January 31, 2018

To: Kelly McGourty, Senior Program Manager, Transportation Planning, PSRC: kmcgourty@psrc.org

Re: PUBLIC COMMENTS—DRAFT Regional Transportation Plan (Transportation 2040 Update)

Ms. McGourty,

Please accept our set of detailed Public Comments on the PSRC's DRAFT *Regional Transportation Plan* (*Plan*) from King County's four Rural Area Unincorporated Area Councils (UACs): the Greater Maple Valley UAC (GMVUAC), Four Creeks UAC (FCUAC), Upper Bear Creek UAC (UBCUAC), and Green Valley/Lake Holm Association (GV/LHA). We represent and advocate with King County, the PSRC, WA State officials, and other organizations for the interests of approximately 125,000 people who live in the King County Rural Area, which covers the vast majority of the county's acreage.

We see the *Plan* as a detailed assessment of regional transportation issues and framework moving forward to address existing and future challenges. That is why we have prepare a comprehensive set of Public Comments herein for you to consider.

The PSRC charter provides a great opportunity to bring together State and City governments, UACs, private groups, and individual citizens within a four-county area. In this regional role, we believe the PSRC is in a unique position to effectively break down organizational *"silos"* to achieve lasting regional solutions. Only the PSRC has this type of flexibility and scope of regional planning responsibilities.

We wish to continue an open dialogue with the PSRC on the *Plan*, its pertinence to Rural Area issues, and its implementation, as we have been doing for some time on PSRC's VISION 2040 and Transportation 2040. Thank you for your consideration of our comments.

Susan Harvey (susandharvey@hotmail.com)
Chair, Joint Transportation Initiative
Greater Maple Valley Unincorporated Area Council (GMVUAC)

Steve Hiester
gmvac_chair@hotmail.com
Chair
Greater Maple Valley UAC

Peter Eberle
mtcphe@msn.com
Chair
Four Creeks UAC

Nancy Stafford
nancy@go2email.net
Chair
Upper Bear Creek UAC

Gwyn Vukich
gvukich@msn.com
Chair
Green Valley/Lake Holm Association

cc: Josh Brown, Executive Director, PSRC: jbrown@psrc.org
King County Council: rod.dembowski@kingcounty.gov, Larry.Gossett@kingcounty.gov, kathy.lambert@kingcounty.gov, jeanne.kohl-welles@kingcounty.gov, Dave.Upthegrove@kingcounty.gov, claudia.balducci@kingcounty.gov, Pete.vonReichbauer@kingcounty.gov, joe.mcdermott@kingcounty.gov, reagan.dunn@kingcounty.gov
Harold Taniguchi, Director, King County Dept. of Transportation: harold.taniguchi@kingcounty.gov
Brenda Bauer, Director, Roads Division, King County DOT: brenda.bauer@kingcounty.gov
Alan Painter, Manager, King County Community Service Areas: alan.painter@kingcounty.gov
Ivan Miller, Comprehensive Planning Mgr., King County: ivan.miller@kingcounty.gov

GREATER MAPLE VALLEY
UNINCORPORATED AREA COUNCIL
working to keep the Rural Area rural

Four Creeks
Unincorporated Area Council

Public Comment

PSRC Regional Transportation Plan— Update to Transportation 2040

January 31, 2018

Presented to

Kelly McGourty
Senior Program Manager
Transportation Planning
Puget Sound Regional Council

Public Comment

CONTENTS

(page numbers below are hyperlinked to the text)

Public Comment

Introduction to Comments

Herein are our detailed Public Comments on the PSRC's DRAFT *Regional Transportation Plan* (*Plan*). Our review covered the entire *Plan* and Appendices. We have included *excerpts* (with key aspects underlined) from the *Plan* followed by our detailed COMMENTS—labeled as such and given in purple.

While our Comments herein address State, Regional, County, and Local issues, we look at things from our Rural Area lens. From that perspective, we believe two major items must be addressed to ensure a sustainable transportation system, while meeting the Growth Management Act (GMA) vision to continue to preserve rural lands and rural character (*"Keep the Rural Area Rural"*):

(1) Develop methodology to promote *"regional transportation concurrency"*—we have provided some detailed background as part of our comments on **Land-Use Forecasting** in **Appendix R — Analysis Tool Documentation**, and

(2) Find *"equitable funding mechanisms"* to maintain rural transportation infrastructure increasingly being used by urban commuters traveling between cities, from homes in one location and work opportunities in others. We address*"equitable funding mechanisms"* throughout our comments herein

We note the lack of an Appendix on *Rural Transportation*, as was the case in the 2014 Transportation 2040 Update's *Appendix R—Rural Transportation Study*. At that time it was stated:

