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Re: Public Comments - Transportation 2040 Update for 2013

Thank you for the opportunity to comment on the subject update. The Greater Maple Valley Unincorporated Area Council (GMVUAC) is an elected local body which serves approximately 18,000 unincorporated area residents in southeast King County.

We fully support the Puget Sound Regional Council's (PSRC's) Transportation 2040 planning efforts to ensure our region stays on track to develop a sustainable transportation system and infrastructure to meet the needs of people and business for the long term.

Our comments are organized into General and Specific--by Chapter and Appendix Section.

General Comments

We applaud the PSRC for an excellent framework to provide for future growth in a sustainable manner. This will ensure a good quality of life and vibrant economy. However, we remain concerned with followthrough and consistency among planning, funding, and implementation. The objective of having funding available for needs is admirable. The movement to use-based revenue system makes sense and we support its implementation.

The objectives for a sustainable transportation infrastructure and a balanced financial plan appear sound. However, as pragmatic as the inclusion of a prioritization process is to assure alignment in the Update, this could risk being out of alignment with the objectives. To achieve both a sustainable system and balanced financials, it must be ensured both the cost of the whole system is known and plans beyond prioritization be identified to create financial balance.

With the apparent focus on the "regional" transportation system, we remain concerned sufficient planning is focussed on rural local and collector roads. For example, does the full \$173B plan include these road segments? If this is something local jurisdictions are to deal with, are there policies at either the PSRC or the GMPC level which guide/require it be addressed?

We would like to see more discussion on how to meet funding objectives, include fairness, on many rural roads principally used by urban commuters. This is a sustainability issue for King County and we expect for some of the other counties as well.

Tolling alternatives appear to be focussed on limited-access facilities, yet such alternatives could be useful on major connectors as well. We request these be added to the mix under study for tolling for the 2018 Update.

There is little discussion about transportation concurrency. This tool is extremely important in maintaining the integrity of the transportation infrastructure as the region grows, especially under revenue constraints. For example, are jurisdictions meeting concurrency requirements? How are they meeting those requirements? Are they upgrading their infrastructure, downgrading their levels of service, or denying development proposals that cause their infrastructure to fail? How is this accounted for in the Update? These all are the options available to jurisdictions through the State's Growth Management Act. We believe answers to these questions is data necessary to long-range planning. For example, if many jurisdictions are simply relaxing their standards, then there is more development than is predicted in the Transportation Needs Reports and planned infrastructure most likely would fall short, thus challenging the goals to have both a sustainable transportation infrastructure and a balanced financial plan.

The objectives are very appealing, but the Update seems to dwell on prioritized segments. This seems contradictory to the other goals. If anything, the Update should result in a holistic definition of a transportation infrastructure that includes all roads. It is not clear whether the objective would have to include all public road segments. Plus, it is not clear if the Update adequately addresses rural roads. We believe a

sustainable infrastructure plan should include funding for all transportation components.

The discussion of rural roads focuses on corridors and arterials, but doesn't adequately address local rural roads, which are the vast majority of rural public roads (at least in King County). Also, it doesn't directly address the issue of urban use of rural roads, although the overall objective is to move to a "use and impact" revenue system--a laudable goal. Consequently, the objectives and the reality, in places like King County, appear to conflict. These comments may be more appropriately addressed to King County officials, but the Update does not appear to address rural roads that are not arterials (e.g., Issaquah-Hobart Rd. is a connector between southeast King County cities and I-90).

Specific Comments

Although we reviewed the entire Update, we provide below comments only on those Chapters and Appendices that are of direct interest to our Rural Area constituency.

Chapters

3. Core Elements

- Prioritization (prioritizing plan investments to better meet VISION 2040)

The nine Prioritization Measures used to evaluate how well system improvement projects implement VISION 2040 (Air Quality; Freight; Jobs; Multimodal; Puget Sound Land & Water; Safety and System Security; Social Equity and Access to Opportunity; Support for Centers; and Travel) are good; however, we recommend adding Comprehensive Long-Term Population/Development Growth.

We are concerned King County (possibly all four counties) does not have a central database to which all cities and areas inside or outside the Urban Growth Boundary are required to report not only current actual numbers of building permits or completed residential units, but to report the projected numbers of residential units or population growth due to commercial activity that may be expected in 15 or 20 years. This appears essential for meaningful long-term planning.

