

February 25, 2022

To: Kelly McGourty, Director, Transportation Planning, PSRC: [kmcgourty@psrc.org](mailto:kmcgourty@psrc.org)

Re: **PUBLIC COMMENTS—Draft PSRC 2022-2050 Regional Transportation Plan (Update)**

Ms. McGourty,

Please accept the *Comments* herein on the the subject **Update** from our Joint Transportation Initiative (JTI) comprised of eight King County Rural Area Unincorporated Area Councils (UACs), Associations (UAAs), and Organizations [\*].

We represent and advocate for the interests of ~125,000 people who live in King County's Rural Area, which covers the vast majority of the county's acreage, in discussions with King County and its cities, PSRC, State officials, and other governmental agencies.

We provide *general* observations and address *specific* areas. We directly quote **Update** sections followed by our **comments in bold purple**.

We applaud goals on climate, equity, mobility, and safety. We support strategies to invest the majority of available funds to maintain, preserve, and operate the regional transportation system and to direct most system improvements to transit. Finally, we support replacement of motor vehicle fuel taxes with an equitable-funding mechanism such as a *Road Usage Charge*, which could help unburden County unincorporated road corridors increasingly used by *inter-city* urban commuters.

PSRC provides a great opportunity to bring together State and City governments, UACs, private groups, and individual citizens within the four-county area. PSRC is in a unique position to effectively break down organizational "*silos*" to achieve lasting *regional* solutions, which are sorely needed.

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[\*]: *EPCA—Enumclaw Plateau Community Association*  
*FoSV—Friends of Sammamish Valley*  
*GMVUAC—Greater Maple Valley Unincorporated Area Council*  
*GRC—Green River Coalition*  
*GV/LHA—Green Valley/Lake Holm Association*  
*HHA—Hollywood Hills Association*  
*SCAR—Soos Creek Area Response*  
*UBCUAC—Upper Bear Creek Unincorporated Area Council*

## General Comments

One major issue we see is that all PSRC traffic modeling and transportation planning is based on jurisdictional agreed-to Growth Targets. This only works if jurisdictions adhere to their targets, which many do, but some cities along the Urban Growth Area *fringe* plan to vastly exceed their housing targets (note the City of Black Diamond is the major outlier here). This scenario presents at least two problems:

- (1) PSRC Traffic-Demand Models (TDMs) and subsequent Traffic-Impact Analyses (TIAs) are thrown into disarray, locally, as they simply do not address what is planned on the ground.
- (2) Being on the urban fringe the impacts to the King County unincorporated area roads, especially in the Rural Area, is ruinous, as they are overwhelmed with urban traffic levels for which they were never designed and cannot be adequately maintained due to a funding model turned upside down.

## Specific Comments

### Summary - A Transportation Plan for the Future (pp. 10-15)

#### Addressing challenges and opportunities (pp. 10-13)

##### Reducing greenhouse gas emissions (pp. 10-15)

(p. 11) *“Figure 2 – Steps to Reducing Greenhouse Gas Emissions and Meeting Climate Goals”*

**We applaud the plan’s recognition of the urgent need to reduce GHG emissions. However, we are alarmed to see that very little of that reduction comes from the region’s planning efforts. In fact, most comes from fuel efficiency improvements in the short run and conversion to electric vehicles in the long run. However, the region has little control over those two dominant assumptions, as they are the result of national trends and federal legislation, respectively. We recommend the text be revised to highlight more clearly that elimination of petroleum-fueled engines is the dominant factor for achieving GHG reduction goals. The graphics should be changed to place the plan’s contribution last rather than in the middle of those external influences.**

## Chapter 1 – An Integrated Multimodal Transportation System (pp. 22-113)

### 1.1. System Uses (pp. 23-87):

#### *Bicycles and Pedestrians (pp. 53-57)*

While we commend a focus on non-motorized modes of travel, consistent with the “complete streets” philosophy, that focus is entirely on urban areas. It should also be recognized similar needs are growing in rural areas. In fact, elsewhere in the RTP, it is shown traffic volumes and congestion will rise in rural areas, which underscores the need to provide “complete streets” standards and goals for improving service to pedestrians and bicycles in rural areas. Rural residents may also be viewed as a socio-economic group that is systematically neglected and should be afforded the same attention as other societal groups in the name of social equity.

