



July 29, 2009

Mr. Sean Ardussi  
Puget Sound Regional Council  
1011 Western Ave., Suite 500  
Seattle, Washington 98104-1035

Dear Mr. Ardussi:

**Subject: Comments on the Transportation 2040 Draft Environmental Impact Statement**  
Sent via e-mail and U.S. Mail

Thank you for the opportunity to comment on the Transportation 2040 Draft Environmental Impact Statement (DEIS). Futurewise is a statewide non-profit organization with many members in the Central Puget Sound counties, cities, and towns that comprise the membership of the Puget Sound Regional Council. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms, working forests, and shorelines for this and future generations.

Overall, we appreciate that the DEIS has addressed the key issues facing our region as we plan for our preferred future. In particular we appreciate the attention to the land use, greenhouse gas emission, and environmental impacts of the alternatives. We do have some concerns about the alternatives and some of the conclusions. We will address those concerns using the questions from the Puget Sound Regional Council's DEIS internet response form.

**1. The various components in the six alternatives**

As the analysis in the technical supporting documents and the DEIS makes clear, the world is changing dramatically as it affects transportation and transportation facilities. The continuing declines in gas tax revenues and the need to reduce greenhouse gas emissions, recover Puget Sound, and meet our mobility needs have the following implications for transportation planning:

- Our scarce transportation funds need to prioritize safety improvements, maintenance and restoration, transit, and freight mobility.
- We need to invest in projects that allow us to maximize our existing investments. These include making our existing general capacity facilities operate better and more efficiently and better using our transit investments.
- We lack the funding for a significant expansion of general purpose capacity in the Central Puget Sound while meeting our other needs. And a significant expansion in general purpose capacity would hinder our ability to meet our region's goals,

including reducing greenhouse gas emissions and recovering Puget Sound to name just two.

We agree that Transportation 2040's "core investments" recognize many of these realities. Alternative 5 comes closest to fully addressing these concerns, but even Alternative 5 needs to focus more transit. Alternative 5 also needs a funded program to provide bus routes, pedestrian improvements, and bicycle improvements so that we can use our expanding investments in commuter rail, light rail, and regional and local transit more efficiently.

We need to revisit the land use plan on which Transportation 2040 is based if we are to achieve the goals the region has for mobility, environmental protection, and social justice. We recommend the following changes:

- The land use plan behind Transportation 2040 needs to increase the proportion of the population living in transit-oriented developments. This will decrease people's need to drive alone, and increase the proportion of the trips made by walking, biking, and transit. This will decrease greenhouse gas emissions. This will also reduce water pollution and aid in the recovery of Puget Sound.
- We need a better balance between jobs and housing within the region and within communities. This will reduce commute lengths and allow more people to walk and bike to work.
- We need to increase residential densities so that all urban growth area neighborhoods can support bus service at half hour headways. This will increase the likelihood that people can use transit for their daily travel needs and increase development capacity within our urban growth areas.
- We need to maintain our close-in industrial and manufacturing areas that remain economically viable so these firms and jobs remain close to workers, transit, ports, highways, and rail connections. This will help maintain mobility for people and freight and reduce the increases in water pollutants and greenhouse gas emissions that would otherwise occur.
- We need to stop urban growth area expansions and protect our existing working farms and working forests. This will reduce the need to expand general purpose transportation capacity, increase the efficiency of our transit and other transportation investments, reduce greenhouse gas emissions from transportation, and reduce adverse water quality impacts on our streams, rivers, and Puget Sound.

The transportation system should be reconfigured to serve this changed land use plan. This transportation system needs to focus on transit and freight investments along with other investments that make the existing system and the new transit investments work more efficiently and effectively.

## **2. The environmental impacts of the alternatives.**

We strongly urge the Puget Sound Regional Council to include an alternative that meets the state greenhouse gas emission reduction requirements attributable to transportation and the statewide per capita vehicle miles of travel (VMT) reduction benchmarks. RCW 70.235.020 requires the following reductions in greenhouse gas emissions:

- Reduce overall emissions to the 1990 level by 2020;
- Reduce overall emissions by 25 percent below 1990 levels by 2035; and
- Reduce overall emissions by 50 percent below 1990 levels by 2050.