> *"The issues and opportunities outlined in the rural transportation study are intended to serve as the starting point for potential future efforts to address rural transportation issues in the central Puget Sound region. The next major update for the region's long-range transportation plan will be in 2018. As the scope of that process is developed, the issues and opportunities outlined in the rural transportation study, as well as the geographic study area, may be considered for possible further examination."*

The issues (our emphases are underlined below) identified in *Appendix R* of that 2014 Transportation 2040 Update have only grown worse:

Demographics:
- 18% of regional population lives outside contiguous UGA--4% in cities outside contiguous UGA and 14% in Rural Area.
- Almost 80% of workers outside the contiguous UGA have jobs in the contiguous UGA.
- Commuters travel twice as far as those in the contiguous UGA - average commute of 22 miles vs 11 miles.
- Higher reliance on driving alone, less use of transit or other alternatives.

Infrastructure:
- Rural Transportation Study Area - 1,500 lane miles (12% of region).
- Contiguous UGA - 11,306 lane miles.
- 6% of the region's park and ride capacity.
- 16% of the region's registered vanpools.
- All counties have fixed service routes – Less than 1% of all transit boardings are in the rural area.

Our detailed comments on the PSRC's DRAFT *Plan* follow below by section and subsection in the main body and by Appendix in the Appendices.

Public Comment

RTP EXECUTIVE SUMMARY

(p. 9)
But the region can do more. With a large portion of highway and regional transit investments in the Regional Transportation Plan funded and under construction, it's a good time to reassess what's next. Some actions will take more time, but the groundwork can be laid today. Short term actions can make a real difference:

- **Accelerate local roadway and transit improvements.** Local roadways and transit are critical for providing access and successfully achieving local growth and economic development plans. While the region has made progress in funding statewide and regional transportation packages, the plan recognizes the need for new funding approaches — both short- and long-term — to fund and deliver important local investments.

COMMENT: King County has one of the largest deficits between available funds and funds necessary for filling infrastructure needs of its extensive road network and large number of bridges. New funding formulae and/or new funding sources are required, as much of the heavy use of the King County road network is by urban commuters whose gas taxes pay only a small fraction of maintenance costs, while Rural Area residents' property taxes cover an inordinate proportion.

- **Ensure transit systems continue to work together.** As mass transit comes on line, the region's transit vision ensures that all transit investments and services are integrated into one, easy-to-use network that makes regional and local destinations convenient to get to, and best serves the public.

COMMENT: If there continue to be bus routes, such as along SR-169, which provide no advantage to the commuter due to either no HOV lanes or no special access/lanes, then we believe transit use will suffer and congestion will continue to build.

Get ahead on key issues. The plan lays the groundwork for structural changes to our transportation system to better protect the environment, prepare for potentially disruptive technology, and transition to a new way to pay for our transportation system.

(p. 11)

- **Finance transportation investments.** … While relying on traditional funding sources in the early years of the plan, over time the region will transition to a new funding structure based on user fees. These could include tolled express lanes, facility and bridge tolls, and road usage charges to replace the gas tax and further fund and manage the transportation system.

COMMENT: New sources must be fair and equitable and reflect true costs to society.

In general, a combination of revenue sources, primarily from unincorporated area residents, is used to fund/maintain King County road infrastructure. King County primarily relies on property taxes (over one-third of the revenues dedicated to County roads) and, to a lesser extent, on gas taxes (state motor vehicle fuel tax is shared among cities, counties, and WSDOT.

To compound the problem, Rural Area taxpayers tend to subsidize (through their property taxes) urban drivers who use King County roads. Such urban users comprise the majority of vehicle miles driven on major King County roads connecting urban areas (e.g., Issaquah-Hobart Rd between the cities of Maple Valley and Issaquah). By not focusing on the actual *"users,"* a funding/usage imbalance is created and perpetuated. The DRAFT *Plan* addresses this, in part, by exploring *"user fees."* However, such fees also must be used on the infrastructure where they are generated for the problems to be truly addressed.

Such user fees will need to be shown to be both more equitable and reduce the need for higher gas and property taxes. This will entail strong public outreach to gain support. Continued guidance is required from the state and regional levels to help solve our transportation problems.

Public Comment

It is desired the imbalance between funding (payers) and usage (users) of King County road services be reduced or eliminated through market-based solutions. More sustainable funding models (perhaps even including changes to state laws regarding taxing authority) must be developed and implemented for King County road services, especially for maintenance of *existing* roads that are serving as regional traffic corridors. More equitable funding of Rural Area roads should be established so those roads, which regularly serve King County's urban residents and/or businesses, support the efficient and timely movement of people and goods. We see several potential solution paths for discussion:

(1) In the short term, State laws (listed below) could be reviewed for opportunities to enable a more transportation-sustainable allocation of gas tax monies and provide more flexibility in revenues used'

(2) Mechanisms, along with incentives, for cities to share revenues with Counties, possibly tied to growth that occurs in the absence of job opportunities;

(3) Establish County road networks/connectors between population centers and work centers, which know no jurisdictional boundaries (similar to State roads), funded by all King County taxpayers; and

(4) In the long term, the Puget Sound region could move towards the DRAFT *Plan's* user-pays model by providing authority for usage charges, such as tolling key roads, etc., along with methods to implement such strategies.