#### *Streets/Highways (pp. 62-69):*

(p. 63): “Streets and highways in rural areas have operational and design characteristics unique to their urban counterparts. For example, while arterials in the urban area serve major activity centers and connect residential areas to employment centers, arterials in the rural area often serve longer through trips and are spaced more infrequently, providing fewer direct connections.”

This description barely touches the surface of issues in the rural area. There are two major problems where rural roads are being made to serve urban traffic purposes to the detriment of the viability of rural areas (which the Growth Management Act pledged to support and protect). First of all, the safety of pedestrians and bicyclists is endangered. This is a “complete streets” issue and a safety issue, not a capacity issue. Secondly, the matter of access to/from abutting properties is overlooked by urban planning methods which focus on the through volumes of traffic to the exclusion of local access. In rural areas, the so-called “arterials” are also the local access roads to all the abutting farmlands and other properties. Ignoring this important function of rural arterials deprives rural residents of their traditional lifestyle by denying the importance of maintaining access to their own properties, i.e., to live the rural life as the Growth Management Act promises. This is a GMA issue and a social equity issue.

(p. 65): “The greatest need on the regional roadway system is ongoing maintenance and preservation, which is critical to keeping highways and streets in a safe and usable condition and making the most efficient use of transportation investments to date.”

As we have already suggested above, the region needs to replace the gas tax with a VMT charge that applies to electric vehicles as well as petro-fueled vehicles, and charges for the proportional use of roads rather than the consumption of fuel. We support such a transformation of transportation system finance. We think it should be established in State law by a formula method that ensures proper calibration of the fee to the documented needs per regional plans, and not be subject to the whims of political campaigns over individual projects. Such a fee would be established much like a utility system’s user charges, which are formulated by the utility and approved by a state utility commission. In fact, why not consider doing the same with multi-modal transportation systems?

(p. 69): “Through development of their comprehensive plans, counties and cities will support implementation of the projects in this plan, as well as identify additional local improvement projects needed to support the transportation system.”

As is well known, King County is woefully short of having sufficient funds to follow through with its transportation element in its comprehensive plans. Consequently, there should be a greater focus on financial solutions to close the observed gap in funding under current law, and to go further in resolving the adverse outcomes that are not mitigated therein (e.g., more congestion on rural roads, inadequate transit service to fringe cities, lack of attention to pedestrian and bicycle needs in rural areas, etc.).

Freight (pp. 70-80):

(p. 74): *“Travel data indicate trucks make a substantial portion of their trips during off-peak periods of the day—in-between the morning peak period and evening peak period when commute-related traffic is heaviest. Roadway congestion is a major impediment to reliable freight delivery, so freight providers make most efficient use of the roadway system and increase reliability by traveling more during less- congested times of day. However, truck travel does also occur during the periods of peak congestion, particularly in the morning. In 2018 the average heavy truck driver in the region spent 56 hours in congestion annually, and the average medium truck driver spent 21 hours in congestion.”*

**Yes, we must strive to move freight efficiently. However, there is no recognition of how freight traffic affects the entire system, as large trucks cause major congestion during commute peak hours on all major roadways.**

(p. 76): *“While freight transport and deliveries will continue to rely on the roadway system, projects and strategies that shift more travelers to high occupancy vehicles and non-vehicular modes are beneficial to freight because they allow roadway capacity to be more used more efficiently by users such as cargo trucks.”*