The current scientific evidence shows that these required reductions are not enough to stabilize atmospheric greenhouse gases at levels that will not dramatically change the climate. However, none of the alternatives in Transportation 2040 would achieve the part of even these inadequate reduction requirements attributable to transportation. We recommend the Puget Sound Regional Council include in the Final EIS and adopt an alternative that would at least meet the state's adopted reduction requirements. In evaluating this reduction, we believe that it is a good practice to take into account the greenhouse gas emission reductions likely to occur as a result of cleaner fuels, the likely future fleet efficiency and fleet emissions generation characteristics, transportation mode switches, and land use changes.

RCW 47.01.440(1) adopted the following statewide benchmarks for reducing vehicle miles of travel (VMT):

- Reducing statewide annual per capita VMT by 18 percent below the projected 2020 VMT by 2020;
- Reducing statewide annual per capita VMT by 30 percent below the projected 2020 VMT by 2035; and
- Reducing statewide annual per capita VMT by 50 percent below the projected 2020 VMT by 2050.

We very much appreciate that the draft EIS analyzed whether the alternatives would meet these standards. However, we disagree with the conclusion that this analysis shows that the Alternatives 3, 4, and 5 will meet the 2035 benchmark. The benchmarks are a statewide standard. Different parts of the state have varying levels of per capita VMT depending on their characteristics, including land use patterns and alternative modes of travel. Because of our available transportation alternatives and other characteristics, the Central Puget Sound Region probably has the greatest ability to reduce VMT. This is consistent with the Puget Sound Regional Council VMT estimates which show that the projected 2020 daily per capita VMT for Washington State is 27.03 miles compared to a baseline regional daily per capita VMT baseline of 20.08 miles. If the state is going to meet the 2035 benchmarks, the Central Puget

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Sound Region must reduce its per capita VMT by 30 percent below the regions 2020 benchmark. This would be a daily per capita VMT of 14.06 miles in 2035. None of the alternatives meet this standard in 2040. We recommend that the Final EIS include an alternative that does meet this standard and that the Puget Sound Regional Council adopt that alternative.

We are also concerned that the alternatives will not maintain the forest cover and pervious surfaces needed to maintain the water quality of rivers, lakes, streams, and Puget Sound. Again, we recommend that the PSRC include such an alternative in the Final EIS and adopt it. We believe the modifications we suggest in Question 1 would go along way to meet all three of these standards.

**3. Funding strategies, for raising revenue and paying for transportation needs.**

We agree that given the other available funding sources, tolling will be a necessary source of finding. To meet the region's needs, tolling revenues must be available to help fund transit capital and operations, bicycle and pedestrian facilities, trip reduction programs and similar measures.

**4. The information contained in the analysis.**

Generally, we believe the information included in the Draft EIS is of high quality. We have not conducted a detailed analysis of the modeling work. We understand that the Cascade Bicycle Alliance has and we recommend that the Puget Sound Regional Council consider incorporating their conclusions and recommendations into the Final EIS.

**5. The alternative you think best accomplishes our regional needs out to 2040.**

Alternative 5 with the changes we outlined in Questions 1 and 2.

**6. Other comments.**

We very much appreciate that the Puget Sound Regional Council is using models and methods that advance the state of the art transportation planning in Washington State and the country. We believe the council should be proud of its work. We also appreciate that the DEIS took into account greenhouse gas generation, VMT, impervious surfaces, and other important factors. We thank the Puget Sound Regional Council, its staff, its consultants, and its policy and governing boards for their hard work.

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Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 and email [tim@futurewise.org](mailto:tim@futurewise.org)

Sincerely,

A handwritten signature in blue ink, consisting of two large, stylized, overlapping loops that resemble the letter 'S'.

Tim Trohimovich, AICP  
Planning Director