The following RCWs and WACs should be explored to provide such opportunities:

RCW 36--COUNTIES / 36.78 RCW--ROADS AND BRIDGES—COUNTY ROAD ADMINISTRATION BOARD (CRAB) [http://www.crab.wa.gov]
RCW 46--MOTOR VEHICLES / 46.68--DISPOSITION OF REVENUE
46.68.120--Distribution of amount allocated to counties -- Generally;
46.68.122--Distribution of amount to counties--Factors of distribution formula;
46.68.124--Distribution of amount to counties—Population, road cost, money need, computed—Allocation percentage adjustment.
RCW 84--PROPERTY TAXES / 84.52--LEVY OF TAXES
84.52.043--Limitations upon regular property tax levies. *(Eff. until 1/1/18)*

WAC 458--REVENUE, DEPARTMENT OF
WAC 365-196-430--TRANSPORTATION ELEMENT.

RTP PLAN DOCUMENT

CHAPTER 1 — Toward a Sustainable Transportation System

Supporting the Regional Economic Strategy
(p. 13)

> Developing a robust transportation system to accommodate recent growth and support future growth is a key objective in the regional economic strategy.…In addition, the strategy supports transportation investments in smaller cities and rural areas that are in line with their growth expectations, while connecting residents and visitors safely to the region's recreational and economic opportunities.

COMMENT: A good deal of these *"investments"* are in *"smaller cities,"* not the *"rural areas."* It is important to understand the differences among the Rural Area, Rural Cities, and Rural Towns—per the King County Comprehensive Plan.

"Rural Towns are unincorporated towns governed directly by the County. The purposes of the Rural Town designation are to recognize existing concentrations of higher density and economic activity in the Rural Area.…" Currently, there are three *"Rural Towns"*: Fall City, Snoqualmie Pass, and the Town of Vashon.

Rural Cities are incorporated and, thus, not governed by King County. They are: Black Diamond, Carnation, Duvall, Enumclaw, North Bend, Skykomish, and Snoqualmie. These smaller cities can be viewed as those that are surrounded by or embedded in the Rural Area:

> *"King County's Rural Area, including communities such as the Hobart Plateau, Vashon-Maury Island, the Snoqualmie Valley, and the Enumclaw Plateau, are characterized by low-density residential development, farms, ranches, forests, watersheds crucial for both fisheries and flood hazard management, mining areas, small cities and towns, historic sites and buildings, archaeological sites, and regionally important recreation areas.…"* (Ref.: *King County Comprehensive Plan: Chap. 3—Rural Areas and Natural Resources Lands, Sec. 3. Rural Area and Communities, p. 3-3; updated December 4, 2017*)

Consequently, the pace in the Rural Area is quite different from that in both *"Rural Cities"* and *"Rural Towns."* As such, there are unique safety impacts on Rural Area roads caused primarily by urban commuters and recreationalists. Urban commuters traverse many King County roads during AM and PM peak-hour travel time periods. This is a major issue we discuss many times in our Comments herein.

Urban recreationalists routinely impact a variety of Rural Area locations, such as, Tiger Mountain, Flaming Geyser, Spring Lake/Lake Desire Park Equestrian Trails, 140th Pl NE/148th Ave NE (wine country), etc. These areas experience heavy and/or speeding traffic, poor signage, lack of parking and what can only be called *"silo disfunction"*—the inability to get things done when having to deal with multiple agencies, such as KCDOT, WSDOT, etc. By not assuring the Rural Area is given priority and adequate funding, locals are left to fend for themselves. Unfortunately, King County does not help to alleviate the pressures on its Rural Area residents living in proximity to these recreational sites.

Supporting a Sustainable Environment

Air Quality and Climate Change

IMPROVE WATER QUALITY
(pp. 21-22)
The Regional Transportation Plan recommends that mitigation of transportation-related impacts to water quality can be accomplished in a number of ways:

Public Comment

- **Upgrading infrastructure.** Many existing facilities lack modern systems for water quantity or quality management. As projects replace, improve, or extend existing facilities, an opportunity exists to improve their environmental performance compared to today. For example, culverts and other drainage facilities associated with transportation infrastructure can be designed and operated to facilitate fish passage. The Regional Transportation Plan supports the opportunity for the region to create innovative, low-impact, environmentally friendly transportation infrastructure.