**This seems to imply: “get more cars off the roads so trucks can move more freely.” However, the roads are for everyone and are paid for by everyone. If anything, all would benefit if locally originating large trucks (as opposed to *inter-region* long-haul trucks) could confine their major road use to off-hours, or if the transportation system could provide separate truck routes in the core of the region.**

## 1.2. Operations and Efficiencies (pp. 88-112):

Transportation Demand Management (TDM) (pp. 88-93)

**While we commend recommendations to update the CTR law so as to modernize TMD strategies, there is a need to focus on long-distance commuter trips from outlying fringe cities into the urban core area, where the regional benefits of TDM would be greatest.**

Maintenance/Preservation (pp. 109-112):

(p. 112): *“...the plan identifies a total of \$168.9 billion in estimated need to maintain, preserve, and operate the existing system, which represents 56% of the total investment planned between 2022 and 2050.”*

**We see this as a major long-term concern with no easy answers. That said, it remains imperative to make clear to all decision-makers that the cost (in terms of economic viability) of solving this problem is far less than the cost of no action.**

## Chapter 2- Performing for People, Environment, and Mobility (pp. 114-161)

### 2.2. Climate and Environment (pp. 128-149):

GHG Reduction (Land Use/Choices/Pricing/Technology)

(p. 133): “Development of updated local growth targets, consistent with the VISION 2050 transit-focused Regional Growth Strategy. These targets will provide the framework for upcoming 2024 comprehensive plan updates.”

**A major flaw is introduced by using jurisdictional “growth targets,” rather than using what jurisdictions actually plan (e.g., the City of Black Diamond’s massive planned growth is not accounted for in any models, thus, results are problematic).**

(p. 138): “Land Use Cities and counties are beginning the process to update their comprehensive plans, with major periodic updates to be completed by 2024 for those in the central Puget Sound region. These comprehensive plans are a key part of the implementation of the regional growth strategy and the policies and objectives identified in VISION 2050. The adoption of growth targets in line with VISION 2050 as well as supportive regulations and implementation actions are critical in helping to achieve regional and local goals.”

**The comment above is applicable here as well.**

### 2.3. Mobility (pp. 150-160):

System Performance (pp. 150-160)

**The graphs and bar charts do not adequately address (if at all) the urban-generated through traffic on rural area roads and its impacts.**

Congestion Management (p. 160)

**The Transportation System Visualization Tool depicts congested conditions on state highways in the King County Rural Area, but does not begin to depict related impacts on the other arterials. We have studied this problem extensively and found most county roads in SE King County are experiencing traffic growth at more than twice the rate of growth on the state highways in our area (~4% vs. ~2% per year). Traffic on rural arterials should be low (statewide average is 3,000 Average Daily Traffic [ADT]), because, in a sparse road network, they function as the local neighborhood streets of the rural community. Many of our rural arterials are carrying 2 to 3 times the statewide average for rural minor arterials per the Federal Highway Performance Monitoring System (HPMS). Rural arterials throughout SE King County are taking up the slack for state highways that do not serve the total demand. Rural residents are adversely affected by this rising through-traffic volume, even though it is below levels that generates high congestion.**

**Consequently, *Congestion Management* could address this impact on rural residents by considering instead the level of service for safe side street ingress/egress. For that side street access in rural areas Highway Capacity Manual (HCM) methodology could be used for stop-sign intersections. But for mapping purposes, the equivalent acceptable volume of through traffic could be used, which can be reverse-calculated using HCM methods. It would be ~1/2 the volume currently used as capacity on rural arterials. When that is done, the congestion map should demonstrate many rural arterials are overloaded, which should be addressed in the RTP. We will separately provide you with a detailed report, “*Opus Trafficus*,” which details our research on these issues over the past year.**

## Chapter 3 – Paying for the Plan (pp. 162-168)

### 3.1. Overview of Financial Strategy (pp. 162-168):

Revenues (pp. 165-168):

(p. 166): *New Revenues: User Fees*—“The Washington State Transportation Commission has determined that a road usage charge (RUC) is feasible and could produce the needed revenue to eventually replace the gas tax and fund the state’s long-term transportation needs. Following a successful 2018 RUC pilot study, in 2020 the Commission recommended enactment of a small-scale RUC program as a first step in a gradual transition away from taxing motor fuel to fund the upkeep of state roads and bridges. The state Legislature directed the Commission to further explore some specific aspects of a potential RUC program.”

