the PSRC could decide not to certify or certify with strong conditions related to funding sources.

In earlier versions there was a heading here called “Developer Contributions.” We can understand why some of it was removed, but the subheading called “Disadvantages” stated some very key aspects the City should be cognizant of and consider going forward and should be put back, in some condensed form, into this Comprehensive Plan Update:

**Disadvantages:**  The primary disadvantage is that developer improvements are focused on fixing the “immediate problem” and can result in solutions that may not be desired by the City. As mentioned earlier this “piece-meal” approach can often result in unforeseen off-site impacts that may cause more traffic congestion or result in improvements that will need to be torn-out in the future to accommodate future improvements. If an intersection already operates below the standard, developers are only required to pay their “fair share” of the cost of an improvement—often requiring the City to fund a portion of the improvement. Further issues can arise over how to deal with developments which are approved after the original developer has completed a major improvement (late-comer’s agreements).
### Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket

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<td>Transportation Improvements pp. 19-32, under &quot;Transportation Improvement Recommendations&quot;:</td>
<td>This is necessary to meet the requirements of RCW 36.70A.070 (6)(a)(iii)(F): &quot;The transportation element shall include the following subelements:…Facilities and services needs, including:…identification of state and local system needs to meet current and future demands,…&quot;</td>
<td>City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment. The City hired reputable transportation consultants to develop Appendix 7. We have confidence in the work they performed.</td>
<td>Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.</td>
<td>[SEE ABOVE]</td>
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Citizens’ Technical Action Team

**Transportation Improvements**

- The city should not address road and intersection improvements "incrementally with developments as traffic volumes increase," as this frequently leads to undersized improvements, which will require retrofitting in an already-developed area. The State GMA calls for identifying the long-term scope in advance, then assigning reasonable proportion of those improvements to each development. We remain concerned the verbiage herein is not consistent.

Several 2022-2035 intersection projects listed in Table 0-9 (also labeled Table 0-1) are not shown as transportation improvements in Figure 7-6. Because of these discrepancies, it is not clear these projects are sufficient to ensure the city’s LOS standards are met. Further, although traffic volume predictions, etc. are provided, there is insufficient explanation of the 2035 scenario. Figure 7-7 shows such predictions at 10 key intersections. These must be consistent with the road network shown in Figure 7-6 and LOS performance listed for each in Table 7-11. We would expect this all to be connected and sufficiently explained in the text, but it isn’t. In fact, the text simply states: "…additional arterial roads will be needed…".

It must be kept in mind that the information provided in Figure 7-7 is critical to evaluating future traffic impacts and whether or not this Comprehensive Plan Update is adequate to meet the city’s Vision and the future needs of its residents. Unfortunately, we have many concerns with the traffic volumes predicted at several key intersections in Figure 7-7.
## Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket

### Transportation Concurrency

**pp. 36-41, under “Concurrency”:**

Add a *Flow Chart* (not dissimilar to Figure 0-1 “Concurrency Management System” on p. 41) that delineates the interrelationship between the continuing cycle of: Meeting LOS Stds: Traffic Monitoring: Traffic-Impact Analyses: Modifying Development Size/Pace: Traffic Monitoring: ….

TAT provided a large number of technical comments on Concurrency that covered over 9 pages (including the original text and figures)—our comments comprised, in total, ~2 pages, which cannot be repeated here, but it is strongly suggested they be read and considered. Below is a very, very brief summary of those comments:

"Herein it is stated (and DKS Associates’ transportation experts have stated same in meetings): "The City's strategy to tie concurrency directly to THE major developer within the City should give the City a step ahead of most communities that struggle to keep up with maintaining concurrency requirements." This is true to a point, but it is not a get out of jail free card, as it depends heavily on MPD COA 20’s Traffic Monitoring Plan, which has some flaws.

The city’s Hearing Examiner recognized these flaws and clearly pointed them out in his Recommendations on the MPD Development Agreements, which were not heeded and subsequently rejected by the 2011 City Council. In fact, the city’s Hearing Examiner enumerated major concerns with how concurrency was handled in the MPD Application Permit Conditions of Approval and the Development Agreements. These should be addressed here.

The MPD Traffic Monitoring Plan is to specify when engineering and design is to begin, not actual construction to mitigate the problem. Such timing of mitigation is a critical path for the city and its residents and businesses. The city must recognize the MPD Master Developer will be providing the bare minimum to meet its local direct impacts, so that cumulative long-term growth could be ignored until it is too late to address transportation infrastructure needs in a cost-effective and timely manner."