COMMENT: Funding will need to be planned for and secured to ensure such projects reach the smaller parts of the region's transportation infrastructure, specifically King County rural roads, where the *first line of defense* exists. Not all projects need to be *"hard"* solutions. In fact, *"soft"* solutions, such as vegetation, rain gardens, wetland areas, etc., often are longer lasting, less expensive, and more aesthetically appealing.

CHAPTER 2 — Plan Investments

Maintenance, Preservation, and Operations
(p. 26)
The region commits as a top priority to fully funding the maintenance, preservation, and operation of existing infrastructure in a safe and usable state. Maintenance, preservation, and operations programs represent approximately 54 percent of the plan's total costs, and preservation and maintenance needs on all facilities are included as part of the plan's financial strategy.
COMMENT: We believe PSRC is in a unique position to provide strong leadership with the State Legislature to help alleviate County infrastructure funding shortfalls. Given King County DOT's severe funding shortfalls, it is not in a position to meet its infrastructure maintenance needs in unincorporated areas. Although the DRAFT *Plan* describes potential new revenues sources, it does not propose changes in current policy, funding allocations, or gas tax allocation formulae.

CHAPTER 3 — A Sustainable Financial Framework

Growth and Transportation Funding
(pp. 64-65)
Nearly all existing transportation revenues are restricted to specific uses, by source, by expenditure, or by geography. Transportation infrastructure costs have been on the rise over the last few decades because of increases in material and labor costs, the costs of mitigating environmental impacts, and increased urban land values. Insufficient public resources have led to an increase in the unfunded backlog of maintenance projects, which ultimately results in higher costs in the future, and are often compounded by increasing safety and mobility concerns. Meanwhile, existing transportation revenues are not keeping pace with travel demand and the infrastructure investments needed to support this growing demand.
COMMENT: Again, the budget for King County's unincorporated area roads and bridges is totally unsustainable (due to an inequitable allocation of fuel tax monies and further annexations of urban unincorporated areas along with its accompanying property tax revenues) and has forced KCDOT to develop a "tiered" system for its infrastructure, where the lowest tiers are expected to *"turn to gravel"* over time as insufficient maintenance and preservation monies are devoted to the higher tiers. This directly causes safety concerns due to lack of maintenance even before the roads "turn to gravel," e.g., snow removal/deicing, repairing flooding damage.

Public Comment

Reliance on the fuel tax will likely come to an end within the next few decades. Changes in vehicle technology, increasing capital costs, and inflation continue to compromise the purchasing power of fuel tax proceeds. This path is unsustainable and new sources of reliable funding must be developed and phased in over time. Federal and state policy makers are encouraging new approaches. User-fee technology is available to allow a transition to another form of direct charging for road use, but many policy and program design issues remain unaddressed. A major piece of future work must involve a comprehensive design of a structural replacement for fuel taxes.
COMMENT: While it is clear the current fuel tax is unsustainable, a simple user fee is unfair unless combined with parameters that account for a vehicle's weight (wear and tear on the infrastructure), mileage (impacts on the environment), etc. Further, as Federal monies are becoming an increasingly unreliable source, the problems are compounded.

A General Funding Scenario
(pp. 70-73)
The following guidance will be used as the region moves into a new approach for financing transportation:

- There should be a nexus between new taxes, fees, tolls, and other user fees, and the uses to which the revenues are allocated. The revenue instruments should relate in some manner to the benefits the users receive and/or the costs that these users impose on the system and other users.

COMMENT: We support tying *"revenue instruments"* to both *"benefits"* received and *"costs"* imposed (i.e., impacts that result in the need for monies to resolve the new impacts). In fact, this has been a major concern of Rural Area residents, who routinely pay more for King County road maintenance thorough their property taxes than do the majority of the users of this roads. Unfortunately, gas tax allocation formulae have exacerbated this problem.

Such a new revenue "general scenario" will require legislative action across a broad range of governments, including cities, counties, the state, and the federal government. The general funding scenario has three primary elements: (1) early revenue actions that support state, local, and regional investments, (2) a phasing in of new revenue sources that are based on the use of the transportation system, and (3) guidance on the use of tolling revenues.

1. Early Action to Support State, Local, and Regional Investments
Cities and counties can take action to increase transportation-related taxes and for new local options for transportation funding. Local jurisdictions should utilize all currently available revenue authority, including vehicle license fees, road and property tax levy adjustments, impact and development fees, increasing taxes on parking, and more coordinated parking pricing.
COMMENT: King County has limited options to do this within the Rural Area where the tax base is completely insufficient without imposing fees on the vast majority of users—urban residents commuting between cities. However, State law does not allow such reallocation of revenues. We believe PSRC can help lobby the State for such needed changes.