**While we support this concept, a key aspect is where the collected monies go, e.g., the jurisdiction where the road is located and maintained.**

(pp. 166-167): *New Revenues: New Local Sources*—“Cities and counties can increase transportation-related taxes and fees and use new local options for transportation funding. This includes new vehicle license fees, road and property tax levy adjustments, impact and development fees, and taxes on parking. In addition, cities and counties can utilize new revenue tools such as indexing the current state fuel tax to inflation, creating new carbon taxes on fuels, and addressing prior legal decisions on the implementation of street utility fees.”

**We concur with the concept of impact fees applied to new developments, as permitted by the Growth Management Act (GMA). What we observe; however, is that the implementation of this concept over the past thirty years has been inconsistent, inadequate, and cumbersome. Impact fees are not consistently applied and, thus, fail to support the GMA as intended. A truly regional approach is needed.**

**Worst of all, impact fees are applied *within* each local jurisdiction’s boundaries only with *external* impacts *not* addressed. Often, in the rural areas, this is a disaster. Outlying King County cities like Black Diamond, Enumclaw, Duvall, and Carnation are separated from the main urban core by rural areas. They are growing rapidly, because GMA encourages growth in cities, but their traffic impacts are borne largely by the rural areas between them and main centers of employment in the urban core. However, there is no consideration of those impacts in the impact fee programs of those cities. Unfortunately, even though the GMA calls for *intergovernmental coordination*, there is no enforcement mechanism, except through the courts. For example, King County maintains these rural arterials, but has no legal way short of costly lawsuits to obtain relief from those cities for the impacts caused by their growth. Consequently, County roads are perpetually underfunded—a seriously broken business model.**

**A major revision of the impact fee concept is called for, as a regional system charge, based not on individual level-of-service deficiencies, but as a share of the RTP’s capital improvement cost proportional to the Vehicle Miles Traveled (VMT) impact of each development. This is easy to calculate with a regional traffic model. How much that share should be can be worked out as part of the regional financial strategy, considering all other funding sources (e.g., current law revenues and future *road-user service charges*) and setting the impact fee charge on developments in the context of a balanced and comprehensive regional financial strategy. That adheres to the original intent of GMA, but may require legislation to establish the regional framework.**



## Chapter 4 – Big Ideas and Implementation (pp. 169-188):

### 4.2. Administrative Procedures and Processes

Policy and Plan Review (pp. 178-179):

Review/Certification of Comprehensive Plans

**We experienced several problems with this process and believe key concerns need to be addressed. More rigidity needs to be injected into the process. Full compliance with GMA requirements must be the final measuring stick. At a minimum, Comprehensive Plans must be internally consistent and be coordinated with adjacent jurisdictions. Also, for major updates, schedule compliance also must be adhered to.**

Review/Certification of Countywide Planning Policies

**While PSRC has no control over this process, we experienced a lack of Public participation in the now nearly completed 2021 CPP Update, as the King County Council assigned its Mobility and Environment Committee, which did not hold any Public Hearings, nor allow any Public Comments at its meetings. Then the committee passed it on to the full King County Council, which did not hold a Public Hearing until the day of its final vote!**

## Appendices

(<https://engage.psrc.org/welcome-rtp#folder-42744-9549>)

### **Appendix A—Transportation System Inventory**

While the baseline inventory is good practice, some additional detail would be helpful in some areas. There is no information about miles of roadway by functional class or by level of service, nor comparable information about transit route-miles and hours by relevant subarea. Baseline performance information is given in *Appendix H*, but the inventory of system elements should be covered in more detail here.