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<td><strong>Transportation Concurrency</strong></td>
<td>City must recognize Concurrency is the mechanism that allows land-use and transportation infrastructure planning to succeed in producing a high quality of life and a strong economic climate. Discussion of concurrency is governed by the requirements of: RCW 36.70A.070 (6)(b): “After adoption of the comprehensive plan by jurisdictions required to plan or who choose to plan under RCW 36.70A.040, local jurisdictions must adopt and enforce ordinances which prohibit development approval if the development causes the level of service on a locally owned transportation facility to decline below the standards adopted in the transportation element of the comprehensive plan, unless transportation improvements or strategies to accommodate the impacts of development are made concurrent with the development. These strategies may include increased public transportation service, ride-sharing programs, demand management, and other transportation systems management strategies. For the purposes of this subsection (6), “concurrent with the development” means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years. If the collection of impact fees is delayed under RCW 82.02.050(3), the six-year period required by this subsection (6)(b) must begin after full payment of all impact fees is due to the county or city.”</td>
<td>City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment. The City hired reputable transportation consultants to develop Appendix 7. We have confidence in the work they performed.</td>
<td>Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.</td>
<td>[SEE ABOVE]</td>
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This is a brief summary of the comments and recommendations provided by the Citizens’ Technical Action Team (TAT) for the Black Diamond Comprehensive Plan 2019 Docket.
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| • Level of Service       | (1) Discussion of level of service standards is governed by the requirements of RCW 36.70A.070 (6)(a)(iiii)(B): “Level of service standards for all locally owned arterials and transit routes to serve as a gauge to judge performance of the system. These standards should be regionally coordinated;”  
(2) This statement should be restored.  
(3) WSDOT’s concerns must be thoroughly evaluated. | City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment. | Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC. | [SEE ABOVE] |

(1) Add a discussion of level of service standards and how they have been and will continue to be regionally coordinated.

(2) The following from the 2009 BDCP should be placed back in:

“The requirements of Black Diamond’s Transportation Concurrency Management program may apply to transportation facilities designated by the Washington State Department of Transportation (WSDOT) as ‘highways of statewide significance.’ The portions of certain highways of statewide significance that do not have limited access and function like city arterials may be included in the Black Diamond concurrency test.”

(3) Please note TAT’s detailed comments on what used to be called section 7.5 Actions Needed to Meet Level of Service Standards (see p. 35 of TAT’s Appendix 7 comments) regarding WSDOT’s comments on the SR-169 roundabouts and mitigation needed for the failing LOS for the 216th Ave/288th St intersection.
Citizens' Technical Action Team

Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket

- Inter-Governmental Coordination
  p. 43, under “Transportation Facilities and LOS Standards Coordination”:

  The discussion herein on such coordination is grossly deficient and simply talks about participating on various transportation boards—*which is necessary, but not sufficient*.

  At a minimum, the city needs to sit down with its counterparts in both the cities of Maple Valley and Covington to decide what can be done by all three to minimize traffic impacts of their combined developments. The three cities share several major roads and, thus, share several major problems today and into the future. Also, the three cities need to share information to better understand their respective traffic-demand models and assumptions: Where they dovetail? Where they conflict? How can they be coordinated and, at least, respective results be understood in the same regional context?

  The City needs to sit down with King County to discuss impacts to its road infrastructure.

  The City must recognize that it has chosen to far, far exceed its agreed-to Growth Targets. This decision will have a strong negative impact on traffic in much of southeast King County for generations. Taxpayers who do not live in Black Diamond should not be asked to pay—through State Grants, State highway funds, County highway funds, etc.—for the City’s decision to permit the two massive MPDs without a full transportation evaluation that was acceptable to the city’s Hearing Examiner and Council.

  This is required by RCW 36.70A.0740(6)(a)(v): “Intergovernmental coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions; …”

  City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment.

  The City hired reputable transportation consultants to develop Appendix 7. We have confidence in the work they performed.

  Input received on the Technical Transportation Appendix will not be considered for the 2019 Annual Comprehensive Plan Docket unless required by PSRC.

  [SEE ABOVE]
**Transportation Element, Chapter 7**

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<td>• Modify Policy T-4 Level of Service Standard to add back in the following from the 2009 Comprehensive Plan: “Adopt levels of service that reflect the preference of the community.”</td>
<td>This is the intent of the State’s Growth Management Act.</td>
<td>The adoption of Levels of Service (LOS) standards must consider many things including the community vision. This specific language was removed because it sets a false expectation that LOS standards can be set based on what the community wants, and it is not as simple as that.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>TAT did not state it was “simple” to set LOS standards, but that such standards should “reflect the preference of the community” that must live with them. The city clearly is ignoring this and removed it from its Comprehensive Plan in this major Update.</td>
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<td>• Modify Policy T-14 Character of the City to add back in the following from the 2009 Comprehensive Plan: “Discourage widening of SR 169 to a four or five lane facility thus creating a ‘thoroughfare’ that will tend to divide the City.”</td>
<td>This was the first item listed in the 2009 Comprehensive Plan as Policy T-10.</td>
<td>Policy T-1 addresses Roadway Design which includes “establishing a range of transportation standards and criteria to ensure roadways are designed in a manner that fits within the context of the built or natural environment, and consistent with the intended functional classification” as well as ensuring roadway designs are coordinated with King County, Washington State, and Federal Highways to achieve compatible design criteria. The 2009 statement is not particularly useful nor is it necessary when the reality is SR 169 in its current condition already creates a thoroughfare through the City. The City must be proactive in continuing to work with the state to improve SR 169 as the corridor develops. It might seem inconsistent for the Land Use Chapter to promote Community Commercial (CC) uses along the corridor without any intention of improving the roadway to handle the additional traffic. And we know the state has no intention of making SR 169 into a four or five lane facility.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The City Staff response admits that “the state has no intention of making SR 169 into a four or five lane facility.” We completely agree and stated as such in our original comments on the Transportation Appendix. All we recommended here was that the city keep its existing language in this major Comprehensive Plan Update. We fail to understand why it appears afraid to do just that.</td>
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Citizens’ Technical Action Team

**Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket**

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<td>Modify Policy T-8 Transportation Demand Management to describe:</td>
<td>(1) A mandatory element is a description of Transportation-Demand Management strategies, such as HOV lanes, parking policies, etc., as required by RCW 36.70A.070(6)(a)(vi), WAC 365-196-430(2)(l) and WAC 365-196-430(2)(l).</td>
<td>(1) There are no existing or planned TDM strategies to describe. Given the fact that a TDM program is used to manage traffic impacts from larger employers or institutions, it is not deemed to be a high priority at this time.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>(1) City Staff fails to recognize that the approved MPDs (which, when fully built out, will bring 6,050 homes and 1.15 million sq ft of commercial space to the city), coupled with the Palmer Coking and Coal property it has rezoned per the new Land-Use Map in its major Comprehensive Plan Update (that could bring upon to an additional 2,000 homes), will completely change the city in terms of major traffic, employers, and businesses. To ignore any consideration of TDM strategies over the next 20 years is clearly deficient and must be corrected to meet the mandatory element required in the RCWs cited.</td>
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<td>(1) Existing and planned Transportation-Demand Management (TDM) strategies, such as HOV lanes, parking policies, etc.: RCW 36.70A.070(6)(a)(vi), WAC 365-196-430(2)(l)</td>
<td>(2) A Commute-Trip Reduction (CTR) Plan to achieve reductions in the proportion of single-occupant vehicle commute trips: RCW 70.94.527. [NOTE: Although the City has a “Commute Trip Reduction” section in Appendix 7 (p. 31), it does not describe a CTR Plan as called for in the RCWs, but simply lists potential elements of a typical CTR Plan.]</td>
<td>(2) The CTR Law requires employers to work with employees to reduce the number and length of drive-alone commute trips made to their worksite. The law targets worksite with 100 or more full-time employees who regularly commute during peak hours. Similar to the response regarding TDM strategies, this is not a high priority for the City at this time.</td>
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<td>(2) Regarding a needed Commute-Trip Reduction Plan, please see logic provided above under (1).</td>
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<td>(2) A Commute-Trip Reduction Plan and ordinance is required by RCW 70.94.527(1) and an option under RCW 70.94.527(2) depending on whether the 100 person-hour delay threshold is exceeded.</td>
<td>(3) The 2009 Comprehensive Plan statement: “zoning and land-use policies” was removed.</td>
<td>(3) This language seems to imply a requirement for “development pays for development” but it is not very clear about intent. The Plan contains many policies throughout the plan; land use, transportation, and capital facilities and utilities in particular that support the concept more succinctly.</td>
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<td>(3) TAT is simply asking the city to not remove language it had in its existing (2009) Comprehensive Plan. City Staff’s response appears to be defensive and not helpful.</td>
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<td>(3) Add back in the following from the the 2009 Comprehensive Plan: “Develop zoning and land use policies that promote land uses and development that are consistent with the City’s goals and visions and which require new development to adequately provide for the transportation needs of that development.”</td>
<td>[Underlying Demand-Management rationale: This is especially important since approval of the MPDs was partially predicated on the assumption of achieving an Internal Capture Rate (ICR) of 18%. Since assumed ICRs have a direct influence on the evaluation of traffic volume, trip distribution, travel times, and queue lengths, they are, possibly, one of the most important assumptions that feed the Traffic-Demand Model (TDM) and subsequent analyses. There is a concern that some Institute of Transportation Engineers (ITE) methods (the Master Developer’s Transportation Consultants used these in assessing the MPDs) for ICRs may not be applicable to large MPDs (KCDOT stated this in its testimony during the MPD Public Hearings).]</td>
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<td>• Modify Policy T-19 Concurrency: “… The most significant adopted policy of meeting concurrency standards is accomplished by the two major MPD Development Agreements that require the developer to implement any and all of the capacity adding projects in the City’s comprehensive plan to maintain the City’s level of service standards.” by adding, immediately thereafter, the following: “However, it is understood the MPD Development Agreements are exempted from both State and City concurrency laws and all ‘concurrency-related’ evaluations will be based on the MPD Traffic Monitoring Plans.”</td>
<td>The City must recognize all MPD “concurrency-related” evaluations will be based on Traffic Monitoring Plans (TMPs) and should there occur “…a disagreement between the applicant and the City about the timing of construction of a transportation project under the monitoring plan,…” (ref.: MPD Permit Condition of Approval 25), it is not clear how it will be rectified, as only the conduct “pre-phase monitoring” and “mid-phase monitoring” are included and disparities in interpretation of results of same could occur. Plus, modeling need only take into account number of new homes &amp; commercial buildings actually occupied/generating traffic. The City must recognize overall intent of the traffic monitoring should be to satisfy BDMC 18.98.010(1) to provide “needed services and facilities in an orderly, fiscally responsible manner.” From the city’s Hearing Examiner: “The City must recognize the TMPs set up detailed timing requirements for infrastructure improvements that are not linked to implementing project-level concurrency assessments. Nothing in the TMPs suggests construction of traffic infrastructure will be superseded by the concurrency findings required by the MPD Development Agreements sect. 11.1. Thus, the City must negotiate an amendment to the TMPs to clarify that GMA traffic concurrency review shall supersede any conflicting timing identified in the monitoring plan. This will ensure it meets the timing requirements of GMA traffic concurrency adopted in BDMC 19.98.080(A)(4).”</td>
<td>That would not be an accurate statement. Development Agreements (DAs) are authorized in RCW 36.70B. 170 where the state legislature finds that DAs the lack of certainty in the approval of a project is not beneficial and therefore a large project, upon government approval, may proceed in accordance with existing policies and regulations. The MPDs were not exempted from concurrency evaluations or the imposition of mitigation fees.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>TAT stands by the City Hearing Examiner’s very well researched and thought out words cited under the “TAT ACCOMPANYING COMMENTS” column herein. City Staff fails to recognize that the agreed-to Traffic Monitoring Plans (TMPs) are insufficient to meet Concurrency. A myriad number of experts (from WSDOT, KCDOT, and the City of Maple Valley, as well as many from the Public (including TAT) provided detailed testimonies to this effect during the MPD Public Hearings before both the City Hearing Examiner and City Council. The City Hearing Examiner agreed!</td>
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## TAT PROPOSED AMENDMENTS