2. The Phasing in of Tolls and Other User Fees
COMMENT: The question is how can this be accomplished on the smaller King County roads such as the Issaquah-Hobart Rd which is subject to both AM and PM 3+-hr peak-hour congestion. Other examples include Green Valley Rd, Auburn-Black Diamond Rd, May Valley Rd, Avondale Rd, Novelty Rd, etc. Many of these directly feed State Routes and, as such, suffer from large traffic volumes.

3. Guidance on the Distribution of User Fees
Implementation of additional user fees must come with a strong commitment to dedicate revenues to the purpose of improving mobility, in the form of direct investments in transportation systems, or off-

setting other existing transportation taxes and fees. Beyond this basic commitment, there are likely to be other specific constraints that get placed on the use of revenues from new user fees.
COMMENT: We strongly support this commitment.

Possibilities include at least the following:

- Limit the use of revenues to the corridor, or geography, from which the revenues are generated.

COMMENT: This is critical to making King County unincorporated area road revenues sustainable. Should *"user fees"* be implemented, they must include a mechanism to allocate collected revenues—based on road miles driven—to those roads themselves. This will require collection methods and software to do such an allocation. This is not something the current fuel tax can do and thus, is one of its many flaws, although not one articulated by government officials except for KCDOT.

- Remit some, or all, revenues to users of the transportation system through a reduction in, or elimination of, other transportation related taxes and fees.

COMMENT: While we support remitting *"some"* revenues, one cannot remit *"all"* revenues back to users to *"eliminate…other transportation related taxes and fees."* If done, there would be no money generated whatsoever for maintaining our transportation infrastructure. In actuality, such *"user fees"* would replace some of the existing revenue sources.

Figure 18 displays the general strategy for new transportation revenue that reflects the above assumptions and guidance. It should be noted that this is a general representation of a very large number of individual revenue actions that will be required to implement the plan. The timing and exact nature of each action can only be defined in strategic terms given the inherent uncertainty involved.
COMMENT: In Figure 18 new *"user fees"* less the *"fuel tax rollback"* amount to less than 45% of all *"new"* revenues. This appears to be a missed opportunity.

CHAPTER 4 — Performance-Based Planning — Measuring What Matters

How Does the System Perform with the Plan?
The Plan Provides Transportation Choices
(p. 80)

The Regional Transportation Plan improves the choices that people have for transportation, as seen in the forecast growth for annual transit boardings. In 2016, approximately 215 million annual boardings occurred on the regional system; by 2040, that number is forecast to increase to almost 510 million boardings (all transit), at an average annual growth rate of 3.6 percent. Other choices that are improved with the plan include biking and walking, which increase by 48 percent to over 510,000 people who walk or bike daily as a form of transportation.
COMMENT: The King County Rural Area grossly lacks transportation choices. No trains and little bus service. And, what little bus service exists, must use congested routes with no HOV (or transit-dedicated) lanes and multiple bus changes in order to arrive at destination, thus providing little to no benefit to users. This also is the case for the nearby cities in spite of what *Figure 22* (p. 81) shows for *"2040."*

(p. 83)

Figure 25 — Regional Transportation Plan Investments and Revenues by Program.
COMMENT: Both the Counties and the Cities show shortfalls in *"current law revenues"* to cover their *"maintenance and preservation"* needs. Yet, at least for the cities, almost all *"new revenue"* is planned to cover

"system improvements." Another concern is the four-county numbers appear too low to cover the identified needs.

CHAPTER 5 — Plan Implementation

Implementation Actions
(pp. 86-87)

Maintenance and Preservation — See Appendix M

- Explore a potential Regional Asset Management Planning Program aimed at better articulating need and making more informed investments.

COMMENT: We see maintenance and preservation as the paramount duty of departments of transportation. The concept of a Regional Asset Management Planning Program appears to be worthwhile exploring. Appendix M states such a program would establish more complete inventories of roadways, bridges, bicycle/pedestrian facilities by using regional guidelines. Should this clearly show current and future maintenance/preservation needs, as well as more informed investments at all levels, then this indeed should be explored; however, using such a top-down and regional approach should not lose sight of dire local needs.

Transit

- Study further opportunities for expanding high-capacity transit throughout the region.

COMMENT: The Rural Area has a dearth of transit opportunities and possesses corridors which lack HOV lanes to facilitate such transit.

Financial Strategy — See Appendix P

- Support efforts to educate the public and the state Legislature on issues related to transportation funding, and the need to transition to a user-fee approach for sustainable long-term funding.
- Collaborate with regional stakeholders and work with the state Legislature to authorize and implement user fees such as road usage charges.