Failure to capture accurate and complete data for current and long-term growth puts the entire region and the PSRC in a precarious position of developing a VISION based on faulty analyses. This issue also is applicable to Potential Core Plan Elements and Issues to be Included in 2018 Update, 1. Prioritization, - Revisiting the Prioritization Measures.

- State of Good Repair (maintaining and preserving the transportation system)

While we support policies that first address the infrastructure we have and ensuring it be maintained for safety and longevity, we are surprised to see future needs simply being extrapolated from historical data and not also good cost estimates. To that end we are encouraged to see the approach for estimating pavement preservation based on pavement condition scores and standard project costs. More such rigor is necessary to fully address our infrastructure needs.

We are encouraged by progress in the areas of Stormwater Drainage, Pavement Preservation, and Local Signal Operation and Intelligent Transportation System (ITS).

- Financial Strategy Update

The objective of having funding available for needs is admirable. The movement to use-based financial methods makes sense and we support its implementation.

The largest current sources of revenue are eroding. New sources of reliable funding rely on a transition to user-based financing. We support the integration of user fees with traditional tax financing beginning in the first decade of the plan through the implementation of toll-financed state highway projects and transitioning to a network of express toll lanes on the region's limited-access facilities by the mid-2020s. This leads to, in the final years of the plan, managing and financing the limited-access highway network as a system of fully tolled facilities.

It is important that guidance is provided with regard to the uses of toll revenues, including a commitment they be used for the purpose of improving mobility, including transit as congestion relief, through direct investment or offsetting other existing transportation taxes and fees.

It's not clear, how rural roads, other than those identified as part of the "regional transportation system", will be addressed. In King County, the overwhelming majority of use of rural connectors (e.g., Issaquah-Hobart Rd) is urban traffic. Since these roads apparently are not intended to be tolled, it's not clear how revenues for these segments will be addressed and financial sustainability assured.

4. Statutory and Ongoing Plan Elements

- Transportation Demand Management and Commute Trip Reduction Elements

We fully support both the Transportation Demand Management (TDM) and Commute Trip Reduction (CTR) programs, as each contains strategies expected to help alleviate the traffic loads on our local roads.

Encouraging people to use lower cost and higher efficiency transportation options is a strong strategy to ensure a sustainable transportation system. We support TDM activities that are both center based and corridor based and that can be coordinated across modes. Aiming towards a decrease in the number of commute trips made by people driving alone as a means to both reduce congestion/delay and conserve resources is the right strategy to ensure a sustainable system.

- Rural Transportation Study

Although PSRC consulted "local agencies and user groups," we are not aware any of the Unincorporated Area Councils (UACs) were contacted. When it comes to studying and understanding the Rural Area transportation infrastructure, the UACs possess unique knowledge and need to be at the table. We strongly recommend this be rectified in for the 2018 Update.

The funding of the Rural Town Centers and Corridors Program in 2012, with its primary purpose to support rural towns with state routes as their "Main Street," is a proactive step. Although a large majority of Rural Area workers commute to jobs inside the urban growth boundary, it must be recognized many urban commuters in northeast, east, and southeast King County commute through the Rural Area to get to their jobs inside other cities.

We strongly support that the following Rural Area issues require further study, especially as the PSRC readies for the 2018 Update: "lack of transit service; deteriorating condition of roads and bridges combined with declining tax revenues; freight traffic on local roads." These issues must be addressed to have any hope of achieving a "sustainable" transportation system in the Rural Area. We urge the PSRC to engage with rural residents when addressing these issues.

The approach of placing transit service where it has the highest usage is good business, but would harm those living in rural areas that can't afford a car and have the furthest to travel, as evidenced by PSRC's own data. Public transit has the responsibility to serve the public as a whole.

We are concerned there is misplaced attention to increased car collision data in rural areas and relating this data to transportation needs. The graph "Central Puget Sound Fatal and Serious Injury Collisions by Contributing Circumstance 2002-2009" indicates the primary reasons for collisions are: "distracted driving, speeding, impaired driving or intersection collisions." These causes are more likely to be issues of personal judgment or lack of proper education, whereas we believe more attention should be placed on clear visibility, proper signage, and road maintenance to improve safety on rural roads.

5. Supporting Information

- Project List including changes for 2013

Although the projects list has been updated, including alignment with the Federal requirement for financial constraint whereby costs and revenues should be reasonably balanced, some plans were moved from constrained to unprogrammed status. This indicates a policy that is not anticipating any new revenue sources or efficiencies. Is that an internal or external constraint placed on the Update?