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<td><strong>• Modify Policy T-20 Funding Sources</strong> to specifically identify stable and predictable funding sources for maintaining and preserving existing transportation facilities and services.</td>
<td>To fulfill PSRC requirements for Comprehensive Plan Transportation Elements. [Underlying rationale: Future Financial Plans to satisfy part of the MPD-needed infrastructure relies heavily on unstable &amp; unpredictable potential Grant monies.]</td>
<td>Is there such a thing as a stable and predictable funding source for transportation facilities? If there are other funding sources to include here that we have missed, please provide them. This policy addresses maintenance and preservation of existing transportation facilities and services— not new infrastructure to support development. Staff is looking into the option to establish a street utility fund. But it is premature to propose this as a strategy at this time.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The City appears to state in writing herein that it plans to ignore this PRSC requirement.</td>
</tr>
<tr>
<td><strong>• Modify Policy T-21 Alternative Level of Service</strong> by eliminating: ❖ Reduce the LOS standard for the system or portions of the system to give the City more time to fund the needed transportation improvements.</td>
<td>This statement, added from what was in the 2009 Comprehensive Plan, says pretty much what State law allows as a last-ditch option on Concurrency, but its citizens desire for their city to not reduce LOS standards to accommodate the Master Developer at the expense of its their quality of life. The City must recognize that under the State’s GMA, if the Master Developer cannot meet the city’s LOS standards, then it simply has to scale back its plans and plan for fewer homes to be built.</td>
<td>The concern seems to be around LOS standards being lowered to accommodate the Master Planned Developer. However, the DA is a contract between the City and Developer. It places the responsibility on the developer to build the needed improvements. The conditions cannot be changed without opening the contract. T-21 is written (consistent with GMA) to support the City when it is the funder of needed transportation improvements and we want to have the ability to use this flexible tool, if needed.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The city fails to realize that the GMA allows it to “deny development” if LOS standards are not met. Even though it has signed DAs with the Master Developer, each piece of the MPDs still goes through a permit approval process that entails traffic analyses, etc. In other words, when it comes to setting or meeting LOS standards the city is not required by the GMA to accommodate the Master Developer, but rather the Master Developer is required to accommodate the city!</td>
</tr>
<tr>
<td><strong>• Modify Policy T-22 Financial Impact Mitigation</strong> (fourth bullet): ❖ Requiring developers at the beginning and mid-point of each phase of the MPD project to monitor traffic generation and distribution to determine if traffic impacts of MPD development are occurring as projected.” by adding, immediately thereafter, the following: “Ensure improvements are constructed with MPD development in order to bring mitigation projects into service before the Level of Service is degraded below the City’s standards.”</td>
<td>The City must recognize it has wide discretion when it comes to MPD traffic-demand modeling and analyses leading to needed identified mitigation due to the strength of MPD Permit Condition of Approval 17 and its ten subparagraphs and its multiple sub-subparagraphs.</td>
<td>The MPD DA is vested to past policies and regulations pursuant to RCW 36.70B.170. As written, T-22 is consistent with the DA which already contemplates improvements be developed and placed into service before further degrading LOS standards. Adding proposed language won’t change the requirements under the DA.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The city fails to recognize that it indeed possesses wide discretion when it comes to identifying needed mitigation and timing.</td>
</tr>
</tbody>
</table>
### Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket

<table>
<thead>
<tr>
<th>TAT PROPOSED AMENDMENTS</th>
<th>TAT ACCOMPANYING COMMENTS</th>
<th>CITY STAFF RESPONSE</th>
<th>CITY STAFF RECOMMENDATIONS</th>
<th>TAT REBUTTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Modify Policy T-24 Intergovernmental Agency Coordination: “Coordinate planning, construction, and operations of transportation facilities and projects with other governmental agencies.” by adding, immediately thereafter, the following: “Develop a plan to avoid new or expanded facilities in rural areas.”</td>
<td>This is necessary to fulfill PSRC requirements for Comprehensive Plan Transportation Elements. A plan is necessary to ensure such Rural Area transportation facilities will not require improvements to handle the predicted increased level of traffic.</td>
<td>This seems to be a suggestion for the City to develop an intergovernmental plan with King County for rural areas. The City would not be adding new or expanded facilities in rural areas without permission from King County because that would be outside our jurisdictional boundaries. I’m just not sure what the intent is here. However, PSRC, King County and all the neighboring jurisdictions have the ability to review and proposed changes. The City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The city fails to recognize its rapid development will impact many King County roads and simply expects King County to do something about it. The city already has ignored all King County DOT testimony throughout the MPD Public Hearings. The plain intent of GMA is for the city to consider the impacts of its development on the adjacent rural road system, and to work with King County to mitigate those impacts. In fact, what “changes” is the city expecting “PSRC, King County and all the neighboring jurisdictions” to “review”?</td>
</tr>
</tbody>
</table>
### Proposed Amendments for the Black Diamond Comprehensive Plan 2019 Docket