COMMENT: Again, should *"user fees"* be implemented, they must include a mechanism to allocate, *where* revenues—based on road miles driven—are generated, to those roads themselves.

Public Comment

RTP APPENDICES

Appendix M — Maintenance, Preservation and Operations

COMMENT: The *Plan's* high-priority commitment to maintenance and preservation of our existing infrastructure is well warranted and something we support. The $100+B estimate for such work, though staggering, is critical to fund and implement over the life of the *Plan*. The KCDOT road and bridge maintenance and repair backlog is immense and very underfunded. This must be fixed.

Appendix P — Financial Strategy Background

COMMENT: The DRAFT *Plan* seeks a long-term vision where *"revenues (are) generated from those who benefit from the investments."* This concept is critical to aiding Counties whose roads are increasingly used by urban commuters traversing from city to city, yet, due to funding constraints such as exacerbated by vagaries in the the gas tax allocation, do not pay their fair share for use of those roads.

The data in *Figure 3—Transportation Revenues in the Central Puget Sound Region 1995-2014* show revenues generated by counties have barely resulted in a *net* change over the 20-yr period. This has caused a tremendous backlog in meeting maintenance and preservation needs.

We question the validity of most of the assumptions in the Current Law Revenue Forecast, especially those for the counties (e.g., property tax levy renewals and high general fund transfers).

Estimating Current Law Revenues

(p. 14)

Cities & Counties. In addition to state distributions of fuel tax revenue, cities and counties support transportation investments from a variety of funding sources, such as property tax levies, development impact fees, local option taxes and fees, state grants, federal contributions and general fund transfers. The state Legislature has authorized several local option taxes that have, in many instances, proved difficult to implement. At the same time, some tax-limiting initiatives and competing demands for general fund dollars have made local commitments to transportation a challenge to sustain. As dedicated local transportation revenues have dwindled, cities and counties have demonstrated their commitment to funding transportation programs and projects through increasing contributions from general funds, sometimes at the expense of other important local needs.

To reflect the unsustainable nature of increasing general fund transfers as local dedicated transportation revenues decrease, the percentage of these transfers has been held at current levels through 2040. Beyond the issues influencing dedicated local transportation revenue decisions, recent increases in the state fuel tax have been disproportionately allocated to state investment needs. This has meant that cities and counties have been receiving a declining share of statewide receipts over time.

COMMENT: This captures the growing dilemma facing King County and shows that something has to change by initiating new systems of funding, as we have enumerated several times herein. In fact, *Figure 5: County Current Law Revenue Forecast*, shows a nearly 50% reliance on property taxes to fund transportation needs. This has forced KCDOT to institute a Tiered Road System which projects lower tier roads (e.g., Tiers 4 and 5) to *"turn to gravel"* over time as insufficient maintenance and preservation monies are devoted to the higher tiers. Again, the budget for King County's unincorporated area roads and bridges is totally unsustainable (due to an inequitable allocation of fuel tax monies and further annexations of urban unincorporated areas along with loss of their accompanying property tax revenues).

New Revenue Assumptions by Program

New Revenues for Cities & Counties

(p. 19)

The primary issue currently facing cities and counties is the availability of revenue tools that are adequate to address pressing maintenance, preservation, and local system improvement needs. Currently available tools do not generate sufficient revenues to have a meaningful impact on this large and growing problem. The Regional Transportation Plan includes recommendations that local jurisdictions maximize existing authority and implement an array of new tools in the near-term to generate additional revenues that will help local jurisdictions meet these challenges.

COMMENT: This explains the dilemma that has faced King County for several years and has only gotten progressively worse with time. Clearly, some form of *"User Fees"* are necessary on King County roads to capture their use by urban commuters traversing from city to city. However, there is no explanation on the details of implementation (e.g., How? Where? Who?).

Table 6: Summary of New Revenues Sources for Cities & Counties

(p. 20)

COMMENT: Table 6 appears to show there are no near-term (i.e., over the next 7 years) fixes. Further, approximately 2/3 of the potential revenue through 2025 is assumed to come from an equally new Carbon Tax and an increased MVET. Clearly, without either there will be major problems both for cities and counties, which already possess the largest revenue shortfalls just to meet their basic maintenance and preservation needs. In the subsequent years through 2040 approximately 1/2 the potential revenue is assumed to come from User Fees (presumably Tolls, VMTs, etc.), which certainly could prove to be big political lifts in the State Legislature.