We appreciate the focus on pedestrian and bicycle facilities. Looking specifically at the rural areas, we know of *no* rural roads that adequately provide for pedestrians and bicycles, so the identification of 26% of rural arterials as having adequate bicycle facilities appears dubious.

We also recommend that the inventory of rural conditions divide the road mileage by low, medium, and high traffic volumes to isolate the degree of risk to non-motorized road users. Brackets could be established as follows:

Low-risk rural roads — Those that can be regarded as “*complete streets*” without any paved shoulders or other “*facilities*” for non motorized users, to the extent that all users share the road reasonably well. An administratively practical cutoff volume, below which the priority for non motorized improvements is low, could be the statewide Average Daily Traffic (ADT) for rural arterials. That is 3,000 vehicles/day according to data in the Federal Highway Performance Monitoring System [HPMS] found on the WSDOT website. Even lower cutoff volumes could be justified using the American Association of State Highway and Transportation Officials (AASHTO) “*Green Book*” of arterial design standards, which for decades has recommended shoulder width of 8 feet at or above 2,000 ADT, and 4-foot shoulders above 800 ADT.

Medium-risk rural roads — Those with higher volumes and inadequate shoulders for pedestrians, bicycles, or horse-riders. A useful upper bound might be 2x or 3x the low-volume cutoff line. The average rural arterial in southeast King County serves ~8,000 vehicles per day and most have no (or very inadequate) shoulders creating major safety issues for non-motorized users.

High-risk rural roads — Those above the medium-risk cutoff line with no shoulders or very inadequate shoulders.

Further adjustments could consider partial shoulders and other design conditions.

Bicycles and Pedestrian (pp. 15-29)

While there is excellent information here to highlight current baseline of inadequate facilities for non-motorized modes, more differentiation of sub-groups within Rural Areas is needed. This is especially true for traffic volume, since low-volume rural roads can remain without shoulders per rural tradition, but higher volume rural roads, which are impacted by urban growth pressures, should be viewed differently. Examples include adding facilities to provide safety for pedestrians and bicycles as systemwide mitigation for urban-induced traffic volumes. In fact, a level-of-service scale could be devised in relation to traffic volume using as a benchmark the HPMS data for rural roads statewide combined with available research into safety of non-motorized road users as affected by traffic volume.

(p. 29): Table 24. Bicycle and Pedestrian Infrastructure Policies and Regulations Inventory.

**This illustrates the disparity between what jurisdictions say and what they do. nearly all jurisdictions say something about pedestrians and bicycles in plans and policies. Yet the lack of corresponding facilities documented in preceding tables demonstrates a failure to follow through with those expressed concerns when it comes to facility improvements.**

Streets and Highways (pp. 29-30)

*"All streets have a designated functional classification, which depends on the level of traffic volume each street carries and the purpose of travel they serve.*

*Streets are classified according to the following general designations:*

- **Highways** generally carry the highest volumes of vehicular traffic, including trucks, buses, and automobiles. Freeways and expressways are high-speed with controlled access, and do not generally accommodate pedestrian or bicycle travel. Other state highways (state routes) function more as arterials and serve vehicular and nonmotorized travel, as well as providing access to adjacent properties.
- **Arterials and Collectors** are high-volume streets that serve a higher mobility function as well as provide some access to properties. Of these, Principal Arterials have the highest traffic volumes and lowest access function. Minor Arterials have lower volumes than Principal Arterials but higher than Collectors, which provide connections between arterials and the local street system. Collectors provide both mobility and access functions and are also classified as major or minor. Arterials and collectors serve all modes of transportation. Because they carry higher vehicle volumes, design standards for these types of roadways may seek to separate pedestrians and bicyclists from vehicular traffic to the extent that right-of-way width allows.
- **Local Streets** primarily provide access to residential and commercial properties. They are lower-speed, lower-volume roads that typically serve automobile, bicycle, and pedestrian travel, as well as vehicle parking and door-to-door freight deliveries.