-- Documentation of Analysis Results and Tools

Tables for the Regional Network Measures--Vehicle Miles Traveled, Vehicles Hours Traveled, Delay, and Average Speed--and Travel Mode Shares--Drive Alone, Shared Ride, Transit, and Non-Motorized, are both informative and useful in recognizing trends. However, we would like to see more detailed examination of the results and potential impacts. For example, how is this data used and how are impacts identified?

- Summary of MAP-21 provisions

Moving Ahead for Progress in the 21st Century (MAP-21) expands the National Highway System (NHS) to incorporate principal arterials not previously included, adding ~800 miles for a total of approximately 1,250 miles of designated NHS facilities to the central Puget Sound region. Although that is a large change, those ~800 miles are not identified.

6. Next Steps – Preparing for the 2018 Major Plan Update

- Draft scope of work – “Pre-scoping”

Of the initial list of possible issues we request the following be included:

- Monitoring/Congestion Management Process (CMP)/T2040 report
- MAP-21 performance-based planning, ITS architecture update, and Regional ITS Implementation Plan Update
- Incorporation of the latest Target Zero priorities.
- Rural Study.

- Potential core plan elements

We find the Potential Core Elements listed to be of value. We further request two of the items under 3. Financial Strategy be given particular emphasis: (1) Adding more rigor for projects entering the regional transportation plan and (2) Additional areas to explore to refine revenue estimates.

We recommend that “more rigor” include a focus on identifying current traffic conditions of surrounding areas. This would result in a more accurate reflection of the impact new projects could have on those areas.

- Other potential plan elements and issues

While we agree with the listing of potential plan elements and issues, we seek particular emphasis on the following:

1. Federal guidance – Implications of MAP-21 requirements on the 2018 Update, such as performance planning in a collaborative process with WSDOT to set targets.

3. The future transit network would be developed in close coordination with the region’s transportation operators, and make use of updated Transit Tools and models, as appropriate. This task will develop a future transit network that incorporates future land use.

Universal collaboration, not only with WSDOT, but other entities contributing to or affected by the 2018 Update and future projects, as well as projecting future land use, are critical elements in resolving the current costly and time consuming reactive mode to correct issues. Collaboration encourages proactive planning, which should lead to more timely project implementation.

Appendices

B: Projects and Programs by SMART Corridor

In the Southeast Corridor, currently, there is an inadequacy with the two-lane section (one lane each way) of SR-169 between SE 231st St in Maple Valley and SE Jones Road between Renton and Maple Valley. This section is inadequate to accommodate current traffic loads. While there are some plans to widen other sections of SR-169 south of this section, those only will exaggerate the issue and result in further bottlenecks.

The amount of development approved or in the pipeline in the entire SR-169 corridor is not adequately accounted for in the Transportation Improvement Plans (TIPs) of the cities of Black Diamond, Covington, and Maple Valley, whose residents are the primary users.

There is no meaningful sustainable SR-169 corridor plan, yet more development continues to be approved with city TIPs listing an inordinate amount of Grants (with no sources identified and precious little available) to attempt to meet Transportation Concurrency. This is a failing proposition with no clear sustainable solution even contemplated.

C: Multicounty Planning Policies

We understand this Appendix simply lists the MPPs that guided the development of Transportation 2040. However, we have a concern with those MPPs that define Growth Targets and how they permeate through the forecasting and development approval system, as they often serve as the base from which critical decisions are made that directly affect traffic loads.

F: Financial Strategy Background

This is an excellent summary of a variety of good financial strategies. The section on tolling is particularly interesting and informative going forward. The analysis suggests a move to financing through fees and use. We support this approach and recognize much still needs to be learned to ensure successful implementation.

We support a general funding scenario with the three primary elements listed:

1. Early revenue actions that support state, local, and regional investments.
2. A phasing in of new revenue sources based on use of the transportation system.
3. Guidance on use of tolling revenues.

H: Analysis Tool Documentation

We support PSRC's analysis efforts to forecast Vehicle Miles Traveled (VMT), Vehicle Hours Traveled (VHT), Time Delays, Average Speeds, and Mode Shares, as well as Macroeconomic Forecasting Models and Land-Use Spreadsheets to feed Traffic-Demand Modeling. Such modeling and analyses serve as the bases for what various land-use developments will generate in terms of traffic loads and where they will concentrate. Consequently, great attention must be given to this area and continuous improvement and refinement are musts.