Financial Strategy Action Plan

Early Action to Support Local and State Investments

(p. 25)

Within the first seven years of the plan it will be necessary to identify additional transportation revenues that can address near-term requirements across a broad array of transportation programs. Cities and counties need additional transportation revenue to address rapidly expanding maintenance and preservation needs as well as to invest in system improvements necessary to support anticipated growth. The Regional Transportation Plan calls for jurisdictions to fully implement currently available revenue authority (including transportation benefit districts and other currently authorized sources) as well as coordinated state and local actions to authorize and implement new revenue tools. New sources could include addressing the current annual limitation on property tax increases, the implementation of a carbon tax on fuel purchases, new license and registration fees, development impact fees, or the implementation of a new street utility tax system. To implement these, and other new revenues proposed in the plan, cities and counties will need to work with each other and the state Legislature to clearly articulate needs and the most appropriate tools and strategies to address them.

COMMENT: This appears to state that cities and counties are on their own in lobbying the State Legislature to obtain *"new sources"* of revenue as identified in the earlier tables. This does not appear to be a plan for success. In fact, we believe the PSRC should present the entire *Plan* to the State Legislature, so that early revenue sources can be identified and secured as soon as practical. In addition, nothing requires a city to take into consideration the impact of its transportation needs on its neighbors—both city and rural surroundings. Neighboring cities call this *"pass-through traffic,"* so do we in the neighboring Rural Area, the difference being that we pay more than urban users, through our property taxes, to maintain King County's unincorporated Area roads. This clearly needs to change.

Public Comment

The Phasing in of Tolls and Other User Fees

(p. 26)

Eventually, in later phase of the plan the intent is to manage and finance the roadway network through the implementation of a road usage (VMT) charge. There is a natural skepticism about how this might work, and how individuals might be affected by such an approach to user-financing. In 2018, the Road Usage Charge Taskforce will implement a pilot project to test a range of deployment approaches, user acceptance, and impacts of driver behavior. These results will directly inform road usage charge program implementation in the future.

COMMENT: While this addresses *existing* tolls on major thoroughfares, it is no direct help to cities and counties moving forward. The phasing in of any VMT charges looks many years away and, thus, will provide no immediate help. While we understand this is a long-term plan (i.e., 22 years from 2018 to 2040), more or less casting off the first 8 years (i.e., to 2026) of the DRAFT *Plan* provides a weak base from which to satisfactorily meet overall DRAFT *Plan* goals. Efforts to expedite this timetable should be addressed.

Guidance on the Use of User Fees

(p. 27)

The Regional Transportation Plan advances the notion that the implementation of user fees, ranging from express toll lanes to road usage charges, must come with a strong commitment to dedicate revenues generated from these programs to the purpose of improving mobility. This can come in the form of direct investment in the transportation system or possibly offsetting other existing transportation taxes and fees. Beyond this basic commitment, there are likely to be other specific constraints that get placed on the use of revenues from road pricing. Possibilities include at least the following:

- Limit the use of revenues to the corridor, or geography from which the revenues are generated
- Constrain revenues to only road investments
- Allow revenues to be used to support transit or other high occupancy vehicle services
- Remit some, or all, revenues to users of the transportation system through a reduction in, or elimination of, other transportation related taxes and fees

All of the above uses of revenues provide direct benefit to some of the users of the transportation system. Some approaches are more supportive of the fee payers themselves; others provide additional incentives for people to modify their travel behavior away from driving alone. A major conclusion, however, is that how revenues do get used has a profound effect upon most of the important dimensions of policy related to user fees.

COMMENT: Again, we support "*(l)imit(ing) the use of revenues to the corridor … from which the revenues are generated.*" However, the term *"geography"* must be clearly defined. Does it mean *"sub-region,"* e.g., southeast King County?

Table 15: Summary of the Financial Strategy Implementation Plan

(p. 28)

COMMENT: King County has tried vainly for years to *"(w)ork with the state Legislature … on financial issues facing local jurisdictions, and the need for additional dedicated resources to support maintenance and preservation programs …."* This has proved to be a dead-end. A coordinated regional effort is needed to move forward. It also has been unsuccessful in arguing for an *"increase local share of statewide revenues."*

Appendix R — Analysis Tool Documentation

COMMENT: There needs to be much more information included, such as peer-reviewed citations, on the Key Assumptions and Models in all four areas explored in this Appendix: Regional Macroeconomic

Forecast, Land Use Forecast, Travel Demand Analysis, and Air Quality / Climate Change Analysis. Links to datasets, models, results, etc. should be provided.