*Freeways, highways, arterials, and collectors are designated through the Federal Functional Classification system, which is approved by WSDOT and recognized by the Federal Highway Administration (FHWA). All other roadways that do not have a Federal Functional Classification of collector or above are considered local streets. Table 26 summarizes the approximate centerline miles of roadway by federal functional classifications within the PSRC region."*

**FHWA'S use of urban and rural geographies differs from GMA's urban-growth boundary. We are concerned King County is utilizing an updated version of arterial classifications that upgrades many collectors to minor arterials, even principal arterials. Unfortunately, that appears to conflict with GMA goals to preserve and protect Rural Areas from urban encroachments. Such differences should be addressed here.**

## Appendix C—Maintenance & Preservation

### Methodologies for Developing Maintenance and Preservation Estimates (p. 4)

#### Cities and Counties (p. 4)

(p. 4) *“Estimating regional maintenance and preservation need is a challenge, in particular for local assets where there are gaps in the data and inconsistencies in how the data is collected. There is limited information available on which to base future maintenance and preservation cost estimates for local jurisdictions. Historically, the plan’s financial strategy relied upon a series of programmatic models based on historic expenditures to project maintenance and preservation investment costs for cities and counties. This approach was limited by the fact that it relied entirely on past spending and did not account for projected future need or local planning policies.”*

**This methodology is fraught with limitations due to incomplete source data and tends to perpetuate underfunding of maintenance and preservation by a policy of benign neglect. Yet the issue of maintenance and preservation consumes ~60% of the region’s investment funds through 2050. This matter deserves much greater attention, understanding, and formulation of adequate financing mechanisms to keep the transportation system running. While there is an absence of clear data, the need can be seen and must be addressed.**

## Appendix D—Regional Capacity Project List & Administrative Procedures

**Every one of these projects are important to key areas of King County, yet all are far out (e.g., “2050”) on the schedule to address.]**

### **Avondale Road**

ID: 4554; Estimated Cost: \$47,112,199; Completion Year: 2050

Description: Capacity and pedestrian improvements will aid traffic flow in the Avondale Corridor.

### **Issaquah Hobart Road**

ID: 4556; Estimated Cost: \$48,031,960; Completion Year: 2050

Description: Operational, ITS and safety improvements to congested corridor used as an Urban Connector between the Maple Valley/SR-18 area and Eastside cities.

### **NE 132nd/NE 128th St**

ID: 447; Estimated Cost: \$36,483,851; Completion Year: 2050

Description: Widen NE 128 St for right-turn lane and shoulder. Modify signals at NE 132 St and NE 128 St. Widen NE 132 St from 3 to 4 lanes. Install a new signal at Bear Creek Rd.

### **Novelty Hill Road**

ID: 4562; Estimated Cost: \$128,766,532; Completion Year: 2050

Description: Capacity, ITS and operational improvements will improve flow through this heavily used commuting corridor in the Bear Creek area between Duvall area and Redmond. Project results in additional lanes, operational, and safety improvements between the UPDs and Redmond.

### **Woodinville-Duvall Road**

ID: 4571; Estimated Cost: \$99,027,595; Completion Year: 2050

Description: Operational, safety, nonmotorized, ITS and capacity improvements in this congested corridor heavily used by regional traffic.

### **WSDOT**

**While there are many State Route projects listed, most are “UNPROGRAMMED.”**

## Appendix H—System Performance

We believe the overall message of progress in the direction of less vehicular travel, and more use of alternative modes is somewhat deceptive. While this appears to support climate change goals and urban planning goals, the alarming and unspoken message is that the change is not more. The transit/walk/bike share of trips increases substantially above current levels, but the proportion of trips made by driving alone remains at high levels around 80% to 85% of the baseline. Again, as we stated earlier, most climate change benefits derive from electrification of vehicles, not land use and transportation system plans, so a more aggressive strategy to reduce VMT per capita further would be a welcome improvement.