It is encouraging the PSRC Traffic-Demand Models will be taking advantage of increased computer resources and capabilities to enable much finer detail (e.g., 4-fold increase in analysis zones, 3+-fold increase in network links). There are many instances where such capabilities are necessary.

The PSRC Cost-Benefit Analyses are a step in the right direction. However, the key is finding and using good data to conduct the analyses, then using the results to actually modify decision paths, which are all too often driven by politics. This area must be given increased attention.

P: Prioritization

This appendix addresses the pragmatic reality of current funding falling far short of identified transportation needs. There's no question a prioritization method is required for decision making, if for no other reason than assuring alignment with policies and objectives. We can't ignore the possibility that revenues won't be sufficient to address needs. The Update identifies a fairly large amount of "unprogrammed" needs. It should be made clear the prioritization template does not trump the objective of revenues addressing needs. The inclusion of a prioritization template should not result in jurisdictions having the option to not include underfunded segments, thus possibly losing their significance in the holistic transportation system.

Ensuring financial "sustainability" requires an understanding both near- and long-term total system costs. It appears the objectives of a sustainable transportation infrastructure, a "balanced financial plan," and the reality in places like King County are in conflict. The objectives are very appealing, but the Update dwells on prioritized segments. This seems contradictory to the other goals. If anything, the Update should use a holistic definition of a transportation infrastructure that includes all roads. A sustainable infrastructure funds all transportation components. Yet, the discussion of rural roads focuses on corridors and arterials, and doesn't adequately address local rural roads, which are the vast majority of rural public roads (at least in King County).

King County has recently adopted a "tier" priority-rating system to determine which roads would receive funding. This system essentially eliminates all tier 2-5 roads from funding unless there are safety issues. King County has assigned tier numbers to 1,482 mi of roads. Only 7% of the county roads have a service level of 1.

R: Rural Transportation Study

We emphasize again that although PSRC consulted "local agencies and user groups," the Unincorporated Area Councils (UACs) were not contacted. This is a big concern, since when it comes to understanding the Rural Area transportation infrastructure, the UACs are invaluable. This must be rectified as the 2018 Update approaches.

Also, the Stakeholder Involvement list appears to have not included cities within the Urban Growth Area. This is evidenced by the following bullet in the Update: "Staff and elected officials at King, Kitsap, Pierce, and Snohomish counties." We will assume this does include those cities.

PSRC's distinction between "contiguous UGA" and "freestanding cities and towns," causes us pause. By this distinction, what we may consider outlying cities (e.g., Black Diamond, Covington, and Maple Valley) are by PSRC's definition within the "Contiguous UGA," since they all touch and there is no Rural break. (Note the only King County "freestanding cities and towns" by PSRC's definition are: Carnation, Duvall, Enumclaw, North Bend, Skykomish, and Snoqualmie.) This distinction causes PSRC to miss a critical problem--that of many urban commuters using King County roads to crisscross the Rural Area to get to other parts of the Urban Growth Area and their places of employment. An excellent example

of this is the Issaquah-Hobart Rd which essentially serves as the only north-south connection between SE King County cities and Issaquah, Bellevue, Redmond, and Seattle.

Regarding "Roadway System – State of Good Repair," we fully agree there is a big disconnect, since much of the region's transportation system outside the contiguous urban growth boundary is managed and maintained by the counties. In King County, the available funding has declined precipitously resulting in much less revenue. This has resulted in many roads outside the contiguous urban growth boundary being in poor or failing condition. This is unsustainable and must be addressed to maintain any integrity of our Rural transportation infrastructure going forward.

S: State of Good Repair

As stated earlier, we support maintaining the safety and long-term integrity of infrastructure already in place. However, we would like to see better techniques to measure and predict state-of-good-repair projects.

T: Transportation Demand Management Action Plan

The Transportation Demand Management (TDM) Action Plan provides a good overall strategy, but is focussed on the region's major transportation corridors. As such, we see few opportunities here that might help our Rural Area constituents. Taking a global perspective should some or all of the TDM strategies outlined here be successfully implemented, they can only help reduce the traffic loads on our local roads and, thus, reduce the need to seek funds which are in short supply.

We respectfully request the PSRC take our comments, herein, into consideration as it deliberates the subject Update. Thank you.

Sincerely,

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