Land Use Forecast – Land Use Vision (LUV) Dataset Purpose

(p. 3):

Key Assumptions

The technical and policy assumptions underlying the LUV dataset were established to ensure federal air quality conformity analysis requirements regarding use of "latest available planning assumptions" were met. The key assumptions are as follows:

- The LUV dataset is consistent with the region's most current long-range regional forecast of households, population and employment from the 2015 Regional Macroeconomic Forecast
- The LUV dataset reflects the regional long-range strategic growth assumptions as detailed by VISION 2040 Regional Growth Strategy
- The LUV dataset is reflective of locally adopted growth targets and comprehensive plans developed to begin implementing the VISION 2040 Regional Growth Strategy

COMMENT: A key concern here is that some cities have exceeded their Growth Targets. How are these instances reflected in the Land-Use Vision datasets? Jurisdictional development should not greatly exceed growth targets. The highest priority of a jurisdiction should be to minimize its impacts on other jurisdictions' (Cities and Rural Areas) infrastructure by creating internal job opportunities at least equal to the growth being permitted. Funding for infrastructure improvements must be highly prioritized in jurisdictional 6-yr Capital Improvement Plans (CIPs) with *guaranteed* revenue sources clearly identified. A regional perspective must be ensured whereby intercity needs and uses are addressed and accommodated by accurately describing impacts to all elements of the transportation network regardless of jurisdiction.

Clearly, there is a need to develop methodology to promote *"regional transportation concurrency."* As part of the GMA, State law requires transportation concurrency, to insure Level of Service (LOS) commitments are met within a reasonable time (6 yr) to respond to transportation service impacts from development. There are concerns this amount of time is too long to have improvements in place to meet needs. Further, all too often, *"financial commitments"* are based on not-as-yet-secured Grant monies, which are really taxpayer monies. This helps perpetuate growth not paying for growth. Also, possibly most importantly, there appears to be no Concurrency enforcement mechanism!

There are several specific issues with applying Concurrency and setting LOS standards:

(1) Holistic concepts like Travel Sheds have limitations in that they stop at jurisdictional boundaries (probably not the *"natural"* nor actual Travel Shed boundary).

(2) Difficult to meet meaningful coordination with neighboring jurisdictions requirements.

(3) Integrated regional transportation concurrency is extremely difficult.

(4) Some jurisdictions define LOS based on an *"average"* degree of travel comfort, e.g., intersection delay, road speed, capacity, *"screenline,"* distance traveled, which easily disconnects from user experience, impacting infrastructure investment.

(5) Some jurisdictions greatly exceed growth targets and appear to have no obligation to create internal job opportunities equivalent to the population growth permitted within their jurisdiction. The text book example is the City of Black Diamond where two new Master-Planned Developments, totaling 6,050-homes, are approved and underway. This edition of up to 15,000 new residents greatly exceeds the city's 1,900 Growth Target, by an order of magnitude!

Public Comment

(6) The Public is usually not consulted (or, if consulted, doesn't understand the complexity of LOS development) when jurisdictions adopt LOS standards and, thus, unique subarea desires are not clearly identified, if at all.

Concurrency must be managed holistically without jurisdictional *"seams."* Measurement must recognize *"natural"* interconnected travel patterns and be used consistently by all jurisdictions. Infrastructure needs should be timely met (i.e., not allowing or suggesting the 6-yr lag to be satisfactory) embracing best-available growth/employment forecasts and align with the travel experience (moving people and freight).

Infrastructure needs should be identified as early and accurately as possible, with implementation of identified improvements truly concurrent, otherwise the development approval must be delayed or denied. Concurrency must be linked to a public dialog. Concurrency must have an enforcement mechanism and it must be exercised.

We see several potential solution paths to be explored:

(1) Policies that require population, growth, and revenue databases could be continuously updated and used to conduct periodic traffic modeling/impact analyses.

(2) Legislation could strengthen requirements for LOS to be linked to public dialog.

(3) Mechanisms could be established so the PSRC can:

(a) Enforce the requirement that jurisdictions create job opportunities at least equal to the population growth they permit within their jurisdictions;

(b) Ensure consistent methods for analyzing regional impacts of development across adjacent and nearby jurisdictions;

(c) Implement policies to *remove* jurisdictional seams from Concurrency;

(d) Scrutinize *"financial commitments"* to ensure attainable sources of funds (perhaps even requiring such *"committed"* funds be deposited into escrow accounts, rather that believing promises of future payments from developers and/or investors who are no longer available when the money is needed); and

(e) Enforce the requirements of Concurrency are met as intended.

We see important roles for the PSRC is addressing regional transportation concurrency. The PSRC could coordinate concurrency programs established by local jurisdictions to address regional cross-jurisdictional impacts of development. The PSRC could ensure jurisdictions perform regional traffic-impact analyses as a condition for certification of their Comprehensive Plans and/or any requested changes in their growth targets.

The following RCWs and WACs should be explored to provide such opportunities:

RCW 36.70A--GM--PLANNING BY SELECTED COUNTIES & CITIES.
36.70A.020--Planning Goals [see 12. Public facilities and services].
36.70A.070--Comp Plans--Mandatory Elements *[see (6) transp element]*.

WAC 365-196-840--CONCURRENCY. (4) Measurement Methodologies