### Hours of Delay (p. 20)

#### (p. 21) Figure 5. Annual Hours of Delay

The outcome in terms of delay per household is barely an improvement, while delay per heavy truck trip rises alarmingly. This suggests inadequate attention to heavy truck facilities. Note, as well, that if a measurable percentage of heavy truck movements were shifted from general purpose freeway lanes to dedicated truck lanes (which would be no small accomplishment if possible at all in this built-up region), the release of freeway capacity to general (e.g., car) traffic would significantly lower delay per household, benefitting the entire regional population.

#### (p. 21) Table 20. Annual Delay per Capita by Regional Geography

This contains a peculiar result: delay per capita grows much more for rural areas and urban unincorporated areas than for all four categories of urban areas. How does this happen? Does it mean that rural roads are becoming much more congested due to the encroachments of urban commuter travel through rural areas? If so, why is there no provision in the RTP to recognize and offer potential solutions to reduce that congestion to the baseline level or below? Or does it mean that rural residents drive longer distances and, thus, experience more urban congestion with fewer non-automobile alternatives? If so, why is there not more attention given to providing rural residents with access to transit since their commute trips tend to be longer in distance and generate more VMT per capita and more GHG per capita than residents of the urban core area? All these issues should be addressed.

### Roadway Congestion & Travel Time (p. 21)

#### (pp. 25-26) Figures 7 (and 8). AM (PM) Peak Period Heavy & Severe Congested Vehicle Miles Traveled by County

These figures suggest that more attention is needed to planning in Kitsap County, Pierce county, and Snohomish County, to reduce VMT still more and thereby limit the expansion of congested roadways outward from King County.

### Federal Performance Targets (p. 29)

#### (p. 30) Table 25. Regional FHWA Performance Targets

While this offers a number of interesting performance targets, including safety and reliability measures, where is the analysis of likely future outcomes for the RTP in 2050?

## Appendix I—Modeling Tools

### UrbanSim Land-Use Model (pp. 5-6):

#### Key Assumptions

(p. 6): “Jurisdiction-level growth assumptions (population, households, employment) for individual cities, urban unincorporated planning areas, and rural areas serve as control totals and key demand drivers in the UrbanSim model framework. These assumptions are derived from the county and regional geography level growth allocations for the Regional Growth Strategy in conjunction with locally developed growth targets.”

**Major flaws are introduced by using jurisdictional “growth targets,” rather than what jurisdictions actually plan, e.g., the City of Black Diamond’s massive planned growth is not accounted for in the model, thus, results are problematic at best.**

### SoundCast Travel Demand Model (pp. 6-7)

#### Key Assumptions

(p.7): “For the travel demand analysis conducted on the RTP, parcel level population, household, and employment outputs from the UrbanSim model for the Regional Growth Strategy comprise the key land use assumptions.”

**See comment above regarding the UrbanSim Land-Use Model. The SoundCast Travel Demand Model only identifies needs to the extent that jurisdictional growth targets are adhered to. It can easily simulate the traffic consequences of a major shift in land use futures in any one area, as a sensitivity analysis or as the basis for calculating the external impact on the RTP of any jurisdiction’s deviation from the growth targets. Such information would be valuable for such PSRC bodies as the Growth Management Policy Board and the Transportation Policy Board, as they consider certifying local comprehensive plans for consistency with the RTP.**

(p. 7): “The set of transportation projects and policies enumerated in the RTP provide the future (year 2050) transportation network assumptions used by SoundCast for this analysis.”