<table>
<thead>
<tr>
<th>TAT PROPOSED AMENDMENTS</th>
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<th>CITY STAFF RECOMMENDATIONS</th>
<th>TAT REBUTTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Modify Policy T-25 Multi-modal Coordination: “Coordinate planning and operation of efficient and varied means of transportation for the City of Black Diamond’s transportation system.” by adding, immediately thereafter, identified needs for SR-169 consistent with the State Multimodal Transportation Plan (RCW 47.06.040).</td>
<td>The City recognizes its unique dependence on SR-169, as well as limitations in providing regular bus service to and from the city. This is needed to fulfill the requirements of RCW 36.70A.070 (6)(a)(iii)(F) “The transportation element shall include the following subelements:…Facilities and services needs, including:…Identification of state and local system needs to meet current and future demands. Identified needs on state-owned transportation facilities must be consistent with the statewide multimodal transportation plan required under chapter 47.06 RCW.”</td>
<td>The City has submitted Comp Plan to Washington State Dept of Commerce and Puget Sound Regional Council (PSRC) for comment.</td>
<td>Not recommended for the 2019 preliminary docket.</td>
<td>The city is stating herein that it doesn’t know what to do to meet the RCW requirements cited in the “TAT ACCOMPANYING COMMENTS” column herein and apparently is awaiting guidance from PSRC and DOC, rather than understanding and facing its own issues.</td>
</tr>
</tbody>
</table>
IN BRIEF

At times it may be necessary to amend the region’s long-range transportation plan between the regularly scheduled four-year updates. The current plan was adopted in 2018, and some changes have occurred to projects throughout the region that require an amendment to the plan. To accommodate these changes, the region has adopted procedures to allow for “minor amendments” that may be approved by the Executive Board on an ad hoc basis. A minor amendment is consistent with the plan’s air quality conformity determination, environmental analysis under the State Environmental Policy Act (SEPA), and adopted financial strategy.

PSRC released a limited call for project updates in November 2019. The results of the requested changes are described in this memo, for recommended approval by the Transportation Policy Board.

RECOMMENDED ACTION

The Transportation Policy Board should recommend the Executive Board adopt a minor amendment to the Regional Transportation Plan to reflect revisions to the Regional Capacity Project list as identified in Attachment A.

DISCUSSION

The current regional transportation plan was adopted in May 2018. While PSRC is required by federal law to review and update the plan at least every four years, it is recognized that projects in the plan evolve and change over time. Opportunities are
provided monthly for sponsors of Regional Capacity Projects\(^1\) to request a change in project status to the Transportation Policy and Executive Boards, and minor administrative updates may be made as needed as long as they are consistent with the plan’s air quality conformity finding. More substantive project revisions require either a minor or a major amendment to the plan.

A minor plan amendment will have no negative impact on the regional air quality conformity determination, will not require additional plan-level environmental review under SEPA, and will be consistent with the plan’s financial strategy. Minor plan amendments may be adopted by action of the Executive Board, and are generally scheduled on an annual basis or as needed. A major plan amendment will require additional environmental review and require action by the General Assembly; as such, they are conducted less frequently.

To reflect updated project information and current activities, PSRC provided an opportunity for sponsors to submit project revisions and status changes in November 2019. Since the next required four-year update of the plan is scheduled for adoption in 2022, the opportunity was limited to projects that needed to begin work prior to that time. Revisions could include changes in cost, scope, or completion date to projects in the existing Constrained plan; requests to move projects from the Unprogrammed portion of the plan to Constrained; or to request new project entries to the plan. As a reminder, the air quality conformity determination and the plan’s financial strategy encompass the investments in the Constrained portion of the plan; the SEPA environmental analysis encompasses the full plan, including both Constrained and Unprogrammed. In order to proceed towards implementation, projects must be included in the Constrained plan.

Attachment A describes the proposed revisions and/or new projects. All requested revisions were reviewed per the adopted Regional Transportation Plan administrative procedures. For new projects, projects requesting to be moved from Unprogrammed to Constrained, or for scope changes to existing Constrained projects, this review included the following: the project as described must be derived from a comprehensive planning process; all affected parties must be in agreement; and the project must respond to the Regional Transportation Plan Prioritization questions covering the nine adopted measures. The requested amendments were also reviewed for consistency with the plan’s adopted financial strategy and air quality conformity finding.