**Elsewhere it has been pointed out that some performance measures such as delay per heavy truck trip are worse in the future than at present. The RTP should discuss plans to alleviate that outcome as well as other deficient outcomes. Included there should be a *sensitivity analysis* to identify *additional* system elements that could be considered as options.**

## Appendix J—Financial Strategy

### Developing the Financial Strategy (p. 4)

(p. 4): “The financial element of the RTP provides a comprehensive picture of the financial requirements to maintain and improve the region’s transportation system. The transportation improvements identified in the plan are estimated to cost approximately \$300 billion (year 2022 constant dollars) between 2022 and 2050, including nearly \$170 billion to operate, maintain, and preserve the existing system. Current-law revenues — defined as existing sources of funds at current tax rates — were found to be sufficient to fund approximately 86% of the identified need. The RTP financial strategy highlights the importance of developing new statewide and regional sources of funding to fill the 14% gap and support the plan’s implementation.”

**It is good that ~56% of monies will go to maintenance and preservation the existing system, but no mention is made of maintenance and preservation of any new improvements, etc. also, the 14% “gap” is large: ~\$42B.**

#### Current Law Revenue

(p. 4):

• Forecasting current law revenues from existing revenue streams based on historic data from an array of sources, including the State Auditor’s Office Budget and Accounting Reporting System (BARS) data for cities and counties.

• Employing updated tax-base forecasts to support financial estimates for all transportation revenue sources contained in the RTP. The 2018 Regional Economic Forecast was incorporated into all aspects of financial planning for the 2022-2050 RTP.

• Including integration of projected revenue from recently passed local initiatives.”

**Revenue streams/sources have various limitations of where and on what they can be used. how does this affect the financial strategy/analyses? Our concern rests with current limitations that affect King County road maintenance and preservation, in addition to lack of revenues from many users of King County roads.**

### Estimating Current Law Revenues

#### Current Law Revenue Sources

(p. 8): “Figure 5 highlights estimated current law revenue by program area:”

**This highlights how the counties are cash-strapped by the existing revenue streams/ sources. This has proved to be unsustainable and progressively worsens each year.**

(p. 9): “The sources that comprise current law revenue by program area include:

##### Counties

- County Road Levy **This is only imposed on unincorporated area residents.**
- General Fund
- Mitigation and Impact Fees **This is minimal due to small business tax base.**
- Real Estate Excise Tax **This is minimal due to relatively little development.**
- Other Local Fees **What “other fees” and do they amount to much ?**
- Fuel Tax **This not user proportionate due to state tax allocation formulae.**
- Other State Funds **What are they ?**
- Federal Grants and Funds” **These are minimal and typically go to large projects.**

### New Revenue Assumptions and Estimates



### New Revenue Risks and Uncertainty

*(p. 10): “A detailed description of all the design and implementation risks associated with this effort is beyond the scope of this document, but issues of public acceptance, governance, toll policy objectives, dispensation of revenues, fairness, privacy, and administrative burden are being actively considered and addressed as new user fees are implemented.”*

**While we support such user fees, distribution of the revenues collected is key, e.g., revenues should be dedicated to the facilities (e.g., roads) used, not the jurisdiction where the user lives, as that would simply perpetuate existing shortfalls faced by counties, especially King County.**

### New Revenue Projections

*(p. 12): “PSRC assumes (as it did for the 2018 RTP) flexibility in the use of revenues generated by the Road Usage Charge to fund a wide variety of transportation improvements beyond roadways, without the constraints on current motor fuel taxes.”*

**We support this concept, as it removes unreasonable constraints.**

### County-Level Breakdown (p. 13)

*(p. 14): “In order to better understand some of the key differences in terms of how the different jurisdictions obtain their revenues, Figures 10 and 11 highlight the revenue split across different categories by county for the cities and counties program areas, respectively.”*

**Figure 11 county-level revenue source split, “counties” program area shows each county’s over-reliance on ‘local’ revenues sources. This clearly is not sustainable.**