Changes to project costs are reflected in Attachment A, and result in a net increase to the Constrained plan of $1.8 billion. The majority of this cost differential is from three Sound Transit Link Light Rail Extension projects. From information provided by Sound Transit, higher capital costs are offset by higher projected tax revenues and available debt capacity, as well as updated operating budget processes that slow spending

\(^1\) The majority of investments contained in the transportation plan are programmatic in nature, such as preservation, maintenance, operations and local transportation investments. However, projects adding capacity to the regional system are required to be included on the Regional Capacity Projects List. Thresholds for all modes are identified to determine whether a project is programmatic or adding regional capacity; more information can be found on PSRC’s website at [https://www.psrc.org/sites/default/files/rtp-201806regionalcapacityprojectlistthresholds.pdf](https://www.psrc.org/sites/default/files/rtp-201806regionalcapacityprojectlistthresholds.pdf).
growth. Based on updated financial plan projections, the overall ST3 program is expected to remain achievable, however, as with all projects and programs, there may be risks in the future from continuing cost pressures and/or a recession scenario.

The total prioritization scores for these projects, per the adopted Prioritization Framework, were compared to the scoring framework and decision process conducted as part of the plan adoption in 2018. Past practice has been to compare project scores to the lowest quartile of all project scores, per four main project types: state routes, arterials, transit and bicycle/pedestrian. The prioritization scores for the requested projects in this amendment are all above the lowest quartile of scores for the adopted plan.

An assessment of the amendment’s potential impact to the plan’s positive finding of air quality conformity was also conducted. As a reminder, regional transportation plans are required to conform to established state air quality plans. Based on the location of the requested projects and the proposed revisions, the minor amendment to the plan will not impact the region’s positive finding of air quality conformity.

For more information, please contact Kelly McGourty at kmcgourty@psrc.org or 206-971-3601.

Attachments:
A – 2020 Proposed Project Revisions

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2 Air quality conformity must be addressed for areas designated by the U.S. Environmental Protection Agency as nonattainment or maintenance for specific pollutants. Within the Puget Sound region, there is currently a fine particulate matter (PM2.5) maintenance area and three coarse particulate matter (PM10) maintenance areas. The region is in attainment of all other criteria pollutants. The State Implementation Plan for Air Quality (SIP) provides a blueprint of how these areas will meet and maintain the National Ambient Air Quality Standards. Positive findings of conformity to the SIP are required for transportation plans and projects within these areas.
### Table 1: New Projects Submitted to the Constrained Plan

<table>
<thead>
<tr>
<th>Sponsor</th>
<th>Project Title</th>
<th>Description</th>
<th>Total Project Cost $2018</th>
<th>Completion Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Seattle</td>
<td>Thomas Street Project</td>
<td>Establish Thomas Street as the principal connection between Seattle Center, Uptown and the South Lake Union urban villages through the construction of a multi-use pathway between the north sidewalk and the vehicle travel lanes. Safety will be enhanced through the construction of a protected intersection at Dexter Ave N and a separation of the bike facility from the streetcar tracks between Westlake Ave N and Terry Ave N. The separated multi-use pathway will extend from 5th Ave N to Fairview Ave N, further connection to the Eastlake Ave N protected bike lane will be made using a combination of neighborhood greenway and protected bike lanes.</td>
<td>$21,000,000</td>
<td>2030</td>
</tr>
<tr>
<td>Tacoma</td>
<td>Historic Water Ditch Trail Phase III</td>
<td>The project will increase active transportation along S. Tacoma Way by closing a gap in the Historic Water Ditch Trail. The project will reconstruct S. Tacoma Way, construct a 10’ wide shared use path and improve sidewalks. One lane of travel will be removed to accommodate the shared use path. The project will improve ADA amenities, access to existing Pierce Transit Service, and illumination will be provided.</td>
<td>$7,965,978</td>
<td>2026</td>
</tr>
</tbody>
</table>

### Table 2: Projects Requesting to be Moved from Unprogrammed to Constrained

<table>
<thead>
<tr>
<th>Plan ID</th>
<th>Sponsor</th>
<th>Project Title</th>
<th>Description</th>
<th>Total Project Cost $2018</th>
<th>Completion Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Portion of 5678</td>
<td>Kitsap County</td>
<td>SR 104 Realignment</td>
<td>Re-align SR104 to move the inbound ferry traffic to the north couplet (NE 1st Street). The project will include sidewalks where appropriate, ferry toll booth relocation, storm water, illumination, signals, and street amenities. The project will add two inbound travel lanes on 1st Street and remove two travel lanes on Main Street, restoring Main Street to two-lane, two-way local circulation between Washington Blvd and W. Kingston</td>
<td>$9,309,000</td>
<td>2026</td>
</tr>
</tbody>
</table>
### Table 3: Requested Revisions to Existing Constrained Projects

<table>
<thead>
<tr>
<th>Plan ID</th>
<th>Sponsor</th>
<th>Project Title</th>
<th>Change to Project Scope</th>
<th>Change to Completion Year</th>
<th>Change to Total Project Cost $2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>2602</td>
<td>Pierce Transit</td>
<td>Pacific Avenue S / SR 7 Transit Center (Spanaway)</td>
<td>X</td>
<td>X</td>
<td>($16,795,000)</td>
</tr>
<tr>
<td>5686</td>
<td>Sound Transit</td>
<td>Link LRT Extension from Angle Lake to Federal Way</td>
<td></td>
<td></td>
<td>$593,852,110</td>
</tr>
<tr>
<td>2524</td>
<td>Sound Transit</td>
<td>Link LRT Extension from Redmond Technology Center Station to Downtown Redmond</td>
<td></td>
<td>X</td>
<td>$275,932,000</td>
</tr>
<tr>
<td>2520</td>
<td>Sound Transit</td>
<td>Link LRT Extension from Northgate to Lynnwood</td>
<td></td>
<td>X</td>
<td>$1,015,964,232</td>
</tr>
<tr>
<td>4410</td>
<td>WSDOT</td>
<td>I-5/Northbound Marine View Dr. to SR 529 Corridor &amp; Interchange Improvements</td>
<td>X</td>
<td>X</td>
<td>$34,948,000</td>
</tr>
<tr>
<td>4528</td>
<td>WSDOT</td>
<td>SR 520 @ 124th Ave. NE Interchange Improvements</td>
<td></td>
<td>X</td>
<td>$0</td>
</tr>
</tbody>
</table>

### Table 4: Administrative Updates

<table>
<thead>
<tr>
<th>Plan ID</th>
<th>Sponsor</th>
<th>Project Title</th>
<th>Change to Project Title</th>
<th>Change to Completion Year</th>
<th>Change to Total Project Cost $2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>5673</td>
<td>King County</td>
<td>ID# 1041 - RapidRide H Line</td>
<td>X</td>
<td>X</td>
<td>$24,905,000</td>
</tr>
<tr>
<td>5674</td>
<td>King County</td>
<td>ID# 1033 - RapidRide I Line</td>
<td>X</td>
<td>X</td>
<td>$38,504,566</td>
</tr>
<tr>
<td>5675</td>
<td>King County</td>
<td>ID# 1030: RapidRide K Line</td>
<td>X</td>
<td>X</td>
<td>($15,327,232)</td>
</tr>
<tr>
<td>Plan ID</td>
<td>Sponsor</td>
<td>Project Title</td>
<td>Change to Project Title</td>
<td>Change to Completion Year</td>
<td>Change to Total Project Cost $2018</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
<td>--------------------------------------------------------------------------------</td>
<td>-------------------------</td>
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<td>-----------------------------------</td>
</tr>
<tr>
<td>4282</td>
<td>Seattle</td>
<td>Central Waterfront Project - Alaskan Way, Promenade and Overlook Walk</td>
<td></td>
<td></td>
<td>($45,328,000)</td>
</tr>
<tr>
<td>5254</td>
<td>Seattle</td>
<td>South Lander Street Grade Separation</td>
<td></td>
<td></td>
<td>($52,450,000)</td>
</tr>
<tr>
<td>3658</td>
<td>Sound Transit</td>
<td>I-90 Two-Way Transit &amp; HOV Operations (Stage 3)</td>
<td></td>
<td></td>
<td>($13,352,112)</td>
</tr>
<tr>
<td>2527</td>
<td>Sound Transit</td>
<td>I-405 Bus Rapid Transit</td>
<td></td>
<td></td>
<td>($44,297,888)</td>
</tr>
<tr>
<td>2523</td>
<td>Sound Transit</td>
<td>Link LRT Extension from Downtown Seattle to Redmond (Overlake)</td>
<td></td>
<td></td>
<td>($24,043,480)</td>
</tr>
<tr>
<td>2492</td>
<td>Sound Transit</td>
<td>Link LRT Extension from University of Washington to Northgate</td>
<td></td>
<td></td>
<td>($10,194,480)</td>
</tr>
<tr>
<td>5359</td>
<td>Sound Transit</td>
<td>NE 145th Street and SR 522 Bus Rapid Transit</td>
<td></td>
<td></td>
<td>$18,524,140</td>
</tr>
<tr>
<td>4084</td>
<td>Sound Transit</td>
<td>Puyallup Station Improvements</td>
<td></td>
<td></td>
<td>$8,528,090</td>
</tr>
<tr>
<td>4083</td>
<td>Sound Transit</td>
<td>Sumner Station Improvements</td>
<td></td>
<td>X</td>
<td>$2,776,155</td>
</tr>
</tbody>
</table>

Total Cost Change to Constrained Plan, Tables 1-4 = $1,864,581,079
DISCUSSION ITEM

To: Transportation Policy Board  
From: Kelly McGourty, Director, Transportation Planning  
Subject: East-West Intercity Passenger Rail Study

IN BRIEF

The Washington State Legislature has directed the Joint Transportation Committee to conduct a feasibility analysis of an east-west intercity passenger rail system for Washington State. At its February 13 meeting, the Transportation Policy Board will hear a report on this study from representatives of All Aboard Washington.

DISCUSSION

The Washington State Joint Transportation Committee has been commissioned to conduct a feasibility analysis of intercity passenger rail from Seattle to Spokane along the Stampede Pass corridor. The study will include, among other things, projections of potential ridership and revenues, operational scenarios and impacts, an assessment of current infrastructure conditions, and an assessment of community support. A report is due to the state legislative transportation committees by June 30, 2020.

Consultant work on the study has begun. Representatives from All Aboard Washington, members of the Staff Workgroup for the study, will brief the board at its February 13 meeting.

For more information, contact Kelly McGourty at 206-971-3601 or kmcgourty@psrc.org.
DISCUSSION ITEM

To: Transportation Policy Board
From: Kelly McGourty, Director, Transportation Planning
Subject: I-976 Survey Results

IN BRIEF

At its November 14 meeting, the Transportation Policy Board requested additional information on how the passage of Initiative 976 may impact transportation projects funded with PSRC’s federal funds. PSRC surveyed sponsors of all current projects with PSRC funds to identify potential impacts. The board will be briefed on the results of this survey and an assessment of any potential risk to the region’s annual delivery target in February.

DISCUSSION

Initiative 976 (I-976) was approved by the voters during the November 2019 election. The initiative affects revenue collection related to various items such as motor vehicle fees and transportation benefit districts. The full impact of the initiative is as yet unknown, and current transportation projects may be affected by this uncertainty.

To understand any potential impacts to the delivery of PSRC’s federal funds, a survey was sent to sponsors of all current PSRC funded projects. Within the survey, sponsors were asked to identify if these projects were directly or indirectly impacted by I-976. If the response was yes, sponsors were asked to describe their planned approach to addressing these impacts and to indicate if the PSRC funds were at-risk of not being delivered by the required deadline.

The results of the survey indicate that only a small percentage of PSRC funded projects are expected to be impacted by I-976 and there appears to be minimal risk of an adverse impact on the region’s ability to meet the annual delivery target for Federal Highway Administration funds. It is important to note, however, that this analysis was
focused solely on the potential of I-976 to impact the delivery of PSRC’s federal funds. These projects represent a relatively modest share of total transportation expenditures by our member agencies. The impacts of I-976 are varied and there may be greater impacts to other projects and investments outside of PSRC’s funding program. In addition, while we do not have quantified data on this point, some jurisdictions may find the need to reprioritize other funding sources to maintain the priority of these federally funded projects.

The Transportation Policy Board will be provided a more detailed briefing on this topic at the February 13 meeting.

For more information, contact Ryan Thompto at 206-464-7122, or rthompto@psrc.org.
DISCUSSION ITEM

To: Transportation Policy Board
From: Kelly McGourty, Director, Transportation Planning
Subject: Regional Transportation Plan Focus Areas

IN BRIEF

At its meeting on January 9, 2020, the Transportation Policy Board was briefed on the schedule and work program for developing the next long-range regional transportation plan. This work will begin in 2020 and continue through 2022, when the plan is scheduled to be adopted. At its February meeting, the board will begin discussing key focus areas for the plan and more detail will be provided on the planned schedule for the year.

DISCUSSION

Under federal and state law, PSRC is required to develop a long-range regional transportation plan every four years. The current plan, adopted in 2018, highlights the significant investment in transportation that has occurred over the last decade while raising awareness of the remaining needs to be addressed, including maintenance and preservation and needs at the local level.

Over the next five years, the region will experience an even greater transformation with significant new high capacity transit services coming online, providing faster and more reliable travel. Other major investments will also be accomplished, such as the completion of high occupancy vehicle lanes in Pierce County. The next plan, to be adopted in 2022, will build on this foundation as the region plans for growth to 2050.

The plan will continue to address critical needs to maintain the system and improve mobility in the face of growth – in people, jobs and goods movement. But the plan will also be forward thinking, and identify new opportunities and challenges expected in the
region over the next several decades, including potential investments in rail, aviation and passenger only ferries.

In January, the board was provided a brief introduction to the schedule and work program for developing the next regional transportation plan, to be adopted in 2022. At its meeting on February 13, the board will begin discussions on key focus areas for the plan, including those emphasis areas identified in the draft VISION 2050. In addition, greater detail will be provided on the proposed schedule for 2020.

For more information please contact Kelly McGourty at 206-971-3601 or kmcgourty@psrc.org, or Gil Cerise at 206-971-3053 or gcerise@psrc.org.
INFORMATION ITEM

To: Transportation Policy Board
From: Diana Lauderbach, Chief Financial Officer
Subject: Draft Supplemental Biennial Budget and Work Program (FY2020-2021)

IN BRIEF

At its February meeting, the Transportation Policy Board will be given information on the Draft Supplemental Biennial Budget and Work Program FY2020-2021.

BACKGROUND

PSRC’s Biennial Budget and Work Program was adopted in May 2019 and covers July 1, 2019 through June 30, 2021. The Executive Board amended the budget in January 2020 to add $250,000 of carryover funds for replacement of the boardroom audio/video system.

The proposed supplemental budget would add $5,040,000 of revenues and expenditure for a total of $33,027,000, including approximately $1.1 million in increased planning fund estimates, with the remainder coming from additional carryover grants from the previous biennium. As a reminder, grants are awarded on a reimbursement basis and are earned only after completion of the work. The proposed budget also adds one new FTE as shown in the attached tables detailing the changes. A full draft budget is available online at https://www.psrc.org/about/budget.

Throughout the month of February, the draft supplemental budget information will be provided to the Executive Board, Economic Development Board, Growth Management Policy Board, Transportation Policy Board, and the Regional Staff Committee. PSRC staff will bring any comments received to the March 26th meeting of the Operations Committee. In April, the Operations Committee will be asked to recommend approval of the budget by the Executive Board and the Executive Board will recommend the budget for adoption by the General Assembly to be held May 28, 2020.
For more information, please contact Diana Lauderbach at 206-464-5416, or dlauberch@psrc.org.